

# Strategic Environmental Assessment (SEA) for the Ash Neighbourhood Plan

Environmental Report

Ash Parish Council (Dover District)

November 2020

## Quality information

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# Non-Technical Summary

## Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Ash Neighbourhood Development Plan (ANP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the ANP is a legal requirement.<sup>1</sup> This is a Non-Technical Summary (NTS) of the SEA Environmental Report.

The ANP is being prepared by Ash Parish Council, in the context of the Dover District Local Plan. Once 'made' it will have material weight when deciding on planning applications, alongside the Local Plan.

The Neighbourhood Plan is at an advanced stage of preparation, with the SEA Environmental Report, including this NTS, accompanying the Submission version of the Neighbourhood Plan.

## Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SEA involved **up to this point?**

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage?**

- i.e. in relation to the draft plan.

3) What happens **next?**

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

## What is the Plan seeking to achieve?

The ANP has a clear vision that *"By 2037, we envision a rural community with green spaces, safe spaces, adequate medical services, and the right kind of houses in the right place, with good biodiversity (also a community pub, a thriving church and schools)."*

To achieve this vision, 5 objectives are identified relating to:

- Environment (landscape, open spaces, biodiversity and climate change);
- Housing, requirements, design, built environment, site allocations, sustainability and climate change resilience;
- Leisure, well-being, education and healthcare;
- Employment in the local economy; and
- Traffic and infrastructure.

<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The CNP was subject to formal screening in 2020.

## What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. A summary framework is presented below, and a full framework which includes assessment questions is provided within the main Environmental Report (see **Table 3.1**).

SEA theme	SEA objective
Air quality	Improve air quality in the Neighbourhood Plan Area and minimise and/ or mitigate all sources of environmental pollution
Biodiversity	Protect and enhance all biodiversity and geodiversity.
Climate change (mitigation and adaptation)	Continue to decrease GHG emissions and increase the resilience of the Neighbourhood Plan area to the effects of climate change.
Landscape	Protect and enhance the character and quality of landscapes and 'villagescapes'.
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land.
	Use and manage water resources in a sustainable manner.
Population and community	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
	Reduce deprivation and promote an inclusive and self-contained community, maximising access to local, high-quality community services and facilities.
Health and wellbeing	Improve the health and wellbeing residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

## Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or housing growth scenarios.

Specifically, Part 1 of the report -

- 1) explains the process of establishing the reasonable alternatives;
- 2) presents the outcomes of assessing the reasonable alternatives; and
- 3) explains reasons for establishing the preferred option, in light of the assessment.

## Establishing the reasonable alternatives

The Environmental Report explains how reasonable alternatives were established subsequent to process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

This work established four sites as the alternative options for SEA purposes:

- ASH003/ HELAA45: Land South of Mill Field
- ASH004/ HELAA95: Land North of Molland Lane
- ASH005/ HELAA96: Land West of Molland Lane
- ASH008/ HELAA136: Land to the East of Queens Road

These sites are subject to a comparative assessment against the SEA framework of objectives.

## Assessing the reasonable alternatives

The table below presents summary findings for the assessment of these options, with detailed findings presented in **Chapter 6** of the Environmental Report.

SEA objective		ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
Air quality	Likely significant effect?	No	No	No	No
	Rank	2	1	2	2
Biodiversity	Likely significant effect?	No	No	No	No
	Rank	=	=	=	=
Climate change	Likely significant effect?	No	No	No	No
	Rank	1	1	1	2
Landscape	Likely significant effect?	No	No	No	No
	Rank	1	1	3	2
Historic environment	Likely significant effect?	No	No	Uncertain	No
	Rank	2	1	3	1
Land, soil and water resources	Likely significant effect?	No	Yes	Uncertain	Yes
	Rank	1	3	2	4
Population and community	Likely significant effect?	Yes	Yes	Yes	Yes
	Rank	2	1	2	1
Health and wellbeing	Likely significant effect?	No	No	No	No
	Rank	2	1	2	1
Transportation	Likely significant effect?	No	No	No	No
	Rank	2	1	2	2

### Summary findings:

Overall, significant positive effects are considered likely under all options with regards to the SEA theme of population and community, predominantly as a result of new housing to meet the identified

## SEA objective

ASH003/  
HELAA45: Land  
South of Mill Field

ASH004/  
HELAA95: Land  
North of Molland  
Lane

ASH005/  
HELAA96: Land  
West of Molland  
Lane

ASH008/  
HELAA136: Land  
to the East of  
Queens Road

housing needs, as well as a relevant contribution to meeting affordable housing needs in line with Local Plan requirements (and potentially further ANP policy provisions).

All sites are relatively well connected, edge-of-settlement sites with good existing footpath connections to the village centre as well as the countryside beyond. In this respect, minor positive effects are also considered likely for all options with regards to the SEA theme of health and wellbeing and transportation, given the potential to extend and/ or enhance existing active travel opportunities.

Significant negative effects have the potential to arise through a loss of high-quality 'best and most versatile' agricultural land at sites ASH004 and ASH008, and also potentially at ASH005 (though this is less certain at this stage). Smaller-scale development within the residential surrounds at ASH003 is considered less likely to lead to negative effects of significance in this respect.

Notably, ASH004 provides the opportunity to create new junction access to the A257 and reduce any congestion pressures at Chequer Lane and Pedding Hill, particularly in light of the wider consented growth going ahead at Chequer Lane. This has the potential to lead to benefits in relation to the SEA themes of air quality and transportation. Whilst no significant effects are considered likely, the option is noted for this opportunity, although it is also recognised that enhanced south and east connections would also be required to ensure that the development does not become isolated from the rest of the settlement area.

In relation to the historic environment it is recognised that development at any of the options should undertake further archaeological assessment prior to any building works commencing on site to establish suitable mitigation strategies if necessary.

ASH005 is recognised for heritage constraints of greater significance overall when compared to the remaining options. This is given the site's location between two conservation areas and its current role in providing open land. As such, it is recommended that if the site is progressed early engagement with Historic England is undertaken to minimise any negative effects arising on heritage settings. The overall significance of effects of development at this site are recognised as uncertain at this stage.

Further, ASH008 is identified as containing an area of high surface water flood risk, which would require mitigation in development proposals.

No significant effects are considered likely with regards to biodiversity; all options are considered for equal potential to deliver net gains, with minor long-term positive effects in this respect.

## Developing the preferred approach

The Parish Council's reasons for developing the preferred approach in light of the alternatives assessment are identified below:

*"The site selection process started in 2018 when the sites that has been submitted for Dover District Council were assessed by the AECOM Site Assessment Report. The parish council based its recommendation to the parish of possible preferred sites on this report.*

*The process used was that sites assessed Green would be considered first with a presumption for inclusion. Red sites would not be further considered, except for ASH011 Land south of Guiton, Ash as this was a brownfield site and such sites were to be included as a priority. Amber sites would be considered for the best 'match' between the objectives of the NDP and meeting the residual housing needs being delivered through the ANP.*

*The parish council then consulted residents by providing detailed information on the sites and the reasons why the recommended sites had been selected at two exhibitions and a public meeting between September and October 2019. It collated all the responses from residents and the Regulation 14 consultation was carried out between 14<sup>th</sup> November to 23<sup>rd</sup> December 2019.*

*In September and October 2020, the parish council re-considered the alternative options in light of this assessment.*

#### **ASH003/HELAA 45: Land South of Mill Field**

*The assessment shows no significant effects although the site is constrained by historic environment considerations. The parish council wanted to protect and enhance the rural setting of the site and protect the historic environment in close proximity to the site. For these reasons, Policy ANP7c) requires the existing south boundary of hedegrows and veteran trees to be retained and enhanced to minimise this impact.*

*This small-scale site is the final phase of a three-stage development. To enhance the internal environment amenity, a green buffer zone between the development and the existing houses to the north side of the site is required by Policy ANP7c).*

*The loss in 2019 of a near-by public bus route will contribute to a small increase in vehicle traffic and the inclusion of the provision of electric vehicle charging points was included in Policy ANP7c).*

*For these reasons, the parish council continues to assess this site as suitable for development.*

#### **ASH004/ HELAA95: Land North of Molland Lane**

*The assessment shows a significant effect from the loss of high-quality 'best and most versatile' agricultural land. All the larger sites that were considered have this impact. On balance, it was considered that the position of this site in relation to the existing built form and as it is possible to access village amenities by including links to existing off-road walking routes, it would have the least negative impact.*

*The parish council had identified the difficulty with road access and noted that the assessment identified the opportunity to create a new junction access to the A257 to reduce congestion pressures at Chequer Lane and Pedding Hill and the potential benefits in relation to air quality and transportation. This would have to be combined with enhanced pedestrian and cycle links to the village amenities to prevent the development becoming separated from the rest of the settlement area. There are existing PRowS and off-road links that could be enhanced by the layout of the site. Kent County Council Highways has to date resisted parish council requests for any new junction access from Ash village to the A257. The site owner has indicated that it may be able to provide improved road access using adjacent land it owns that would help alleviate the problems associated with using the existing road to the site. Either of these options would help improve the site access.*

*The parish council has included in Policy ANP7d) a 15metre green buffer zone between the site and the A257 that aims to lessen the negative impact of noise and poor air quality that will be associated with the adjacent A257.*

*This site will round off the built form of the Ash village with the least impact on the rural character of the village, compared to the other large sites considered. It also contributes the majority of the units needed to deliver the residual housing.*

*For these reasons, the parish council continues to assess this site as suitable for development.*

#### **ASH005/ HELAA96: Land West of Molland Lane**

*The assessment shows the historic constraint is of a greater significance overall when compared to the other sites. While it is also land of high-quality 'best and most versatile' agricultural land, the size of the site would mean less of a loss than the other larger sites.*

*The site is also considerably higher than the adjacent development and the design of the development would need to take this and its impact on the adjacent conservation areas into account.*

*There would also be a cumulative negative impact for congestion from traffic from site ASH04 if a new junction on to the A257 or new access road to Guilton was not provided. This combined with the traffic pressure from the adjacent school would have a significant negative impact for local residents.*

*The selection of the other sites does not require this site to meet the residual housing need.*

*For these reasons, the parish council continues to assess this site as unsuitable for development.*



### **ASH008/ HELAA136: Land to the East of Queens Road**

*The assessment shows a significant effect from the loss of high-quality 'best and most versatile' agricultural land. All the larger sites that were considered have this impact. This site has also been identified as containing an area of high surface water flood risk.*

*This site had been assessed as Red in the AECOM Site Assessment as it has significant access issues. The parish council considered it was unsuitable for development and had recommended it as such when it carried out its public engagement in late 2019.*

*The parish council re-iterated its serious concerns to Dover District Council in March 2020 on publication of its site assessments that had given the site an Amber rating. The parish council's concerns were:*

- It would not be possible to create a safe traffic access on to Queens Road due to the road being a single lane width*
- Land required to widen the road is not in the ownership of the applicant. Further the amount of the site needed to provide safe access would considerably reduce the number of units that could be built*
- The possibility of an option to provide another access to A257, in close proximity to the existing junction with Chequer Lane, would require extensive road re-design, purchase of land and construction costs that would make the site uneconomic*
- The removal of the land that is currently on short lease and is used as rugby pitch would further reduce the number of units that could built, although it is accepted that this would reduce the loss of recreational amenity.*
- There would be no way to provide a secondary access for emergency vehicles*
- The traffic impact on the residential properties on Queens Road would considerably reduce the environmental amenity of the area*

*The parish council also considered the development of this site as having a significant negative impact on the open rural landscape that extended from the adjacent agricultural land starting at Sandwich Road and extending west to the site. It would also depart from the built form of the village.*

*The parish council noted that the site was assessed as having an area of brownfield land. The parish council considers this area that contains a café and farm produce shop as a positive addition to amenities for the community that provide sustainable economic and social benefits. Its loss would have a negative impact on health and well-being.*

*The parish council noted that the site borders an area of high-risk surface water flood risk in the north east corner of the site and this would require mitigation. The parish council has concerns about the problem of surface water flood risk on other sites that have come forward for development outside of the ANP. These have or are likely to add to the existing problems for the drainage network in Ash village. Mitigation on these sites has not overcome the problems.*

*On balance, the negative impact of developing this site, outweighed the negative impact of developing the site ASH004 and it was not needed to meet the residual housing need. The assessment did not alter this calculation.*

*For these reasons, the parish council continues to assess this site as unsuitable for development.*

### **Conclusion**

*The parish council has considered the assessment and has decided that sites ASH003, ASH004 are suitable for development and ASH005 and ASH008 are unsuitable for development."*

## **Assessment findings at this stage**

Part 2 of the Environmental Report presents an assessment of the Submission version of the CNP. Assessment findings are presented as a series of narratives under the 'SEA framework' topic headings.

Overall the appraisal of the ANP has identified the potential for both significant positive and significant negative effects, as well as a number of minor positive and neutral effects. Key considerations in the context of Ash are avoiding harm to the range of nearby biodiversity designations, limiting the loss of high-quality agricultural land, protecting the setting and character of the village and avoiding increasing traffic flows through the constrained centre of the village.

The key appraisal findings are:

- The potential for significant positive effects is identified in relation to the population and communities SEA objective on the basis that the plan will deliver new housing to meet local needs in full, including significant potential for affordable housing at scale.
- The loss of several hectares of high-quality 'best and most versatile' agricultural land gives rise to potential significant negative effects in relation to the land, soil and water resources SEA objectives.
- In terms of landscape, a key concern is avoiding harm to the rural setting and context of the village and Ash's built character. The policies of Neighbourhood Plan are considered likely to deliver growth which does not result in significant adverse effects to how the village is perceived within the landscape or to the character of its built area.
- In terms of transport, the plan directs the majority of growth away from the village centre to locations which have direct access to the A257.
- Minor positive effects are anticipated in relation to the biodiversity, climate change, landscape, health and wellbeing SEA objectives.

Overall it is considered that the ANP takes a proactive approach to delivering new development whilst protecting key aspects of the natural, built and historic environment that contribute to the overall sense of place and quality of life in the Ash, though significant negative effects are considered inevitable in relation to the loss of best and most versatile agricultural land.

## Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

## Plan finalisation

The 'Submission' version of the plan and accompanying SEA Environmental Report will be submitted to Dover District Council. The plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Dover District Local Development Framework.

If the subsequent Independent Examination is favourable, the ANP will be subject to a referendum, organised by Dover District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the ANP will become part of the Development Plan for Dover District, covering the defined Neighbourhood Plan Area.

## Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Dover District Council as part of the process of preparing its Annual Monitoring Report (AMR).

The SEA has not identified any potential for significant negative effects that would require closer review or monitoring over and above the monitoring arrangements of the AMR.

# 1. Introduction

## Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Ash Neighbourhood Plan (ANP).
- 1.2 The Plan is being prepared by Ash Parish Council, in the context of the Dover District Local Plan. Once 'made' it will have material weight when deciding on planning applications, alongside the Local Plan.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the ANP is a legal requirement.<sup>2</sup>

## SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "identifies, describes and evaluates" the likely significant effects of implementing "the plan, and reasonable alternatives".<sup>3</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
  - 1) What has plan-making / SEA involved up to this point?
    - including in relation to 'reasonable alternatives'.
  - 2) What are the SEA findings at this stage?
    - i.e. in relation to the draft plan.
  - 3) What happens next?

## This Environmental Report

- 1.7 This report is the Environmental Report for the Ash Neighbourhood Plan. It is published alongside the 'submission' version of the plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.<sup>4</sup> Each question is answered within a discrete 'part' of the report.
- 1.9 However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

<sup>2</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The Ash Neighbourhood Plan was subject to screening in 2019, at which time it was determined that SEA is required.

<sup>3</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>4</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

## 2. What is the plan seeking to achieve?

### Introduction

- 2.1 This section considers the context provided by Dover District Council's Local Plan before setting out the established Neighbourhood Plan vision and objectives. **Figure 2.1** (at the end of this chapter) identifies the area covered by the ANP.

### Relationship with the Dover District Local Plan

- 2.2 The Dover District Local Plan consists of several adopted documents, including; the Core Strategy (2010), the Land Allocations Local Plan (2015), and the saved policies of the Dover District Local Plan (2002). Dover District Council (DDC) are currently in the early evidence-gathering stages of producing a new Local Plan; which will eventually replace the current suite of documents.
- 2.3 Ash is identified within the adopted Core Strategy as a 'local centre', with its function being as a *"secondary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to its home and adjacent communities"*.
- 2.4 The adopted Land Allocations Local Plan identifies Ash as one of the largest villages in the District and states that additional housing will be required over the lifespan of the Plan (to 2026). The Plan identifies sites for residential development which will provide approximately 200 dwellings through the following policies:
- Policy LA 20: Land to the West of Chequer Lane, Ash. This site is allocated for residential development with an estimated capacity of 90 dwellings.
  - Policy LA 21: Land to the South of Sandwich Road, Ash. This site is allocated for residential development with an estimated capacity of 95 dwellings.
  - Policy LA 22: Land at Mill Field, Ash. This site is allocated for residential development with an estimated capacity of 10 dwellings.
  - Policy LA 23: Residential Development. The policy identifies an opportunity for a further five dwellings at the Former Council Yard, Molland Lea and identifies changes to settlement confines at a further three sites.

### Vision and objectives of the Neighbourhood Plan

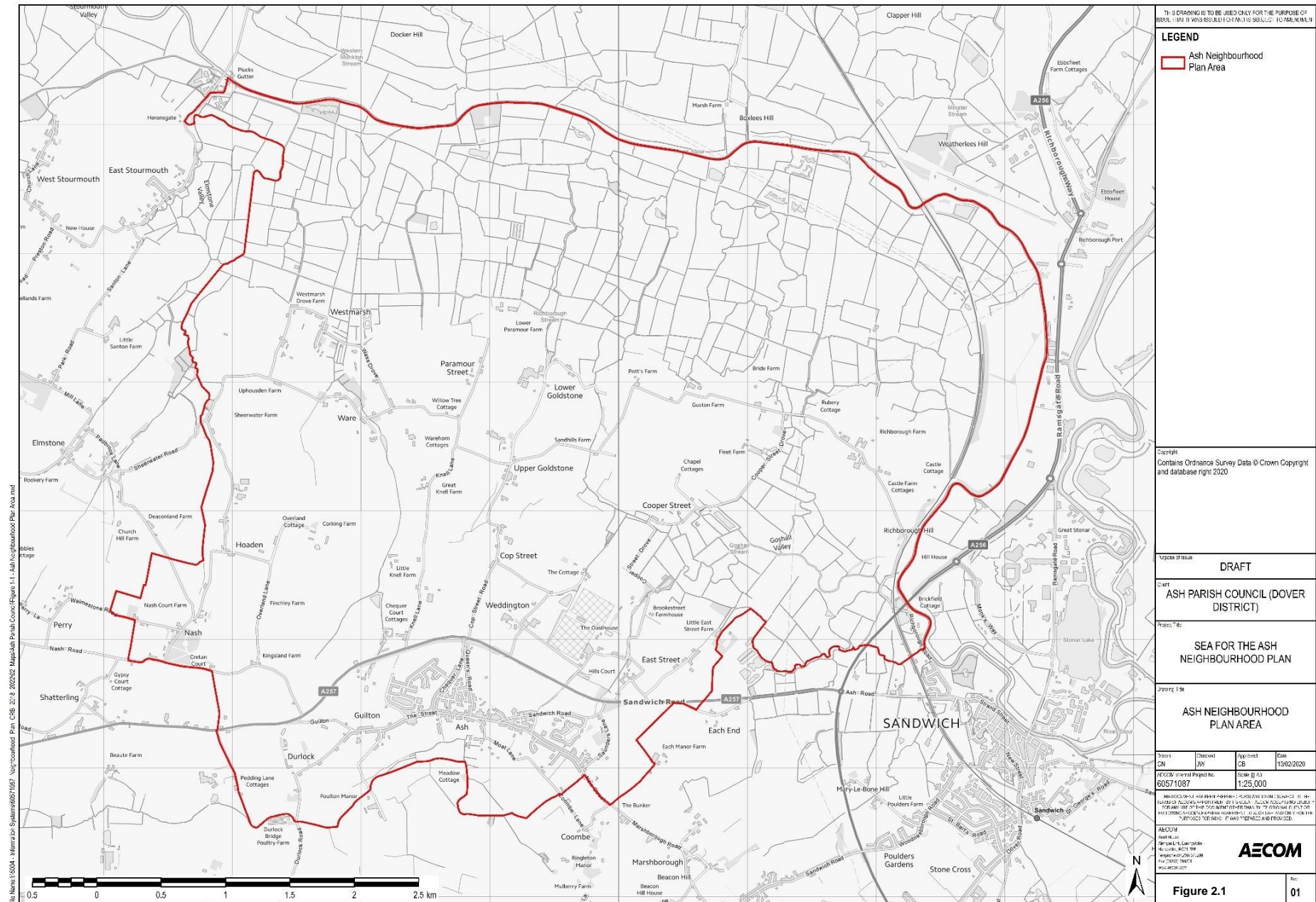
- 2.5 The vision of the Ash Neighbourhood Plan, which was developed during earlier stages of plan development, is as follows:

*"By 2037, we envision a rural community with green spaces, safe spaces, adequate medical services, and the right kind of houses in the right place, with good biodiversity (also a community pub, a thriving church and schools)."*

- 2.6 To achieve this vision, the following plan objectives have been established:
- Environment (landscape, open spaces, biodiversity and climate change). The objective is to protect the parish's landscape and heritage, promote a healthy and safe environment, secure existing and promote new green and open spaces, improve biodiversity and wild-life habitats, address climate change through sensitive site developments, good design and building techniques. This will be achieved through a mixture of planning policies and community actions over the lifetime of the plan.
  - Housing, requirements, design, built environment, site allocations, sustainability and climate change resilience. The objective will ensure that the housing requirements of the parish are sustainable i.e. number, type, design quality and built quality, built environment, site allocations and how they will respond to climate change resilience. These will be achieved through the planning policies over the life-time of the plan.

- Leisure, Well-being, Education and Healthcare. The objective will ensure that leisure, well-being, education and healthcare provision will be protected and enhanced through new developments. This will be achieved through ensuring open spaces are within new developments. The Section 106 agreements support improved education, healthcare and community facilities over the life-time of this plan. This will be managed by ensuring the service providers are engaged and pro-active in delivering the improvements.
- Employment in the local economy. The objective is to enhance the local economy by encouraging local business to expand and / or new businesses to become established. This will increase the diversity of services provided and used in Ash. This will contribute to employing more local people and increase the wealth within the parish and surrounding area.
- Traffic and Infrastructure. The objective is to improve traffic flows and reduce climate impact within the parish so as to reduce the reliance on private cars and to improve the infrastructure and traffic management by ensuring developments are located within easy reach of local amenities to encourage walking and cycling. To encourage the use of electric vehicles by ensuring the necessary charging points are installed in each development and the village centre, if and when developments take place. This will be achieved through a mixture of planning policies and local initiatives to:
  - improve access to the village and rural areas (car parking)
  - improve traffic management
  - improve I.T technologies to reduce travel
  - increase the number of people working from home by ensuring new dwellings support these activities.





## 3. What is the scope of the SEA?

### Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability issues/objectives that should be a focus of (and provide a methodological framework for) SEA. The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
  - Baseline data against which the Neighbourhood Plan can be assessed;
  - The key sustainability issues for the Neighbourhood Plan; and
  - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.2 Further information on the scope of the SEA is presented in **Appendix II**.

### Consultation

- 3.3 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>5</sup> As such, these authorities were consulted in 2020. Consultation responses can be found in **Appendix II**.

### The SEA framework

- 3.4 The SEA scope is summarised in a list of topics, objectives, issues and questions, known as the SEA framework. **Table 3.1** presents a summary.

**Table 3.1: SEA framework for the ANP (as broadly agreed in 2020)**

SEA theme	SEA objective	Assessment Questions
Air quality	Improve air quality in the Neighbourhood Plan Area and minimise and/ or mitigate all sources of environmental pollution	<ul style="list-style-type: none"> <li>• Promote and encourage more sustainable transport?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Reduce the need to travel outside of the Neighbourhood Plan area?</li> <li>• Locate and design development so that current and future residents will not regularly be exposed to poor air quality?</li> <li>• Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the Neighbourhood Plan area?</li> </ul>
Biodiversity	Protect and enhance all biodiversity and geodiversity.	<ul style="list-style-type: none"> <li>• Support the status of the internationally, nationally and locally designated sites within and surrounding the Neighbourhood Plan area?</li> <li>• Protect and enhance priority habitats and protected and priority species?</li> </ul>

<sup>5</sup> These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

		<ul style="list-style-type: none"> <li>• Achieve the required level of biodiversity net gain set out within the new DDC local plan?</li> <li>• Support enhancements to multifunctional green infrastructure networks which include ecological corridors and connections between habitats?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
Climate change (mitigation and adaptation)	Continue to decrease GHG emissions and increase the resilience of the Neighbourhood Plan area to the effects of climate change.	<ul style="list-style-type: none"> <li>• Promote sustainable development, including sustainable construction and operation of new housing and employment land?</li> <li>• Promote energy efficiency and renewable energy generation including solar panels, energy efficient buildings and recycled water and materials?</li> <li>• Locate development so as to minimise the need to travel, and maximise opportunities to travel by more sustainable modes of transport, in particular active travel opportunities?</li> <li>• Ensure that development avoids areas of highest flood risk?</li> <li>• Increase the resilience of the built and natural environment to the effects of climate change, including flood resilience measures such as Sustainable Drainage Systems and enhancements to ecological networks, green infrastructure and biological connectivity?</li> </ul>
Landscape	Protect and enhance the character and quality of landscapes and 'villagescapes'.	<ul style="list-style-type: none"> <li>• Conserve and enhance locally important landscape and 'villagescape' features within the Neighbourhood Plan area as defined by the Dover District LCA and supporting evidence base?</li> <li>• Support the retention and enhancement of existing landscape features at proposed development sites where possible?</li> <li>• Conserve and enhance local diversity and character, including the character and identity of the Neighbourhood Plan area?</li> <li>• Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?</li> </ul>
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area	<ul style="list-style-type: none"> <li>• Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Identify and protect the key characteristics and features of the three Conservation Areas?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Support the integrity of the historic setting of key buildings of cultural heritage interest as listed on the Kent HER?</li> </ul>



		<ul style="list-style-type: none"> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Conserve and enhance archaeological remains, including historic landscapes?</li> <li>• Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?</li> </ul>
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land.	<ul style="list-style-type: none"> <li>• Promote the use of vacant &amp; derelict brownfield land opportunities?</li> <li>• Minimise loss of areas of 'Best and Most Versatile' agricultural land?</li> <li>• Avoid the unnecessary sterilisation of mineral resources in the Plan area?</li> <li>• Reduce/ avoid surface water run-off that may affect soil quality both during construction and operation?</li> </ul>
	Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Protect surface water and groundwater resources from pollution?</li> <li>• Ensure appropriate drainage and mitigation is delivered alongside development?</li> <li>• Minimise water consumption?</li> <li>• Maximise water efficiency and opportunities for water harvesting and/ or water recycling?</li> </ul>
Population and community	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> <li>• Support the provision of a range of house types, tenures and sizes?</li> <li>• Support the delivery of affordable housing to meet locally identified needs.</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible/ adaptable homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to local services and facilities?</li> </ul>
	Reduce deprivation and promote an inclusive and self-contained community, maximising access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> <li>• Maintain and/ or improve the provision of community infrastructure, services and facilities?</li> <li>• Support accessibility enhancements and opportunities to promote active travel networks within the Plan area?</li> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing residents?</li> </ul>
Health and wellbeing	Improve the health and wellbeing residents within the	<ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> </ul>

Neighbourhood Plan area.	<ul style="list-style-type: none"> <li>• Ensure the current and future health and wellbeing needs of the local population are met, as set out in the Kent JSNA?</li> <li>• Enhance community access to green infrastructure?</li> <li>• Protect and enhance access to nature via greenspace and footpaths?</li> <li>• Promote the use of healthier modes of travel, including active travel networks?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>
Transportation Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> <li>• Support the key objectives within the Kent County Council Local Transport Plan to encourage more sustainable transport?</li> <li>• Ensure sufficient road capacity to accommodate new development?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Facilitate home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents from the road network?</li> </ul>

## **Part 1: What has plan-making/ SEA involved up to this point?**

## 4. Introduction (to Part 1)

- 4.1 The 'narrative' of plan-making/ SEA up to this point is told within this 'part' of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the ANP. The SEA Regulations<sup>6</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.
- 4.3 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of the alternatives appraised.
- 4.4 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the ANP and potential locations for development. Specifically, this chapter explains how the Neighbourhood Plan's development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan Area.

### Structure of this part of the report

- 4.5 This part of the report is structured as follows:
- **Chapter 5** – explains the process of **establishing** reasonable alternatives
  - **Chapter 6** – presents the outcomes of **assessing** reasonable alternatives
  - **Chapter 7** – explains reasons for establishing the **preferred option**, in light of the assessment.

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<sup>6</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 5. Establishing the reasonable alternatives

### Introduction

- 5.1 Plan-making for the ANP has been underway since 2013 when the Steering Group and Neighbourhood Plan Area was established. Consultation has incorporated informal and formal exercises, including surveys, news releases, exhibitions, public sessions and online progress updates. Consultation has sought to inform local people and to ensure that local businesses, organisations and residents had the opportunity to contribute to the making of the plan from the outset. Full details of consultation to date can be found in the Consultation Statement that accompanies the 'submission' version of the ANP.
- 5.2 This section of the Environmental Report seeks to set out the key steps taken to inform the development of growth scenarios. The aim is to present "*an outline of the reasons for selecting the alternatives dealt with*".<sup>7</sup>
- 5.3 Specifically, there is a need to **1)** explain strategic issues/ objectives with a bearing on the establishment of growth scenario; **2)** discuss work completed to examine site options (i.e. sites potentially in contention for allocation); and then **3)** explain how the 'top down' and 'bottom up' understanding generated was married together to arrive at growth scenarios.

### Strategic considerations (top-down)

- 5.4 The ANP steering group has sought to review the data and forecast the demand for housing needs over the Plan period. The aim of this review was to positively plan for and meet the identified need for housing in the Parish and agree this target figure with DDC based upon Ash's place in the settlement hierarchy as a 'Local Centre'.
- 5.5 The Ash Housing Survey was undertaken in 2017, the data from which was used alongside national and local data in the AECOM Housing Needs Assessment (HNA) completed in April 2019 to establish an overall housing requirement for the parish over the Plan period. The HNA concluded an overall need for 201 additional dwellings between 2018 and 2037; however, following completion of the HNA, DDC completed a review of its strategic policies and identified a difference between DDC's requirements and the HNA for the base housing numbers for Ash. This altered the unconstrained figure and following discussions between Ash Parish Council and DDC, an acceptable number has been agreed for the unconstrained needs for Ash Parish over the Plan period of 323 dwellings on development sites. This is considered alongside an anticipated windfall allowance of two dwellings per annum (totalling 38 additional homes over the plan period). Including windfall, the total unconstrained number of dwellings required for Ash over the Plan period, is therefore established as 361 dwellings.
- 5.6 The 'Land at Mill Field' for 10 dwellings, which was one the four sites allocated in Ash by Policy LA 22 of the Dover District Land Allocations Local Plan (2015), was delivered prior to 2018 and as such, will not contribute to meeting the identified need calculated for the Plan period.
- 5.7 The remaining three Local Plan allocations (Policy LA 20: Land to the West of Chequer Lane, Policy LA 21: Land to the South of Sandwich Road, and Policy LA 23 the 'Former Council Yard, Molland Lea') will contribute a combined total of 115 dwellings towards the identified housing needs. The 'Chequer Lane' site (Policy LA 20) is currently under construction and is expected to deliver 73 homes when complete. An outline planning application has been submitted at the 'Land to the South of Sandwich Road' site (Policy LA 21) for 37 homes, and the 'Former Council Yard, Molland Lea' site (Policy LA 23) is allocated for five new homes.
- 5.8 Two more sites have gained planning permission during the development of the ANP. The land 'Rear of White Post Farm' has gained outline permission for the development of 30 homes, and

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<sup>7</sup> Schedule 2(8) of the SEA Regulations.

the 'Land North of Orchard View, West of Saunders Lane' has gained planning permission for the development of 76 homes.

- 5.9 The allocations carried forward from the Local Plan, alongside committed development (i.e. those sites with planning permission) will contribute a total of 221 new homes towards the target figure of 323 dwellings (excluding windfall development). This leaves a residual need for 102 new homes, which the ANP seeks to identify land to accommodate.

## Site options (bottom-up)

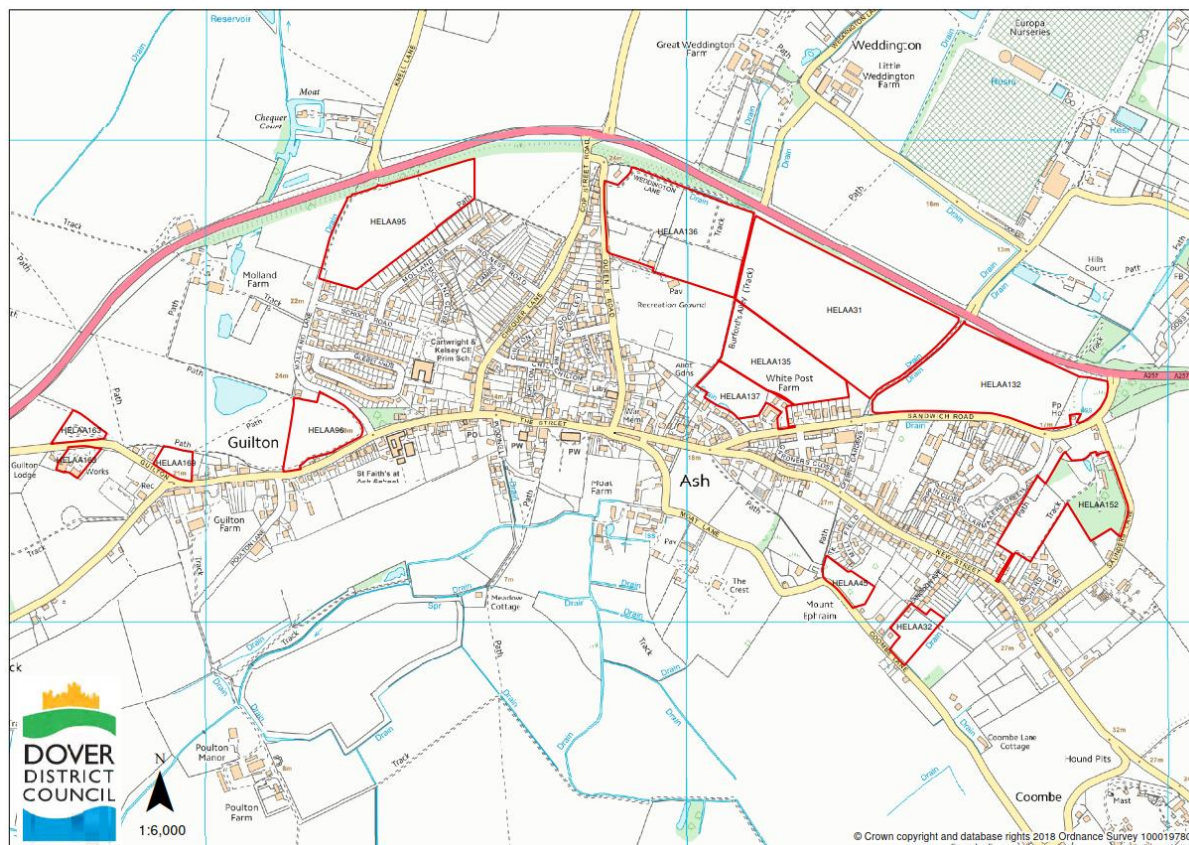
- 5.10 In terms of sites potentially available to allocate through the Neighbourhood Plan, different sources have informed the identification of additional development site options within Ash. The Dover District Strategic Housing Land Availability Assessment (SHLAA), which was produced in 2009 as part of the evidence base for the Land Allocations Local Plan is one of these sources, alongside a more recent 'call for sites' undertaken by the District Council in 2017.
- 5.11 The Ash Site Options and Assessment (SOA) Report was completed in 2018, which has investigated the identified site options to provide a 'RAG' rating as to whether the sites have potential to be taken forward as allocations in the ANP.
- 5.12 Using the two sources identified above, the Ash SOA Report assessed a total of twelve sites. These sites are identified in **Table 5.1** and **Figure 5.1** below. The Ash SOA Report gave a red rating to six of the twelve sites, essentially identifying them as available, but not appropriate for allocation in the ANP. The remaining six sites were given an amber rating; identifying them as available and suitable for allocation in the NDP subject to addressing constraints identified in the report.

**Table 5.1: Ash site options and SOA Report conclusion**

Site name	ANP site reference	2017 'call for sites' site reference	SHLAA site reference	SOA conclusions
Land South of the A257 at Ash	ASH001	HELAA31		
Land at the end of Langdon Avenue, New St, Ash, CT3 2BP	ASH002	HELAA32		
Land South of Mill Field, Ash, Canterbury, Kent. CT3 2BD	ASH003	HELAA45	SHL011 (part of)	
Land North of Molland Lane, Ash, Kent	ASH004	HELAA95		
Land West of Molland Lane, Ash, Kent	ASH005	HELAA96	SHL081	
Land off Sandwich Road, Ash	ASH006	HELAA132		
Land to the Rear of No.24 Sandwich Road, Ash, CT3 2AF	ASH007	HELAA135		
Land to the East of Queens Road, Ash, CT3 2BG	ASH008	HELAA136		
Rear of White Post Farm, Sandwich Road, Ash, CT3 2AF	ASH009	HELAA137		
Land adjacent to Saunders Lane, Ash CT3 2BX	ASH010	HELAA152		
Guilton, Ash, Canterbury, Kent, CT3 2HS	ASH011	HELAA163		

Site name	ANP site reference	2017 'call for sites' site reference	SHLAA site reference	SOA conclusions
Land at Gilton, Ash.	ASH012	HELAA169	SHL004	

**Figure 5.1: Ash SOA Report site options assessed (taken from DDC's Call for Sites)**



- 5.13 The methodology used to assess sites in the Ash SOA Report was originally agreed with DDC, however; DDC have more recently published their Housing and Economic Land Availability Assessment (HELAA) which has provided an updated assessment for these sites, using a slightly different methodology. As a result of this work, alongside site boundary amendments at ASH010, four of the sites assessed in the Ash SOA has been identified with different overall 'RAG' ratings in the HELAA.
- 5.14 ASH010, and ASH008 are identified in the HELAA with an overall 'RAG' rating of amber, rather than the red rating identified within the Ash SOA Report. Consequently, as identified in paragraph 5.8 above, ASH010 (Land North of Orchard View, West of Saunders Lane/ Land adjacent to Saunders Lane) has recently received planning permission for 76 homes. ASH008 (Land to the East of Queens Road) is also being reconsidered as an option as a result of the HELAA work.
- 5.15 ASH007 and ASH012 are identified in the HELAA with an overall 'RAG' rating of red, rather than the amber rating identified within the Ash SOA Report. The HELAA identifies that at ASH007 (Land to the Rear of No.24 Sandwich Road), access and heritage constraints alongside the role of the site within an undeveloped buffer for the A257 have led to the conclusion that the site is unsuitable for development. The ASH012 (Land at Gilton) site has been deemed unsuitable for development as a result of unacceptable heritage impacts in relation to the character of the conservation area and setting of the listed buildings. These two sites are therefore no longer being considered further as potential options for future growth.
- 5.16 Further to the HELAA publication, a recent site boundary amendment to ASH011 (Land South of Gilton) has also reduced the size of this site to an area of brownfield land only.



## Establishing reasonable alternatives

5.17 Considering the above, **Table 5.2** identifies the available options, highlighting those that are considered 'constant' in any future growth scenario in Ash, and those that are 'variable' or alternative options for future growth. Sites considered as 'constants' are those which are allocated through the existing Dover District Land Allocations Local Plan (2015), or which have already gained planning permission. Given the recent boundary amendments to ASH011 (Land south of Gilton), the updated site is wholly brownfield, and in-line with community and existing policy aspirations which prioritise the use of brownfield land, the site is also considered a constant or 'given' in any future growth scenario for Ash. Variable options are those considered through the Ash SOA Report and Dover District HELAA as potential allocations which could contribute to meeting the residual housing needs in Ash. It is worth noting that not all variable options need to be allocated in the ANP to meet the residual housing need for an additional 102 homes.

**Table 5.2: Constant and variable site options in Ash**

Site option		Site/ policy reference	Dwelling capacity
Constants	Land to the West of Chequer Lane	LA 20	73
	Land to the South of Sandwich Road	LA 21	37
	Former Council Yard, Molland Lea	LA 23	5
	Rear of White Post Farm, Sandwich Road	ASH009	30
	Land North of Orchard View, West of Saunders Lane	ASH010	76
	Land South of Gilton	ASH011	9
Constants total for development sites			230
Unconstrained need for development sites (exc. windfall)			323
Residual need			93
Variables	Land South of Mill Field	ASH003	12
	Land North of Molland Lane	ASH004	114
	Land West of Molland Lane	ASH005	45
	Land to the East of Queens Road	ASH008	110

5.18 Four sites are therefore identified for their potential to contribute to the residual housing needs being delivered through the ANP – listed as variable options in **Table 5.2** above. These four sites are established as the alternative options for SEA purposes. For clarity, the four sites are:

- ASH003/ HELAA45: Land South of Mill Field
- ASH004/ HELAA95: Land North of Molland Lane
- ASH005/ HELAA96: Land West of Molland Lane
- ASH008/ HELAA136: Land to the East of Queens Road

5.19 These sites are subject to a comparative assessment against the SEA framework of objectives.



## 6. Assessing reasonable alternatives

### Introduction

6.1 As established in the previous section, the following four sites are established as alternative options for the purposes of SEA:

- ASH003/ HELAA45: Land South of Mill Field
- ASH004/ HELAA95: Land North of Molland Lane
- ASH005/ HELAA96: Land West of Molland Lane
- ASH008/ HELAA136: Land to the East of Queens Road

### Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework. **Green** is used to indicate potential significant positive effects, whilst **red** is used to indicate potential significant negative effects.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.
- 6.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.<sup>8</sup> So, for example, account is taken of the duration, frequency and reversibility of effects.

### Assessment findings

- 6.6 **Tables 6.1 to 6.9** below provide a comparative analysis of the four site options identified as alternatives, against each of the SEA themes established through scoping (see **Table 3.1**). Following on from this, summary findings for the assessment are provided.

<sup>8</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

**Table 6.1: Air quality assessment**

	ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
<b>Air quality</b>				
<b>Likely significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2</b>

**Assessment findings:**

The closest AQMAs are located within Thanet district in the north, or further south around Dover. As higher order settlements with varying service, facility and infrastructure provisions, it is likely that residents will travel to these settlements at times. Growth under any of the options is likely to increase pressures on the road network to some degree, however; given that there are no existing significant air quality issues within the Plan area, no significant effects are considered likely in terms of air quality.

Further, all options are reasonably located at the settlement edge to maximise accessibility to existing services and facilities within the Plan area and all connect well to the local road network. Development at ASH004 could create new junction access to the A257 (Ash Bypass) which could in turn potentially reduce congestion pressures at Chequer Lane and Pedding Hill. Whilst this is not considered likely to lead to any significant effects (given that there are no known significant issues at these existing junctions), the opportunities for minor positive effects in this respect are reflected in the ranking of options, with ASH004 performing marginally better overall.

**Table 6.2: Biodiversity assessment**

	ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
<b>Biodiversity</b>				
<b>Likely significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>=</b>	<b>=</b>	<b>=</b>	<b>=</b>

**Assessment findings:**

None of the site options contain or lie close to any designated biodiversity sites, and only ASH004 contains BAP Priority Habitat (Deciduous Woodland). This habitat is a wooded buffer along the A257 in the north of the site. It is assumed that this habitat could be readily retained in development, and as such, the site could perform on par with the remaining options. All options are either wholly or predominantly greenfield land bordered by trees and hedgerow; as such it will be important to retain ecological features in development at any of the sites.

Considering the above, no significant effects are considered likely at any of the options, and the options cannot be meaningfully differentiated with regards to biodiversity.

**Table 6.3: Climate change assessment**

	ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
<b>Climate change (mitigation and adaptation)</b>				
<b>Likely significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>

**Assessment findings:**

None of the options are located within an area of fluvial flood risk and no significant effects are anticipated in relation to climate change adaptation at any of the options. However, ASH008 contains an area of high surface water flood risk in the north east corner of the site. ASH004 also borders an area of high surface water flood risk along the drains north of Molland Lane. ASH003 and ASH004 are less constrained by surface water flood risk, which is limited to low risk areas on the adjacent roads. It will be important for development at the sites to consider the appropriate use of Sustainable Drainage Systems, and given the greater risk presented at ASH008 this site is not ranked as highly as the remaining options, reflecting the need for mitigation at this site. Despite this, the use of sustainable drainage measures would be likely to ensure that no residual negative effects arise in development at ASH008.

All options are considered to provide similar opportunities for delivering climate change mitigation measures which support low-emission, resource and energy efficient and resilient development, and this is most likely to be guided by the existing policy context and the proposed ANP policy framework.

**Table 6.4: Landscape assessment**

	ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
<b>Landscape</b>				
<b>Likely significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>2</b>

**Assessment findings:**

In terms of development effects, the HELAA and Ash SOA Report has investigated potential landscape impacts at each of the sites and summaries of this work are provided below:

- ASH003 is considered in the HELAA as a logical small extension to the existing built form where landscape impact can be mitigated through appropriate screening.
- ASH004 is considered in the HELAA as a logical rounding off for the built form of Ash, and the Ash SOA identifies that the site has a gentle slope from west to east and is screened by trees which lowers the sensitivity of the site to development.
- ASH005 is considered in the HELAA as of low landscape sensitivity however, given the prominence of the site, a low density, well designed scheme that respects the character of the area would be required. A landscape buffer would also be required to mitigate potential landscape impacts. The Ash SOA further identifies that the site is located adjacent to the Gilton Conservation Area with potential to affect the historic landscape in this respect.
- ASH008 is considered in the HELAA as of low landscape sensitivity, however; the Ash SOA identifies development of the site would depart from the built form of the village.

Ultimately, a greater need for mitigation measures and the constraints of the historic environment at ASH005 (discussed below) is reflected in the ranking of options, with ASH003, ASH004 performing better overall in this respect, followed by ASH008 given its slight departure from the built form. Despite this, no significant effects are considered likely under any of the options.

**Table 6.5: Historic environment assessment**

	<b>ASH003/ HELAA45: Land South of Mill Field</b>	<b>ASH004/ HELAA95: Land North of Molland Lane</b>	<b>ASH005/ HELAA96: Land West of Molland Lane</b>	<b>ASH008/ HELAA136: Land to the East of Queens Road</b>
<b>Historic environment</b>				
<b>Likely significant effect?</b>	<b>No</b>	<b>No</b>	<b>Uncertain</b>	<b>No</b>
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>3</b>	<b>1</b>

**Assessment findings:**

Given their closer proximity to the designated historic environment assets in Ash, both ASH003 and ASH005 are more constrained by historic environment considerations than ASH004 and ASH008. ASH004 and ASH008 are both located in the north of the settlement bordered by the A257 and removed from the conservation areas in Ash and Gilton. These sites do not contain any designated assets, however, the HER reveals a wealth of archaeological finds in the Plan area which should naturally translate to precaution in any development. In this respect, it is recognised that further archaeological assessment is required to determine the significance of any effects in relation to archaeology at the sites.

ASH003 lies relatively close to the Street End Ash Conservation Area (separated by an open field), with direct PRow footpath connections and potentially viewed from areas along New Street (although there are treelines here that provide significant buffering). Further, a listed building is located just east of the site at Moat Lane. Development at the site has the potential to impact the setting of designated assets through inappropriate design and may affect views from local footpath connections to the conservation area. However, assuming standard density and building heights in new housing at the site, no significant negative effects are considered likely. Mitigation, in consultation with Historic England should be provided to avoid/ minimise potential negative effects arising.

ASH005 is situated adjacent to the Gilton Conservation Area in the west, and a short distance from The Street Conservation Area in the east (although a landscape/ tree buffer lies between the site and The Street Conservation Area). Development has significant potential to affect the setting of the Gilton Conservation Area, particularly its north-eastern views. If the site is progressed, it is recommended that appropriate early engagement with Historic England is undertaken to minimise the effects arising through effective design, layout and housing density.

Overall it is recognised that development at any of the options should undertake further archaeological assessment prior to any building works commencing on site to establish suitable mitigation strategies if necessary. ASH005 is recognised for constraints of greater significance overall when compared to the remaining options, and it is recommended that if the site is progressed early engagement with Historic England is undertaken to minimise any negative effects arising on heritage settings. The overall significance of effects of development at this site are therefore recognised as uncertain at this stage. ASH003 is recognised for constraints of greater significance when compared to ASH004 and ASH008, though mitigation is considered likely to minimise the potential negative effects here. ASH004 and ASH008 are both considered to have a greater potential to avoid any negative effects arising; the ranking of options reflects these assumptions.

**Table 6.6: Land, soil and water resources assessment**

	ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
<b>Land, soil and water resources</b>				
<b>Likely significant effect?</b>	No	Yes	Uncertain	Yes
<b>Rank</b>	1	3	2	4

**Assessment findings:**

Development at any of the sites taken forward the options will result in the loss of greenfield land, although it is noted that ASH008 contains an area of brownfield land that would be regenerated through development. Despite this, national provisional datasets indicate that the land at ASH008 is of the highest quality grade (Grades 1 and 2). The loss of this land to development is considered likely to lead to permanent significant negative effects.

Similarly, ASH004 is recognised (through national provisional datasets) as likely Grade 2 'best and most versatile' agricultural land, the loss of which may also lead to significant negative effects. Whilst recent detailed assessment has not been undertaken of agricultural land quality at this location, taking a precautionary approach it is recognised that there is also a high potential for best and most versatile land at both ASH003 and ASH005. It is recognised though that ASH003 minimises land take and is largely surrounded by existing residential development minimising its practical use for agricultural purposes when compared to the remaining options. As a result, ASH003 is considered to perform marginally better than the remaining options and no significant effects are considered likely. ASH005 which will similarly result in reduced land-take when compared to ASH004 and ASH008 and the overall effects of development here are uncertain at this stage until indicative soil quality is better defined.

**Table 6.7: Population and community assessment**

	ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
<b>Population and community</b>				
<b>Likely significant effect?</b>	Yes	Yes	Yes	Yes
<b>Rank</b>	2	1	2	1

**Assessment findings:**

Each option is considered likely to lead to significant long-term positive effects for population and communities through their contribution to meeting the identified residual housing needs, and affordable housing needs, either alone or in-combination. By their potential to deliver the remaining needs in full on-site, sites ASH004 and ASH008 are both considered for positive effects of enhanced significance. Whilst all sites are well connected to the existing settlement area, maximising access to existing local connections, services and facilities; it is recognised that the larger scale development potential at ASH004 and ASH008 provides increased opportunities for infrastructure upgrades and new provisions, such as new open space to support the growing population. As a result, these sites are ranked more favourably in respect of communities.

**Table 6.8: Health and wellbeing assessment**

	<b>ASH003/ HELAA45: Land South of Mill Field</b>	<b>ASH004/ HELAA95: Land North of Molland Lane</b>	<b>ASH005/ HELAA96: Land West of Molland Lane</b>	<b>ASH008/ HELAA136: Land to the East of Queens Road</b>
<b>Health and wellbeing</b>				
<b>Likely significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>1</b>

**Assessment findings:**

The sites are accessible to Ash's GP surgery. This will support access to healthcare. Capacity at the relevant surgery is unknown at this stage, and it is recommended that any necessary contributions to expanded capacity are sought through development if appropriate.

Given the increased scale of development at ASH004 and ASH008, contributions to healthcare infrastructure and new provisions such as new open space supporting resident health are considered likely to be more viable, with greater potential to secure long-term positive effects in this respect.

However, sites ASH004 and ASH008 border the A257 where air quality and noise may have implications for the health of residents at the site. In this respect, suitable mitigation such as a landscape buffer may be required to avoid/ minimise the negative effects arising.

Each option is well connected with existing Public Rights of Way (PRoW) as explored in turn below:

- ASH003 is bordered by public footpaths at the rear of Mill Field connecting with New St north of the site, and The Street north-west of the site.
- ASH004 contains public footpaths in the north of the site connecting with Molland Lea and Chequer Lane and borders a bridleway north of Molland Lane connecting with the A257.
- ASH005 contains the eastern extent of a footpath connection between the A257 and Molland Lane and between Gilton and and Molland Lane. A north-south connection between Gilton and Molland Lane also runs adjacent to the western border of the site.
- ASH008 borders a north-south footpath running between the A257 and The Street in the east and connects to another footpath west off Queens Road.

It will be important to ensure any footpath/ bridleway connectivity both on and off-site is retained in development to avoid any minor negative effects arising in this respect. All sites are considered to have the potential to enhance connectivity through the sites, extending/ enhancing existing active travel opportunities (particularly towards the village centre) and access to the wider countryside in this respect.

Overall, assuming suitable mitigation is provided at ASH004 and ASH008 in respect of air quality and noise impacts on resident health, no significant effects are considered likely under any of the options. Through their greater potential to secure development benefits through economies of scale, such as contributions to healthcare capacity, or new open space provisions, ASH004 and ASH008 are considered to perform marginally better overall when compared to ASH003 and ASH005.

**Table 6.9: Transportation assessment**

	<b>ASH003/ HELAA45: Land South of Mill Field</b>	<b>ASH004/ HELAA95: Land North of Molland Lane</b>	<b>ASH005/ HELAA96: Land West of Molland Lane</b>	<b>ASH008/ HELAA136: Land to the East of Queens Road</b>
<b>Transportation</b>				
<b>Likely significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2</b>

**Assessment findings:**

Given a lack of existing public transport connections, any development in the Plan area is considered likely to increase traffic on local roads to some extent. Given the scale of development being proposed at any of the individual sites, no significant negative effects are considered likely in relation to traffic and congestion on the supporting road network. It is likely that all sites will be able to achieve suitable access, though the HELAA identifies that all sites will require a transport assessment, and that the cumulative impact from ANP allocation sites will need to be assessed.

It is recognised that development at ASH004 could create a new junction access to the A257 supporting enhanced connectivity in the north-west of the village, and potentially reducing congestion at peak times at the Chequer Lane and Pedding Hill junctions. In this respect, ASH004 is recognised for potential positive opportunities when compared to the remaining options and the ranking of options reflects this. It will be important however to ensure that suitable enhanced connections are also provided south and east of the site, particularly towards the village centre, to ensure that the site does not become isolated from the rest of the community.

As explored under the health SEA theme, sites are well-connected with existing PRowS/ footpaths and each site has potential to extend and enhance the connections in this respect. It is therefore difficult to meaningfully differentiate the remaining options in respect of active travel opportunities.

## Summary findings

**Table 6.10: Summary findings for the assessment of alternative site options**

SEA objective		ASH003/ HELAA45: Land South of Mill Field	ASH004/ HELAA95: Land North of Molland Lane	ASH005/ HELAA96: Land West of Molland Lane	ASH008/ HELAA136: Land to the East of Queens Road
Air quality	Likely significant effect?	No	No	No	No
	Rank	2	1	2	2
Biodiversity	Likely significant effect?	No	No	No	No
	Rank	=	=	=	=
Climate change	Likely significant effect?	No	No	No	No
	Rank	1	1	1	2
Landscape	Likely significant effect?	No	No	No	No
	Rank	1	1	3	2
Historic environment	Likely significant effect?	No	No	Uncertain	No
	Rank	2	1	3	1
Land, soil and water resources	Likely significant effect?	No	Yes	Uncertain	Yes
	Rank	1	3	2	4
Population and community	Likely significant effect?	Yes	Yes	Yes	Yes
	Rank	2	1	2	1
Health and wellbeing	Likely significant effect?	No	No	No	No
	Rank	2	1	2	1
Transportation	Likely significant effect?	No	No	No	No
	Rank	2	1	2	2

### Summary findings:

Overall, significant positive effects are considered likely under all options with regards to the SEA theme of population and community, predominantly as a result of new housing to meet the identified housing needs, as well as a relevant contribution to meeting affordable housing needs in line with Local Plan requirements (and potentially further ANP policy provisions).

All sites are relatively well connected, edge-of-settlement sites with good existing footpath connections to the village centre as well as the countryside beyond. In this respect, minor positive effects are also considered likely for all options with regards to the SEA theme of health and wellbeing and transportation, given the potential to extend and/ or enhance existing active travel opportunities.

Significant negative effects have the potential to arise through a loss of high-quality 'best and most versatile' agricultural land at sites ASH004 and ASH008, and also potentially at ASH005 (though this is less certain at this stage). Smaller-scale development within the residential surrounds at ASH003 is considered less likely to lead to negative effects of significance in this respect.

Notably, ASH004 provides the opportunity to create new junction access to the A257 and reduce any congestion pressures at Chequer Lane and Pedding Hill, particularly in light of the wider consented growth going ahead at Chequer Lane. This has the potential to lead to benefits in relation to the SEA themes of air quality and transportation. Whilst no significant effects are considered likely, the option is noted for this opportunity, although it is also recognised that enhanced south and east



## SEA objective

ASH003/  
HELAA45: Land  
South of Mill Field

ASH004/  
HELAA95: Land  
North of Molland  
Lane

ASH005/  
HELAA96: Land  
West of Molland  
Lane

ASH008/  
HELAA136: Land  
to the East of  
Queens Road

connections would also be required to ensure that the development does not become isolated from the rest of the settlement area.

In relation to the historic environment it is recognised that development at any of the options should undertake further archaeological assessment prior to any building works commencing on site to establish suitable mitigation strategies if necessary.

ASH005 is recognised for heritage constraints of greater significance overall when compared to the remaining options. This is given the site's location between two conservation areas and its current role in providing open land. As such, it is recommended that if the site is progressed early engagement with Historic England is undertaken to minimise any negative effects arising on heritage settings. The overall significance of effects of development at this site are recognised as uncertain at this stage.

Further, ASH008 is identified as containing an area of high surface water flood risk, which would require mitigation in development proposals.

No significant effects are considered likely with regards to biodiversity; all options are considered for equal potential to deliver net gains, with minor long-term positive effects in this respect.

## 7. Developing the preferred approach

- 7.1 This section presents the Ash Neighbourhood Plan Steering Group's reasons for developing the preferred approach in light of the alternatives assessment. The Steering Group and the Ash Parish Council have stated:

*"The site selection process started in 2018 when the sites that has been submitted for Dover District Council were assessed by the AECOM Site Assessment Report. The parish council based its recommendation to the parish of possible preferred sites on this report.*

*The process used was that sites assessed Green would be considered first with a presumption for inclusion. Red sites would not be further considered, except for ASH011 Land south of Guilton, Ash as this was a brownfield site and such sites were to be included as a priority. Amber sites would be considered for the best 'match' between the objectives of the NDP and meeting the residual housing needs being delivered through the ANP.*

*The parish council then consulted residents by providing detailed information on the sites and the reasons why the recommended sites had been selected at two exhibitions and a public meeting between September and October 2019. It collated all the responses from residents and the Regulation 14 consultation was carried out between 14<sup>th</sup> November to 23<sup>rd</sup> December 2019.*

*In September and October 2020, the parish council re-considered the alternative options in light of this assessment.*

### **ASH003/HELAA 45: Land South of Mill Field**

*The assessment shows no significant effects although the site is constrained by historic environment considerations. The parish council wanted to protect and enhance the rural setting of the site and protect the historic environment in close proximity to the site. For these reasons, Policy ANP7c) requires the existing south boundary of hedegrows and veteran trees to be retained and enhanced to minimise this impact.*

*This small-scale site is the final phase of a three-stage development. To enhance the internal environment amenity, a green buffer zone between the development and the existing houses to the north side of the site is required by Policy ANP7c).*

*The loss in 2019 of a near-by public bus route will contribute to a small increase in vehicle traffic and the inclusion of the provision of electric vehicle charging points was included in Policy ANP7c).*

*For these reasons, the parish council continues to assess this site as suitable for development.*

### **ASH004/ HELAA95: Land North of Molland Lane**

*The assessment shows a significant effect from the loss of high-quality 'best and most versatile' agricultural land. All the larger sites that were considered have this impact. On balance, it was considered that the position of this site in relation to the existing built form and as it is possible to access village amenities by including links to existing off-road walking routes, it would have the least negative impact.*

*The parish council had identified the difficulty with road access and noted that the assessment identified the opportunity to create a new junction access to the A257 to reduce congestion pressures at Chequer Lane and Pedding Hill and the potential benefits in relation to air quality and transportation. This would have to be combined with enhanced pedestrian and cycle links to the village amenities to prevent the development becoming separated from the rest of the settlement area. There are existing PRoWs and off-road links that could be enhanced by the layout of the site. Kent County Council Highways has to date resisted parish council requests for any new junction access from Ash village to the A257. The site owner has indicated that it may be able to provide improved road access using adjacent land it owns that would help alleviate the problems associated with using the existing road to the site. Either of these options would help improve the site access.*

*The parish council has included in Policy ANP7d) a 15metre green buffer zone between the site and the A257 that aims to lessen the negative impact of noise and poor air quality that will be associated with the adjacent A257.*

*This site will round off the built form of the Ash village with the least impact on the rural character of the village, compared to the other large sites considered. It also contributes the majority of the units needed to deliver the residual housing.*

*For these reasons, the parish council continues to assess this site as suitable for development.*

#### ***ASH005/ HELAA96: Land West of Molland Lane***

*The assessment shows the historic constraint is of a greater significance overall when compared to the other sites. While it is also land of high-quality 'best and most versatile' agricultural land, the size of the site would mean less of a loss than the other larger sites.*

*The site is also considerably higher than the adjacent development and the design of the development would need to take this and its impact on the adjacent conservation areas into account.*

*There would also be a cumulative negative impact for congestion from traffic from site ASH04 if a new junction on to the A257 or new access road to Guilton was not provided. This combined with the traffic pressure from the adjacent school would have a significant negative impact for local residents.*

*The selection of the other sites does not require this site to meet the residual housing need.*

*For these reasons, the parish council continues to assess this site as unsuitable for development.*

#### ***ASH008/ HELAA136: Land to the East of Queens Road***

*The assessment shows a significant effect from the loss of high-quality 'best and most versatile' agricultural land. All the larger sites that were considered have this impact. This site has also been identified as containing an area of high surface water flood risk.*

*This site had been assessed as Red in the AECOM Site Assessment as it has significant access issues. The parish council considered it was unsuitable for development and had recommended it as such when it carried out its public engagement in late 2019.*

*The parish council re-iterated its serious concerns to Dover District Council in March 2020 on publication of its site assessments that had given the site an Amber rating. The parish council's concerns were:*

- *It would not be possible to create a safe traffic access on to Queens Road due to the road being a single lane width*
- *Land required to widen the road is not in the ownership of the applicant. Further the amount of the site needed to provide safe access would considerably reduce the number of units that could be built*
- *The possibility of an option to provide another access to A257, in close proximity to the existing junction with Chequer Lane, would require extensive road re-design, purchase of land and construction costs that would make the site uneconomic*
- *The removal of the land that is currently on short lease and is used as rugby pitch would further reduce the number of units that could be built, although it is accepted that this would reduce the loss of recreational amenity.*
- *There would be no way to provide a secondary access for emergency vehicles*
- *The traffic impact on the residential properties on Queens Road would considerably reduce the environmental amenity of the area*

*The parish council also considered the development of this site as having a significant negative impact on the open rural landscape that extended from the adjacent agricultural land starting at*

*Sandwich Road and extending west to the site. It would also depart from the built form of the village.*

*The parish council noted that the site was assessed as having an area of brownfield land. The parish council considers this area that contains a café and farm produce shop as a positive addition to amenities for the community that provide sustainable economic and social benefits. Its loss would have a negative impact on health and well-being.*

*The parish council noted that the site borders an area of high-risk surface water flood risk in the north east corner of the site and this would require mitigation. The parish council has concerns about the problem of surface water flood risk on other sites that have come forward for development outside of the ANP. These have or are likely to add to the existing problems for the drainage network in Ash village. Mitigation on these sites has not overcome the problems.*

*On balance, the negative impact of developing this site, outweighed the negative impact of developing the site ASH004 and it was not needed to meet the residual housing need. The assessment did not alter this is calculation.*

*For these reasons, the parish council continues to assess this site as unsuitable for development.*

### ***Conclusion***

*The parish council has considered the assessment and has decided that sites ASH003, ASH004 are suitable for development and ASH005 and ASH008 are unsuitable for development.”*

## **Part 2: What are the SEA findings at this stage?**

## 8. Introduction (to Part 2)

### Introduction

- 8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'submission' version of the ANP. This chapter presents:
- An appraisal of the current version of the ANP under the nine SEA theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Appraisal method

- 8.2 The appraisal is structured under the nine SEA themes taken forward for the purposes of the SEA and that are linked to the SEA objectives, see **Table 3.1**.
- 8.3 For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 8.4 Every effort is made to identify/ evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### ANP policies

- 8.5 To support the implementation of the vision for the ANP, discussed in Chapter 2, the current version of the plan puts forward 20 policies to guide development in the Neighbourhood Plan area.
- 8.6 The policies, which were developed following extensive community consultation and evidence gathering, are set out in **Table 8.1** below.

**Table 8.1: ANP ('submission' version) policies**

Policy reference	Policy name
ANP1	Development in the Countryside
ANP2	Designated local green and open spaces
ANP3	Green and open spaces in new developments
ANP4	Biodiversity
ANP5	Climate Change
ANP6	Developments and Conservation
ANP7a	Agri / Cowans land brought forward from DDC 2015 Land Allocation
ANP7b	Old Council Yard, land allocated from DDC 2015 Land Allocation
ANP7c	HELAA 45 Land South of Mill Field
ANP7d	HELAA 95 Land north of Molland Lane
ANP7e	HELAA 163 Land South of Gilton

Policy reference	Policy name
ANP8	Retention of Community Facilities
ANP9	Health and social care
ANP10	Village Shops and Public Houses
ANP11	Conversion of rural buildings to business use, tourist accommodation and tourist attractions
ANP12	Working from home
ANP13	Off-Street Parking
ANP14	Communications
ANP15	Transport
ANP16	Infrastructure

## 9. Appraisal of the ‘submission’ version ANP

### Air quality

- 9.1 There are no areas of notably poor air quality within the Neighbourhood Plan area, with closest AQMAs located within Thanet District to the north, or further south around Dover. The A257 is the key strategic road serving the village and therefore all sites proposed for allocation are likely to make a degree of contribution to traffic flows, including some journeys to Thanet which may be routed through the AQMA. However, on the basis that the town of Sandwich provides a range of higher tier services more locally than Thanet and Dover, it is considered that the pattern and amount of development proposed through the preferred strategy is highly unlikely to lead to significant additional emissions within the Thanet Urban AQMA or AQMAs around Dover docks.
- 9.2 Additionally, the Neighbourhood Plan proposes measures which may help encourage walking and cycling and therefore reduce reliance on emissions-generating journeys via car. In line with the preferred strategy, Policy **ANP1** (Development in the countryside) seeks to direct future growth to within the revised settlement boundary in order to ensure new residents remain largely within walking and cycling distance of village services. Policy **ANP5** (Climate Change) says new development should “*provide good quality pedestrian/cycle infrastructure*”, whilst Policy **ANP6** (Developments and Conservation) requires proposals to “*provide facilities for cycle storage*”, and Policy **ANP15** (Transport) seeks a range of measure intended to incentivise sustainable transport (these will be explored in more detail under subsequent SEA topics).
- 9.3 Furthermore, a range of policies seek to embed electric vehicle charging capacity into new development with a view to reducing reliance on emissions-generating vehicles over time. Policy **ANP5** (Climate Change) requires new development to “*provide charging points in accordance with current building regulations*”, whilst Policy **ANP6** (Developments and Conservation) elaborates, stating that “*there should be provision for electric charging to either each dwelling or 1 per 5 dwellings, as long as it is within 100m and has a dedicated charging bay*”. This requirement is subsequently reflected in each of the five site allocation policies (i.e. Policies **ANP7a, b, c, d and e**).
- 9.4 Overall, in the absence of any notable air quality sensitivity within the plan area itself, and with only very limited potential for new development within the plan area of the scale proposed to have effects on the nearest AQMA, it is considered that the current version of the Neighbourhood Plan will not give rise to any significant effects in relation to air quality. **Minor negative effects** are attributed to potential additional pressures on the A257 as a result of the proposed growth, and **minor positive effects** are attributed to the policy directions encouraging active travel and supporting the use of electric vehicles.

### Biodiversity

- 9.5 The Neighbourhood Plan area itself contains no biodiversity designations of note, though it does have sensitivity in relation to multiple national and European-designated sites nearby. The Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Stodmarsh SPA are each within around 3km of the plan area, both of which are also designated as Special Areas of Conservation (SAC), whilst Sandwich Bay is further designated as a Ramsar site. Additionally, the Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI) is a short distance to the east of Ash at its closest point, whilst the Stodmarsh SSSI and Preston Marshes SSSI are a short distance to the west of Ash. Therefore, whilst development proposed under the preferred strategy is unlikely to have potential for effects within the plan area itself, there could be potential for effects in relation to a number of nearby sites of biodiversity significance, particularly in terms of increased recreational pressure.



- 9.6 In this context, the quantum of growth proposed through the preferred strategy, i.e. around 360 new dwellings, could have potential for minor negative effects in relation to these sensitive sites.
- 9.7 The accompanying Habitats Regulations Assessment (HRA) has investigated the potential for the ANP to affect the integrity of European designated biodiversity sites. The HRA has identified policy recommendations which seek to mitigate potential impacts arising in relation to recreational pressures, effects on water quality and air pollution effects. It is considered that if the recommendations of the HRA are implemented in the draft ANP then there will be no significant effects in relation to European designated biodiversity sites.
- 9.8 Currently, the draft Neighbourhood Plan recognises this potential and establishes the need for mitigation strategies to accompany proposals at the largest proposed site allocations. Policy **ANP7d** (HELAA 95 Land north of Molland Lane) proposes allocation of around 100 dwellings, subject to, among other criteria, “*a mitigation strategy to address any impact on the Thanet Coast and Sandwich Bay Ramsar and SPA sites and Sandwich Bay SAC site*” being provided. The specifics of such a mitigation strategy are not prescribed, recognising that there may be several ways of achieving mitigation and the optimal approach may depend on the details of the eventual scheme proposed.
- 9.9 Similarly, Policy **ANP7a** (Agri/Cowans land brought forward from DDC 2015 Land Allocation) includes the same requirement in relation to the proposed allocation of around 95 dwellings. Again, specific mitigation is not prescribed, with the policy noting that “*a range of measures and incentives*” could be employed. The supporting text of the policy does add some further detail, suggesting that measures could include “*open space, green infrastructure, water drainage and contributions to off-site infrastructure*”, though this is not presented as an exhaustive list.
- 9.10 The smaller site allocation policies do not attract explicit requirements in relation to SPA mitigation, though this is considered appropriate in light of the low growth proposed through each and the requirement for more strategic mitigation to be provided via APN7a and APN7d, as discussed above.
- 9.11 Policy **APN4** (Biodiversity) is the key detailed policy in relation to protecting and enhancing biodiversity. The policy is ambitious, requiring development proposals to “*provide biodiversity net gains of not less than 10%*”, and extends policy protection to non-designated “*local biodiversity and habitats*” to supplement higher-tier protection for the designated sites nearby. This recognition of the potential for net gain and the importance of non-designated sites is significant, particularly in light of Ash’s potential to function as part of a wider habitat network between the nearby designated sites outside the plan area.
- 9.12 This echoes Policy **ANP1** (Development in the countryside) which says that proposals outside the settlement boundary will be supported in principle if, among other conditions, they enhance biodiversity and deliver a net gain. Policy ANP1 also goes further, setting out detailed requirements for development proposals outside the settlement boundary, including “*additional features for the support of protected species, such as bird and bat boxes*” and demonstrating that “*the conservation of protected species will be maintained, including that of their foraging habitat*”. Whilst these points are considered likely to be positive in relation to biodiversity, it is not clear why similar requirements are not made of development proposals within the settlement boundary, as even stronger outcomes may be achieved if that were the case.
- 9.13 Overall, assuming the recommendations of the HRA are incorporated into the ANP policy framework, it is anticipated that the draft neighbourhood plan will give rise to **minor positive effects** in relation to biodiversity.

## Climate change (mitigation and adaptation)

- 9.14 In terms of climate change adaptation, a key element is avoiding directing growth to locations which are likely to be affected by flood risk, either now or as a result of future climate change. The draft Neighbourhood Plan performs well in this regard, directing growth to sites which are in areas of low fluvial flood risk outside Flood Zones 2 or 3. Surface water flood risk is more widespread within Ash, with ribbons of medium and high risk permeating the village and its

surroundings. However, growth is directed to sites away from the areas most affected by surface water flood risk.

- 9.15 This is supplemented by Policy **ANP5** (Climate Change), which establishes a requirement for new development to “*not increase, and where possible, to reduce surface water run-off*” through the implementation of SuDS. More broadly, the policy also requires new development to “*be resilient to climate change*”, though guidance on how to achieve this resilience in practice is not included in the policy or its supporting text. Therefore, a requirement to ensure climate change resilience is broad-brush and could be interpreted as applying more generally than simply in relation to resilience to flood risk. However, in the context of the plan area this is considered appropriate, as the baseline flood risk from all sources appears low.
- 9.16 Policy **ANP6** (Developments and Conservation) repeats the requirement for developments to be “*resilient to climate change*”. However, little additional guidance is given on how this resilience might be achieved in practice, other than the repetition of the requirement for the use of SuDS in new developments to minimise surface water runoff. Currently these messages are duplicated between policies ANP5 and ANP6. This duplication is superfluous, and it is therefore considered that the plan would be strengthened if this message is contained in just one of these policies rather than both.
- 9.17 In terms of climate change mitigation, a key focus should be on reducing emissions from the built environment. The preferred strategy directs growth to sites within an approximate ten-minute walking distance of the range of services at the village centre, offering potential for new residents to meet a range of needs without using vehicles.
- 9.18 The detailed policies also seek to reduce emissions from the built environment. Most directly, Policy **ANP5** (Climate Change) states that new development should maximise energy efficiency by “*utilising low carbon energy and reduce greenhouse emissions*”. The policy adds detail to this requirement, stating that proposals should include a strategy “*demonstrating how the development will achieve low energy consumption based upon low carbon technologies*”, suggesting a range of measures by which this might be achieved, such as air/ground source heat pumps, solar panels and rainwater harvesting. Whilst the policy recognises that these requirements are subject to viability, this is considered a proactive and detailed policy requirement.
- 9.19 Additionally, Policy **ANP8** (Retention of Community Facilities) seeks to ensure that future upgrades to community facilities maximise the opportunity to “*reduce the carbon footprint by incorporating low carbon technologies as part of any improvements*”. This appears far sighted and demonstrates an awareness of the potential to retrofit opportunities to reduce emissions through changes to existing buildings rather than simply embedding low emissions into new development, an important aspect of mitigating climate change. Similarly, the outlined strategy seeks to retrofit low carbon measures to Parish Council-owned buildings over the plan period, setting the ambition for all such buildings to be low carbon by 2035 and where possible be net contributors to the energy supply systems.
- 9.20 Overall, the draft Neighbourhood Plan is ambitious in its scope to reduce emissions from new developments whilst also recognising the potential to adapt older buildings to be low carbon. Additionally, new development is directed away from areas of flood risk. Whilst recognising that climate change is a macro issue and local measures are necessarily micro in scale, the draft Neighbourhood Plan is considered to take a proactive approach to actions within its control and is therefore anticipated to give rise to **minor positive effects** in relation to climate change.

## Landscape

- 9.21 The preferred strategy directs all growth to sites at the periphery of the village. Whilst this simply reflects the distribution of suitable and available sites, it could give rise to potential effects on the landscape setting and character of Ash by altering the way in which the village is perceived within the landscape. Most notably, by directing significant growth to sites to the north of the village, the existing rural buffer between the built area of the village and the A257 Ash Bypass could be eroded, reducing both the visual distinctiveness and rural character of the village.

- 9.22 Policy **ANP1** (Development in the countryside) seeks to protect the village's rural setting and character by limiting new development beyond the settlement boundary in the open countryside. The policy text states that in order for such development to achieve support in principle, it must "*not have an adverse impact on the landscape setting of Ash*" and must "*maintain the distinctive views and visual connectivity of the village with the surrounding countryside*". These protected view corridors are defined and mapped to ensure clarity for developers and decision makers. The village's character and identity are informed in part by its attractive rural setting and protecting this setting is considered likely to lead to positive effects.
- 9.23 Policy **ANP6** (Developments and conservation) repeats the requirement to maintain key views, though expands this to apply to all new development and not simply development which comes forward outside the settlement boundary. The policy also establishes that design of new development must "*respect and respond to the village setting*" in order to ensure that proposals will cohere with the character of the existing built area of the village and be sympathetic to the village's rural surroundings. To help achieve this, the policy text signposts to both the Ash Character Assessment and the Ash Design Guide for further detailed guidance.
- 9.24 The site allocation policies each seek measures to minimise the potential for adverse effects on the landscape setting of Ash, with some adding additional landscaping mitigation measures specific to their individual context. Policy **ANP7a** recognises that the scale of the site could have potential to affect the way the village is perceived within the landscape, and requires development to come forward via "*a comprehensive approach*" to ensure that "*impact of the development on the setting of the village and wider landscape is minimised*". Policy **ANP7c** underscores the importance of the planted boundary to the site in helping screen views in from the countryside beyond, stating that "*the existing boundary hedgerows and veteran trees*" should be retained and a "*green buffer zone*" provided between the site and the existing development at Mill Field to minimise impacts on the amenity of existing residents. Similarly, Policy **ANP7e** requires boundary treatment at Land South of Gilton to ensure the site "*respects its location within the countryside*".
- 9.25 There are a number of less direct ways in which the detailed policies seek to mitigate potential effects from development on the landscape setting and character of Ash. For example, Policy **ANP11** (Conversion of rural buildings to business use, tourist accommodation and tourist attractions) states that any changes to the existing buildings should retain the "*traditional rural character*" of the buildings which will contribute to maintaining the identity of the village.
- 9.26 Overall, although proposed growth is substantial, the distribution of this growth will help dilute its overall visual impact, whilst the location of the two largest sites are both relatively well screened from the wider landscape. Additionally, landscaping and design measures required by the general policies and guidance of the plan and by the site allocations policies means the draft Neighbourhood Plan is not considered likely to give rise to any significant effects. Overall however, the erosion of greenfield land at the settlement edge, particularly that land which provides a buffer between the village and the A257 (Land North of Milland Lane) protecting its rural character, minor long-term negative effects are considered likely.

## Historic environment

- 9.27 The preferred strategy directs most growth to sites away from the historic core of the village and without any significant sensitivity in relation to specific heritage assets. Four of the five proposed site allocations are disconnected from any of the village's three conservation areas and do not appear to be within the settings of individual listed buildings or clusters of listing buildings. The notable exception to this is the proposed site allocation at Land South of Gilton which is adjacent to the Gilton Conservation Area and potentially within the setting of a handful of Grade-II listed buildings along Gilton Road. However, Land South of Gilton is proposed for nine dwellings only and it is likely that effects can be mitigated through detailed matters of design and layout. Overall, if ANP policies which seek to conserve and enhance the historic environment are implemented, the preferred strategy appears to perform positively in relation to the historic environment.
- 9.28 Policy **ANP6** (Developments and Conservation) provides the key detailed policy messages in relation to the historic environment, requiring that new developments "*respect, protect and*

*enhance*” listing buildings and their settings and “*respect the integrity, character and appearance*” of the conservation areas and Character Assessment Areas in the village. The supporting text of ANP6 notes that the intention of the policy is to ensure new developments reflect the prevailing “village character and heritage”.

- 9.29 Additionally, the policy recognises the significance of non-designated heritage assets, providing support-in-principle to proposals which “*protect and enhance the fabric of non-listed buildings in the conservation area*”. However, there could be potential to strengthen the policy further by also recognising the significance of non-designated assets which are outside the conservation area as these will not benefit from the additional safeguards provided by conservation area status.
- 9.30 The site allocation policies (**Policies ANP7a – 7e**) do not require any specific mitigation in relation to potential harm to historic assets, though policies 7d (HELAA 95 Land north of Molland Lane) and 7e (HELAA 163 Land South of Gilton) both stipulate that development at these sites should be of a density which “*reflects the special character*” of the Gilton Conservation Area. Whilst this is positive in principle, it is not clear why Policy ANP7d includes such provision as Land north of Molland Lane is some distance from Gilton and does not appear to have potential for direct effects on its conservation area. It is recommended that the policy be amended to remove this reference.
- 9.31 Elsewhere, there is broad recognition of the potential for effects on the historic character of Ash in other ways. Policy **ANP1** requires that “*all development works should review the possibilities of archaeological finds within the site confines and seek early discussions with the Kent County Council Heritage Conservation team.*” Policy **ANP14** (Communications) notes that proposals for new communications masts should be directed away from “*historic buildings and conservation areas*”, whilst Policy **ANP1** (Development in the countryside) recognises the contribution of Ash’s landscape setting to the overall historic character of the settlement, requiring new development outside the settlement boundary to ensure no adverse effects on the setting of the conservation area.
- 9.32 Overall, it is anticipated that the draft Neighbourhood Plan will lead to **minor positive effects** in relation to the historic environment, though there could be scope to enhance this further through clearer recognition of the sensitivity of non-designated assets outside the conservation area.

## Land, soil and water resources

- 9.33 Much of the Neighbourhood Plan area is underlain by high quality agricultural land, considered ‘best and most versatile’ (BMV). The NPPF establishes a presumption against the loss of BMV land where poorer quality land is available<sup>9</sup>.
- 9.34 In this context, it is notable that the entire area within the Ash settlement boundary is underlain by BMV land, meaning that any greenfield allocations will necessarily result in the loss of BMV agricultural land. Although the preferred strategy directs some growth to the two identified brownfield sites in the village (i.e. Old Council Yard and Land South of Gilton) there is insufficient brownfield capacity to meet housing need in full and three greenfield sites are also proposed for allocation. Consequently, it follows that the preferred strategy will result in the loss of productive agricultural land of the very highest quality. Whilst this is consistent with the NPPF in the sense that alternative sites of poorer quality are not available, it is considered that the preferred strategy will give rise to negative effects in relation to the loss of BMV land.
- 9.35 However, in isolation Policy **ANP7b** (Old Council Yard) and Policy **ANP7e** (HELAA 163 Land South of Gilton) each perform well in relation to the land, soil and water resources objectives by virtue of making the best use of available land and bringing forward growth at previously developed sites. Correspondingly, Policies **ANP7a** (Agri / Cowans site), **ANP7c** (Chequer Lane site) and **ANP7d** (Land North of Molland Lane) are considered to perform poorly in relation to the land, soil and water resources objectives as they will lead to the loss of productive agricultural land.

<sup>9</sup> As per footnote 53 of the NPPF

- 9.36 Overall, it is considered that the draft Neighbourhood Plan will give rise to **significant negative effects** in relation to land, soil and water resources on the basis that the plan will lead to the permanent loss of over 7ha of high quality agricultural land.

## Population and community

- 9.37 The preferred strategy proposes delivery of around 360 new dwellings which will meet the identified housing target for Ash in full and is considered a significant positive. This scale of growth, particularly given that it is concentrated at two large strategic sites, gives rise to good potential for delivery of a broad range of types and tenures of housing, including affordable housing, to meet a range of needs.
- 9.38 This housing delivery is achieved via Policies **ANP7a – ANP7e**, with new homes being delivered at sites from which access to important community facilities is easily achieved. Although growth is concentrated at the two largest sites, the overall spatial distribution of the sites means some degree of growth is directed to all parts of the village. This is considered positive by ensuring that the benefits of growth are not concentrated at a single part of the village, whilst potentially helping the new development be more organically absorbed into the community.
- 9.39 In terms of maximising access to local services and facilities, Policies **ANP8** (Retention of Community Facilities) and **ANP10** (Village shops and Public Houses) provide the key messages in relation to providing support for businesses and employment, establishing a presumption against the loss of commercial premises and employment floorspace. The village's community assets, such as the village hall, and businesses, such as the village shop, perform key roles in supporting the community. Their retention and improvement will help cater to existing and future needs of residents, particularly as the village grows over the plan period.
- 9.40 Policy **ANP2** (Designated local green and open spaces) identifies and protects spaces of importance to local residents, to prevent the loss of, or adverse effect on 13 specific open spaces, plus the village's 'green corridors'. The policy recognises the value of these spaces as important community assets, protecting them from development which harms the "*quality or amenity value*" of the assets.
- 9.41 Overall, the scale of growth proposed is substantial and will help ensure that a range of different housing needs are met, whilst also supporting support for key community assets and village businesses. The draft Neighbourhood Plan is anticipated to give rise to **significant positive effects** in relation to population and community.

## Health and wellbeing

- 9.42 Elements of health and wellbeing cut across several SEA topics, particularly matters relating to active travel options such as walking and cycling. In this sense, there is some overlap with the discussion under the air quality, above, and transportation, below.
- 9.43 The preferred strategy directs all proposed growth to sites within or adjacent to the existing built area of the village, avoiding directing growth to more remote areas of the Neighbourhood Plan area. This will help ensure the Neighbourhood Plan performs strongly in relation to health and wellbeing as it could help position walking and cycling as the favoured transport choice for many short, local journeys within the village. All sites appear to be within reasonable walking or cycling distance of the range of local services available at the village centre, though it is unlikely that active travel will be a viable option for accessing a wider range of services at larger settlements.
- 9.44 There is a consistent thread running through the draft Neighbourhood Plan which sees a focus on walking and cycling woven into a range of detailed and site-specific policies. Most directly, Policy **ANP15** (Transport) requires new development proposals to "*demonstrate how walking and cycling opportunities have been prioritised*" and to deliver "*new and enhanced pedestrian / cycle routes to the existing network*".



- 9.45 The site allocation policies **ANP7a – ANP7e** each recognise the importance of maximising pedestrian connectivity with village services, requiring enhanced PRow and pedestrian access where applicable.
- 9.46 This ambition to prioritise walking and cycling is reflected in a range of other policies. Policy **ANP5** (Climate change) says that new developments will be expected to “*provide good quality pedestrian / cycle infrastructure*”. Policy **ANP11** (Conversion of rural buildings to business use, tourist accommodation and tourist attractions) seeks, where possible, enhancement of the public rights of way network so that they are “*improved for access to walking routes*”. Policy **ANP12** (Working from home) recognises the value of encouraging travel to work by walking and cycling where possible, stating that in instances where working from home would require planning permission, these should only take place in locations with “*high quality walking and cycling infrastructure*”.
- 9.47 Away from active travel, Policy **ANP2** (Designated local green and open spaces) identifies 13 recreational green spaces plus a number of ‘green corridors’ for protection from loss. **ANP3** (Green and open spaces in new developments) looks to ensure that such local green space is also provided through new developments of over 5 dwellings to ensure new developments provide local recreation space. Access to green open space can be of benefit to both the mental and physical health of residents and the delivery and protection of such assets will help sustain positive health outcomes.
- 9.48 Policy **ANP9** (Health and Social Care) is also likely to give rise to positive effects on the basis that it recognises the need for the village’s GP practice to expand to accommodate future growth and safeguards land to support an extension when required. This will be an important element in ensuring the surgery continues to have capacity to serve the village and its wider catchment as the population grows.
- 9.49 Overall, it is considered that the draft Neighbourhood Plan is likely to give rise to **minor positive effects** in relation to health and wellbeing.

## Transportation

- 9.50 The current version of the Neighbourhood Plan identifies the existing issue of ‘pinch points’ on roads through the village, particularly at peak hours, as well as the issues caused by on-street parking in the village centre. By directing growth to sites from which the village centre can be accessed without a car, the preferred strategy will help reduce the need to travel whilst also helping minimise an increase in pressure on low-capacity roads through the village and on the limited parking available at the village centre. However, the quantum of growth proposed through the preferred strategy is substantial and given Ash’s rural location it is likely that many needs will continue to be met at higher-order settlements which are most easily accessed by car. This will inevitably result in increased traffic flows, though it is recognised that the two largest sites are north of the village and will be able to access to the A257 without travelling through the village centre.
- 9.51 The key messages from the detailed policies on walking and cycling have been discussed already, principally under the health and wellbeing SEA topic above, and are therefore not repeated in detail here. the potential for positive effects in relation to enabling walking and cycling identified above also apply in relation to the transport theme.
- 9.52 However, the draft Neighbourhood Plan includes a range of other proposals aimed at promoting sustainable transport use or reducing the overall need to travel where possible. Ash is reasonably well served by regular bus services between Canterbury and Sandwich, and Policy **ANP15** (Transport) seeks to maximise the potential benefits of this connectivity. For developments which are already proximate to bus stops, proposals should ensure footways “*lead to public bus stops*”, whilst those further from bus stops should seek to install additional stops “*as part of the development*”. This is considered positive in principle, though in practice the provision of new bus stops will likely require support from both KCC as the highways authority and from the service providers themselves. As such, it may be challenging for the Neighbourhood Plan to determine new bus stop provision in isolation.

- 9.53 The supporting text of Policy ANP15 notes that access to bus stops in the village has been obstructed at times by parked cars, identifying this as a potential threat to the continued viability of bus services to the village. The narrow roads of the village centre and high rates of car ownership in the village contribute to Ash's traffic issues, as identified by the Parish Council's traffic survey. In part, on-street parking is likely to be a contributing factor by virtue of narrowing the carriageway and introducing bottlenecks which cause queuing traffic and congestion. Correspondingly Policy **ANP13** (Off Street Parking) aims to help ensure that new development avoids loading new on-street parking onto the already busy village roads, stating that new development should "*provide the KCC Standard*" of on-site parking provision, whilst avoiding the loss of existing on- or off-road parking. Policy **ANP15** (Transport) says that developments which may "*cause significant impact*" on the village road network should "*provide mitigation by encouraging the use of public transport / cycling, and / or the provision of alternatives*".
- 9.54 Whilst many residents will continue to need to travel outside the Neighbourhood Plan area for employment, Policy **ANP12** (Working from home) and **ANP14** (Communications) could both contribute to making it easier for some people to work from home, reducing the need to travel for work. Although many instances of working from home do not involve a change of use of a property, Policy ANP12 looks to provide support in principle in cases where permission would be needed to erect dedicated structures for "*offices and / or light industrial use*". The policy also establishes support in principle for "*the development of a community business centre*" to provide local office facilities for people who may not be required to go into their place of work but who also may not have the facilities to work from their home. Both strands of the policy are considered likely to help some workers to work locally rather than travel to other locations for work.
- 9.55 Policy ANP14 dovetails with this objective by seeking to ensure that all residential and employment development in Ash will support Fibre to the Premises, i.e. superfast broadband. This will help ensure that all new developments have capacity to support many kinds of home working, where such jobs are reliant on high bandwidth internet availability.
- 9.56 Overall, the draft Neighbourhood Plan seeks to encourage and enable walking and cycling where possible, whilst taking measures to minimise the need to travel where possible and minimise the impact of new development on the local road network. It is recognised that the addition of around 360 new dwellings will inevitably lead to additional traffic flows. However, the two strategic sites are located to the north of the village centre and it is reasonable to expect that the majority of traffic looking to join the main strategic road serving the village, the A257 will therefore not travel through the village to do so.
- 9.57 On balance, the draft Neighbourhood Plan is considered likely to give rise to **both minor positive and minor negative effects** in relation to transport.

## 10. Conclusions and recommendations

- 10.1 Overall the appraisal of the ANP has identified the potential for both significant positive and significant negative effects, as well as a number of minor positive and neutral effects. Key considerations in the context of Ash are avoiding harm to the range of nearby biodiversity designations, limiting the loss of high-quality agricultural land, protecting the setting and character of the village and avoiding increasing traffic flows through the constrained centre of the village.
- 10.2 The key appraisal findings are:
- The potential for significant positive effects is identified in relation to the population and communities SEA objective on the basis that the plan will deliver new housing to meet local needs in full, including significant potential for affordable housing at scale.
  - The loss of several hectares of high-quality ‘best and most versatile’ agricultural land gives rise to potential significant negative effects in relation to the land, soil and water resources SEA objectives.
  - In terms of landscape, a key concern is avoiding harm to the rural setting and context of the village and Ash’s built character. The policies of Neighbourhood Plan are considered likely to deliver growth which does not result in significant adverse effects to how the village is perceived within the landscape or to the character of its built area.
  - In terms of transport, the plan directs the majority of growth away from the village centre to locations which have direct access to the A257.
  - Minor positive effects are anticipated in relation to the biodiversity, climate change, landscape, health and wellbeing SEA objectives.
- 10.3 Overall it is considered that the ANP takes a proactive approach to delivering new development whilst protecting key aspects of the natural, built and historic environment that contribute to the overall sense of place and quality of life in the Ash, though significant negative effects are considered inevitable in relation to the loss of best and most versatile agricultural land.



## **Part 3: What are the next steps?**

# 11. Next steps (Part 3)

- 11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

## Plan finalisation

- 11.2 The 'Submission' version of the plan and accompanying SEA Environmental Report will be submitted to Dover District Council. The plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination.
- 11.3 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Dover District Local Development Framework.
- 11.4 If the subsequent Independent Examination is favourable, the ANP will be subject to a referendum, organised by Dover District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the ANP will become part of the Development Plan for Dover District, covering the defined Neighbourhood Plan Area.

## Monitoring

- 11.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 11.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Dover District Council as part of the process of preparing its Annual Monitoring Report (AMR).
- 11.7 The SEA has not identified any potential for significant negative effects that would require closer review or monitoring over and above the monitoring arrangements of the AMR.

## Appendices

# Appendix I: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation. **Table C** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

**Table A: Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements**

	Questions answered		As per regulations... the Environmental Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
Part 1	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
Part 2	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
Part 3	What happens next?		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

**Table B: Questions answered by this Environmental Report, in-line with regulatory requirements**

<b><u>Schedule 2</u></b>	<b><u>Interpretation of Schedule 2</u></b>		
<b><i>The report must include...</i></b>	<b><i>The report must include...</i></b>		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

**Table C: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.**

Regulatory requirement	Discussion of how requirement is met
<b>Schedule 2 of the regulations lists the information to be provided within the SA Report</b>	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix II of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix II presents key messages from the context review. With regards to explaining " <i>how...considerations have been taken into account</i> ", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e. explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an appraisal of the draft plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options.  Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
<b>The SA Report must be published alongside the Draft Plan, in accordance with the following regulations</b>	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express	At the current time, this Environmental Report is published alongside the 'submission' version of the

**Regulatory requirement****Discussion of how requirement is met**

their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

Ash Neighbourhood Plan, with a view to informing Regulation 16 consultation.

**The SA Report must be taken into account, alongside consultation responses, when finalising the plan.**

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.

## Appendix II: The scope of the SEA

This appendix presents the outcomes of scoping consultation and provides an updated summary of the baseline and context review.

The Draft Scoping Report (February 2020) was shared with the Environment Agency, Historic England and Natural England, as well as Dover District Council for formal consultation over the period 25<sup>th</sup> February to the 31<sup>st</sup> March 2020. The responses received are provided in **Table AII.1** below.

**Table AII.1: SEA scoping consultation responses, April 2020.**

Consultation response	How the response was considered and addressed in the SEA
<b>Environment Agency</b>	
<b>Ms Sara Gomes, Planning Advisor</b>	
Ash NDP SEA Scoping Report consultation Thank you for consulting us on the above SEA Scoping/Neighbourhood Plan.	Many thanks for your response to Scoping consultation.
The Environment Agency is a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.	Noted, with thanks.
We always recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, water quality, biodiversity.	The following objectives/ decision-aiding questions relate to the recommended objective 'to protect and enhance the environment': <ul style="list-style-type: none"> <li>• Protect and enhance priority habitats and species</li> <li>• Include ecological corridors and connections between habitats</li> </ul>
Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. (copy attached). There is a useful check list in this document.	Noted, with thanks.
We also recommend your SEA takes account of relevant Dover Borough Council's policies, plans and strategies including DBC's Strategic Flood Risk Assessment, flood risk strategies ( <a href="https://www.gov.uk/government/collections/flood-riskmanagement-current-schemes-and-strategies">https://www.gov.uk/government/collections/flood-riskmanagement-current-schemes-and-strategies</a> ), and the South East River Basin Management Plan ( <a href="https://www.gov.uk/government/publications/south-east-riverbasin-management-plan">https://www.gov.uk/government/publications/south-east-riverbasin-management-plan</a> )	DDC's SFRA is present within the report. South East River Basin Management Plan has been noted in the policy context.
<b>Dover District Council</b>	
<b>Stuart Watson, Senior Policy Planner</b>	
Please find below Dover District Council's formal comments on the Strategic Environmental Assessment (SEA) for the Ash Neighbourhood Plan Scoping Report February 2020.	Many thanks for your response to Scoping consultation.
<b>Paragraph 1.4</b> - Please amend the time period that the emerging Local Plan for Dover will cover from 2018 to 2038 to 2020 to 2040. The time period was agreed by the cabinet in	Noted, with thanks.



## Consultation response

## How the response was considered and addressed in the SEA

December 2019 as part of the revised Local Development Scheme for the Dover Local Plan. Link: <a href="https://moderngov.dover.gov.uk/ieListDocuments.aspx?CId=121&amp;MId=3184">https://moderngov.dover.gov.uk/ieListDocuments.aspx?CId=121&amp;MId=3184</a>	
<b>Paragraph 3.21</b> - Add the following SEA objectives <i>'achieve the required level of biodiversity net gain set out within the new DDC local plan'</i> <i>'protect and enhance priority habitats and protected and priority species'</i>	These are existing decision-aiding questions (tweaked to more closely align with the recommendation) supporting the broader objective to "Protect and enhance all biodiversity and geodiversity".
<b>Paragraph 5.1</b> - Bullet point regarding Green Belts – Dover District contains no land classified as Green Belt is this point relevant, from a national context it is pertinent however it does not relate to the context of Dover of District.	Noted and removed.
<b>Paragraph 6.8</b> - Historic England have an updated version of their guidance on conservation areas dated Feb 2019.	Noted and amended.
<b>Paragraph 6.12 to 6.13</b> - Whilst not a policy document, the Dover District Heritage Strategy (DDHS) is the Councils response to the 'positive strategy' required by the NPPF and should be included here.	Noted and added.
The Land Allocations LP includes a relevant annexe regarding the historic environment, including the criteria for local listing should this be progressed.	Noted and added.
The Core Strategy includes other policies that relate to heritage and should be included here; DM25, DM20, DM21 and DM4.	Noted and added.
The key objective relating to the historic environment in the Core Strategy needs to be acknowledged.	Noted and added,
<b>Paragraph 6.14</b> - Links to maps required.	Noted.
<b>Paragraph 6.21</b> - There appears to be an error in this paragraph which stating that a 'reference source not found' – is this reference for the map on page 34 titled Historical Environmental designations. Could this be clarified in the final version of the Scoping Report.	Noted and amended.
<b>Paragraph 6.26</b> - The assessment questions need to consider any relevant recommendations within the DDHS and ensure that they are reflected here.	Noted.
<b>Paragraph 8.11 to 8.16</b> - This section needs checking and redrafting, due to the Index of Multiple Deprivation (IMD) 2015 having been superseded by the IMD 2019 link: <a href="https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019">https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019</a>	Noted and amended.
<b>Paragraph 10.6</b> – Reference should also be made to the Kent Active Travel Strategy - <a href="https://www.kent.gov.uk/_data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf">https://www.kent.gov.uk/_data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf</a>	Noted and added.
<b>Paragraph 10.7</b> – For completeness reference should be made to the Dover District Council & Partners (2007) Dover Transport Strategy. It should be noted that a revised Dover District Transportation Strategy is to be produced in support of Dover District Local Plan. It is not however envisaged that this will be available until Summer 2021.	Noted and added,

## Consultation response

## How the response was considered and addressed in the SEA

<b>Paragraph 10.7</b> – It should be noted that a District wide Transport model is currently being developed by consultants WSP in support of the emerging Dover Local Plan. At the time of writing, new housing sites to be considered as part of the do-something scenario testing are yet to be finalised.	Noted, with thanks.
<b>Paragraph 11.4</b> - It would be appropriate within the paragraph to mention that after successful referendum of the neighbourhood plan, it is for Dover District Council to decide whether to make the plan after which point, if it is made will then become part of the development plan for the District.	Noted.
<b>Historic England</b> <b>Edward Winter, Planning Adviser</b>	
Please find below Dover District Council's formal comments on the Strategic Environmental Assessment (SEA) for the Ash Neighbourhood Plan Scoping Report February 2020.	Many Thanks for your response to the Scoping consultation.
<b>Paragraph 6.14</b> - Typographical error: missing reference to Figure 6.1.	Noted.
<b>Paragraph 6.21</b> - Typographical error: missing reference to Figure 6.1.	Noted.
<b>Paragraph 6.23</b> - The results of the HER should be shown as a map. This is readily accessible through Kent County Council's website, please see below.	Noted with thanks, the information is too detailed at a neighbourhood plan scale so maps have not been included. The HER will inform the subsequent assessment however.
<b>Paragraph 6.28</b> - The SEA objective in column 1 of the table should be amended to include reference to the historic environment outside the neighbourhood plan area, to account for the possibility that the setting of heritage assets outside the neighbourhood plan area could be affected by development within the neighbourhood plan area.	Noted and amended.
<b>Natural England</b> <b>Jacqui Salt, Consultations Team</b>	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Many thanks for your response to Scoping consultation.

Following on from consultation, the sections below provide an updated summary of the baseline and context review.

## Air quality

## Context review

Key messages from the National Planning Policy Framework<sup>10</sup> (NPPF) include:

- Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

<sup>10</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

- Opportunities to improve air quality of mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

The Clean Air Strategy 2019<sup>11</sup> identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.<sup>12</sup> This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "*the link between improving air quality and reducing carbon emissions is particularly important*" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>13</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25-year plan directly relate to the air quality SEA theme.

DDC is required to monitor air quality across the District under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

DDC is part of the Kent Air Quality Partnership, which was established in 1992 to work towards improving the quality of Kent's air. The Partnership is made up of representatives from each District's transport, planning and environment departments, Kent County Council, the Environment Agency, National Power and other stakeholders related to air quality issues.

In this context, DDC has published its 2019 Air Quality Annual Status Report (ASR) in August 2019<sup>14</sup>. DDC are currently working on a revised updated AQAP which will cover the two AQMAs in the District

<sup>11</sup> DEFRA et al. (2019) Clean Air Strategy 2019 [online] available from: <https://www.gov.uk/government/publications/clean-air-strategy-2019>

<sup>12</sup> DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

<sup>13</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>14</sup> Dover District Council (2019) 2019 Air Quality Annual Status Report (ASR) [online] available at: <https://www.dover.gov.uk/Environment/Environmental-Health/Air-Quality/ASR-Dover-England-2019-v1.1.pdf>

A20 AQMA and High Street/ Ladywell AQMA. The current AQAP<sup>15</sup> was published in October 2007, at which time the High Street/ Ladywell AQMA had not yet been declared and a third AQMA, Dover Docks, was still in effect (now revoked).

There are no specific policies relating to air quality in the DDC Adopted Core Policy (2010).

## Baseline review

### Current baseline

The 2019 ASR<sup>16</sup> identifies that the main sources of pollution in the area are linked with port activities, including regular cross-channel ships and road traffic along the A2 and A20. Both of the AQMAs in the District have been designated due to exceedances of the annual mean Air Quality Strategy (AQS) objective for nitrogen dioxide (NO<sub>2</sub>), caused primarily by road traffic emissions. Other pollutants, such as particulates, have been previously assessed and confirmed as not being at risk of exceeding respective air quality objectives.

In 2018, dispersion modelling was carried out for both AQMAs within Dover District to establish whether any changes in the extent of AQMA boundary could be made. The results concluded that the exceedances of the annual mean NO<sub>2</sub> objective were still evident within both AQMAs. In addition, there were areas outside of the existing AQMAs where exceedances were predicted; these areas are all located in the vicinity of Dover town and therefore not close to the Neighbourhood Plan area.

There are no AQMAs within the Neighbourhood Plan area. The closest AQMA is Thanet Urban AQMA, located approximately 2km north-east of the Neighbourhood Plan area (as the crow flies from the northernmost extent), within Thanet District, which is designated for exceedances of the NO<sub>2</sub> annual mean caused largely by road traffic.

### Future baseline

New housing and employment provision in the parish and the surrounding area has the potential to negatively impact air quality through increasing traffic flows and associated pollutants, including NO<sub>2</sub>, particularly along the main routes through the Neighbourhood Plan area. More specifically, the designated AQMA in Thanet District is an area of high sensitivity to increased traffic flows and consequent pollution.

New development may also present opportunities to place increased focus on sustainable means of transport, particularly development in more sustainable locations such as near transport hubs or links. New development in Ash, the surrounding villages, and in the wider Dover District area, may provide opportunities to enhance the sustainable transport offer, both through new or improved access to existing public transport hubs and/ or active travel opportunities.

## Key issues

The following key issues emerge from the context and baseline review:

- Emissions (primarily NO<sub>2</sub>) associated with port activities, including regular cross-channel ships and road traffic along the A2 and A20, are the main pollutants of concern in Dover District.
- There are two AQMAs in the District, which have been designated due to exceedances of the annual mean Air Quality Strategy (AQS) objective for nitrogen dioxide (NO<sub>2</sub>), caused primarily by road traffic emissions. However, neither of these AQMAs are situated near the Neighbourhood Plan area.
- The closest AQMA is Thanet Urban AQMA, located approximately 2km north-east of the Neighbourhood Plan area, within Thanet District, which is designated for exceedances of the NO<sub>2</sub> annual mean caused largely by road traffic.

<sup>15</sup> Dover District Council (2007) Local Air Quality Management Final Action Plan October 2007 [online] available at: [https://www.dover.gov.uk/Environment/Environmental-Health/Air-Quality/Dover-Air-Quality-Action-Plan-\(No-2-A20\).pdf](https://www.dover.gov.uk/Environment/Environmental-Health/Air-Quality/Dover-Air-Quality-Action-Plan-(No-2-A20).pdf)

<sup>16</sup> Dover District Council (2019) 2019 Air Quality Annual Status Report (ASR) [online] available at: <https://www.dover.gov.uk/Environment/Environmental-Health/Air-Quality/ASR-Dover-England-2019-v1.1.pdf>

- Traffic and congestion arising from planned new development within and surrounding the area have the potential to increase emissions and reduce air quality in the Neighbourhood Plan area.

## Biodiversity

### Context review

Key messages from the National Planning Policy Framework<sup>17</sup> (NPPF) include:

- One of the three overarching objectives of the NPPF to ‘contribute to protecting and enhancing our natural, built and historic environment’ including by ‘helping to improve biodiversity’.
- Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.
- To protect and enhance biodiversity and geodiversity, plans should:
  - Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
  - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
  - Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
- The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

The Government’s 25 Year Environment Plan<sup>18</sup> (2018) sets out a strategy for managing and enhancing the natural environment, embedding ‘net gain’ principles as key to environmental considerations. These aims are supported by a range of policies which are focused on six key areas. In this context, Goal 3 ‘Thriving plants and wildlife’ and the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Chapter 5 ‘Securing clean, productive and biologically diverse seas and oceans’ directly relate to biodiversity and geodiversity.

The Biodiversity 2020 Strategy<sup>19</sup> (2011) presents a strategy for England’s wildlife and ecosystem services which builds on the Natural Environment White Paper<sup>20</sup> and sets out the “strategic direction

<sup>17</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>18</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

<sup>19</sup> Defra (2011) Biodiversity 2020: A strategy for England’s wildlife and ecosystem services [online] available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

<sup>20</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>



for biodiversity for the next decade". The strategy aims to halt biodiversity loss and improve ecological networks and ecosystems for all people.

The UK Biodiversity Action Plan<sup>21</sup> (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

Kent County Council has published a consultation draft of its new Biodiversity Strategy for the period 2019 to 2044<sup>22</sup>. Until the new strategy is published, the 'Kent Biodiversity 2020 and Beyond' Strategy (2015)<sup>23</sup> still applies. In Kent Biodiversity 2020 and Beyond, Kent County Council sets out its strategy for the natural environment from 2015 to 2025. It sets out four key outcomes that will help achieve its overall aim of halting biodiversity loss and conserving habitats:

- **Outcome 1 – Habitats and ecosystems on land** (including freshwater environments). By 2020 measures will be in place so that biodiversity is maintained and enhanced, further degradation has been halted and where possible restoration is underway, helping deliver more resilient and coherent ecological networks, healthy and well-functioning ecosystems, which deliver multiple benefits for wildlife and people.
- **Outcome 2 – Marine habitats, ecosystems and fisheries.** By 2020 we will have put in place measures so that biodiversity is maintained, further degradation has been halted and where possible restoration is underway, helping deliver good environmental status and our vision of clean, healthy, safe productive and biologically diverse oceans and seas.
- **Outcome 3 – Species.** By 2020, we will see an overall improvement in the status of our wildlife and will have prevented further human-induced extinctions of known threatened species.
- **Outcome 4 – People.** By 2020, significantly more people will be engaged in biodiversity issues, aware of its value and taking positive action.

The following policies in the DDC Adopted Core Strategy (2010) directly relate to the biodiversity SEA theme:

- Policy CP 7: Green Infrastructure Network; and
- Policy DM 15: Protection of the Countryside.

## Baseline review

### Current baseline

There are no internationally or nationally designated nature conservation sites within the Neighbourhood Plan area.

However, Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA and Ramsar site are located approximately 200m to the east of the Neighbourhood Plan area at the nearest point, along with Sandwich and Pegwell Bay National Nature Reserve (NNR) and Sandwich Bay to Hacklinge Marshes SSSI (the SSSI is located immediately north of the Neighbourhood Plan area's north-eastern boundary). In addition, Stodmarsh Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, SSSI and NNR is located approximately 3km to the west of the Neighbourhood Plan area. A further SSSI, Preston Marshes SSSI, is also located approximately 3km to the west of the Neighbourhood Plan area.

SSSI Impact Risk Zones (IRZ) are a GIS tool/ dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

<sup>21</sup> JNCC (2007) UK BAP priority species [online] <http://archive.jncc.gov.uk/page-5717>

<sup>22</sup> Kent County Council (2019) Kent Biodiversity Strategy 2019 to 2044 (Consultation Draft) [online] available: <https://kccconsultations.inconsult.uk/consult/ti/Kentbiodiversityconsultation/consultationHome>

<sup>23</sup> Kent County Council (2015) Kent Biodiversity Strategy 2020 and Beyond [online] available: <http://www.kentnature.org.uk/uploads/files/Nat-Env/Kent-Biodiversity-Strategy-final.pdf>

In this context, the Neighbourhood Plan area is located wholly within a SSSI IRZ for development types which are likely to be taken forward through the Neighbourhood Plan (i.e. residential and rural residential development types). For some parts of the Neighbourhood Plan area (such as the village of Ash), the SSSI IRZ thresholds are relatively high (500 residential units or more) and therefore the scale of the development proposals likely to come forward through the Neighbourhood Plan are less likely to meet or exceed the SSSI IRZ thresholds which indicate a need for further consultation with Natural England. In other instances, including areas to the east of Ash village and the easterly and westerly parts of the Neighbourhood Plan area, development is more likely to meet or exceed the SSSI IRZ thresholds. Thresholds in these areas range from 50 residential units through to all planning applications (except householder) that are outside of settlement boundaries. The SSSI IRZs provide a corridor for birds migrating across England to and from mainland Europe.

Local Wildlife Sites are areas of land selected by Kent County Council that are recognised for having high wildlife value. These sites are protected by the local planning system and their selection is based on the most important, distinctive and threatened species and habitats within a national, regional and local context.

There are currently two Local Wildlife Sites within/ partially within the Neighbourhood Plan area: Ash Level and South Richborough Pasture, and Elmstone Valley. Ash Level and South Richborough Pasture was designated in 2011 and covers an area of approximately 1,039 ha, located in the northern and eastern parts of the Neighbourhood Plan area. The site crosses the Parish boundary to include a small area of the River Stour near to Sandwich Town. Elmstone Valley was designated in 2002 and covers an area of approximately 17 ha, located predominantly within Preston Parish a small area extends into the west of the Neighbourhood Plan area.

The Lower Stour Wetlands Biodiversity Opportunity Area, which is approximately 11,328 ha, is located partially within the Neighbourhood Plan area, primarily towards the northern and eastern perimeters of the Neighbourhood Plan area but also covering a small part of Ash village.

There are a range of Biodiversity Action Plan Priority (BAP) Habitats within and surrounding the Neighbourhood Plan area, including, but not limited to:

- Coastal and floodplain grazing marsh;
- Good quality semi-improved grassland;
- Lowland fens;
- Deciduous woodland;
- Traditional orchards;
- Coastal saltmarsh;
- Coastal sand dunes;
- Mudflats;
- Saline lagoons; and
- Intertidal substrate foreshore.

## Future baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, with the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The SSSI IRZs provide a corridor for birds migrating across England to and from mainland Europe. It can be expected that use of the corridors will continue in future and potentially be enhanced in line with reversing biodiversity loss.

Local Wildlife Sites act as wildlife corridors and have the potential to be impacted by new development which can remove the connection between habitats for species such as birds.

Ecological sites can also be impacted by poor air quality and water quality, and factors such as noise and lighting can disturb vulnerable species.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised both within the Neighbourhood Plan area and in the surrounding areas.

## Key issues

The following key issues emerge from the context and baseline review:

- Sandwich Bay SAC and Thanet Coast and Sandwich Bay SPA and Ramsar site are located approximately 200m to the east of the Neighbourhood Plan area at the nearest point, along with Sandwich and Pegwell Bay National Nature Reserve (NNR) and Sandwich Bay to Hacklinge Marshes SSSI. In addition, Stodmarsh Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, SSSI and NNR is located approximately 3km to the west of the Neighbourhood Plan area. A further SSSI, Preston Marshes SSSI, is also located approximately 3km to the west of the Neighbourhood Plan area. Development will need to ensure that potential impact pathways are considered and if necessary, mitigation is in place to ensure that it does not adversely affect the integrity of these sites.
- The Neighbourhood Plan area is located wholly within a SSSI IRZ for development types which are likely to be taken forward through the Neighbourhood Plan (i.e. residential and rural residential development types). The location of development will determine the significance in relation to potential impacts, and mitigation or further consultation with Natural England may be required.
- There are currently two Local Wildlife Sites within the Neighbourhood Plan area: Ash Level and South Richborough Pasture, and Elmstone Valley. The Lower Stour Wetlands Biodiversity Opportunity Area is located partially within the Neighbourhood Plan area. This is alongside a range of Biodiversity Action Plan Priority (BAP) Habitats within and surrounding the Neighbourhood Plan area, including areas of coastal and floodplain grazing marsh, deciduous woodland and coastal saltmarsh. It will be important to ensure that habitats and the connections between them are supported and enhanced in development of the Plan area, particularly considering expected climate change impacts.

## Climate change (mitigation and adaptation)

### Context review

Key messages from the National Planning Policy Framework<sup>24</sup> (NPPF) include:

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).

<sup>24</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)



- Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.
- Plans should take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.

One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

The Flood and Water Management Act (2010)<sup>25</sup> sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

The UK Climate Change Act<sup>26</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'<sup>27</sup> which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from local authorities.

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report<sup>28</sup> containing six priority risk areas requiring additional action in the next five years:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and

<sup>25</sup> Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

<sup>26</sup> HM Government (2008): 'Climate Change Act 2008' [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>27</sup> CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

<sup>28</sup> DEFRA (2017) 'UK Climate Change Risk Assessment Report January 2017' [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The Clean Air Strategy<sup>29</sup> released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

The Dover Surface Water Management Plan (SWMP) (2011)<sup>30</sup> identifies suitable responses to manage surface water flooding in the District. A four-phase approach has been undertaken in line with Defra's SWMP technical guidance (2010). These are: Phase 1 – Preparation, Phase 2 – Risk Assessment, Phase 3 – Options and Phase 4 – Implementation and Review. Phase 4 includes an Action Plan which provides an evidence base for future decisions and funding applications for putting the recommendations into practice. The Action Plan sets out the following generic management options that could be implemented across the District:

- Develop and implement a targeted maintenance schedule;
- Raise awareness of surface water flood risk;
- Develop and implement a policy to use green roofs and permeable paving where practicable;
- Further develop DDC planning policy with respect to flood risk (including use of SuDS);
- Improve flood warning;
- Develop Kent Highway Services for highways to be used as exceedance routes;
- Misconnections and surface water sewer interruption; and
- Improve management of agricultural land to reduce runoff volume and sediment transport.

A Strategic Flood Risk Assessment (SFRA) for the District was published in 2019<sup>31</sup>. The main objectives of the SFRA are as follows:

- To identifying the risk of flooding from each source of flooding at key locations within the District;
- To inform the sustainability appraisal so that flood risk is taken into account when considering strategic land use policies;
- To provide data and information to enable the Council to apply the Sequential Test to land use allocations and to identify whether the application of the Exception Test is likely to be necessary; and
- To support the Council's policies for the management of flood risk within the Local Development Documents and to assist with the testing of site proposals.

The DDC Adopted Core Strategy (2010) notes that parts of the District are at risk to flooding from a combination of river (fluvial) and tidal (sea) sources, and from localised surface water runoff, noting that in the north and western rural parts of the District the risk "is a combination of sea and river flooding (River Stour), although the sea poses a much greater risk". The following policy from the Dover Adopted Core Strategy (2010) directly relates to the climate change SEA theme:

- Policy CP 5: Sustainable Construction Standards.

In addition, the Core Strategy states the following as a key driver of change:

*"Climate change - it is likely that the Country will see more extreme weather events, including hotter and drier summers, flooding and rising sea levels and permanent changes to the natural*

<sup>29</sup> HM Gov (2019) Clean Air Strategy 2019 [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

<sup>30</sup> Jacobs (2011) 'Dover Surface Water Management Plan, Volume 1: Summary Report and Action Plan' [online] available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/51302/Dover-SWMP.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0011/51302/Dover-SWMP.pdf)

<sup>31</sup> Herrington Consulting (2019) in partnership with Dover District Council 'Strategic Flood Risk Assessment March 2019' [online] available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

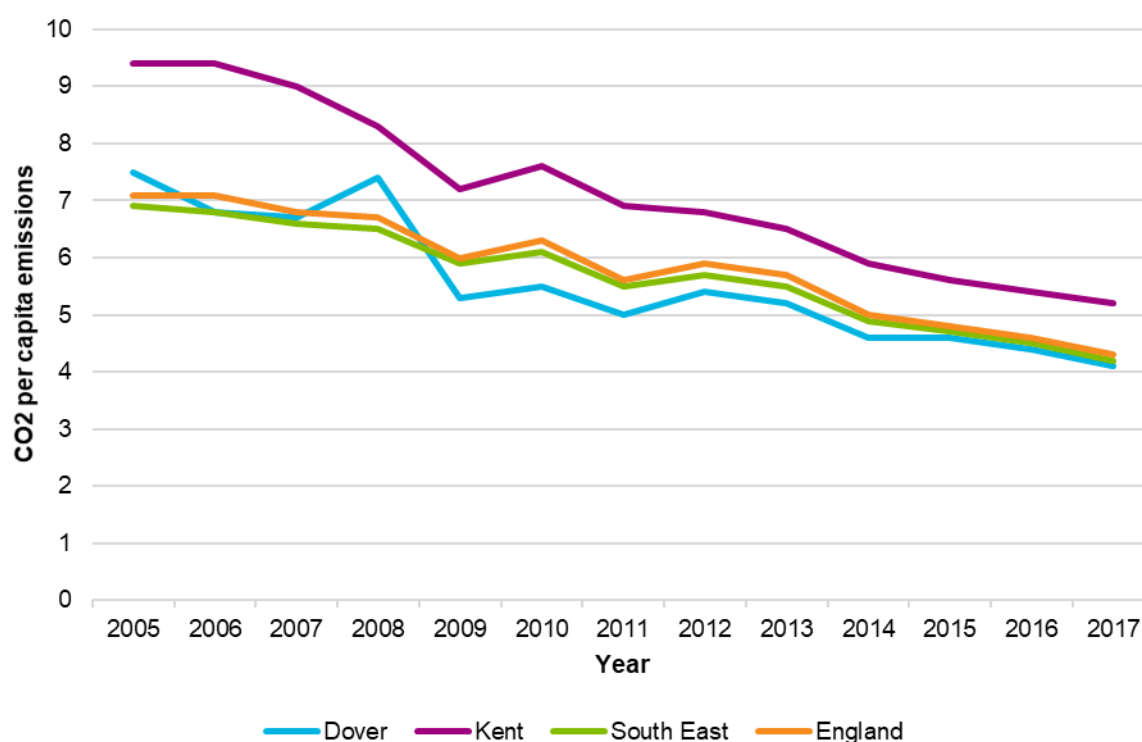
*environment. There are also likely to be economic and social impacts that may well disproportionately affect the most vulnerable in society. The coastal location of the District in the extreme south east of the country means that it will have to take particular account of rising sea levels, drier summers and shorter periods of heavier rain combined with having wards with some of the highest levels of deprivation in the region. Measures to help reduce the level of local greenhouse gas emissions and to be more efficient with water will need to be employed.”*

## Baseline review

### Current baseline

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change<sup>32</sup> suggests that Dover District has had lower per capita emissions than Kent, the South East of England and England since 2005. Kent has had higher per capita emissions compared with the South East of England and England. Dover and Kent have both seen a 45% decrease in the percentage of total emissions per capita between 2005 and 2017, which is more than the reductions the South East of England (40.0%) and England (40.0%) – see **Figure 4.1**.

**Figure 0.1: Carbon dioxide emissions (2005 – 2017)**



The data identifies that the industry and commercial sector is the biggest contributor to emissions in the District, followed by the domestic and transport sectors. Industry and commercial gas consumption is the main source of emissions within this sector, followed by electricity consumption. This same trend is repeated in the domestic sector, with domestic gas followed by domestic electricity identified as the main sources. Within the transport sector, A-roads are the main source of emissions, however minor roads also make a relatively significant contribution to the emissions total for this sector.

### Potential effects of climate change

Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team<sup>33</sup>. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in

<sup>32</sup> Department of Energy and Climate Change (2019) '2005 to 2017 UK local and regional CO2 emissions – data tables' [online] available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>

<sup>33</sup> The data was released on 26<sup>th</sup> November 2018: Available from: <http://ukclimateprojections.metoffice.gov.uk/>

probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50<sup>th</sup> percentile) for the South East of England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows<sup>34</sup>:

- The central estimate of increase in annual mean temperatures of between 1°C and 2°C; and
- The central estimate of change in annual mean precipitation of 0 to +20% in winter and -10% to -30% in summer.

Due to these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100-year floods;
- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

## Flood risk

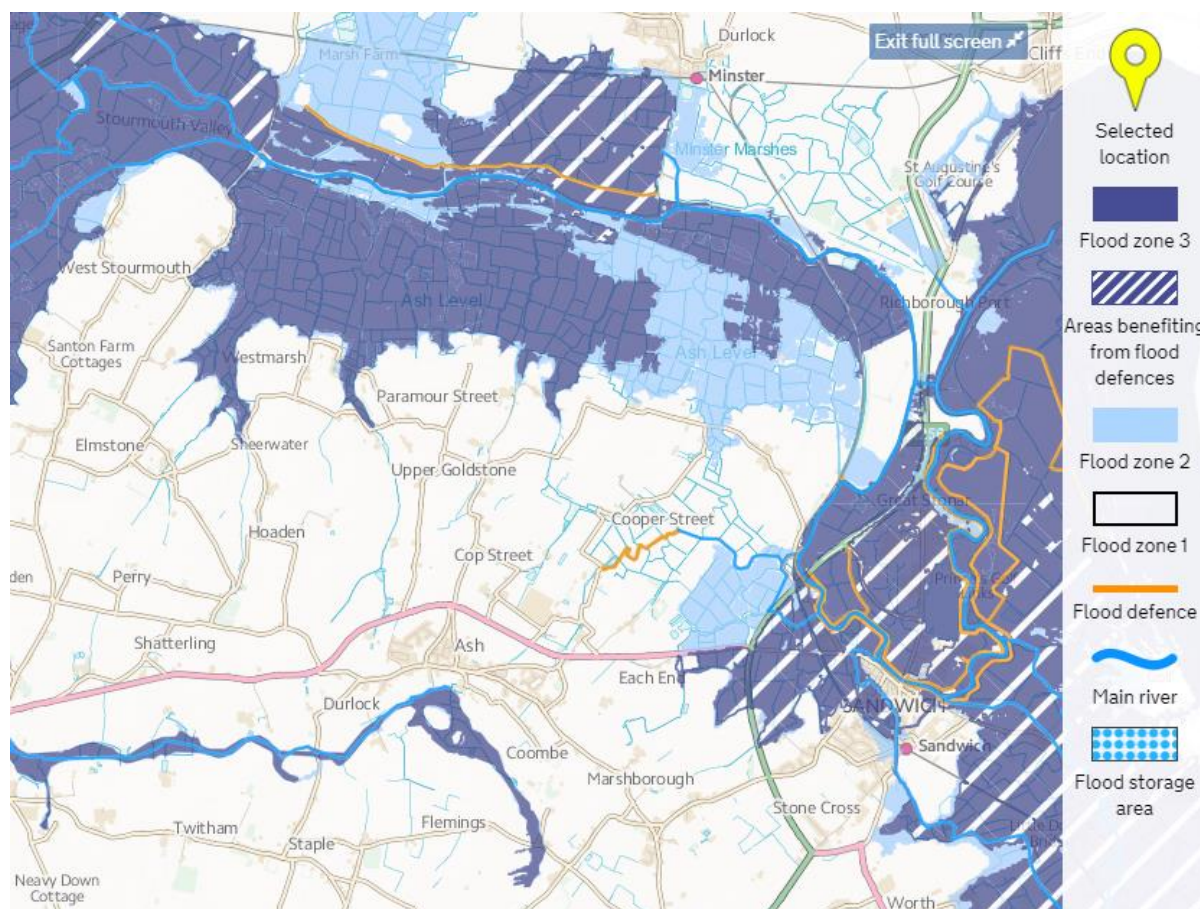
The areas at highest risk of flooding within the Neighbourhood Plan area are mainly towards the north and east, within proximity of the River Stour, Richborough Stream and Wingham River. **Figure 4.1** shows areas at risk from flooding from the River Stour are in Flood Zone 3, representing areas that

<sup>34</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>



have a 1% (1 in 100) or greater annual flood risk, and Flood Zone 2, representing areas that have between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%).

**Figure 0.2: Fluvial flood risk within the Neighbourhood Plan area<sup>35</sup>**

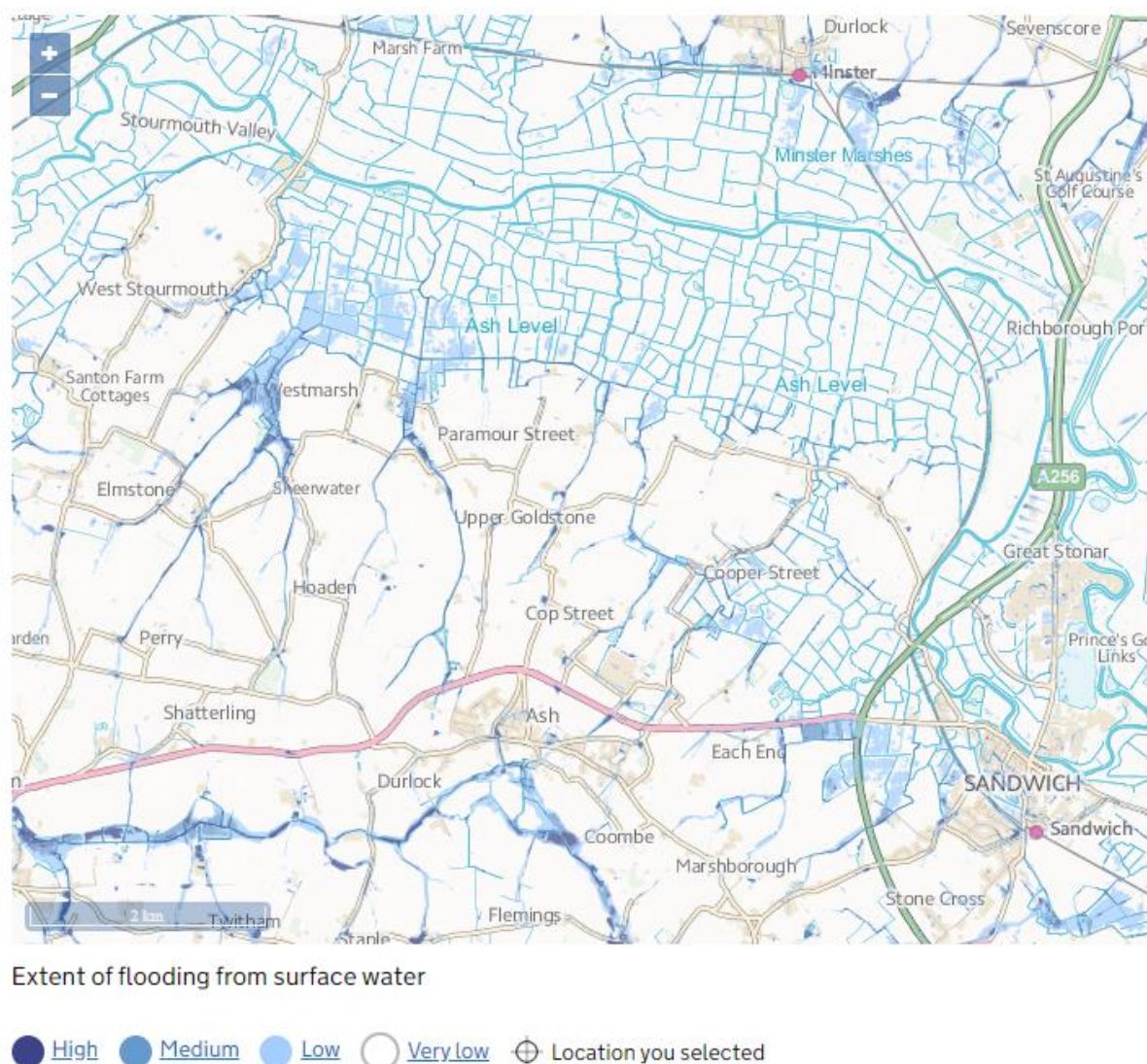


The DDC Strategic Flood Risk Assessment (SFRA) (2019)<sup>36</sup> states that many parts of the District are “highly reliant on flood defences”. It also notes that the northern part of the District (within which the Neighbourhood Plan area falls) benefits from an extensive network of land drainage ditches, which are often managed using pumps. There are instances whereby the capacity of these drainage ditches has been exceeded following an extreme rainfall event, or due to failure of a pumping station.

**Figure 4.2** shows the risk of surface water flooding in the Neighbourhood Plan area, with the majority in low or very low risk areas, with localised areas of medium to high risk.

<sup>35</sup> GOV UK (2019): 'Flood Map for Planning' [online] available at: <https://flood-map-for-planning.service.gov.uk/>

<sup>36</sup> Herrington Consulting (2019) in partnership with Dover District Council 'Strategic Flood Risk Assessment March 2019' [online] available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

**Figure 0.3: Surface water flood risk within the Neighbourhood Plan area<sup>37</sup>**

In relation to groundwater flooding in the northern part of the District (where the Neighbourhood Plan area is located), the SFRA states:

*“Groundwater flooding is also possible across the low lying flat land to the north of the District, where there is a high potential for elevated groundwater levels and flooding to occur in close proximity to the River Stour. The drainage system in this area consists of an extensive network of ditches designed to remove water, to allow this land to be used. These ditches control groundwater levels and as a result, groundwater emergence in this part of the District is normally directly related to water levels within the drainage network”.*

### Future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

Per capita greenhouse gas emissions generated in the Neighbourhood Plan area are likely to continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies; however, increases in the built environment and carbon footprint of the Plan area would contribute to an increase in the total levels of greenhouse gas emissions.

<sup>37</sup> GOV UK (2019): 'Long term flood risk assessment for locations in England' [online] available at: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/>



The SFRA for Dover<sup>38</sup> considers the potential future impact of climate change. It notes that the River Stour is tidally influenced throughout the entire District “and thus, an increase in sea level would also result in a larger area further inland being at risk of flooding. Therefore, it is necessary to ensure that new development is designed so that these residual risks are mitigated”. It also states:

*“The reliance of villages and towns (such as, Deal and Sandwich) on tidal flood defence infrastructure will increase over the next century as sea levels increase. The consequences of such structures failing (i.e. a breach), or becoming overtopped, will therefore increase too. When the dynamics of a breach are considered, the increase in sea level over the next 100 year period will result in a significant increase in the volume of water which is able to flow through the breach during the peak of an extreme event. Higher water levels can promote larger wave heights along the coastline, as waves are sustained closer inshore through a combination of increased water levels and increases in offshore wind speed.”*

Increased rainfall intensity as a result of climate change is likely to increase the likelihood and frequency of surface water flooding. Climate change is also likely to result in wetter winters, which may result in more frequent groundwater flooding problems in areas which are already susceptible, such as the Neighbourhood Plan area.

## Key issues

The following key issues emerge from the context and baseline review:

- Developments of new housing and infrastructure within the Neighbourhood Plan boundary have the potential to increase the local carbon footprint and overall greenhouse gas emissions in Ash.
- Dover District has seen a 45% decrease in the percentage of total emissions per capita between 2005 and 2017. This is a higher percentage decrease than the South East of England and England and it will be important to support continued emissions reductions to meet emerging environmental objectives for carbon neutrality.
- The northern and eastern parts of the Neighbourhood Plan area, within proximity of the River Stour, Richborough Stream and Wingham River, are at highest risk of fluvial flooding. There are areas of Flood Zone 2 and Flood Zone 3, meaning these areas have a medium to high risk from fluvial flooding. The increase in precipitation and peak river flow allowances associated with climate change may result in the floodplain encroaching on settlement areas in the future. Development within the flood zone should ultimately be avoided, and measures to increase climate and flood resilience will be important in light of these risks.
- Surface water flooding is generally low risk in the Neighbourhood Plan area, with localised areas of medium to high risk. Groundwater flooding is also possible in the Neighbourhood Plan area, where there is a high potential for elevated groundwater levels and flooding to occur in close proximity to the River Stour. Appropriate mitigation, such as the use of Sustainable Drainage Systems, should be considered in development proposals to increase flood resilience in this respect.
- The emerging ANP should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

## Landscape

Key messages from the National Planning Policy Framework<sup>39</sup> (NPPF) include:

- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The

<sup>38</sup> Herrington Consulting (2019) in partnership with Dover District Council ‘Strategic Flood Risk Assessment March 2019’ [online] available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

<sup>39</sup> MHCLG (2019) National Planning Policy Framework [online] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.

- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
  - b. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
  - c. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

National Character Area (NCA) Profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics.<sup>40</sup> NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.

The Government’s 25 Year Environment Plan<sup>41</sup> states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England. Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s “A Green Future: Our 25 Year Plan to Improve the Environment” directly relates to the Landscape.

The following policies in the Dover Adopted Core Strategy (2010) directly relate to the landscape SEA theme:

- Policy DM 15 Protection of the Countryside; and
- Policy DM 16: Landscape Character.

## Baseline review

### Current baseline

There are no designated landscapes in or adjacent to the Neighbourhood Plan area. The Kent Downs Area of Outstanding Natural Beauty (AONB) is the nearest protected landscape designation, located approximately 7km from the Neighbourhood Plan area.

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Neighbourhood Plan area is located within the North

<sup>40</sup> Natural England (2012) ‘National Character Area profiles’ [online] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>41</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)



Downs NCA. The NCA profile for the North Downs<sup>42</sup> lists several key characteristics, with the following of particular relevance to the Neighbourhood Plan area:

- Elevation in the NCA ranges from 0 m to a maximum of 268 m on the chalk escarpment in Surrey.
- The backbone of the Downs is a distinctive ridge with a steep south-facing scarp and northern dip slope. The ridge is cut by numerous dry valleys, some containing winterbournes. The Downs end abruptly in the east at the distinctive landmark of the White Cliffs. During the ice ages although not glaciated the area was under the influence of very cold tundra-like conditions at the edge of the ice sheets. Processes of erosion and deposition during this period have contributed significantly to the formation of the present landscape.
- The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole. The river valleys cut through the chalk ridge, providing distinctive local landscapes which contrast with the steep scarp slope.
- Woodland is a dominant feature of the landscape and is found primarily on the steeper slopes of the scarp, valley sides and areas of the dip slope capped with clay-with-flints. Nearly half of the woodland is ancient and many are designated for their biodiversity value. There are extensive areas of yew with box woodland on parts of the scarp in Surrey.
- Most settlement in the area is in the form of small, nucleated villages, scattered farmsteads including oasts and barns. A predominantly rural landscape punctuated by a few large settlements but with significant urban development along the boundaries of the NCA.

The North Downs NCA identifies an opportunity to “*Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area’s rich cultural and natural heritage, famous landmarks and views for future generations.*”

A Dover District Landscape Character Assessment (LCA)<sup>43</sup> was undertaken in 2006. The assessment identifies twelve landscape character areas in the District. Those which fall within the Neighbourhood Plan area are set out below, along with a summary of their characteristics:

- **Character Area 2: Preston and Ash Horticultural Belt.** The Horticultural Belt lies to the south and east of the Stour Marshes, covering the settlements of Stourmouth, Preston, Ash, Marshborough, Woodnesborough and Worth. The topography is relatively flat, although slightly undulating in comparison to the adjoining Stour Marshes and Ash Level. There is a variety of agricultural land use, with orchards, vineyards, greenhouses, vegetables, pasture and arable land. Winding narrow lanes dissect the countryside, along field boundary lines. They are often enclosed by poplar windbreaks and hedgerows. There is a strong sense of enclosure in places with hedgerows and poplar windbreaks bordering the small fields and roads, and a moderate amount of tree cover with these in addition to the orchards. Views are limited due to tree cover and the reasonably flat landscape.
- **Character Area 3: Ash Level.** The north of the area is defined by the River Stour. The area is characterised by topography and geology. The land is low lying and flat, providing a strong visual characteristic. There is little built development, creating a predominantly horizontal landscape with little to interrupt the view or focus the eye. Neither do many roads cross the area with access only reaching its boundary edges in the form of straight ‘Drove’ roads, created for herding sheep out to marshland pasture in past times. There are far reaching views across the fields due the flat topography and lack of tree cover, providing a subsequent lack of physical and visual enclosure.

<sup>42</sup> Natural England (2013): NCA Profile:119 North Downs (NE431) [online] available at: <http://publications.naturalengland.org.uk/publication/7036466?category=587130>

<sup>43</sup> Jacobs Babbie (2006) Dover District Landscape Character Assessment [online] available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>

- **Character Area 5: Richborough Castle.** Richborough Castle and the land to the west form a small character area amidst the flat topography of Ash Level and the industrial character of Sandwich Industrial Estate to the east. Sandwich lies to the southwest of the area, approximately one mile away. The surrounding land is used as arable agricultural land, with medium sized flat fields of no significant shape or pattern.

## Future baseline

New development, including infrastructure development, has the potential to lead to incremental changes in landscape quality in and around the Neighbourhood Plan area. This could include the loss of landscape features, visual impact on existing features, loss of tranquillity, and the potential for incremental coalescence between settlements.

New development also has the potential to support landscape character through regeneration and brownfield development that improves village settings, delivering green infrastructure improvements and new recreational opportunities and enhanced framing of key views.

## Key issues

The following key issues emerge from the context and baseline review:

- Development of the area may alter the character and appearance of the landscape and affect key views, it could also reduce the sense of tranquillity.
- The Ash Level Character Area is particularly sensitive to new development, given that it is characterised by little existing development.
- Landscape features that contribute to the overall character and quality of the place may be affected in development, including trees, hedgerows and areas of open space.

## Historic environment

### Context review

The Planning (Listed Buildings & Conservation Areas) Act 1990 is a UK Act of Parliament that changed laws relating to the granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.<sup>44</sup> It created special controls for the demolition, alteration or extension of buildings, objects or structures of particular architectural or historic interest, as well as conservation areas.

The Ancient Monuments & Archaeological Areas Act 1979 is an Act to consolidate and amend the law relating to ancient monuments; to make provision for the investigation, preservation and recording of matters of archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters; to provide for the recovery of grants under section 10 of the Town and Country Planning (Amendment) Act 1972 or under section 4 of the Historic Buildings and Ancient Monuments Act 1953 in certain circumstances; and to provide for grants by the Secretary of State to the Architectural Heritage Fund.<sup>45</sup>

The Government's Statement on the Historic Environment for England<sup>46</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

<sup>44</sup> UK Public General Acts (1990) Planning (Listed Buildings and Conservation Areas) Act 1990 [online] available at: <<https://www.legislation.gov.uk/ukpga/1990/9/contents>> last accessed [28/08/19]

<sup>45</sup> UK Public General Acts (1990) The Ancient Monuments & Archaeological Acts 1979 [online] available at: <<https://www.legislation.gov.uk/ukpga/1979/46>> last accessed [28/08/19]

<sup>46</sup> HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: <[http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx)> last accessed [28/08/18]

Key messages from the National Planning Policy Framework<sup>47</sup> (NPPF) include:

- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.

These messages are supported by the national Planning Practice Guidance (PPG)<sup>48</sup> which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.

Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>49</sup> directly relates to the Historic Environment.

Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2019)<sup>50</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of Conservation Areas.

<sup>47</sup> MHCLG (2019) National Planning Policy Framework [online]  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>48</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online]  
<http://planningguidance.communities.gov.uk/>

<sup>49</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online]  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>50</sup> Historic England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1' [online] available from:  
<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>51</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> Edition) (December 2017)<sup>52</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>53</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

The following policies within the adopted Dover Core Strategy (2010) directly relate to the historic environment SEA theme:

- Policy DM 4: Re-Use or Conversion of Rural Buildings
- Policy DM 19: Historic Parks and Gardens
- Policy DM 20: Shopfronts
- Policy DM 21: Security Shutters and Grilles
- Policy DM 25: Open Space

The Core Strategy acknowledges the *“very large and particularly rich stock of historic assets”* which *“play a large part in defining the character of the District and the individuality of settlements”*.

Objective 10. of the Core Strategy notes to: *‘ensure the intrinsic quality of the historic environment is protected and enhanced and that these assets are used positively to support regeneration, especially at Dover’*.

Additionally, the Dover District Heritage Strategy (2013)<sup>54</sup> helps to identify and understand the many historic assets in the District and how their special character could contribute to the future of the area. The Strategy also provides advice and guidance for the management of historic assets and can be used to support future funding bids.

<sup>51</sup> Historic England (2016): 'SA and SEA: Advice Note 8' [online] available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

<sup>52</sup> Historic England (2017): 'Setting of Heritage Assets: 2<sup>nd</sup> Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

<sup>53</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment' [online] available at: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

<sup>54</sup> Dover District Council (2013): 'Heritage Strategy' [online] available at: <https://www.dover.gov.uk/Planning/Conservation/Heritage-Strategy.aspx>

The Dover District Land Allocations Local Plan (2015)<sup>55</sup> follows on from the Core Strategy and identifies and allocates specific sites that are suitable for housing, employment and retail development in order to meet the Core Strategy's requirements and to support the implementation of the Strategy.

## Baseline review

### Current baseline

The Neighbourhood Plan area contains two Grade I listed buildings (Richborough Castle and Church of St Nicholas), four Grade II\* listed buildings and 99 Grade II listed buildings. The largest number of listed buildings are located within Ash Village, particularly along The Street.

The Historic England listing for the Grade I listed Richborough Castle describes *“Remains of Roman settlement of Rutupiae A.D.43, C2, c239, C10 and C12. Principal remains are the sea-pebble and rubble stone walls faced with stone and tile levelling courses, three sides of the late C3 Saxon shore fort (the eastern wall fell to the sea, now some miles distant)”*.

The Historic England listing for the Grade I listed Church of St Nicholas describes a *“Parish Church. Circa 1190, altered C14, with central C15 tower. Restored 1847 by Butterfield and 1861 by Christian, 1896 by Edward Fry. Flint with rubble stone and re-used tile and plain tiled roof. Cruciform with chancel, north chapel, nave, north aisle, large north porch and central tower.”*

The four Grade II\* listed buildings in the Neighbourhood Plan area are as follows:

- Stourmouth House. Early C18 front to C16 rear wing. Plum brick with red brick dressings on main front.
- Wingham Barton Manor. C15 or earlier. Timber framed and close studded with plaster infill, brick herringbone nogging on left return, and tile hung wing.
- Paramour Grange. Circa 1600, re-fronted early C19: Timber framed and clad with stone and rendered.
- Chilton House. Late C17. Red brick and plain tiled roof. Two storeys and attic on moulded plinth with discontinuous plat band and brick eaves cornice to hipped roof with 2 hipped dormers and stack to rear left and to right.

There are three conservation areas within the Neighbourhood Plan area, as follows:

- The Street Ash, designated in 1973, covering the main high street in the village of Ash;
- Street End Ash, designated in 1976, located to the east of the high street; and
- Gilton Ash, designated in 1991, located to the west of Ash village.

At the time of writing, DDC have not produced conservation area appraisals for the three areas listed above.

There are three scheduled ancient monuments within the Neighbourhood Plan area: Richborough Saxon Shore fort, Roman port and associated remains, Ash Mill Anglo-Saxon cemetery and Chequer Court Medieval moated site.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people.

Following a high-level review of the Historic Environmental Record (HER) for Kent<sup>56</sup>, there are 417 records relating to Ash, including iron-age, roman, anglo-saxon, medieval/ post-medieval (including a significant number of hay stack stances) and WWII records/ finds.

<sup>55</sup> Dover District Council (2015): 'Land Allocations Local Plan' [online] available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Adopted-Development-Plans/Land-Allocations-Local-Plan.aspx>

<sup>56</sup> Kent County Council (2020): 'Historic Environmental Record – Exploring Kent's Past' [online] available at: <https://webapps.kent.gov.uk/KCC.ExploringKentsPast.Web.Sites.Public/MultiResults.aspx?firstrec=101&lastrec=120>

## Future baseline

New development within the Neighbourhood Plan area has the potential to impact heritage assets and their settings through inappropriate design and layout. The Neighbourhood Plan area has a wide range of built heritage, and the range of historic contexts presents potential for a variety of negative effects from inappropriate development, including potential effects on archaeological remains.

Equally, however, new development will offer opportunities for enhancing the quality of the area's historic environment, either through regeneration of a specific asset or through improvements to an asset's setting and wider environment. Development can also offer opportunities to improve access to or better reveal the significance of a heritage asset, and improve our understanding of the historical development of the area through increased archaeological finds.

Whilst existing historic environment designations and the policies of the NPPF and Local Plan will continue to offer a degree of protection to heritage assets and their settings, non-designated or locally designated assets can be provided greater protection through the Neighbourhood Plan.

## Key issues

The following key issues emerge from the context and baseline review:

- The Neighbourhood Plan area contains two Grade I listed buildings (Richborough Castle and Church of St Nicholas), four Grade II\* listed buildings and 99 Grade II listed buildings. Many of these are located within Ash Village, particularly along The Street, and will be sensitive receptors in terms of new development in the settlement.
- There are three conservation areas within the Neighbourhood Plan area, all within or on the outskirts of the village of Ash. These are: The Street Ash, Street End Ash and Gilton Ash. These areas do not currently have conservation area appraisals to inform development in terms of the character and significance of these assets. The Neighbourhood Plan presents an opportunity to identify appropriate design standards and key features that contribute to the overall character, integrity and significance of these historic areas and their settings.
- There are three scheduled ancient monuments within the Neighbourhood Plan area: Richborough Saxon Shore fort, Roman port and associated remains, Ash Mill Anglo-Saxon cemetery and Chequer Court Medieval moated site. Development should consider appropriate archaeological investigation prior to any works on site, undertaking appropriate consultation with Historic England where necessary.
- There are a number of non-designated heritage assets present within the Neighbourhood Plan area; the significance and setting of which should be considered in, and positively impacted upon by, new development.

## Land, soil and water resources

### Context Review

Key messages from the National Planning Policy Framework<sup>57</sup> (NPPF) include planning policies and decisions should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and

<sup>57</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)



mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.

- Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- Ensure that, wherever possible, development helps to improve local environmental conditions including water quality, taking into account relevant information such as river basin management plans.

Since July 2017 the Government's Planning Practice Guidance (PPG) requires Local Planning Authorities to publish a Brownfield Land Register, and review it at least once a year, in order to identify all previously developed sites with potential for delivering new development. This is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield sites.<sup>58</sup> Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.<sup>59</sup>

The Government's 25 Year Environment Plan was published in 2018 and presents the 'goals for improving the environment within a generation and leaving it in a better state than we found it'.<sup>60</sup> The implementation of this plan aims to achieve clean air, clean and plentiful water, reduced risk from environmental hazards, and managed exposure to chemicals. Specific policies and actions relating to environmental quality include:

- Improving soil health and restoring and protecting our peatlands;
- Respecting nature in how we use water;
- Reducing pollution; and
- Maximising resource efficiency and minimising environmental impacts at end of life.

Safeguarding our Soils: A strategy for England<sup>61</sup> sets out a vision for soil use in England which includes better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

<sup>58</sup> MHCLG (2017) Guidance: Brownfield Land Registers [online] available at: <https://www.gov.uk/guidance/brownfield-land-registers>

<sup>59</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>60</sup> DEFRA (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>61</sup> DEFRA (2009) Safeguarding our Soils: A strategy for England [online] available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>



The Water Framework Directive<sup>62</sup> (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.

The Water White Paper 2011<sup>63</sup> sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The Government's Water Strategy for England<sup>64</sup> (2008) provides strategy for the water sector up until 2030, which aims to sustainably deliver secure water supplies and an improved and protected water environment. It sets out actions within the following areas:

- Water demand;
- Water supply;
- Water quality;
- Surface water drainage;
- River and coastal flooding;
- Greenhouse gas emissions;
- Charging for water; and
- Regulatory framework, competition and innovation.

Water for life<sup>65</sup> (2011) sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The South East River Basin Management Plan (updated 2018)<sup>66</sup>, sets out the current state of the water environment, pressures affecting the water environment, environmental objectives for protecting and improving the waters programme of measures, actions needed to achieve the objectives and progress since the 2009 plan. It also informs decisions on land-use planning because water and land resources are closely linked.

The Dover District Brownfield Register comprises all brownfield sites that have been assessed as appropriate for residential development after meeting initial conditions such as being capable of supporting development of five or more dwellings and being suitable and available for housing development. Two of these sites are located within the Neighbourhood Plan area.

The DDC Water Cycle Study (2009)<sup>67</sup> was prepared to identify whether there are any water-related issues that present significant obstacles to the success of development in the Dover District. Drinking water in the District is supplied wholly by groundwater sources from the underlying Chalk and the area is covered by the Stour Abstraction Licensing Strategy (2013)<sup>68</sup>.

The following policy in the Dover Adopted Core Strategy (2010) directly relates to the land, soil and water SEA theme:

- Policy DM 17: Groundwater Source Protection.

<sup>62</sup> Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy.

<sup>63</sup> Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

<sup>64</sup> Defra (2011) Future Water: the Government's Water Strategy for England [online] available at:

<https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england>

<sup>65</sup> Defra (2011) Water for life [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

<sup>66</sup> Gov UK (2018) South East River Basin Management Plan [online] available at:

<https://www.gov.uk/government/publications/south-east-river-basin-district-river-basin-management-plan>

<sup>67</sup> Dover District Council (2009) 'Water Cycle Study' [online] available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Water-Cycle-Study.pdf>

<sup>68</sup> Environment Agency (2013) 'Stour Abstraction Licensing Strategy' [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289867/LIT\\_2048\\_61c7f0.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289867/LIT_2048_61c7f0.pdf)

## Baseline review

### Current baseline

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land. In the absence of detailed local information, the national Provisional Agricultural Land Quality dataset<sup>69</sup> shows that a large proportion of the Neighbourhood Plan area is 'best and most versatile land'. The plan area comprises a mix of Grade 1 'excellent' in the western and southern areas, Grade 2 'very good' in the northern area, a strip of Grade 3 'good to moderate' in the immediate vicinity of the River Stour and a smaller pocked of Grade 3 and Grade 4 'poor' in the south-eastern corner of the Neighbourhood Plan area towards Sandwich.

Without the subset grading (3a or 3b) which would be obtained through more localised surveys, it is not possible to tell at this stage whether the Grade 3 agricultural land is considered to be 'best and most versatile'. It is also important to note that the national dataset is of very low resolution and provides an indicative rather than accurate reflection of the agricultural land quality within the Neighbourhood Plan area.

The Predictive Likelihood of Best and Most Versatile Land map<sup>70</sup> for the London and South East Region identifies the non-urban parts of the Neighbourhood Plan area as having a 'high' likelihood of best and most versatile agricultural land, with some small areas of 'moderate' likelihood of best and most versatile agricultural land adjacent to the River Stour and East Stourmouth.

The high-level review of the British Geological Survey (BGS) maps show the bedrock geology is largely the Thanet Formation (sand, silt and clay) and, towards the western plan area boundary, Lambeth Group (clay, silt, sand and gravel)<sup>71</sup>. The Thanet Formation is described as "*Glaucinite-coated, nodular flint at base, overlain by pale yellow-brown, fine-grained sand that can be clayey and glauconitic*" and Lambeth Group is described as "*Vertically and laterally variable sequences mainly of clay, some silty or sandy, with some sands and gravels, minor limestones and lignites and occasional sandstone and conglomerate*".

Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance.<sup>72</sup> In this respect, the Kent Minerals and Waste Local Plan 2013-30<sup>73</sup> identifies Sub-Alluvial River Terrace Deposits south of Ash village which are safeguarded. However, there are no active or planned mineral working sites in the Plan area.

The main watercourse flowing through the Neighbourhood Plan area is the River Stour, which at 47 miles long, flows through the northern part of the plan area. Other watercourses located within the Neighbourhood Plan area include the Richborough Stream.

The Neighbourhood Plan area is also located within the Stour catchment area, covered by the Stour Abstraction Licensing Strategy (2013)<sup>74</sup>. The licensing strategy sets out how water resources are managed in the Stour area and provides information about where water is available for further abstraction. It notes that Kent and South London is one of the driest parts of England and Wales and there are many catchments where there is little or no water available for abstraction during dry period,

<sup>69</sup> Natural England (2018) 'Agricultural Land Classification Map London and the South East' (ALC007) [online] available at: <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>

<sup>70</sup> Natural England (2017) 'Likelihood of Best and Most Versatile Agricultural Land – Strategic scale maps' [online] available at: <http://publications.naturalengland.org.uk/category/5208993007403008>

<sup>71</sup> British Geological Society (2019) Geology of Britain Viewer [online] available at: <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

<sup>72</sup> GOV.UK (2014): 'Minerals Guidance' [online] available at: <https://www.gov.uk/guidance/minerals>

<sup>73</sup> Kent County Council (2017) 'Kent Minerals and Waste Local Plan 2013-30' [online] available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1>

<sup>74</sup> Environment Agency (2013) 'Stour Abstraction Licensing Strategy' [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289867/LIT\\_2048\\_61c7f0.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289867/LIT_2048_61c7f0.pdf)

stating that “*demand from agriculture and industry, and above average household consumption all add to this pressure and affect both the water environment and fresh supplies*”.

Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency’s Catchment Data Explorer<sup>75</sup> classifies the 25 water bodies in the Stour management catchment area as ranging from ‘Bad’ to ‘Good’ ecological status (with 15 of the 25 water bodies classed as ‘Moderate’) and all have a ‘Good’ chemical status. The ‘reasons for not achieving good status’ (RNAGs) are primarily attributed to the following activities: agricultural and rural land management, water industry, domestic general public, local and central government, and industry.

South East Water manage water supplies in Dover and outline in their Water Resource Management Plan (WRMP)<sup>76</sup> both consumption efficiency measures and supply improvement measures to maintain water supply in the future as long-term forecasts currently show that there is insufficient water available to meet demand. The Plan outlines the range of demand management measures and new water supply options that could meet that shortfall in available water. In this respect, development in the Plan area should seek to maximise water efficiency in new development and ensure infrastructure capacity, which may require consideration of appropriate phasing of works to coincide with any planned upgrades.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination.

In this regard, the southernmost part of the Neighbourhood Plan area (comprising Ash village) is within the ‘Wingham River’ Surface Water NVZ. However, it is useful to note that the Neighbourhood Plan is likely to allocate land for residential/ employment development and such uses are not considered likely to increase the risk of pollution to the NVZ.

## Future baseline

Future development has the potential to affect water quality through increased consumption, diffuse pollution, waste water discharges, water run-off, and modification. Water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area. However, it will be important for new development to avoid impacts on water quality and to contribute to reducing consumption and improving efficiency.

New development within the Neighbourhood Plan area could result in losses of higher quality (best and most versatile) agricultural land. In this respect, the growth strategy of the Neighbourhood Plan should seek to minimise losses and impacts upon soil resources and maximise efficient land use.

## Key issues

The following key issues emerge from the context and baseline review:

- Greenfield development has a high potential to impact upon best and most versatile (high-quality) agricultural land resources. Development south of Ash village may also impact upon mineral resources. Consultation with Kent County Council as the mineral authority may be required.
- ‘Domestic general public’ influences on water quality in the Plan area contribute to ‘reasons for not achieving good’ ecological status. New development should ensure appropriate mitigation, including the use of Sustainable Drainage Systems, to minimise

<sup>75</sup> Environment Agency (2020): ‘Stour – Summary’, Catchment Data Explorer’ [online] available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3087/Summary>

<sup>76</sup> South East Water (2019) Water Resources Management Plan 2020 to 2080 [online] available at: <https://corporate.southeastwater.co.uk/media/2219/draft-water-resources-management-plan-2019-main-document.pdf>

impacts on water quality in the plan area and promote positive enhancements where possible.

- New development should seek to maximise water efficiency and opportunities for water harvesting and water recycling, to support the wider management aims for the catchment in maintaining future water supplies.

## Population and community

### Context review

Key messages from the National Planning Policy Framework<sup>77</sup> (NPPF) include that planning policies should:

- Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services.
- Retain and develop accessible local services and community facilities in rural areas.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Enable and support health lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Ensure that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

National Planning Practice Guidance (NPPG)<sup>78</sup> identifies that:

- Local Planning Authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.
- Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning and should be at the heart of the plan making process.
- A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community.
- Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.

The Select Committee on Public Service and Demographic Change report *Ready for Ageing?* (2013)<sup>79</sup> warns that society is underprepared for the ageing population. The report says that '*longer*

<sup>77</sup> MHCLG (2019) National Planning Policy Framework [online]  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>78</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online]  
<http://planningguidance.communities.gov.uk/>

<sup>79</sup> Select Committee on Public Service and Demographic Change (2013) *Ready for Ageing?* [online]  
<http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

*lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'.* The report says that the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.

A significant proportion of the policies within the Dover Adopted Core Strategy (2010) directly relate to the population and community SEA theme. This includes:

- Policy CP 2: Provision for Jobs and Homes between 2006 – 2026;
- Policy CP 3: Distribution of Housing Allocations;
- Policy CP 4: Housing Quality, Mix, Density and Design;
- Policy DM 2: Protection of Employment Land and Buildings;
- Policy DM 5: Provision of Affordable Housing;
- Policy DM 6: Rural Exception Affordable Housing;
- Policy DM 7: Provision for Gypsies, Travellers and Travelling Showpeople;
- Policy DM 9: Accommodation for Dependent Relatives;
- Policy DM 10: Self-contained Temporary Accommodation for Dependent Relatives
- Policy DM 23: Local Shops; and
- Policy DM 24: Retention of Rural Shops and Pubs.

## Baseline review

### Current baseline

As shown in **Table 8.1**, the population of Ash parish has increased by 8.1% in the decade from 2001. This population change is higher than the District percentage increase but roughly equivalent to regional and national levels.

**Table 8.1 Population Growth 2001-2011<sup>80</sup>**

Date	Ash	Dover	South East of England	England
2001	3,113	104,566	8,000,645	49,138,831
2011	3,365	111,674	8,634,750	53,012,456
<b>Population Change 2001-2011</b>	8.1%	6.8%	7.9%	7.9%

As shown in **Table 8.2**, there are a higher proportion of residents within the 60+ age category in the Neighbourhood Plan area (27.70%) and the District (27.53%) in comparison to the percentages for the South East of England and England. The youngest age category (0-15) is broadly similar in all the above regions. In contrast, there are fewer residents within the 16-24 age category in the Neighbourhood Plan area in comparison to the regional and national trends.

With regard to the working age categories (25-44 and 45-59) the total for the Neighbourhood Plan area (44.5%) is roughly in line with the total for Dover (44.1%) and marginally lower than the total for the South East of England (46.4%) and England (46.9%).

<sup>80</sup> ONS (no date): Census 2011: Population Density 2011; Population Density 2001, AECOM calculations

**Table 8.2 Age Structure (2011)<sup>81</sup>**

Age group	Ash	Dover	South East of England	England
<b>0-15</b>	19.41%	18.17%	19.02%	18.90%
<b>16-24</b>	8.44%	10.17%	11.22%	11.90%
<b>25-44</b>	23.24%	23.13%	26.51%	27.50%
<b>45-59</b>	21.22%	21.01%	19.88%	19.40%
<b>60+</b>	27.70%	27.53%	23.36%	22.30%
<b>Total Population</b>	3,365	111,674	8,634,750	53,012,456

Census statistics measure deprivation across four 'dimensions' of deprivation, summarised below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on the information presented in **Table 8.3**, a lower percentage of households in the Neighbourhood Plan area (52.09%) are deprived in at least 1 dimension, in comparison to the totals for Dover (33.54%), the South East of England (52.3%) and England (57.4%).

Out of the 52.09% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in either one or two dimensions, similar to the regional and national trends.

**Table 8.3: Relative household deprivation dimensions<sup>82</sup>**

	Ash	Dover	South East of England	England
<b>Household not deprived</b>	47.90%	40.37%	47.70%	42.50%
<b>Deprived in 1 dimension</b>	29.80%	33.54%	32.23%	32.70%
<b>Deprived in 2 dimensions</b>	18.24%	20.67%	16.02%	19.10%
<b>Deprived in 3 dimensions</b>	3.75%	4.92%	3.65%	5.10%
<b>Deprived in 4 dimensions</b>	0.30%	0.49%	0.39%	0.50%

<sup>81</sup> ONS (no date): Census 2011: Age Structure 2011, AECOM calculations

<sup>82</sup> ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011, AECOM calculations



The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - a. 'Geographical Barriers': relating to the physical proximity of local services.
  - b. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - c. 'Indoors Living Environment' measures the quality of housing.
  - d. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

1. Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
2. Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)<sup>83</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The Neighbourhood Plan area falls within three LSOAs: 'Dover 001A', 'Dover 001B' and 'Dover 001C'. However, a large proportion of the plan area falls within just two LSOAs, 'Dover 001A' which covers most of the western part of the Neighbourhood Plan area and 'Dover 001C' which covers much of the eastern part. LSOAs 'Dover 001B' covers a smaller part of the Neighbourhood Plan area, to the south and west of Ash village. Accordingly, LSOA 'Dover 001B' is not included in the analysis set out in **Table 8.4**. It should be noted that the LSOAs presented in Table 8.4 do not therefore cover the Neighbourhood Plan area exclusively or in its entirety.

**Table 8.4** sets out the level of deprivation by domain. It shows that the two LSOAs are within the 50% most deprived and 40% most deprived in the country for Dover 001A and Dover 001C respectively. Both LSOAs score very highly for barriers to housing and services deprivation, both falling within the 10% most deprived. For living environment deprivation, LSOA Dover 001A (covering the western part of the Neighbourhood Plan area) is within the 20% most deprived and LSOA Dover 001C (covering the eastern part) is within the 40% most deprived. Crime deprivation is relatively low for both LSOAs, within the 30% least deprived and 50% least deprived for LSOA Dover 001A and Dover 001C respectively.

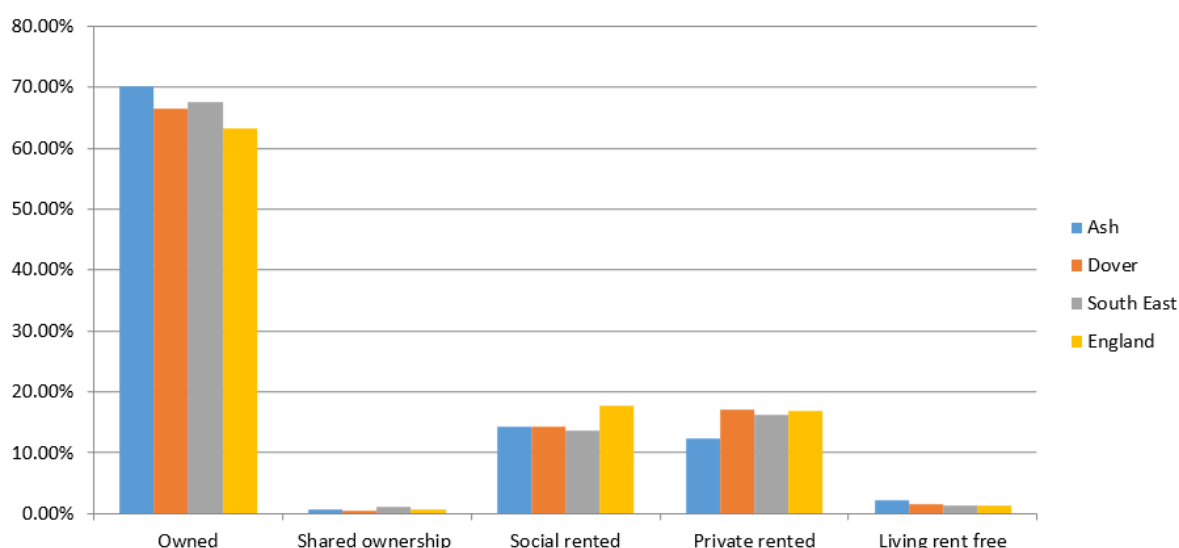
<sup>83</sup> DCLG (2019): Indices of Deprivation Explorer', [online] available at: [http://dclgapps.communities.gov.uk/imd/iod\\_index.html](http://dclgapps.communities.gov.uk/imd/iod_index.html)



**Table 8.4 Indices of Deprivation for the two main LSOAs covering the Neighbourhood Plan area<sup>84</sup>**

Domain	Dover 001A	Dover 001C
Overall IMD	50% most deprived	40% most deprived
Income Deprivation	50% least deprived	40% most deprived
Employment Deprivation	50% least deprived	40% most deprived
Education, Skills and Training	50% most deprived	50% least deprived
Health Deprivation and Disability	40% least deprived	50% most deprived
Crime	30% least deprived	50% least deprived
Barriers to Housing and Services	10% most deprived	10% most deprived
Living Environment Deprivation	20% most deprived	40% most deprived
Income Deprivation Affecting Children	50% least deprived	40% most deprived
Income Deprivation Affecting Older People	40% least deprived	50% most deprived

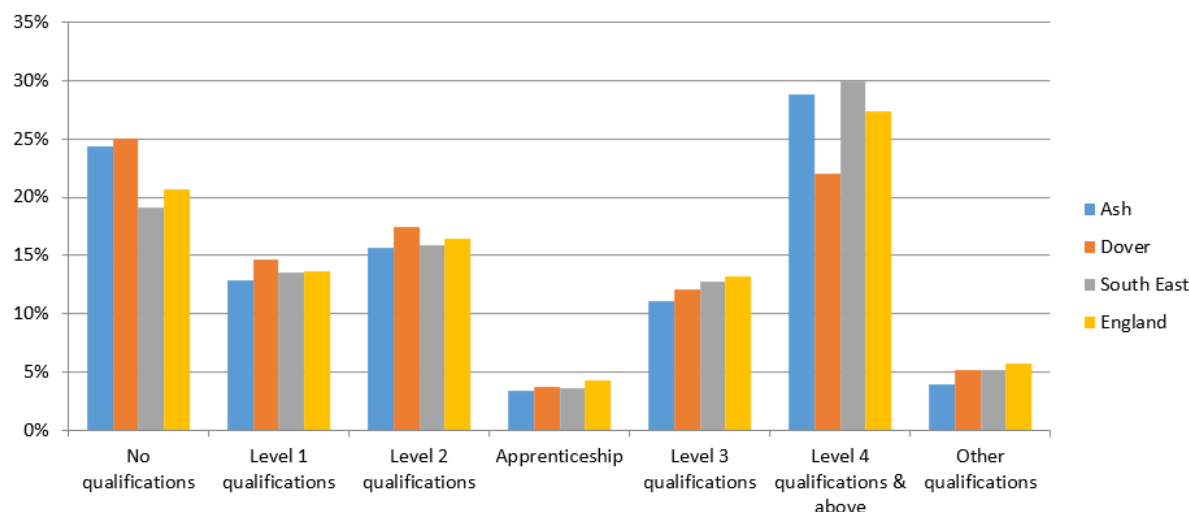
As shown in **Figure 8.1**, within the Neighbourhood Plan area, 70.3% of residents either own their home outright or with a mortgage, higher than all other comparators. The proportion of residents living in privately rented accommodation in the Neighbourhood Plan area (12.5%) is lower than the regional and national totals. Comparatively, the total percentage of residents within shared ownership accommodation or living rent free within the Neighbourhood Plan area (2.9%) is slightly higher than the total for Dover (2.2%), the South East of England (2.4%) and England (2.1%).

**Figure 8.1 Tenure by Household<sup>85</sup>**

Based on the 2011 census data, 24.4% of residents in the Neighbourhood Plan area have no qualifications (**Figure 8.2**), roughly in line with the total for Dover (25.0%) but higher than the South East of England (19.1%) and England (20.7%). The proportion of residents in the Neighbourhood Plan area that have a Level 4 qualification and above (28.8%) is higher than Dover (22.0%) but roughly equivalent to the South East of England (29.9%) and England (27.4%).

<sup>84</sup> DCLG (2019): Indices of Deprivation Explorer', [online] available at: [http://dclgapps.communities.gov.uk/imd/iod\\_index.html#](http://dclgapps.communities.gov.uk/imd/iod_index.html#)

<sup>85</sup> ONS (no date): Census 2011: Tenure-Households 2011, AECOM calculations

**Figure 8.2 Highest level of Qualification<sup>86</sup>**

Regarding employment within the Neighbourhood Plan area, **Figure 8.3** shows the following three occupation categories support the most residents:

- Professional occupations (21.0%); 17.49
- Skilled trade occupations (15.4%); and 11.36
- Managers, directors and senior officials (11.5%). 10.87

Overall, 47.9% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, higher than the totals for Dover (36.5%), the South East of England (42.1%) and England (39.7%).

31.2% of residents in the Neighbourhood Plan area are currently economically inactive, which is lower than Dover District (32.6%) but higher than the South East of England (27.9%) and England (30.1%).

**Figure 8.3 Occupation of usual residents aged 16 to 74 in employment<sup>87</sup>**

## Future baseline

As the population of the Neighbourhood Plan area continues to increase and age, this could potentially negatively impact upon the future vitality of the local community and economy of certain

<sup>86</sup> ONS (no date): Census 2011: Highest Level of Qualification 2011, AECOM calculations

<sup>87</sup> ONS (no date): Census 2011: 'Occupation 2011', AECOM calculations

parts of the Neighbourhood Plan area, whilst also placing additional pressures on existing services and facilities.

The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of delivering the right mix of housing types, tenures and sizes in suitably connected places.

## Key issues

The following key issues emerge from the context and baseline review:

- Considering an ageing population and fewer residents in the lower age ranges, it will be important for new development to contribute towards meeting the housing needs of residents, in terms of types, tenures and sizes, in well-connected and accessible locations to support the future vitality of the community.
- Deprivation in the Plan area is most pronounced in barriers to housing and services. New housing development should target local needs to reduce deprivation, and where possible, deliver new or improved community infrastructure and services to support improved accessibility.

## Health and wellbeing

### Context review

Key messages from the National Planning Policy Framework<sup>88</sup> (NPPF) include that planning policies should:

- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.

National Planning Practice Guidance (NPPG)<sup>89</sup> identifies that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Fair Society, Healthy Lives ('The Marmot Review')<sup>90</sup> investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: *"overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities"*.

<sup>88</sup> MHCLG (2019) National Planning Policy Framework [online]  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>89</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online]  
<http://planningguidance.communities.gov.uk/>

<sup>90</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online]  
<http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

The Kent Joint Health and Wellbeing Strategy (2018)<sup>91</sup> sets out a vision to “*improve health and wellbeing outcomes, deliver better coordinated quality care, improve the public’s experience of integrated health and social care services, and ensure that the individual is involved and at the heart of everything we do*”. To deliver this vision, the following outcomes are sought:

- Every child has the best start in life;
- Effective prevention of ill health by people taking greater responsibility for their health and wellbeing;
- The quality of life for people with long term conditions is enhanced and they have access to good quality care and support;
- People with mental health issues are supported to ‘live well’;
- People with dementia are assessed and treated earlier and are supported to live well.

Kent County Council have commissioned a Health Inequalities Analytical Report (2019)<sup>92</sup> which sets out areas for action in the county, including: educational and dwelling deficits (overcrowding); reduction of inequalities through earlier detection and preventative measures; interventions informed by behavioural insights; and intensification of efforts to help people stop smoking.

There are no specific policies relating to health and wellbeing in the DDC Adopted Core Policy (2010).

## Baseline review

### Current baseline

The Kent JSNA<sup>93</sup>, published in 2016 and updated annually<sup>94</sup>, identifies the current and future health and wellbeing needs of the local population. Some of the key findings are provided below:

- From 2015-17 the leading causes of premature death (considered preventable) in the Kent population for the under 75 age group are: cancer (76.9/100,000; trend decreasing), cardiovascular disease (38.6/100,000; trend decreasing), respiratory disease (18.1/100,000; trend static) and liver disease (14/100,000; trend increasing).
- Adult smoking prevalence in Kent has continued to fall, from 20.7% in 2012 to 16.3% in 2017.
- Air pollution is a significant contributor to preventable ill health and premature mortality. In 2016, 5.6% of mortality in the under 75 population in Kent was attributable to particulate air pollution, which is similar to mortality rates attributable to respiratory disease and liver disease.
- Despite a recent slight fall, suicide rates in Kent are still higher than national and regional comparators, particularly amongst men. The rates of depression co-existing with comorbidities, including anxiety, obesity, smoking, poor self-care, alcohol misuse and self-harm, are increasing.
- In 2016/17, 63% of adults in Kent were identified as having excess weight (overweight or obese) based on the Active Lives Survey, which is higher than England. The National Child Measurement Programme in 2017/18 in Kent found that 20.7% of reception aged children and 33.2% of Year 6 children had excess weight.

The Kent Health Inequalities Analytical Report (2019)<sup>95</sup> identifies that while mortality rates in Kent have been falling over the past decade, the ‘gap’ in mortality between the most deprived and least

<sup>91</sup> Kent County Council (2018) ‘Kent Joint Health and Wellbeing Strategy, Outcomes for Kent’, [online] available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf)

<sup>92</sup> Kent Public Health Observatory (2019) ‘Mind the Gap: Health Inequalities Action Plan for Kent’ Data Refresh Analytical Report March 2019, [online] available at:

<https://democracy.kent.gov.uk/documents/s90251/Mind%20The%20Gap%20Data%20Refresh.pdf>

<sup>93</sup> Kent County Council (2016) ‘Kent Joint Strategic Needs Assessment’, [online] available at: <https://www.kpho.org.uk/joint-strategic-needs-assessment/about-the-jsna/what-makes-up-the-jsna-process>

<sup>94</sup> Kent County Council (2019) ‘Kent Joint Strategic Needs Assessment (JSNA) Exceptions Report 2018/19’, [online] available at: <https://democracy.kent.gov.uk/documents/s88993/HWBB%20JSNA%20REPORT%2030012019.pdf>

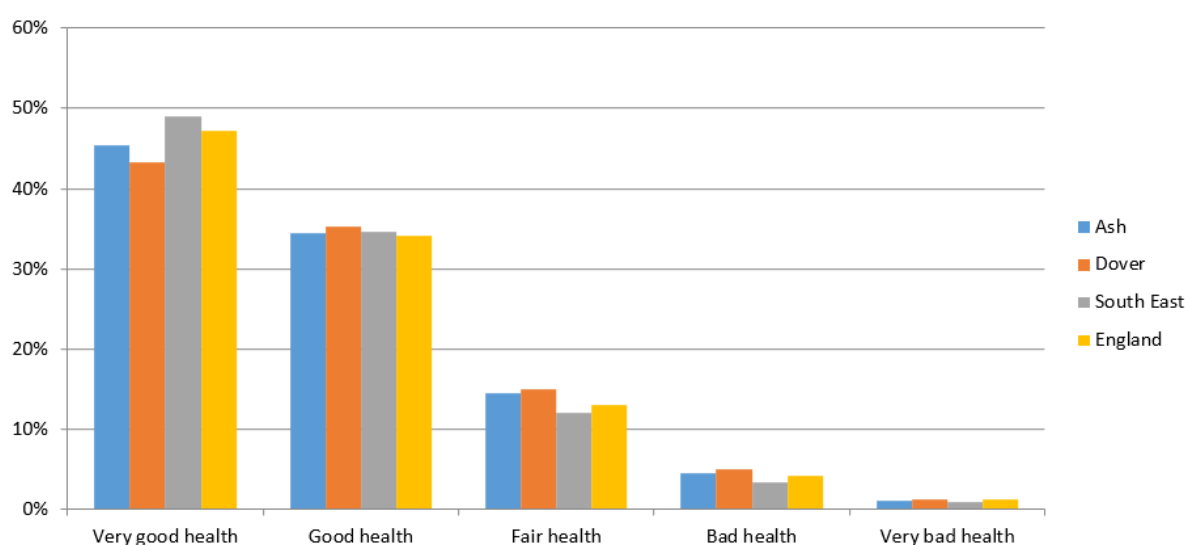
<sup>95</sup> Kent Public Health Observatory (2019) ‘Mind the Gap: Health Inequalities Action Plan for Kent’ Data Refresh Analytical Report March 2019, [online] available at: <https://democracy.kent.gov.uk/documents/s90251/Mind%20The%20Gap%20Data%20Refresh.pdf>

deprived Lower Super Output deciles has persisted with the most deprived cluster of LSOAs experiencing an additional 400 deaths per 100,000 population per year on average. The most deprived populations also have disproportionately worse premature mortality rates and life expectancy.

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in **Chapter 8**.

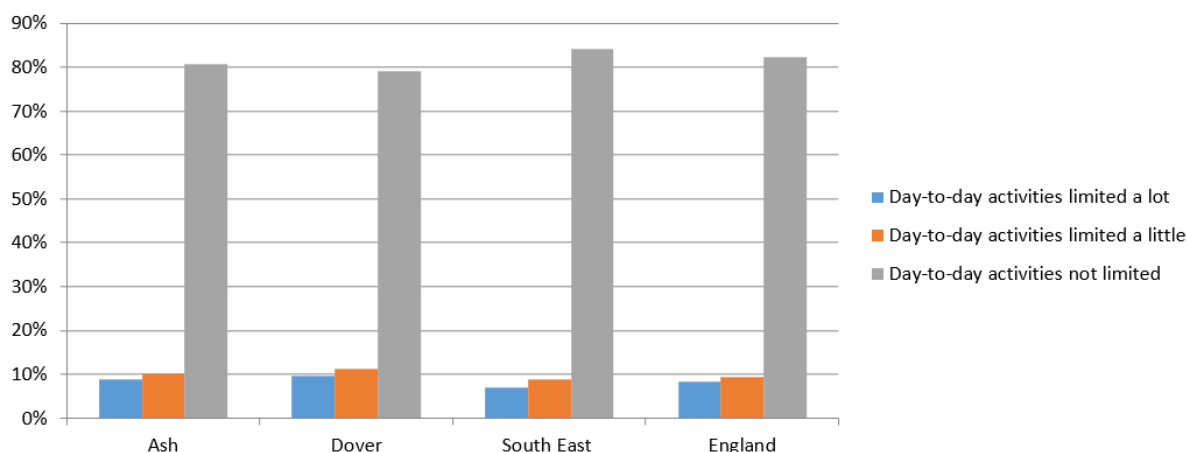
As highlighted in **Figure 9.1**, 79.9% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', which is higher than the totals for Dover (78.7%), but lower than the South East of England (83.7%) and England (81.4%). The number of residents in the Neighbourhood Plan area considering themselves to have 'bad health' or 'very bad health' is 5.6%, lower than the totals for Dover (6.3%), higher than the South East of England (4.3%) and roughly equivalent to the totals for England (5.4%).

**Figure 9.1 General Health<sup>96</sup>**

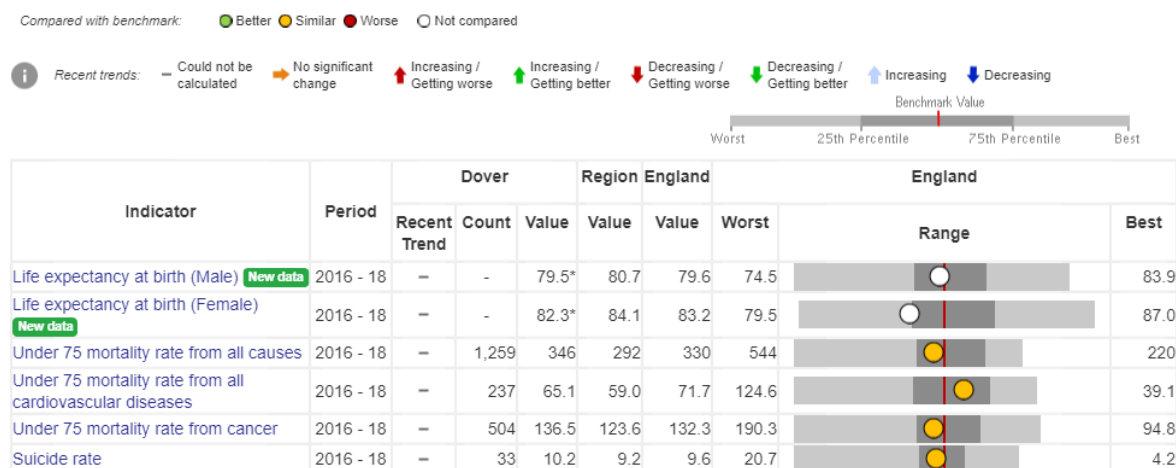


Based on the 2011 census data, the total number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' by their health (9.0%) is slightly lower than for Dover District but higher than the regional and national trends observed in **Figure 9.2**. Overall, 80.8% of residents within the Neighbourhood Plan area report that their activities are not limited, which is in line with the trends for Dover (79.2%) but lower than the South East of England (84.3%), and England (82.4%).

<sup>96</sup> ONS (no date): Census 2011: 'Health and Provision of unpaid Care 2011' (Table KS301EW)

**Figure 9.2 Disability<sup>97</sup>**

**Figure 9.3** shows that the district of Dover fares worse than the rest of the country for metrics such as life expectancy, suicide rate and under 75 mortality rate for all causes except cardiovascular diseases for the period 2016-2018.

**Figure 9.3 Dover Public Health Profile<sup>98</sup>**

\*Asterisk denotes that confidence intervals could not be calculated

## Future baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally in line with or slightly worse than regional and national trends, with a higher percentage of residents reporting 'bad health' or 'very bad health', and a higher than average proportion of residents reporting that their activities are limited in some way.

Health inequalities across Kent are getting wider, with the most recent analysis on mortality showing that whilst the rates have been falling over the last decade, the 'gap' in mortality rates between the most deprived and least deprived in Kent persists<sup>99</sup>.

An ageing population within the Neighbourhood Plan area might place future pressures on health services in the area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing over the long-term.

<sup>97</sup> ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

<sup>98</sup> Public Health England (no date) 'Local Authority Health Profiles' [online] available at:

<https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132696/pat/6/par/E12000008/ati/201/are/E07000108>

<sup>99</sup> Kent County Council (2019) 'Kent Joint Strategic Needs Assessment (JSNA) Exceptions Report 2018/19', [online] available at: <https://democracy.kent.gov.uk/documents/s88993/HWBB%20JSNA%20REPORT%2030012019.pdf>

## Key issues

The following key issues emerge from the context and baseline review:

- Planning can potentially influence some of the health indicators identified in the baseline. In particular, health outcomes relating to air quality are likely to be affected by increased development in the Plan area. The location of development in respect of its opportunities to minimise the need to travel and maximise travel by more sustainable modes of transport will be a key consideration for the Neighbourhood Plan in this respect. The promotion of active travel networks can have multiple benefits for health in terms of both air quality and physical exercise.
- Health indicators may also be influenced by the retention and enhancement of community infrastructure (including health facilities) and green infrastructure (including public open spaces and recreational areas).

## Transportation

### Context review

Key messages from the National Planning Policy Framework<sup>100</sup> (NPPF) include:

- Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
  - a. The potential impacts of development on transport networks can be addressed;
  - b. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
  - c. Opportunities to promote walking, cycling and public transport use are identified and pursued;
  - d. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
  - e. Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

National Planning Practice Guidance (NPPG)<sup>101</sup> identifies that it is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

The Transport Investment Strategy - Moving Britain Ahead (2017)<sup>102</sup> sets out the Department for Transport's approach for future investment decisions and priorities. At the local level, the strategy relies on devolved decision-making where local communities have the power and will be backed by funding. Investment aims to achieve a transport network that is reliable, well-managed, safe, and works for everyone. The transport system should also provide smooth, fast and comfortable journeys, and have the right connections in the right places.

<sup>100</sup> MHCLG (2019) National Planning Policy Framework [online] available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>101</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>102</sup> Department for Transport (2017) Transport Investment Strategy - Moving Britain Ahead [online] available at: <https://www.gov.uk/government/publications/transport-investment-strategy>



Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Kent County Council adopted its fourth Local Transport Plan (LTP4) 'Delivering Growth Without Gridlock'<sup>103</sup> in August 2017. The LTP4 sets out the county's policies to deliver strategic outcomes for transport and details the key transport priorities and longer-term transport objectives.

LTP4 sets out the following ambition for Kent in relation to transport:

*"To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported."*

It is anticipated that this ambition will be realised through five overarching policies:

- **Outcome 1: Economic growth and minimised congestion.** Policy: Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.
- **Outcome 2: Affordable and accessible door-to-door journeys.** Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.
- **Outcome 3: Safer travel.** Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.
- **Outcome 4: Enhanced environment.** Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.
- **Outcome 5: Better health and wellbeing.** Policy: Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality

Additionally, the Kent Active Travel Strategy (2018)<sup>104</sup> aims 'to make active travel an attractive and realistic choice for short journeys in Kent...by developing and promoting accessible, safer and well-planned active travel opportunities', and outlines methods to do so.

The Dover District Council & Partners Dover Transport Strategy (2007)<sup>105</sup> includes an assessment of existing and future (with LDF development) transport conditions, the identification, prioritisation and costing of transport proposals, consideration of the transport issues associated with the Whitfield Masterplan, the growth of Dover Port and an assessment of Air Quality. The 2007 document is to be replaced by an updated Strategy in 2021.

The following policies within the Dover Adopted Core Strategy (2010) directly relate to the transportation SEA theme:

- Policy CP 6: Infrastructure;
- Policy DM 11: Location of Development and Managing Travel Demand;
- Policy DM 12: Road Hierarchy and Development; and
- Policy DM 13: Parking Provision.

## Baseline review

### Current baseline

There are no railway stations within the Neighbourhood Plan area, the nearest being located in Sandwich, approximately 5km southeast of the plan area (estimated road distance from centre of Ash village), and Minster, approximately 14km north of the plan area (estimated road distance from centre of Ash village). Both stations are operated by Southeastern Railway and offer direct trains to London

<sup>103</sup> Kent County Council (2016) 'Local Transport Plan 4: Delivering Growth without Gridlock 2016–2031' [online] available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>104</sup> Kent County Council (2018): 'Active Travel Strategy' [online] available at:

<sup>105</sup> Dover District Council & Partners (2007): 'Dover Transport Strategy' [online] available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Transport-Strategy.pdf>

St Pancras International (from Sandwich) or London Charing Cross (from Minster) as well as local towns and villages.

The number 43 bus service, operated by Stagecoach, serves the village of Ash and provides residents with regular access to Canterbury, Sandwich and Wingham.

The A527 is the main road running through the Neighbourhood Plan area and providing residents with access to surrounding towns and cities. In addition, the A256 which runs partially within the south-eastern corner of the Neighbourhood Plan area, provides access to Ramsgate to the north and Dover to the south. The nearest motorway is the M2, with junction 7 located approximately 23km west of the Neighbourhood Plan area and providing access into London, and the M20 which is located south of the M2. Additionally, there is a network of smaller country roads and lanes which pass through the Neighbourhood Plan area, connecting residents to nearby settlements.

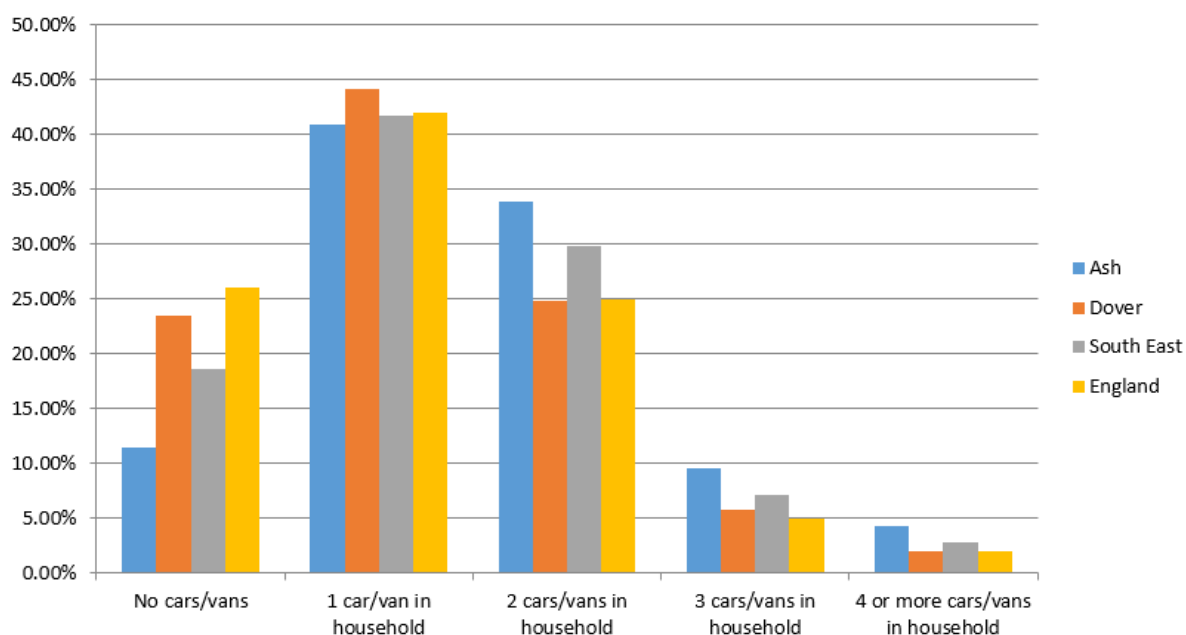
There are no airports in the Neighbourhood Plan area. Gatwick is the nearest international airport which is located approximately 100km west of the Neighbourhood Plan area, accessible via the A2 and M20.

The National Cycle Route 1 runs east-west through the Neighbourhood Plan area. Route 1 is a long-distance route covering over 2,700 km and connecting Dover in the south with the Shetland Islands to the northeast of Scotland. The Regional Cycle Route 15 runs to the east of the Neighbourhood Plan area in a north-south direction.

Immediately east of the Neighbourhood Plan area boundary is the England Coast Path Route Folkstone to Ramsgate stretch, covering a distance of 59 km. There are numerous other Public Rights of Way (PRoW) footpaths, bridleways and walking trails running through the Neighbourhood Plan area.

Based on the 2011 census data, 88.5% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for Dover (76.5%), the South East of England (81.4%) and England (74.0%). The total proportion of households in the Neighbourhood Plan area with access to two cars or vans (33.9%) is also higher than the District (24.8%), regional (29.8%) and national (25.0%) percentages. The percentage of households in the Neighbourhood Plan area with no cars or vans (11.5%) is lower than the District (23.5%), regional (18.6%) and national (26.0%). These figures are shown in **Figure 10.1**.

**Figure 10.1: 'Car and van ownership'**



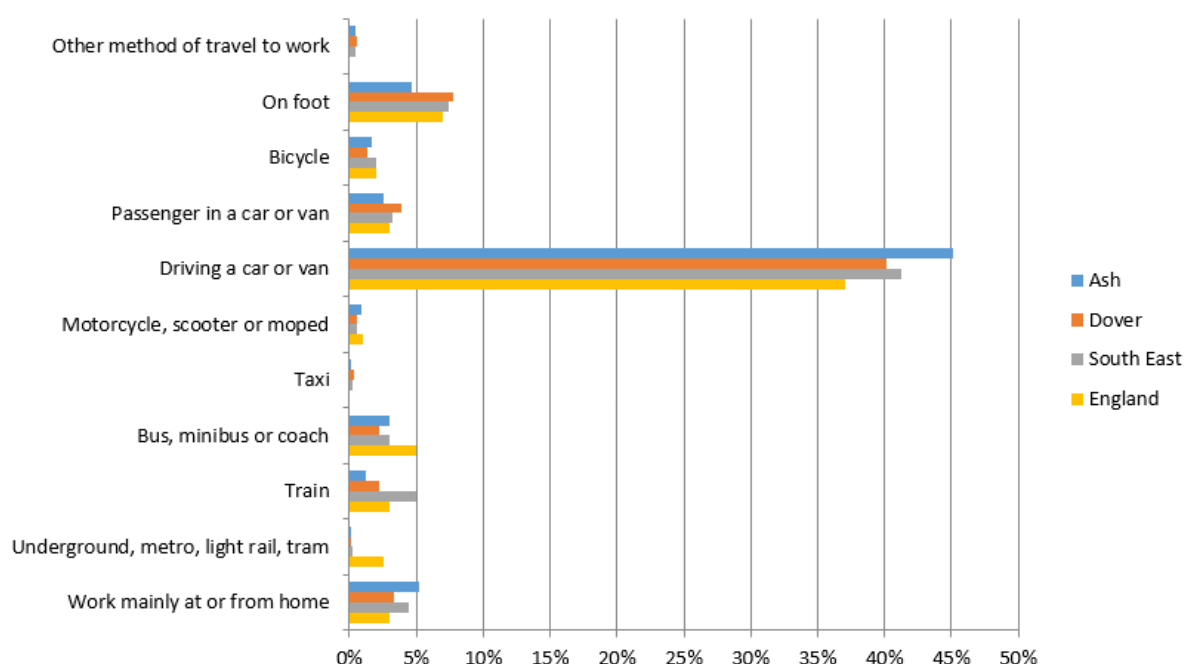
As shown in **Figure 10.2**, the most popular mode of transport to work in the Neighbourhood Plan area is driving via a car or van (45.1%). This is higher than the totals for Dover (40.2%), the South East of England (41.3%) and England (37.0%) and also reflective of the rural nature of the Plan area.

Comparatively, a higher percentage of economically active residents in the Neighbourhood Plan area choose to work from home (5.2%) in comparison to the District (3.3%), regional (4.5%) and national (3.0%) trends.

The total percentage of the working population in the Neighbourhood Plan area that travel to work on foot (4.7%) is lower than the totals for Dover (7.7%), the South East of England (7.4%), and the whole of England (7.0%).

The percentage of the working population in the Neighbourhood Plan area that travel to work by train (1.2%) is lower than the District (2.3%), regional (5.0%) and national averages (3.0%). When taking all forms of public transport into account (including bus, minibuses, coach, underground, metro, light rail, tram), public transport use in the Neighbourhood Plan area (4.4%) is lower than the District (4.6%), regional (8.2%) and national (10.6%) averages.

**Figure 10.2: 'Method of Travel to Work'**



## Future baseline

A greater proportion of residents in the Neighbourhood Plan area choose to work from home compared to regional and national trends, reflecting a national shift towards more flexible working practices. Additional residents choosing to work from home could reduce traffic and congestion on the local network, further helped by residents in the Neighbourhood Plan area that travel to work on foot. In this respect the Neighbourhood Plan can support enhancements to infrastructure that maximise active travel opportunities and opportunities to work from home.

A large proportion of the existing roads within the Neighbourhood Plan area are smaller country roads and lanes, many of which are single lane roads and unsuitable for significant increases in vehicle use. New development has the potential to increase traffic on these smaller roads within the Neighbourhood Plan area, as well as the A257 and negatively impact upon congestion and journey/travel times.

In the absence of significant strategic transport interventions (such as rail development), public transport use is likely to remain low compared with private car use; however, there is the potential for maintenance and expansion of the current bus services to connect the Neighbourhood Plan area with the surrounding area.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by the Kent County Council Local Transport Plan, there will be a continuing need for development to be situated in the most accessible locations that both minimise the need to travel and maximise opportunities to travel by more sustainable modes.

## Key issues

The following key issues emerge from the context and baseline review:

- A lack of direct rail connections and limited bus services make new development likely to continue trends of an increased reliance on private vehicle use. It will be important in this respect to deliver a growth strategy that both minimises the need to travel to access day-to-day needs, and maximises opportunities to travel by more sustainable modes of transport, including active travel networks.
- With a large proportion of smaller roads in the Plan area, it will be important for development to consider its impacts on local road capacity, and deliver the necessary infrastructure upgrades required to accommodate growth.
- Opportunities to connect development with National and Regional Cycle Routes should be maximised.

