Agenda Item No:	
Report To:	Cabinet
Date of Meeting:	31 July 2025
Report Title:	Draft Regulation 18 (Reg 18) Local Plan for Consultation
Report Author: **Job Title:**	Daniel Carter Spatial Planning Manager
Portfolio Holder: **Portfolio Holder for:**	Cllr. Harman Planning, Housing Delivery & Communication

Summary:	The first formal stage of the Local Plan process is the preparation of a Regulation 18 document which sets out the Council's direction of travel on several strategic issues, such as housing, economic development and the environment. The Regulation 18 Local Plan has been prepared and is presented to Cabinet for agreement to undertake an 8 week public consultation commencing in August 2025.

Key Decision:	YES
Significantly Affected Wards:	All wards
Recommendations:	**The Cabinet is recommended to:-** **I. Agree the contents of the Regulation 18 Local Plan, subject to (III) below;** **II. Subject to (III) below, agree the Regulation 18 Local Plan be subject to a 8 week public consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.** **III. Delegate authority to the Assistant Director – Planning & Development in consultation with the Portfolio Holder for Planning, Housing Delivery & Communication to make any necessary corrections, clarifications, minor textual changes or formatting changes to the Regulation 18 Local Plan and its maps/plans/diagrams, prior to its publication.**
Policy Overview:	The statutory Development Plan for the Borough does not change as a result of the production/publication of this Reg. 18 Local Plan. Nor does it contain any fully-drafted draft policies. Following the Cabinet's agreement to the Regulation 18 Local Plan, the Policy Intentions and Policy Ambitions contained within it will, where appropriate, assume very limited weight in decision-making for Development Management purposes, but not such as to displace, on their

	own, the policies of the statutory development plan. Such weight will increase in the future throughout the new plan making process.
Financial Implications:	Preparation of a Local Plan requires significant funds and resources. This relates to the key stages of production of the Local Plan 2042, including the need to produce evidence to justify the emerging policy approach. For the Regulation 18 Local Plan, evidence work to support the emerging policy approach has been commissioned, where required. For the consultation element, officers will seek to manage costs to be economical whilst ensuring that the consultation remains far-reaching, engaging and effective.
Legal Implications: *Text agreed by Principal Solicitor – Strategic Development on 23 July 2025*	Local Plans must be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), the Council's published Local Development Scheme 2024, and The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). Consideration must also be given to the Council's adopted Statement of Community Involvement 2023 and any consultation carried out in accordance with it. As noted in the report there is scope for considerable future change in plan making arising from secondary legislation pursuant to the Levelling Up and Regeneration Act 2023 and also the Planning and Infrastructure Bill 2025. Future iterations of the Local Plan 2042 will need to be in accordance with any updated legislation in force at the time.
Equalities Impact Assessment:	See attached.
Data Protection Impact Assessment:	None.
Risk Assessment (Risk Appetite Statement):	The risk of not preparing a Regulation 18 Local Plan is that local communities, interested parties and key stakeholders will remain unclear about the Council's intended direction of travel for the new Local Plan. The Regulation 18 Local Plan removes this lack of clarity and provides an up-to-date position. Given the scope and nature of plan making, there are always risks to the preparation of a Local Plan. The content of the Regulation 18 Local Plan respects these risks and is based upon what is considered to be the most realistic pathway that can be pursued under the current planning regime, taking into account proposed parameters of the new planning system (where known) through the proposed Planning &

	Infrastructure Bill and the enacted Levelling Up and Regeneration Act (LURA). Secondary legislation to the LURA is yet to be issued by Government and the Planning & Infrastructure Bill is currently progressing through the legislative process. As such there is a risk that the preparation of a new Local Plan may be impacted upon by the introduction of further legislation. However, the alternative would be to not proceed with drafting a new Local Plan, which would have unfavourable consequences on decision making within the borough. More widely, there is a risk that further national planning reforms (i.e. the introduction of National Development Management Policies) will change the way Local Plans are prepared in the future, and these changes will be introduced into future stages of work before any revised Local Plan is adopted.
Sustainability Implications:	The Regulation 18 version of the Local Plan 2042 has been prepared with the objective of contributing to the achievement of sustainable development.
Other Material Implications:	None
Exempt from Publication:	**NO**
Background Papers:	Appendix 1: Draft Regulation 18 Local Plan
Contact:	Daniel.carter@ashford.gov.uk – Tel: (01233) 330238

Agenda Item No.

Report Title: Draft Regulation 18 (Reg 18) Local Plan for Consultation

Introduction and Background

1. The Local Plan is fundamental to delivering a number of council priorities including those at the heart of the Borough Plan 2024 – 2028.

2. The Ashford Local Plan 2030 was adopted in 2019 and sets the decision making framework for determining planning applications in the borough. Now that the Local Plan 2030 is more than 5 years old, a new Local Plan is being developed.

3. The emerging Local Plan will cover the period 2024 – 2042 and will cover a range of issues such as housing, employment and economic development and the environment. The new Local Plan will also be able to address important issues that have arisen since the last Local Plan, such as Biodiversity Net Gain and nutrient neutrality.

4. The Council has reached the first formal consultation stage of plan making known as Regulation 18. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Local Planning Authority to consult residents and specific consultation bodies on the subject of the Local Plan and invite them to make comments on what the Local Plan ought to contain.

Proposal

5. The purpose of this report is to set out the Council's proposed approach as detailed in the Regulation 18 Local Plan (Appendix 1) and to recommend that Cabinet agrees to a public consultation on the document for a period of 8 weeks commencing in August 2025.

Scope of the Regulation 18 Local Plan

6. The Local Plan regulations do not define the scope of a Regulation 18 Local Plan. The document can contain information, policy directions and draft planning policies on a range of planning issues. The level of detail within a Regulation 18 Local Plan is therefore at the discretion of the Local Planning Authority.

7. The Council is currently at an early stage of plan-making. It should be recognised that plan-making is an iterative process, which is informed by consultation with the community and stakeholders, as well as considering changes to the planning system and national planning policy.

8. The Regulation 18 process provides the opportunity for a 'touch point' with the community to seek comments about the Council's proposed direction of travel to help inform future work on the Local Plan. Outcomes from the consultation

will then help to shape the Council's approach within the later stages of the Local Plan.

9. For clarity, the regulation 18 consultation is limited to seeking views on what the emerging Local Plan should contain. It does not adopt new planning policies at this stage. This will not happen until later stages of the Local Plan, once the emerging Local Plan has undergone an examination by the Planning Inspectorate.

10. This Regulation 18 Local Plan, included in Appendix 1, shall set out a hybrid approach to planning for development in the borough. For a number of planning issues, the Regulation 18 Local Plan will establish broad principles, expressed as Policy Intentions. Elsewhere the Regulation 18 Local Plan will be framed around a favoured 'direction of travel', expressed as Policy Ambitions.

Policy Intentions

11. The Policy Intentions will set out the Council's desired approach towards a number of strategic matters by establishing principles for the emerging Local Plan.

12. The Regulation 18 Local Plan identifies the overall housing target that will need to be met in the period 2024 – 2042. The housing target has been derived from the Standard Method prepared by Government.

13. Five key spatial character areas within the borough have also been identified (Ashford Town Centre, Ashford Urban Area, Edge of Ashford, Tenterden, and the Villages). Identifying the key spatial character areas has helped to express the Council's proposed housing strategy, which focuses development upon Ashford.

14. For the Ashford Town Centre and Tenterden, a more detailed policy intention has been expressed. In these areas, specific housing targets and sites have been identified for housing growth. For the remaining character areas, a broad housing range has been identified and the Regulation 18 Local Plan sets out the favoured direction of travel.

15. Gypsy and Traveller accommodation is also included as a Policy Intention in the Regulation 18 Local Plan. The Regulation 18 Local Plan identifies the need for Gypsy and Traveller accommodation during the plan period and establishes the broad strategy for meeting these needs.

Policy Ambitions

16. The Policy Ambitions will set out the Council's direction of travel on a number of strategic matters that will be further explored at later stages of the plan making process.

17. For issues such as employment, economic development, retail, leisure, sports and recreation the Regulation 18 Local Plan will signpost the role that these uses shall play to support the housing growth envisaged.

18. The Regulation 18 Local Plan addresses infrastructure and developer contributions (collected through Section 106 legal agreements) by signposting the role these are intended to play to meet the demands of new development. The Regulation 18 Local Plan will also pick up on the role that the Community Infrastructure Levy (CIL) might play in the future Local Plan.

19. The Regulation 18 Local Plan also reviews and signposts the Council's proposed direction of travel on a number of topic based policies including climate change, green corridors/buffers and Biodiversity Net Gain.

Impact of planning reforms

20. The planning system is currently in a state of flux as Government continues to introduce a series of planning reforms. Government has stated its intention to introduce a new plan making system from autumn 2025 as well as the introduction of National Development Management Policies.

21. The Planning & Infrastructure Bill is currently progressing through Parliament. Proposals within the Bill could impact on the Council's direction of travel on a number of planning issues that have been included within the Regulation 18 Local Plan. The Council's strategic approach to these issues, such as nutrient neutrality, may therefore need to be revised in line with the legislative requirements at later plan-making stages (e.g. after this Regulation 18 consultation).

22. Secondary legislation to the Levelling Up and Regeneration Act (LURA) is also awaited. Government has indicated that this would be introduced this year and will include amendments to the plan making system, such as timescales for Local Plan preparation and the introduction of National Development Management Policies.

23. As such there is a risk that the preparation of the emerging Local Plan may be impacted upon by the introduction of further legislation. However, the timescales for introducing the legislation and changes to the planning system are currently unknown (anticipated to be sometime this year). The alternative would be to not proceed with drafting a new Local Plan, which would have unfavourable consequences on decision making within the borough and would not provide the community with clarity about the Council's proposed direction of travel for the emerging Local Plan.

Equalities Impact Assessment

24. Members are referred to the attached Assessment.

Consultation Undertaken

25. During the summer of 2024 the Council held a series of community engagement events on the emerging Local Plan entitled 'Our Local Plan Explained'. These events were held to engage the community at the earliest stage of the Local Plan so that the community could find out what the Local Plan is, how to get involved and to understand the plan-making process. The outcomes of the events have helped to inform the Regulation 18 Local Plan.

26. Preparation of the Regulation 18 Local Plan has been undertaken through discussions with the Local Plan and Planning Policy Task Group (LPPPTG). The full working draft of the Regulation 18 Local Plan was presented to the 16 July 2025 meeting of the Local Plan & Planning Policy Task Group (LPPPTG) meeting where the Task Group agreed to broadly endorse and recommend that Regulation 18 Local Plan to Cabinet for agreement and publication for an 8-week period of consultation commencing in August 2025, subject to comments made at the LPPPTG meeting and to changes made by the Assistant Director Planning & Development in consultation with the Portfolio-Holder for Planning, Housing Delivery and Communication. The Notes of that meeting will be brought to Cabinet in due course.

Consultation Planned

27. The Council's Local Development Scheme 2024 commits the Council to a Regulation 18 Local Plan consultation period of eight weeks.

28. The consultation will take place through the Council's online consultation portal and hard copies of the Regulation 18 Local Plan (and supporting evidence base) will be available to view at a number of document viewing locations, including at libraries and the Council's offices.

29. A series of exhibition events will also be held in various venues across the borough to provide residents with the opportunity to 'drop-in' and find out more about the Regulation 18 consultation. Officers from the Plan Making & Infrastructure Team will also be at the sessions to help answer any questions about the Local Plan process.

30. The consultation proposed will be undertaken in accordance with the Council's adopted Statement of Community Involvement.

Other Options Considered

31. The other main option would be not to consult on the draft Local Plan until further work and evidence has been undertaken by the Council to refine the Council's proposed Local Plan and to consult on a more definitive approach, e.g. a complete set of planning policies.

32. Also, some Local Planning Authorities have recently taken the decision to pause their plan making pending further clarification on the national planning reforms. Advice from Government and the Planning Inspectorate has always been to keep plans up to date using the best information and guidance available at the time.

33. It is considered for successful community engagement, which helps to inform the Local Plan, that residents should be able to interact with the Local Plan process in a meaningful way at the earliest stage. Consulting on the Regulation 18 Local Plan at this early formative stage will help to develop a Local Plan which takes into account residents' views and establishes a sustainable vision for the growth in the borough. Delaying the Regulation 18 consultation would limit public interaction with the Local Plan process until later which is not in line with Government intentions to increase community engagement in the plan-making process.

34. It should be noted that undertaking the consultation now does not preclude the Council from undertaking further 'Regulation 18 consultations' in due course, if it wishes to do so. There is no set maximum number of Regulation 18 consultations which may be undertaken during the plan-making process.

35. On this basis, it is recommended that the Regulation 18 Local Plan is agreed and subject to a public consultation.

Reasons for Supporting Option Recommended

36. Consulting on the Regulation 18 Local Plan now is recommended to provide the community with the opportunity to be involved in the plan-making process as early as possible. It also demonstrates that the Council is continuing to work hard to prepare its emerging Local Plan, despite planning reforms and local government reorganisation.

37. The Regulation 18 Local Plan can also help to set out and indicate the Council's likely direction of travel for important issues that have arisen since the Local Plan was adopted in 2019. This includes issues such as those associated with nutrient neutrality at Stodmarsh Lakes and the implications of the Environment Act 2021/Biodiversity Net Gain. It also provides an opportunity to refresh the policy approach for Gypsy and Traveller accommodation. Providing this clarity for the market will help to steer and shape growth within the borough in a sustainable manner.

38. Therefore, it is recommended that the Cabinet agree to the contents of the Regulation 18 Local Plan and that it is subject to a public consultation.

Next Steps in Process

39. Subject to Cabinet's agreement, the Regulation 18 Local Plan will be made available for public consultation starting in August 2025 for a period of 8 weeks.

40. After the close of the consultation, the comments received will be reviewed and where appropriate, will help to inform and help guide the Council's work to prepare the emerging Local Plan.

Conclusion

41. A Regulation 18 Local Plan has been prepared to set out the Council's intended direction of travel for a number of planning issues that will need to be addressed in the Council's emerging Local Plan. The Regulation 18 Local Plan is the first formal stage of the plan making process and will provide residents and key stakeholders with the opportunity to inform the Council as to what they consider the Local Plan should contain.

42. Subject to Cabinet's approval, the Regulation 18 Local Plan will be subject to a public consultation of 8 weeks, commencing in August 2025.

Portfolio Holder's Views

43. This draft Local Plan sets out the Council's direction of travel on a number of key planning matters and will be the first formal stage of the Local Plan process to seek residents' views on the new Local Plan. Everyone is affected by planning so it's important that we give residents and organisations in the borough an opportunity to have their say and to help shape our Local Plan.

Contact and Email

44. Daniel Carter – Spatial Planning Manager – Daniel.carter@ashford.gov.uk

Equality Impact Assessment

1. An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in its decision-making. Although there is no legal duty to produce an EIA, the Council must have **due regard** to the equality duty and an EIA is recognised as the best method of fulfilling that duty. It can assist the Council in making a judgment as to whether a policy or other decision will have unintended negative consequences for certain people and help maximise the positive impacts of policy change. An EIA can lead to one of four consequences:

   (a) No major change – the policy or other decision is robust with no potential for discrimination or adverse impact. Opportunities to promote equality have been taken;

   (b) Adjust the policy or decision to remove barriers or better promote equality as identified in the EIA;

   (c) Continue the policy – if the EIA identifies potential for adverse impact, set out compelling justification for continuing;

   (d) Stop and remove the policy where actual or potential unlawful discrimination is identified.

Public sector equality duty

2. The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:

   (a) Eliminate discrimination, harassment and victimisation;

   (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

   (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).

3. These are known as the three aims of the general equality duty.

Protected characteristics

4. The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:

   - Age
   - Disability
   - Gender reassignment
   - Marriage and civil partnership*
   - Pregnancy and maternity
   - Race
   - Religion or belief
   - Sex
   - Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

Due regard

5. Having ‘due regard’ is about using good equality information and analysis at the right time as part of decision-making procedures.

6. To ‘have due regard’ means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations. This can involve:

   - removing or minimising disadvantages suffered by people due to their protected characteristics.
   - taking steps to meet the needs of people with certain protected characteristics when these are different from the needs of other people.
   - encouraging people with certain protected characteristics to participate in public life or in other activities where it is disproportionately low.

7. How much regard is ‘due’ will depend on the circumstances The greater the

potential impact, the higher the regard required by the duty. Examples of functions and decisions likely to engage the duty include: policy decisions, budget decisions, public appointments, service provision, statutory discretion, decisions on individuals, employing staff and procurement of goods and services.

8. In terms of timing:

    - Having 'due regard' should be considered at the inception of any decision or proposed policy or service development or change.

    - Due regard should be considered throughout development of a decision. Notes shall be taken and kept on file as to how due regard has been had to the equality duty in research, meetings, project teams, consultations etc.

    - The completion of the EIA is a way of effectively summarising this and it should inform final decision-making.

Armed Forces Community

9. As part of the council's commitment to the Armed Forces Community made through the signing of the Armed Forces Covenant the council's Cabinet agreed in November 2017 that potential impacts on the Armed Forces Community should be considered as part of the Equality Impact Assessment process.

10. Accordingly, due regard should also be had throughout the decision making process to potential impacts on the groups covered by the Armed Forces Covenant:

    - Current serving members of the Armed Forces (both Regular and Reserve)

    - Former serving members of the Armed Forces (both Regular and Reserve)

    - The families of current and former Armed Forces personnel.

Case law principles

11. A number of principles have been established by the courts in relation to the equality duty and due regard:

    - Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty and so EIA's must be attached to any relevant committee reports.

    - Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.

- A public authority cannot satisfy the duty by justifying a decision after it has been taken.

- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.

- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.

- The duty is a continuing one so that it needs to be considered not only when a policy, for example, is being developed and agreed but also when it is implemented.

- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.

- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.

- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

The Equality and Human Rights Commission has produced helpful guidance on "Meeting the Equality Duty in Policy and Decision-Making" (October 2014). It is available on the following link and report authors should read and follow this when developing or reporting on proposals for policy or

service development or change and other decisions likely to engage the equality duty. *Equality Duty in decision-making*

Lead officer:	Daniel Carter
Decision maker:	Cabinet
Decision: • Policy, project, service, contract • Review, change, new, stop	To agree the draft Local Plan 2042 (Regulation 18) for public consultation.
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	31 July 2025
Summary of the proposed decision: • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected?	If the Cabinet agrees, the draft Ashford Local Plan 2042 will be subject to an 8-week public consultation in accordance with Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations 2012. Regulation 18 marks the initial stage in the plan making process. The draft Plan will set out the Council's intended 'direction of travel' and seek feedback on potential strategic development options and development management policies. The outcome of the consultation will help to further shape the preparation of the Local Plan – which will guide decisions on future planning applications and related matters by providing an up-to-date planning framework. The draft Local Plan 2042 will be subject to further rounds of consultation prior to its submission to the Planning Inspectorate for public examination. The approval of the draft Local Plan and the subsequent consultation will affect the population borough-wide.
Information and research: • Outline the information and research that has informed the decision. • Include sources and key findings.	The Local Plan's preparation will be based on an extensive range of evidence and research that ensures that it meets both the legal compliance and 'soundness' (i.e. positively prepared, justified, effective and consistent with national policy) tests. To date, evidence base documents including the Strategic Housing Market Assessment (SHMA), Sustainability Appraisal (SA) and Gypsy and Traveller Accommodation Assessment (GTAA), have all influenced the drafting of the Local Plan to some extent.
Consultation: • What specific consultation has occurred on this decision? • What were the results of the consultation? • Did the consultation analysis reveal any difference in views	There have been ongoing discussions with the Local Plan & Planning Policy Task Group to shape the content of the draft Local Plan. In summer 2024, the council ran a series of informal community engagement events (Our Local Plan Explained) to seek the views of residents on the topics that the Local Plan should address. A separate background document summarises the key issues identified and the Council's response. The difference in views of those with protected

across the protected characteristics? • What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics?	characteristics was not analysed as part of the response to representations process. The approval of the decision will result in a public consultation, which is proposed to run from mid-August for eight weeks. The council will hold the consultation in accordance with the published Statement of Community Involvement (SCI). The approval of the decision will have no differential impact on people with different protected characteristics.

Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Protected characteristic	**Relevance to Decision** High/Medium/Low/None	**Impact of Decision** **Positive** (Major/Minor) **Negative** (Major/Minor) **Neutral**
AGE Elderly	Low	Positive
Middle age	Low	Positive
Young adult	Low	Positive
Children	Low	Positive
DISABILITY Physical	Low	Positive
Mental	Low	Positive
Sensory	Low	Positive
GENDER RE-ASSIGNMENT	Low	Positive
MARRIAGE/CIVIL PARTNERSHIP	Low	Positive
PREGNANCY/MATERNITY	Low	Positive
RACE	Low	Positive
RELIGION OR BELIEF	Low	Positive
SEX Men	Low	Positive
Women	Low	Positive

SEXUAL ORIENTATION	Low	Positive
ARMED FORCES COMMUNITY Regular/Reserve personnel	Low	Positive
Former service personnel	Low	Positive
Service families	Low	Positive

Mitigating negative impact: Where any negative impact has been identified, outline the measures taken to mitigate against it.	N/A

Is the decision relevant to the aims of the equality duty?

Guidance on the aims can be found in the EHRC's *Essential Guide*, alongside fuller *PSED Technical Guidance*.

Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	N/A
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	N/A
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	N/A

Conclusion: • Consider how due regard has been had to the equality duty, from start to finish. • There should be no unlawful discrimination arising from the decision (see guidance above). • Advise on whether the proposal meets the aims of the equality duty or whether adjustments have been made or need to be made or whether any	Due regard has been made to the equality duty throughout the preparation of the current stage of the Ashford Local Plan 2042. The proposal meets the aims of the equality duty as all sections of the community, including those with protected characteristics, will have the opportunity to comment on the draft Local Plan during all stages of its preparation. The planning department is committed to ensuring that everyone is able to comment on plans that may have an impact on them, which is reiterated in the Statement of Community Involvement (SCI). The outcome of the consultation proposed as part of the decision will help to inform and prepare the next iteration of the Local Plan which will be further subject to public consultation and Examination in Public. The monitoring of the policies, procedures and decisions and their implementation will be reported in the annual Authority Monitoring Report.

residual impacts are justified. • How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported?	
EIA completion date:	16 July 2025

Draft Ashford Local Plan 2042 – Regulation 18 consultation

Ashford Borough Council

Contents

CHAPTER 1 INTRODUCTION

1.1 What is a Local Plan?

1.1.1 A Local Plan is a key strategic planning document that sets out the vision and framework for the future growth of the borough. It forms part of the wider Development Plan, which includes the Minerals and Waste Local Plan (prepared by Kent County Council), and any made Neighbourhood Plans (prepared by Parish/Town Councils and Neighbourhood Planning Forums).

1.1.2 Ashford Borough Council is the Local Planning Authority for the area and is required to prepare a Local Plan and keep it up to date. It provides a series of policies that are used to guide decisions on planning applications and the future development of housing, employment, community facilities and infrastructure, alongside other topics, including the natural and historic environment and mitigating climate change.

1.1.3 The Council's most recent Local Plan is called the Local Plan 2030 and was adopted in February 2019. The Local Plan 2030 covers the whole area of the borough, apart from the area covered by the Chilmington Green Area Action Plan (2013) – see below. It covers the period up to 2030.

1.1.4 The Local Plan 2042 is an opportunity to refresh the current version, incorporate new policies to reflect changes in the national planning framework and shape the borough over the new plan period of 2024 – 2042, setting out where development should be, the type of development needed as well as identifying areas that need to be protected.

1.1.5 Work has begun in the form of evidence gathering, liaising with neighbouring Local Authorities and infrastructure providers and informal engagement with local communities, which took place last summer.

1.1.6 This document is a first, early draft of the new Local Plan to be subject to formal public consultation to invite views on the direction of travel. It is important to note that much of the evidence and detailed policies will come later in the process. This draft iteration of the Local Plan 2042 shows the Council's initial thoughts. There will be further opportunities to have your say as the Local Plan progresses, and the detail is refined.

1.1.7 This draft iteration of the Local Plan, in large part, takes stock of what has happened since the current plan was adopted in 2019. Inevitably some of the assumptions that were made while that plan was being prepared have changed due to factors beyond the Local Planning Authority's control, for example, the Covid-19 Pandemic in 2020/21. This document provides an opportunity to consider the impacts of these changes, the likelihood of further changes ahead (such as the Government's National Planning Reforms) and invite you to share your views and priorities for this next Local Plan up to the year 2042. In this way, the briefs for the additional evidence can be informed by this

process and the technical work can be more focused on the emerging strategies, policies and plans in a more efficient and effective way.

1.1.8 There remains a significant amount of uncertainty about how and what a Local Plan will cover in future and to commission all the evidence now would risk abortive work, further, it would not demonstrate best value for money. This incremental approach to the evidence base is more transparent and interactive, benefiting from the comments that the Council receive and ensuring that vital information and data that the Council will rely on at examination is more up to date and relevant.

1.2 What is a Regulation 18 version of a Local Plan?

1.2.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the key stages for preparing a Local Plan. Regulation 18 requires the Local Planning Authority to consult on the subject of the Local Plan that is being prepared, notify all the relevant persons and bodies and invite representations, which will be taken into account in subsequent iterations. There can be more than one Regulation 18 version and consultation.

1.2.2 This Regulation 18 Local Plan is a draft plan, being produced at an early stage of an iterative process. There are two main policy approaches being advocated at this stage. These are:

Policy Intentions

Policy intentions have a deliberate and targeted focus. Their purpose is to inform stakeholders of the policy areas that the Council intends to deliver. They shall be refined as part of the next iteration of the Local Plan. Elements may change, for example, in response to national context, or further evidence, but the underlying principles are likely to remain.

Policy Ambitions

Policy ambitions are emerging policy areas. The Council are sharing these ambitions at an early stage of plan making to seek feedback through the consultation process. The Council shall undertake further evidence to justify and determine how these policies might be delivered through the next iteration of the Local Plan.

1.2.3 This Regulation 18 consultation is a chance to share your views on what you think should be included in the Plan and any issues you think need to be addressed. Everyone can be affected by development, across the borough, so it is important that you are involved in the preparation of the Plan.

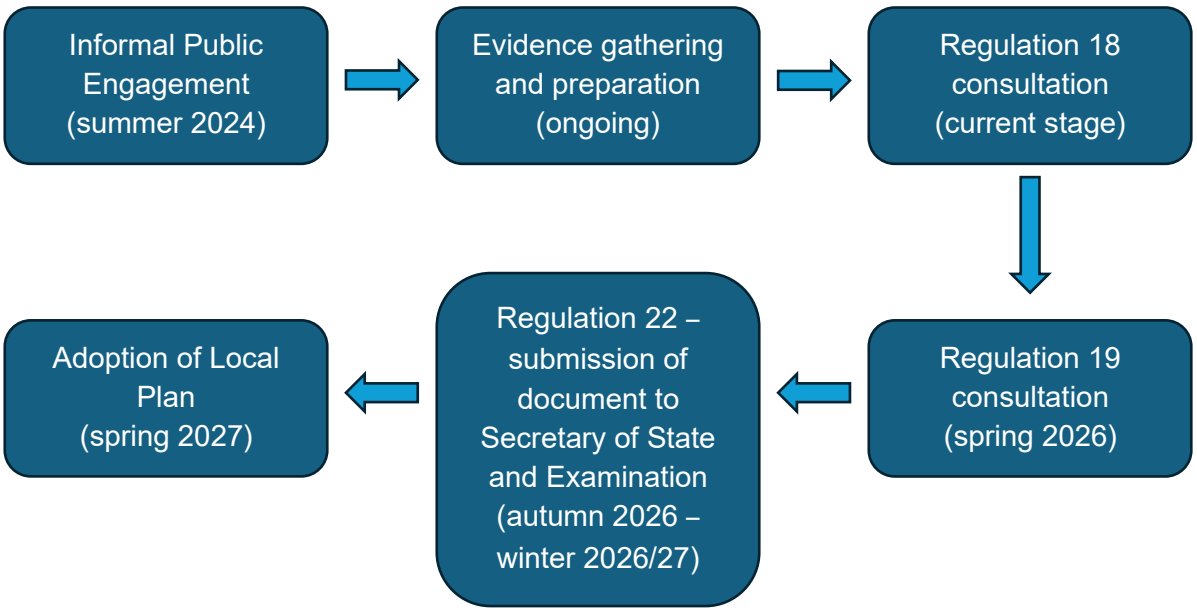
1.2.4 To comment on the Regulation 18 Plan, please use the following link [**insert link**]. The Regulation 18 version of the Local Plan can be found at [**insert webpage**]. The deadline for comments is [**insert date**].

1.2.5 Ashford Borough Council will carefully consider the representations made and take these into account in the next iteration of the Local Plan. This will form the basis of a further Regulation 18 consultation before moving to the Regulation 19 Pre-Submission version, which will be a final draft. The Regulation 19 Pre-Submission version shall also be subject to a public consultation exercise prior to submitting the plan to the Secretary of State for examination.

1.3 Timescale of this Local Plan

1.3.1 Producing the Local Plan is an iterative process and requires co-operation with numerous statutory bodies and stakeholders. This is the first formal consultation stage and opportunity for early engagement in preparation of the Plan. There will be subsequent consultations at different stages as the Plan progresses, where interested parties will be able to share if they agree or disagree with the approach and will be able to make suggestions to improve the Plan. In preparing the Plan, the Council will work with neighbouring authorities and relevant bodies to ensure that strategic and cross-boundary issues are addressed.

1.3.2 The diagram below illustrates the current timeline for producing the Local Plan. The Ashford Local Development Scheme also provides further information and details on the timetable for the Local Plan.



1.4 What will this Local Plan cover?

1.4.1 The current Local Plan covers the whole of Ashford borough except for the area covered by the Chilmington Green Area Action Plan, which was adopted as a separate Development Plan Document (DPD) in 2013. The Chilmington Green Area Action Plan was reviewed in September 2018 and this review concluded that there was no conflict with the National Planning Policy Framework (NPPF) at that time and therefore no revisions were needed.

1.4.2 There have been a number of national planning reforms since 2018 including various further revisions to the NPPF. The preparation of the new Local Plan provides an opportunity to review the Chilmington Green Area Action Plan once more. The Council's current intention is that the Local Plan 2042 shall cover the whole spatial area of the borough. In doing so, the adopted Local Plan 2042 would supersede the Chilmington Green Area Action Plan (2013). This intention is currently under review and will be firmed up at the next iteration of Local Plan production.

1.5 What is the relationship between this draft Local Plan and the adopted Local Plan?

1.5.1 The NPPF advises that relevant policies in emerging Local Plans can have some weight in decision making according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF.

1.5.2 This Regulation 18 Local Plan is a first draft and will require further refinement before it is ready for submission, therefore the planning weight attributed to it is limited and it does not supersede the policies in the adopted Local Plan. Once the new Local Plan is adopted in 2027 it will replace the current Local Plan for the period up to 2042, subject to periodic reviews every five years.

1.6 What is the relationship between this draft Local Plan and Neighbourhood Plans?

1.6.1 Made or adopted Neighbourhood Plans form part of the development plan for Ashford borough. At the time of writing, there are now eight made Neighbourhood Plans (Aldington & Bonnington, Boughton Aluph & Eastwell, Charing, Egerton, Pluckley, Rolvenden, Tenterden, Wye with Hinxhill) and three at various stages of preparation (Bethersden, Hothfield, Smarden).

1.6.2 While Local Planning Authorities are required to review Local Plans every five years, there is no equivalent requirement to review Neighbourhood Plans.

1.6.3 However, National Planning Guidance notes that individual policies in a neighbourhood plan may become out of date, if, for example, they conflict with policies in a plan that is adopted after the neighbourhood plan becomes part of the development plan.

1.6.4 In these cases, the more recent policy takes precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions if, for example, the evidence base for the relevant plan policy becomes less robust. In such cases, the qualifying body may seriously consider whether it is an appropriate time to review and update their neighbourhood plan, or part of it to remain in general conformity with the most recent Local Plan, so the individual policies within the neighbourhood plan continue to be effective.

1.7 The wider planning context

1.7.1 Government advice to Local Planning Authorities is to keep Local Plans up to date and work with the most up to date information available at the time. This draft Local Plan responds to that advice. However, it is worth noting that there are significant national planning reforms and changes being introduced to the planning system in England at the time of writing. This may require some adjustments as the new Local Plan is prepared.

1.7.2 To illustrate this, the main national planning reforms underway can be summarised as follows:

The Levelling Up and Regeneration Act 2023 (LURA)

1.7.3 Although this piece of legislation was passed in October 2023, much of the secondary legislation, which will introduce significant changes to the planning system, has yet to emerge.

1.7.4 Two of the most important elements are the introduction of National Development Management Policies (NDMPs) and a new process for preparing Local Plans.

1.7.5 The NDMPs will effectively remove some policies that are common to Local Plans and set them out as national policy. This means that Local Plans will focus on policies covering more locally relevant issues in future resulting in shorter, more succinct Plans that potentially take less time to prepare and examine, since the NDMPs will not form part of the examination process.

1.7.6 The Government has committed to consulting on NDMPs during 2025 before agreeing a final set of policies, but it is not known exactly what they will cover. The Government has indicated that once it has finalised the NDMPs the NPPF will be updated and slimmed down to focus on planning policy and plan making.

1.7.7 It is likely, therefore, that some adjustment will need to be made to later iterations of the Local Plan to remove any policies duplicating the new NDMPs when they become known.

1.7.8 The new process for preparing Local Plans envisaged by the LURA anticipates a much quicker timescale of only 30 months from deciding to prepare or review a Local Plan to

Adoption. This will be ambitious as at present it takes on average at least twice as long and in some cases much longer. The changes include reducing the size of Local Plans by introducing the NDMPs, providing three 'Gateway' meetings between the Local Planning Authority and the Planning Inspectorate at key stages to ensure plans are on the right track and shortening examinations to a maximum of 6 months.

1.7.9 The LURA had anticipated this new planning system to be in place by the end of 2024 but following the change of Government in July of that year, further amendments were made, and this has been pushed back a year to the end of 2025.

The Planning and Infrastructure Bill

1.7.10 The Planning and Infrastructure Bill is currently at the second reading stage in the House of Commons, having been introduced in the King's speech in July 2024. This Bill complements and goes further than the LURA as part of the new Government's aspirations for growth.

1.7.11 The overall aims of the Bill are to streamline the planning process and accelerate infrastructure developments. Measures include reintroducing strategic planning to England including new Strategic Development Strategies (SDS), revising the rules for Nationally Significant Infrastructure Projects (NSIPs) and a new Nature Restoration Fund and Environmental Delivery Plans.

1.7.12 The SDS are intended to be high level strategic plans which will help guide Local Plans, identify infrastructure requirements and apportion housing needs. The Government wants these to be in place during this Parliament.

Local Government Reorganisation

1.7.13 In February this year, local authorities in two tier areas of England were invited by the Government to prepare options and a business case for moving to unitary authorities. Unitary Authorities have responsibility for all the local Government functions in an area that would normally be provided by the County and Districts.

1.7.14 A preliminary response by Kent and Medway authorities in March suggested that 3 or 4 new unitary authorities could replace the 12 District Authorities, Kent County Council and Medway Council as part of this reorganisation. Final submissions must be submitted to the Government by 28 November 2025 following local engagement. If approved by the Government, a process will be put in place to transition from the current structure to the new unitary authorities by April 2028.

1.7.15 The new unitary authorities will then prepare Local Plans for the new areas guided by the SDS which will be prepared by a new strategic authority covering Kent and Medway. This is a similar model to that found in the Greater London area, with the Mayor and Greater London Authority preparing a London Plan and the 33 London unitary authorities preparing Local Plans in general conformity with the London Plan.

1.7.16 It is not yet known what transitional arrangements will be put in place to move from current Local Plans to the new unitary Local Plans. Up to date Local Plans (less than 5 years since adoption) within a new unitary may well be saved until the new style plans can replace them, but it is less clear what status Local Plans still in preparation will have.

1.7.17 Despite the uncertainties that these changes create, the Government has reiterated that the planning system remains 'plan-led'. In other words, an up to date plan is the first consideration when determining planning applications and therefore Local Planning Authorities should continue to progress their plans and make any necessary adjustments as required.

1.8 How are the Council dealing with 'nutrient neutrality' in this Local Plan?

1.8.1 In 2020, Natural England issued advice to the Council stating that the nationally and internationally protected lakes at Stodmarsh (located in neighbouring Canterbury district) were in an 'unfavourable' condition.

1.8.2 In line with established case law, and the Conservation of Habitats and Species Regulations 2017 (as amended), qualifying development (e.g. overnight accommodation, including new housing) from that point forward is required to demonstrate that it would not result in an adverse effect on the protected lakes, i.e. any proposal would need to demonstrate it was 'nutrient neutral'.

1.8.3 Details around how this impacts the determination of planning applications is on the Council's nutrient neutrality webpages.

1.8.4 Nutrient neutrality also impacts plan-making. A Local Plan is a 'plan' or 'project' in line with the Habitat Regulations. A Local Plan will therefore need to demonstrate how any policy framework can be delivered in a way that will not adversely affect the Stodmarsh Lakes.

1.8.5 This is reflected in Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended), which requires that the plan-making authority needs to undertake an Appropriate Assessment (AA) prior to the Plan taking effect (e.g. being adopted). The AA will form part of the evidence of the 'submission' version of the Local Plan, as it will be needed to justify the overall approach.

1.8.6 The Regulations do not require an AA to be undertaken at the Regulation 18 stage – i.e. for this draft Local Plan. This gives the Council a degree of flexibility at this stage of plan making.

Local contextual issues

1.8.7 Since the Natural England advice was issued, there has been progress made to resolving the wider Stodmarsh impediment in a variety of ways.

1.8.8 A nutrient 'credit' market is emerging, see the 'Nutrient Neutrality' section of Chapter 3.1 for more details. The market will generate reserves of credits via large-scale mitigation. Credits can then be used by individual developments to meet their nutrient requirements. In some cases, the credit platforms, such as the Stour Environmental Credits – the Council's joint venture company with Canterbury City Council, will use money generated from the sale of nutrient credits to re-invest in generating more mitigation. These measures will deliver sources of nutrient credits across the catchment.

1.8.9 Also, several developments have been able to deliver their own nutrient mitigation solutions to achieve nutrient neutrality and therefore allow proposals to be granted planning permission. Examples of these on-site mitigation solutions have included Sustainable Urban Drainage Systems, greenspace creation and the delivery of large-scale Wastewater Treatment Plants. Proposals that have relied on off-site mitigation solutions have delivered wetlands, upgrades to septic tanks on nearby properties and have taken land out of agricultural use to create greenspace.

1.8.10 Given the nature of the Stodmarsh issue, it has inevitably taken the wider market time to adjust and react. Whilst nutrient neutrality remains a significant impediment, the above shows that there has been progress made and there is nothing to suggest that this progress will not continue over the plan period.

Wider contextual issues

1.8.11 Nationally, nutrient neutrality has been recognised by the Government as a significant impediment that needs rectifying, especially if their national plans for house building are to be achieved. The Government has responded and is continuing to respond in the following ways:

1.8.12 ***Improvements to the Wastewater Treatment Works by 1 April 2030***: The Levelling Up and Regeneration Act (2023) requires upgrades and improvements to Wastewater Treatment Works in nutrient neutrality catchments. The legislation requires improvements to the infrastructure responsible for treating wastewater to be in place by 1 April 2030. These improvements can be taken into account now when calculating nutrient requirements and will significantly help to improve water quality and reduce nutrient requirements for housing through a strategic infrastructure led approach.

1.8.13 As these improvements will be implemented within the plan period, it will be important for the next iteration of the Local Plan to consider the phasing of sites that may seek to rely on these upgrades when calculating their nutrient mitigation requirements.

1.8.14 ***Planning & Infrastructure Bill:*** Introduced in March 2025, the Planning & Infrastructure Bill seeks to amend the current nutrient neutrality approach to move towards a levy-style approach whereby development contributes to a Nature Restoration Fund to deliver projects to reduce nutrient pollution. Natural England will be responsible for the identification (and potentially delivery) of the projects which will use the money from the Nature Restoration Fund.

1.8.15 These proposals represent a significant change in direction for nutrient neutrality and demonstrate Government's clear intention to remove the impediment. By implementing a Nature Restoration Fund it will transfer the burden of delivering nutrient mitigation from the Local Planning Authority and developers to Natural England. Mitigation can therefore be delivered in a more strategic manner.

1.8.16 As developers will be required to contribute to the Nature Restoration Fund rather than deliver their own nutrient mitigation, this will help to speed up the planning process and release planning permissions for sustainable development. By streamlining the process, whilst still meeting the environmental obligations, this approach will essentially remove the Stodmarsh impediment.

Drawing it all together

1.8.17 The Council do not under-estimate the difficulties that the nutrient neutrality impediment has created. The nutrient neutrality catchment covers the town of Ashford – the most sustainable location in the borough. However, resolutions are being progressed both at the national and local level. Most importantly, the Government's proposals in the Planning & Infrastructure Bill shall significantly change the approach to nutrient mitigation and this shall be in place early in the plan period.

1.8.18 Based on the above, the Council are content to progress with the Local Plan 2042 now, in the way envisaged in this iteration of the Plan. This is echoed by Government who encourage Local Planning Authorities to prepare Local Plans quickly, for the planning system to remain 'plan-led'.

1.9 A Summary of the evidence base that has supported the Plan to date

1.9.1 The evidence base for a Local Plan is a crucial part of demonstrating the soundness of the plan at examination. At this stage of plan production, much of the evidence is in its infancy, and some elements have yet to be commissioned. However, the evidence that is relied upon to help support the Policy Intentions and Ambitions shall be produced alongside this iteration of the Local Plan 2042.

1.9.2 The evidence will be refined and added to, as the Local Plan progresses, but the summaries below provide further information on the evidence relied upon so far.

- Our Plan for the Borough 2024 – 2028 – This document, also known as the Borough Plan, sets out the Council's priorities for making Ashford a place where people, business and nature can collectively thrive based around three pillars of Planet, People and Place. The new Local Plan will contribute to achieving the aims set out in the Borough Plan.
- **Duty to Cooperate Statement** – The Duty to Cooperate Statement outlines how Ashford Borough Council has complied with the legal obligation to engage with other

bodies on strategic cross-boundary matters when preparing the Local Plan. This statement demonstrates how the authority has fulfilled its duty to engage constructively, actively, and on an ongoing basis with relevant bodies. It is a key part of the plan-making process and helps ensure that plans are deliverable and based on effective joint working. The statement will be added to throughout the preparation of the Local Plan.

- **Consultation to date –** During the summer of 2024 a community engagement exercise on the new Local Plan entitled 'Our Local Plan Explained' took place in the form of a series of manned exhibitions across the borough together with two virtual events. Comments were invited and these have been recorded and taken into account in formulating the draft Local Plan. This will eventually form part of a Consultation Statement that will be included as part of the submission documents for the Local Plan.

- **Call for Sites Exercise and Housing and Economic Land Availability Assessment (HELAA) –** The Call for Sites exercise is usually carried out at the beginning of the Local Plan process and invites those with an interest in land in the borough to submit suggestions for future allocations to meet the development needs of the borough over the plan period. The HELAA is the assessment of the submitted sites based on their suitability and deliverability. The Call for Sites was carried out in the latter part of 2023 and the assessments are ongoing. An initial assessment of the sites around Tenterden has been conducted, but further assessment work shall be needed, as part of the next iteration of the Local Plan.

- **Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) –** The Sustainability Appraisal is a process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives**.** The Strategic Environmental Assessment, a European Directive only deals with environmental assessment and is incorporated into the Sustainability Appraisal process.

- **Habitats Regulations Assessment (HRA) –** The Habitats Regulations Assessment is a mandatory process for Local Plans to ensure that proposals do not negatively impact protected natural habitats.

- **Strategic Housing Market Assessment (SHMA) –** The Strategic Housing Market Assessment breaks down the overall housing target for the borough as a whole into more detailed needs for things like affordable and accessible housing.

- **Gypsy and Traveller Accommodation Assessment (GTAA) –** The GTAA assesses the needs for Travellers over the plan period, including for Gypsies, Travellers and Travelling Showpeople.

- **Draft Infrastructure Delivery Plan (IDP) –** The IDP will be added to, and updated, once the site allocations and infrastructure requirements up to 2042 are firmed up in further iterations of the Local Plan. This will include inputs from infrastructure providers including Kent County Council and the NHS.
- **Infrastructure Funding Statements (IFS) –** The annual Infrastructure Funding Statements provide a record of infrastructure that has been delivered over the past year and lists any new developer contributions in the pipeline. In simple terms they monitor the means for delivering the infrastructure listed in the Infrastructure Delivery Plan.
- **Local Plan Policies Map –** A Local Plan policies map was prepared to support the current Local Plan 2030 (adopted 2019). This remains the 'up to date' policies map. Where appropriate, this draft version of the Local Plan references the policies map.

1.10 Consultation

1.10.1 The Regulation 18 consultation period for this draft version of the Ashford Local Plan 2042 will run from **XX** am on **XXXX** 2025 until **XX** pm on **XXXX** 2025. Supporting documentations that can be read alongside the draft Local Plan 2042 can be viewed online at [**INSERT LINK**].

1.10.2 In tandem with the Regulation 18 consultation the Council have re-opened the Call for Sites. In addition, the Council are asking those with an interest in land in the borough to submit suggestions for Local Green Space. Further information including how to submit a site for consideration can be viewed online at **[INSERT LINK]**.

How do I make comments?

1.10.3 Comments can be made on the draft Local Plan 2042 directly on the Council's Have Your Say portal at: **[INSERT LINK]**.

1.10.4 A consultation form is available to download on the consultation website at **[INSERT LINK]**. Once completed, the consultation form should be sent to the Plan-Making & Infrastructure team email address, which is planning.policy@ashford.gov.uk. Paper copies of completed consultation forms can be sent in to: Plan-Making & Infrastructure Team, Ashford Borough Council, International House, Dover Place, Ashford, TN23 1HU.

1.10.5 All consultation forms must be provided by **XX** pm on **XXXX** 2025.

Why is it important to get involved?

1.10.6 The new Local Plan 2042 will help encourage growth in Ashford's economy and housing stock, whilst also seeking to protect the borough's valued assets. It will aim to control the type and size of development coming forward in the borough and ensure that development within Ashford borough caters towards providing for local needs i.e. through the provision of affordable homes and necessary infrastructure.

1.10.7 Therefore, it is important to get involved in the preparation of the Local Plan as every resident of the borough could be impacted by development. By getting involved in the Local Plan consultations, your responses will help to shape the content of the next iteration of the Local Plan.

What does the Council do with the comments?

1.10.8 Once the consultation period has ended, the consultation responses will be made available to view on the Council's website. The responses will be reviewed by the Council and are vital to shaping the next iteration of the draft Local Plan to help reflect the needs and aspirations of the local residents. The consultation responses will help the Council to make amendments to the draft Local Plan before progressing to the next stage.

1.11 What are the next steps?

1.11.1 Figure 1 displays the next steps throughout the production of the Local Plan 2042.

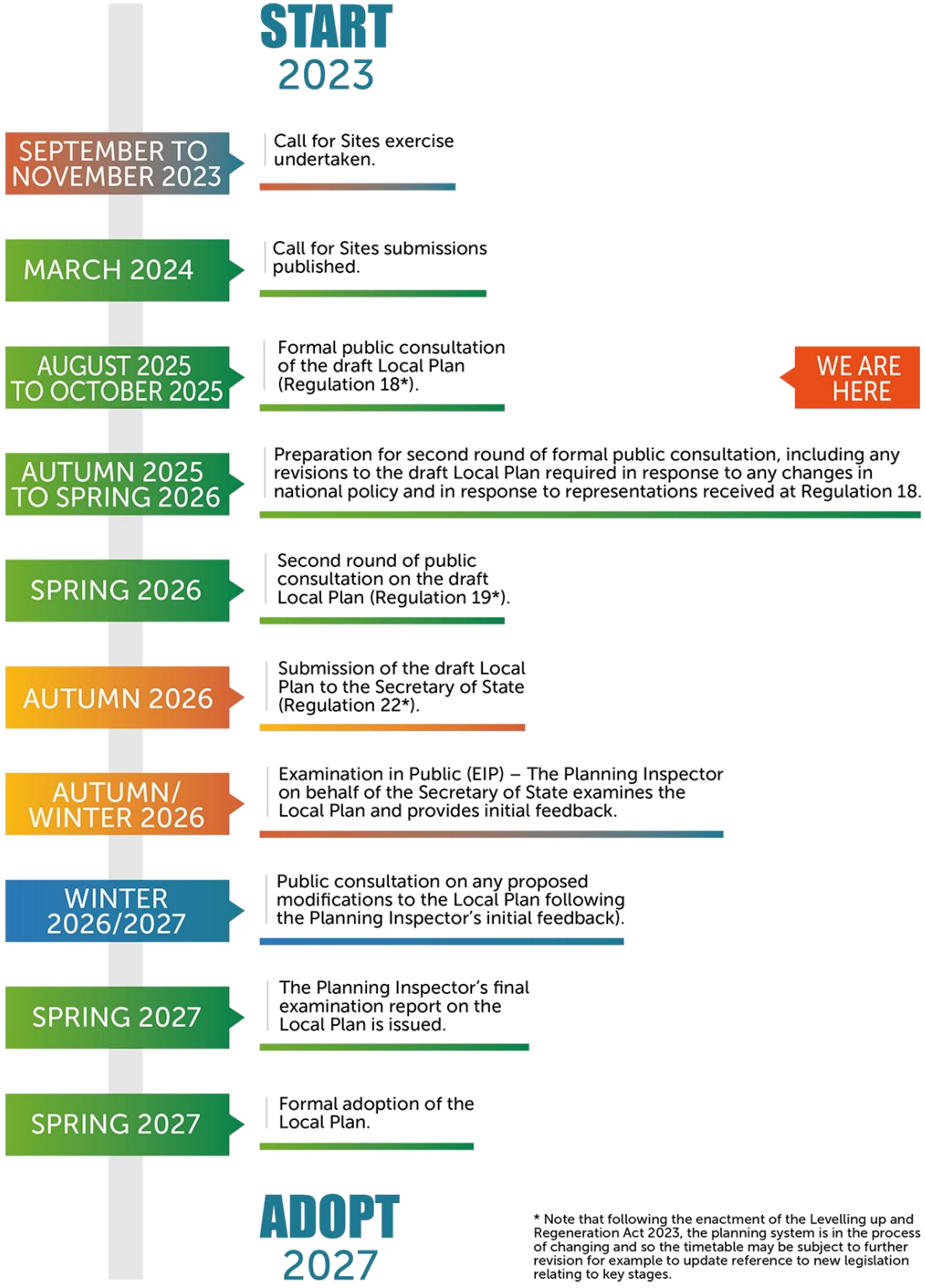


Figure 1 Timescales for the preparation of the Local Plan 2042

CHAPTER 2 POLICY INTENTIONS

2.1 The plan period and establishing the housing requirement

The plan period

2.1.1 A plan period is the length of time to be covered by the Local Plan. The NPPF requires Local Plans to cover a time horizon of at least 15 years from the anticipated date of adoption. The Council's latest Local Development Scheme (2024), suggests this will be achieved by 2027. Accordingly, this Local Plan covers the period from 1 April 2024 to 31 March 2042.

2.1.2 However, Local Plans are iterative in nature and can be impacted by unforeseen delays (such as how to respond to a changing national planning system). In this context, the plan period should be viewed as 'fluid' at this stage and will become more certain as the Local Plan progresses towards Examination.

Establishing the Overall Housing Requirement

2.1.3 A key requirement of the Local Plan is to set out a strategy that identifies the amount of new housing that needs to be provided for, over the plan period. To establish this figure, the expectation set out by the Government (in the NPPF, and associated Planning Practice Guidance) is that the national 'standard method' should be used as the starting point for identifying the minimum amount of housing required.

2.1.4 The national 'standard method' is based on a two-step approach to calculating need. The first step is to establish a baseline of 0.8% of the existing housing stock using the most recent published data and the second stage is to apply an upward adjustment to take account of local affordability calculated using the mean average affordability over the five most recent years for which data is available.

2.1.5 For Ashford borough the standard method currently yields a figure of **17,622 dwellings** over an 18-year plan period from 2024 to 2042, equating to **979 dwellings** per annum. This is reflected in Table 1 below.

Table 1 Annual Housing Requirement calculated using the Standard Method.

Step 1 – Baseline	
Dwelling stock estimates by local authority districts (2024)	58,752
0.8% of existing dwelling stock	0.8% of existing dwelling stock 470 dwellings per year
Step 2 – Adjustment to take account of affordability	
Affordability ratio (last 5 years)	2020: 10.38 2021: 10.94 2022: 10.57 2023: 11.47 2024: 10.15
Average affordability ratio	10.70
Adjustment factor	$\left(\frac{10.70-5}{5}\right) \times 0.95 + 1 = 2.083$
Adjusted housing number	470 × 2.083 979 dwellings per year
Total Housing Need	**979 dwellings per year**
Plan period (2024 – 2042)	**18 years**
Total Local Plan Housing need **18 years x dpa**	**18 x 979** **17,622**

2.1.6 The figure of 17,622 will need to be kept under review during the preparation of the Local Plan. This is to take account of any changes to the inputs used to generate a housing need figure using the standard method as the inputs are variable. New estimates of housing stock are published annually (usually in May), and updated affordability ratios are published annually (usually in March).

2.1.7 The plan period date is also relevant in this regard, as the housing figure is derived from this established timeframe. As the plan progresses, there will be a need to revise the 'start' date of the plan to make sure that the Local Plan is seeking to plan for the correct overall housing figures and is 'up to date' in that context.

2.1.8 Therefore, the current figure of **17,622 dwellings** over the plan period will change as the plan progresses. However, it is a sound planning approach to use this figure as the 'starting point' for this draft Local Plan.

Meeting the overall housing requirement

2.1.9 The Council intend to meet its housing need in full, through the Local Plan 2042. As explained below (and in part 2.2 of this Local Plan), this shall be through a combination of existing 'planning commitments', future housing windfall proposals, and through new site allocations.

2.1.10 The Council shall need to maintain a platform to continue to address any cross-boundary issues in line with the Duty to Cooperate. In preparing this draft Local Plan, the Council has engaged with the neighbouring authorities and other relevant bodies.

2.1.11 The approach to the 'duty' requirements will be set out in the Council's Duty to Cooperate Statement, which forms part of the evidence base for the Local Plan. For the avoidance of doubt, currently, the Council are not intending to meet any neighbours' housing need.

The 'residual' housing requirement

2.1.12 A 'residual housing requirement' figure needs to be established, to determine the amount of new housing that needs to be delivered between 2024 and 2042 through new site allocations – i.e. where new land allocations shall be needed. This figure has been derived from the following considerations.

2.1.13 ***Planning 'commitments':*** A planning commitment, for the purpose of this Local Plan, is a proposal that the Council considers meets the definitions of 'deliverable' or 'developable', as set out within NPPF. Planning commitments can effectively be 'netted off' the total housing requirement figure.

2.1.14 For the early years of the plan period, the 'commitments' are derived from the Council's latest published 5 Year Housing Land Supply Position which identifies sites that are considered 'deliverable' within the period 2024 – 2029. Due to the 'Stodmarsh impediment' (see Introduction section), this includes several applications that have reached the 'resolution to grant' stage (i.e. they are acceptable in principle, and the resolution to nutrient neutrality remains the barrier to the granting of permission). This position has been widely supported by Inspectors recently in planning appeals.

2.1.15 For plan making purposes, the position statement allows us to assume, at this point, that a total of **4,266 dwellings** shall come forward in the early years of the plan period. Given the iterative nature of plan making, this figure will need updating for the next iteration of the Plan, and as the Plan progress through to the Examination stage.

2.1.16 However, relying on this evidence now is considered reasonable, and avoids delaying consultation on the Local Plan to wait for an updated five-year housing land supply

position that will change as the plan progresses. All Local Plans are only ever a 'snapshot' in time.

2.1.17 In addition to the first five years of the plan period, there are also several planning commitments that will deliver housing between 2030 and the end of the plan period (2042). These are sites that are considered to be 'developable', having regard to the approach advocated in the NPPF.

2.1.18 At this stage of the Local Plan, it is suggested that a total of **6,126 dwellings** shall come forward from these sites between 2030 – 2042. This is reflected in Appendix 2 – List of Housing Commitments.

2.1.19 In combination, 'planning commitments' are assumed to contribute a total of **10,370 dwellings** over 2024 to 2042 and this is reflected in the 'residual' housing requirement figure.

2.1.20 Further exploration of the approach taken towards identifying the planning commitments, including a list of the sites relied upon, is set out in the Housing Topic Paper supporting this iteration of the Local Plan.

2.1.21 ***Future Housing windfall assumptions:*** Housing windfalls is the term used for housing that comes forward on land which is not allocated in the development plan (i.e. aren't from allocated sites). Many dwellings counted as part of the 'planning commitments' referenced above include housing from 'known' windfall sites.

2.1.22 With regard the reliance on future windfalls (at this stage 'unknown' housing windfalls), Government policy allows Local Plans to rely on such sites as part of the anticipated supply over the plan period. However, the NPPF is clear that Local Planning Authorities may only make an allowance for windfalls of this nature, if there is compelling evidence that they will provide a reliable source of supply.

2.1.23 Evidence prepared by the Council indicates that over the last 15 years the average windfall delivery is 206 dwellings per year. It is accepted that past trends don't necessarily indicate what shall happen in the future – for example it may have been the case that some windfalls came forward on urban brownfield sites which tend to be limited opportunities. However, the evidence above does show a strong and consistent rate of windfall housing delivery over a long period of time.

2.1.24 At this stage of plan making, the Council are content to suggest a reliance on a further **1,500 dwellings** to come forward on 'unknown' windfall sites over the remainder of the plan period (2030-2042). On average, this falls well below the yearly average but is considered to be a reasonable starting point on which to inform the wider housing strategy articulated in this Policy Intention. The Council may well revisit this assumption at the next stage of plan making.

Residual housing requirement

2.1.25 Taking the above context into account, a residual housing figure of **5,730 dwellings** had been identified. This is the total number of new dwellings, currently assumed, which shall need to be allocated through the next stage of the plan, to meet the overall housing requirement.

Table 2 Breakdown of the housing requirement and residual housing requirement for the Local Plan period 2024 – 2042

Type	Number of dwellings 2024 – 2042
Housing Requirement	17,622
Committed sites	10,392
Future unidentified windfalls	1,500
Residual (to be delivered via new land allocations)	**5,730**

Policy Intention 1 – The Housing Requirement

A total housing requirement of 17,622 dwellings has been identified for the plan period between 2024 and 2042.

The majority of the total housing requirement shall be met through a combination of existing deliverable and developable committed schemes, alongside new land allocations, to be determined at the next stage of plan making, that shall deliver approximately 5,730 new dwellings.

Suitable future windfall housing proposals, to deliver around 1,500 dwellings shall also contribute to meeting the housing requirement figure.

2.2 The strategic distribution of new housing land allocations across the borough

2.2.1 This Policy Intention establishes five spatial areas within the borough and sets out how the residual housing requirement is intended to be shared between these areas, to steer new land allocations as part of the next iteration of the Local Plan. The five spatial areas are: Ashford Town Centre, Ashford Urban Area, Edge of Ashford, Tenterden and the Villages.

2.2.2 The broad approach contained within this Policy Intention has been influenced by several important factors, including:

- The location of existing planning commitments that are viewed as ‘deliverable’ and/or ‘developable’ in the context of the NPPF;

- The nature, character and wider environmental sensitivities of the spatial areas;
- The proximity to and range of nearby services, facilities and jobs;
- The historical role played by the spatial area in previous Local Plans;
- The ability to access or expand upon existing infrastructure; and
- The broad pattern of sites promoted by the market through the 2023 Call for Sites exercise.

2.2.3 The Sustainability Appraisal and Strategic Environmental Assessments is also an important consideration. As part of the preparation of this draft Local Plan, the Council have initially explored a number of high level 'strategic growth options' and this forms part of the evidence base that supports the plan. This clearly shows that the most optimal option is one which focuses most change in and around Ashford, followed by Tenterden with a subsequent dispersed approach for the remaining villages in the borough.

2.2.4 As detailed evidence emerges, as part of the next iteration of the Local Plan, there may be a need to revisit elements of the approach below. For example, the ability to adequately serve certain areas with infrastructure, or feedback from stakeholders, may require us to explore other land options or locations, rather than those currently envisaged. However, the Council are not expecting that a significant shift in the broad approach advocated below will be necessary.

The broad strategy

2.2.5 The broad strategic planning strategy for the borough has been a consistent one for over 25 years in that the focus of the majority of new housing growth has been targeted to areas in and around the town of Ashford.

2.2.6 Ashford clearly sits atop of the settlement hierarchy and is the most sustainable location in terms of the range of services, facilities, job opportunities and strategic transport connections. This approach has been the foundation of several past Local Plans (since 2000), and is the same approach advocated in previous County Structure Plans, and the previous Regional Southeast Plan.

2.2.7 Adopting this approach allows for a consistent 'infrastructure led' strategy to be promoted, one that utilises or expands upon existing or already planned infrastructure. Much of this infrastructure has been funded, or is being funded, via money secured from development. Significant public investment has also been committed over the years which has helped the delivery of key infrastructure that – in turn – unlocks further growth.

2.2.8 The borough's current Local Plan 2030 (adopted 2019) Policy SP2 'The Strategic Approach to Housing Delivery' states that:

'*The majority of new housing development will be at Ashford and its periphery, as the most sustainable location within the Borough, based on its range of services and*

facilities, access to places of employment, access to public transport hubs and the variety of social and community infrastructure available'.

2.2.9 The areas of the borough which sit outside of Ashford town, and the edge of Ashford, are very different in context.

2.2.10 This area includes Tenterden, the borough's only other town. Tenterden, has a far lower population than Ashford, of just over 8,000 people. Tenterden is distinctly different both physically and in nature and character to the town of Ashford. Tenterden lies approximately 20km to the southwest of Ashford and has no domestic trainline.

2.2.11 Beyond Tenterden, the remaining areas of the borough are predominantly rural in nature which includes expansive areas of countryside, and a range of historic villages. For these areas, Policy SP2 'The Strategic Approach to Housing Delivery' states that:

'Development in the rural areas will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity'.

2.2.12 The Council's clear intention for the Local Plan 2042 is to continue to adopt a similar spatial strategy, in broad terms. The NPPF is clear that Local Plans need to be cognisant of local context when preparing the strategy. The status, character and nature of the different spatial areas within the borough has not changed since 2019, in any way that would point to an alternative approach being needed. The town of Ashford still sits at the top of the hierarchy, followed by the edge of Ashford, then the town of Tenterden, and then the rural villages.

2.2.13 It is self-evident that areas beyond the town of Ashford do not have the infrastructure needed to support significant levels of new housing growth. Nor are they areas where significant levels of public investment have been committed or is planned to be committed to deliver key infrastructure.

2.2.14 An alternative strategy would merely undermine the consistent approach, and this would have negative consequences. Not only would it mean a need for much more costly, new, standalone infrastructure – that is disconnected from the existing networks – it would also lead to difficulties in the ability to sustain existing infrastructure. It would also require a significant shift for infrastructure providers and require them to alter their strategies and investment plans.

2.2.15 In environmental terms, areas beyond the town of Ashford are much more sensitive in character and nature and are much more reliant on car-based trips as the primary mode of transport.

2.2.16 Focussing too much housing growth in these more sensitive and less well served locations would quickly lead to an unsustainable growth model overall.

2.2.17 Therefore, this draft Local Plan is envisaging up to 25% of the overall residual housing requirement, via new land allocations, being targeted towards Tenterden and the villages.

Doing so recognises the need for these areas to contribute towards meeting the overall housing requirement, but not with a scale and pace of housing that is damaging to the nature and character of these areas.

2.2.18 This broad strategy is a sound planning one and has been consistently supported by Local Plan Inspectors.

2.2.19 Accordingly, it therefore needs to be reflected in decision making. Failure to do so would merely erode the plan-led approach which is still the foundation of the national planning system. Requiring the more sensitive locations (in a strategic context) to over-compensate for a lack of housing delivery at Ashford (should that occur), is inherently unsustainable. It is accepted that housing 'delivery', in itself, is important, but it is not the only consideration that should be applied. Decision makers need to be cognisant of this position.

The Spatial Areas

2.2.20 The five spatial areas identified in this Policy Intention, and the intended share of housing to be accommodated via new land allocations through the next iteration of the Local Plan, are described in more detail below.

Ashford Town Centre

2.2.21 Ashford Town Centre is the most accessible and sustainable location within the borough. It includes a wide variety of shops, services, facilities and jobs and is the main public transport interchange. It is where the cycle network converges, it includes significant and attractive areas of the Green Corridor, and it includes the important green space of Memorial Gardens. Victoria Park also abuts the Town Centre.

2.2.22 The Town Centre has a historic core which includes the grade I listed St Mary's church, and an extensive conservation area.

2.2.23 Currently, the Council's five-year housing land supply position statement (2024 to 2029) shows that a total of 915 dwellings shall come forward in the Town Centre by 2029. There are also assumed to be 80 dwellings that shall come forward over the plan period from existing committed sites (where housing delivery shall proceed beyond the five-year period, between 2030 to 2042). At this point in plan production, it is the Council's intention that a further **900 to 1,100 new dwellings** shall be attributed to the Town Centre, over the plan period.

2.2.24 To help facilitate this change, the Local Plan has proposed a series of spatial 'zones' within the Town Centre area. Please see Chapter 2.4 Spatial Area 1 – Ashford Town Centre.

Ashford Urban Area

2.2.25 The Ashford Urban Area is the next most sustainable location in the borough. The Town has evolved over many years, and this is reflected in the variety of built form which

stitches the town together. This ranges from traditional Victorian type housing in streets such as Jemmett Road and Lower Vicarage Road to more modern developments at places like Repton and Finberry. In addition, a variety of employment uses in the form of industrial estates, out of town entertainment complex at Eureka Park and the Outlet make up the urban fabric.

2.2.26 The Council's five-year housing land supply position statement shows that a total of 1,379 dwellings shall come forward by 2029. There are also assumed to be 2,018 dwellings that shall come forward over the plan period from existing committed sites (where housing delivery shall proceed beyond the five-year period, between 2030 to 2042). See Appendix 2 – List of Housing Commitments.

2.2.27 This shows that the Ashford Urban Area is already playing an important role. Most land parcels that provide opportunities for new housing growth are already known. In addition, Ashford Urban Area also plays an important employment role which supports the mixed-use nature of the wider town and supports the local economy. There is no intention, in this iteration of the Plan, to seek the redevelopment of active employment land. As such, further opportunities within Ashford Urban Area, for new housing sites are likely to be limited.

2.2.28 That said, opportunities shall no doubt present themselves as the plan progresses (including the potential for re-examining existing proposals). At this point in plan production, it is the Council's intention that a further **600 to 800 new dwellings** shall be attributed to the Ashford Urban Area, over the plan period.

Edge of Ashford

2.2.29 Land parcels at the edge of Ashford are broadly sustainable in that they are near to the range of services, facilities and infrastructure that the wider Town of Ashford has to offer.

2.2.30 The wider planning benefits in this location is that it can allow large scale developments to be identified that can yield high numbers of dwellings per year, once they are underway. They can also create clearly distinctive new places that utilise good placemaking in a way that can 'create' accessible connections to the existing town, such as linkages with Public Rights of Ways (PROWs), or new cycle networks or extension opportunities to the Green Corridor.

2.2.31 However, large scale development at the edge of Ashford presents several challenges around how development interacts with existing and distinct villages that surround the town and the need to ensure that sufficient infrastructure is put in place, at the right time, in a way that is consistent with what has been planned before or is being planned currently. There is also the impact on the wider landscape to consider, as they are often sites which are greenfield in nature.

2.2.32 Balancing these wider considerations is always a difficult challenge and one which the Local Plan 2042 shall need to address.

2.2.33 Currently, the Council's five-year housing land supply position statement suggests that around 802 new dwellings shall come forward at the edge of Ashford by 2029. In addition, there are also assumed to be 3,935 dwellings that shall come forward over the plan period from existing committed sites (where housing delivery shall proceed beyond the five-year period, between 2030 to 2042). This includes the proposals and assumptions for Chilmington Green, Kingsnorth Green and the recent Possingham Farm proposals that were allowed at appeal in 2024.

2.2.34 The 'edge of Ashford' is already earmarked to play a key role in meeting new housing growth. At this point in plan production, it is the Council's intention that a further **2,500 to 2,700 new dwellings** shall be attributed to the edge of Ashford, over the plan period.

Tenterden

2.2.35 Whilst Tenterden is markedly different in size and level of services and facilities provided when compared to Ashford, it remains the borough's only other town. Tenterden plays an important service centre role for the surrounding area. Tenterden is largely constrained to the south, east and west by the High Weald National Landscape area which positively contributes to the overall setting of the town.

2.2.36 Over the last few years, Tenterden has accommodated several new dwellings. In recent years, over 360 dwellings have been delivered, mainly from the developments at 'TENT1A' (Southern Extension Phase A) and 'Tilden Gill'. Currently, the Council's five-year housing land supply position statement suggests that 219 new dwellings shall come forward by 2029.

2.2.37 However, there are two areas highlighted in this Local Plan that are envisaged to accommodate up to 250 dwellings each. Accordingly, up to **500 new dwellings** are identified at Tenterden over the plan period. Please see Chapter 2.4 Spatial Area 4 – Tenterden.

The villages

2.2.38 The borough includes many historic villages. These villages, and the rural parts of the borough in which they are located, are recognised as being a more sensitive environment which needs careful thought around managing future change. This Local Plan adopts an approach which balances these wider sensitivities with the need to ensure that this area continues to play a role in meeting the overall housing requirement. This is explained in more detail through Chapter 2.4 Spatial Area 5 – The villages.

2.2.39 Currently, the Council's five-year housing land supply position statement suggests that around 951 new dwellings shall be accommodated up to 2029. In addition, there are also assumed to be 93 dwellings that shall come forward over the plan period from existing committed sites (where housing delivery shall proceed beyond the five-year period, between 2030 to 2042).

2.2.40 In combination, the Council are suggesting that the 'villages' could accommodate up to **1,000 new dwellings** over the plan period.

The potential for a new standalone settlement

2.2.41 A remaining strategic option would be for the Council to actively pursue one or more larger, predominantly residential site allocations, which could be termed a new 'standalone settlement'.

2.2.42 The ancestry of this broad approach stems back to Ebenezer Howard's Garden City movement in the late 19th Century (e.g. Welwyn Garden City (1920). This was reinforced through the New Towns Act 1946 which delivered communities such as Stevenage (1946) and Milton Keynes (1967). Most recently in 2014, the then Government released their Garden Communities initiative which has included developments at Ebbsfleet (2014) and more locally Otterpool Park near Folkestone in 2016.

2.2.43 However, while these options promise large yields of new homes with accompanying new infrastructure and opportunities for good placemaking from the outset, they can take a long time to deliver significant numbers of new homes and be prone to delays due to the scale and complexities of the proposals.

2.2.44 The consultants Lichfields reviewed the performance of the 2014 Garden Communities Plan in 2019 in the report 'How Does Your Garden Grow?' concluding that these settlements: *'……would not be expected to reach critical mass of delivery until the 2030s'*, some 15 years after designation.

2.2.45 On balance, at this stage of plan making, the Council do not intend to pursue a 'standalone settlement' option as part of the Local Plan 2042. It is highly unlikely that any such proposal would start delivering housing until the very end of the plan period. At this stage, the Council are content that other, more sustainable and deliverable, options shall present themselves over the plan period, accepting that detailed site assessment work is yet to take place.

2.2.46 Clearly such options can be presented to the Council as part of the consultation responses on the draft Local Plan, and the Council will robustly consider any proposals, as part of the plan making process.

Bringing it all together

2.2.47 The table below show the broad spatial strategy in terms of the number of dwellings committed, in new land allocations and the overall total number of dwellings to be delivered in the Plan period, broken down by spatial area.

Table 3 Distribution of dwellings proposed within the Local Plan 2042

Spatial Area	Dwellings committed (2024 – 2042)	Dwellings in new land allocations and future unidentified windfalls
Ashford Town Centre	995	900 – 1,100*
Ashford Urban Area	3,397	600 – 800*
Edge of Ashford	4,737	2,500 – 2,700*

Spatial Area	Dwellings committed (2024 – 2042)	Dwellings in new land allocations and future unidentified windfalls
Tenterden	219	500
Villages	1,044	1,000
Future unidentified Windfalls		1,500
Total	**10,392**	**7,300**

** For the purpose of achieving an assumed 'total' and demonstrating how the overall housing requirement of 17,622 shall be met the mid-point number from each of the ranges has been assumed.*

Policy Intention 2 – The spatial distribution of new housing land allocations across the borough

To meet the identified residual housing requirement of 5,730 dwellings, the majority of new land allocations shall be targeted at Ashford and edge of Ashford locations in the following ways:

- **900 to 1,100 new dwellings in Ashford Town Centre,**
- **600 to 800 new dwellings in Ashford Urban Area, and**
- **2,500 to 2,700 new dwellings at the Edge of Ashford.**

At Tenterden, up to 500 new dwellings are identified to be accommodated via new land allocations.

A range of villages have also been identified to accommodate up to 1,000 new dwellings via new land allocations. The exact composition of these allocations won't be determined until more detailed site assessment work has been undertaken through the next iteration of the Local Plan.

2.3 Meeting the needs of Gypsies, Travellers and Travelling Showpeople

Introduction

2.3.1 Paragraph 63 of the NPPF, in conjunction with the Planning Policy for Traveller Sites, requires Local Planning Authorities (LPAs) to establish and plan for the need, size, type and tenure of housing for different groups – including the Gypsy and Traveller Community.

2.3.2 To inform the early preparation of the Ashford Local Plan, the Council has recently updated its Gypsy & Traveller Accommodation Assessment (GTAA 2025). This study provides a summary of permanent and transit accommodation needs for Gypsy, Travellers and Travelling Showpeople across the borough, over the plan period. This Assessment forms part of the evidence base for this Local Plan.

2.3.3 There is a distinction between Gypsies, Travellers and Travelling Showpeople based on their lifestyle and needs. Gypsies and Travellers are traditionally nomadic people, often with a cultural tradition of living in caravans, and their sites consist of pitches for living quarters. Travelling Showpeople are those who operate fairgrounds and circuses, requiring yards and larger plots to accommodate circus and fairground equipment alongside living spaces.

2.3.4 The Gypsy & Traveller Accommodation Assessment concluded that a minimum need of 115 permanent Gypsy and Traveller pitches and four additional plots for Travelling Showpeople are required across Ashford borough up to 2042. This has been phased in Table 4 as follows:

Table 4 Gypsy and Traveller pitch need and Showpeople plot need across Ashford borough phased from 2024 to 2042.

	2024-28	2029-33	2034-38	2039-42	Total
No. of Pitches	53	17	26	19	115
No. of Plots	4	0	0	0	4

2.3.5 The Gypsy & Traveller Accommodation Assessment found that demand for new accommodation in the borough is principally being driven through:

- families on unauthorised or temporary developments requiring authorised pitches;
- new family formations arising within existing family units (for example children growing up and starting their own families); and
- families moving into the area from elsewhere (in migration).

2.3.6 A high portion (almost 50%) of the pitch need, some 53 pitches, relate to the first two drivers of need highlighted above; and are required to be delivered in the first five years to 2028/29 to address immediate accommodation needs.

2.3.7 Since the Gypsy & Traveller Accommodation Assessment was published in 2025, a Traveller Site at Rosemary Lane, Smarden has been granted planning permission on appeal for four pitches. The decision, issued by the Planning Inspectorate in May, has the effect of reducing the overall pitch need to 111 pitches over the plan period: or 49 pitches in the first five years.

2.3.8 At this time, the Council are not intending to meet any unmet needs of the immediate neighbours to the borough.

Policy Intention 3 – Meeting the needs of Gypsies, Travellers and Travelling Showpeople

The next iteration of the Local Plan 2042 shall seek to promote a policy framework, that shall include new land allocations, to accommodate the needs identified in the Gypsy & Traveller Accommodation Assessment. As of July 2025, the target is 111 pitches and 4 plots.

Meeting the need for Gypsy and Traveller pitches in the short term

2.3.9 Paragraph 10 of the Planning Policy for Traveller Sites requires that Local Planning Authorities identify and update annually a five-year supply of deliverable sites for Gypsy and Travellers, and to identify a supply of specific, developable sites, or broad locations for years 6-10 and where possible years 11-15.

2.3.10 The Council acknowledge that it does not currently have a five-year land supply of Traveller pitches and/or Showperson plots.

2.3.11 This draft Local Plan does not seek to rectify this current position by identifying specific sites. That will be for a later stage of plan making. This will require the Council to undertake further work that seeks to identify potential sites and then assess their suitability and deliverability for allocation in an effort to demonstrate a 5-year supply of pitches.

2.3.12 Based upon the findings of the Gypsy & Traveller Accommodation Assessment 2025 this would amount to identifying sufficient sites with capacity to deliver a minimum of 53 pitches to 2028/29.

2.3.13 In addition, the Council is also giving consideration as to whether it would be prudent to apply a contingency i.e. 10%, to this figure. The inclusion of a contingency is often recommended as it allows a degree of flexibility should any of the allocated sites not become available as anticipated and ensures the housing accommodation needs to the Gypsey and Traveller community can still be met.

Identifying sites for future Gypsy and Traveller pitches

2.3.14 The Council's Call for Sites was held between September and November 2023 and invited the submission of land for a variety of uses including for Gypsy & Traveller accommodation. However, only 4 sites were put forward for consideration. This and past experiences in Ashford and elsewhere suggests that the market is unlikely to voluntarily generate sufficient available sites. Nevertheless, the Council remain interested in hearing

from any landowners in the borough who have land that may be available for Gypsy & Traveller pitches.

2.3.15 The main source of sites is often from within the Gypsy and Traveller community itself. Therefore, in the early phase of the plan the Council will have to respond in a similar vein to many other Local Planning Authorities and focus its attention on a combination of the following sources of sites:

- Review existing temporary and/or unauthorised sites to assess whether any are suitable for regularisation either through allocation or the granting of a permanent permission.
- Undertake further work to explore whether any existing private sites are available and suitable for either expansion and/or intensification.
- New small sites specifically promoted for Gypsy and Traveller accommodation.

Meeting the need for Gypsy and Traveller pitches over the longer term

2.3.16 Beyond the first five years, the Council intend to identify a supply of specific, developable sites, or broad locations for years 6-10 and where possible years 11-15 of the plan period. This will be reflected in the next iteration of the Local Plan 2042 once the Council have assessed site options in more detail.

2.3.17 Based on the evidence of need presented by the Gypsy & Traveller Accommodation Assessment, it is being suggested that the Local Plan should seek to identify and allocate sufficient deliverable sites to accommodate a minimum of 17 pitches. This figure may change over time, but for now forms a reasonable position on which to base the 'intention' below.

2.3.18 The Gypsy and Traveller population of Ashford has historically settled to the west and north east of Ashford. Consequently, the rural parishes of Shadoxhurst and High Halden have a high number of Gypsy and Traveller sites, accounting for around 50% of the total number of pitches in the borough and this can often impact upon local services.

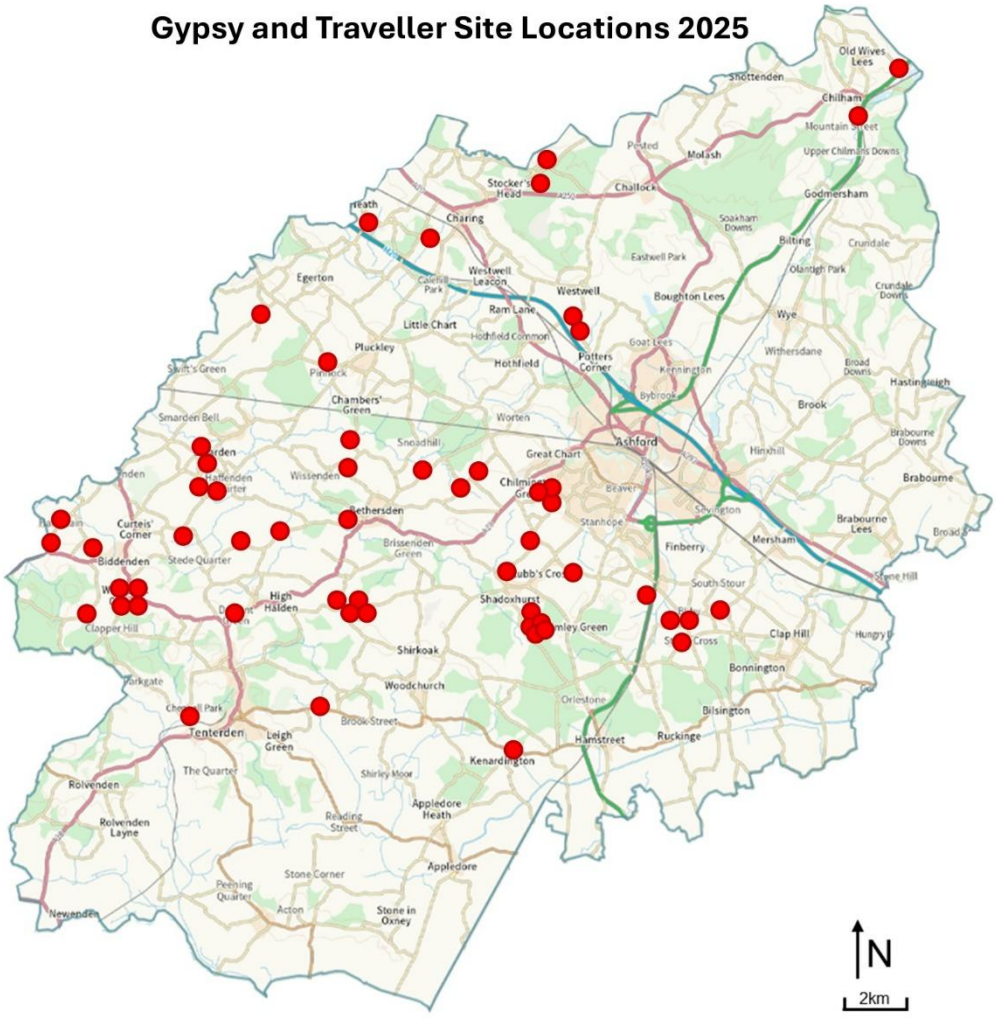


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Figure 2 Location of Gypsy and Traveller sites and plots for Travelling Showpeople in Ashford borough.

2.3.19 The Planning Policy for Traveller Sites states that 'when assessing the suitability of sites in rural or semi-rural settings, Local Planning Authorities should ensure that the scale of such sites does not dominate the nearest settled community'.

2.3.20 The need for additional pitches is often derived from the need to accommodate additional family members as they grow older and seek their own accommodation. Strong familial ties means that the preference is often to either live on the same site together through the expansion or intensification of existing sites, or on a separate site but in close proximity. This cyclical pattern of growth has resulted in the current concentrated model of distribution experienced in the west of the borough and a lack of available sites, as well as pressures with the settled community.

2.3.21 It may therefore be appropriate to consider the geographical concentration of current sites when addressing the possible location of new sites with a view to try and move to a more dispersed model of growth across the borough over the plan period.

What evidence does the Council need?

2.3.22 Further evidence and work that will need to be undertaken to inform the next iteration of the Local Plan will need to predominately focus on the identification of sites that are potentially available for Gypsy & Traveller development. This will be undertaken through a more targeted Call for Sites exercise that will aim to identify new site opportunities as well as existing sites with an interest to intensify or expand. The Council also propose to review unauthorised sites or those that currently benefit from temporary permissions and assess which if any could be granted permanent permissions (regularisation).

2.3.23 In addition to the work looking at the intensification and/or expansion of existing sites, the Council are also considering the need to review Policy HOU16 'Traveller Accommodation', specifically in terms of the 5 pitch limit for individual sites. When preparing the next iteration of the Local Plan, consideration will need to be given to whether this is the correct approach or whether the maximum threshold should be linked to a preferred maximum density (and what this should be). This would ensure that smaller sites do not become over-crowded but enable larger sites with potential to accommodate additional pitches.

Policy Intention 4 – Spatial Strategy for the distribution of Gypsy and Traveller Sites

The Council intends to promote a policy framework in the next iteration of the Local Plan 2042, that shall:

- **Provide an up to date 5-year land supply figure,**
- **Identify a number of deliverable sites and solutions on existing sites that shall deliver the identified 5-year land supply figure,**
- **Explore whether a 10% buffer is needed to that figure and set out how that buffer shall be delivered, and**
- **Beyond the first five years of the plan, identify a strategy as to how Gypsy and Traveller needs shall be more dispersed across the borough.**

2.4 The key spatial areas of the borough

Spatial Area 1 – Ashford Town Centre

2.4.1 This Policy Intention covers the Ashford Town Centre area, the boundary of which is identified in the Council's current Local Plan 2030 (adopted 2019) and via the adopted Policies Map (See Figure 3 below).

2.4.2 Policy Intention 2 of this Local Plan sets out that the Ashford Town Centre area is intended to accommodate between 900 and 1,100 new dwellings via new land allocations, which shall be determined as part of the next iteration of the Local Plan.

2.4.3 National Planning Policy Framework and associated Planning Practice Guidance encourages residential development in town centres (Planning Practice Guidance Paragraph: 001 Reference ID: 2b-001-20190722). The Council broadly endorse this overall position and recognises the important role new housing will play in helping to revitalise Ashford Town Centre. Not only will this create new footfall movements, but new dwellings will also encourage social experiences and interactions which can help to support new and existing town centre uses. The provision of new dwellings will also help to provide activity in the evening which will help to create and then support both the evening and night-time economy.

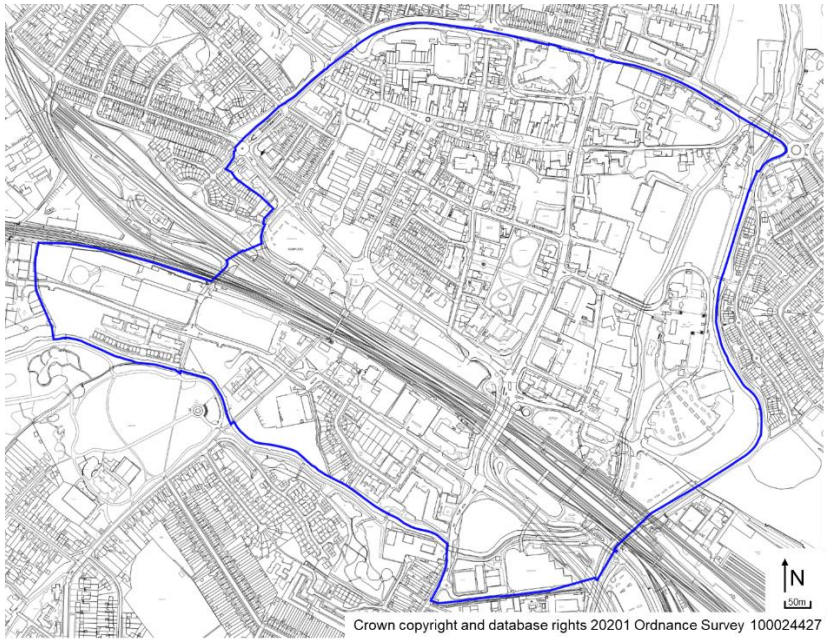


Figure 3 Ashford Town Centre boundary

2.4.4 With this in mind, the Council have dedicated resources to develop strategies and ideas which explore some of the specific benefits that residential use can bring to the Town Centre. This work is broadly reflected in the following documents.

- **The** Council's Borough Plan 2024 – 2028: This document acknowledges that the provision of residential accommodation in the town centre is key to supporting further

diversification. The Borough Plan identifies several projects that the Council consider are central to addressing challenges the brough faces. This includes converting the Civic Centre to apartments, bringing forward the Kent Wool Growers site, the redevelopment of Park Mall and taking the former Odeon project forward.

- **The Ashford Town Centre Reset Strategy and Report:** This identifies a number of interventions and actions in priority areas to further accelerate town centre regeneration. The strategy highlights a number of sites that present opportunities to introduce new residential accommodation in the Town Centre. In addition to those referenced in the Borough Plan, the site of Elwick Place Phase 2 is also mentioned.

2.4.5 Recent years have seen new housing delivered in the Town Centre and this is reflected through new flatted accommodation along Victoria Way, and new developments at Station Road (Stour Heights), Somerset Road (Somerset Heights) and Trafalgar House.

2.4.6 There remains a clear market interest to deliver housing in the town centre, as evidenced through the sites submitted in response to the Call for Sites exercise undertaken in September to November 2023. The Council and its subsidiaries are also active in bringing housing led sites forward in the Town Centre and are keen to adopt a variety of approaches to achieve mixed tenure housing that is affordable to local people. This is reflected in the Council's priorities to the 'People' set out in the Borough Plan 2024 – 2028.

2.4.7 With regards to affordable housing, the adopted position in the current Local Plan is that major development in the Town Centre is not required to provide any Affordable Social Rented accommodation. Flatted development in the Town Centre is not required to provide any form of affordable housing unless it is being promoted as Build to Rent, in which case it may be required to deliver affordable private rented housing (to be determined on a case-by-case basis in accordance with adopted Local Plan Policy HOU1 'Affordable Housing'). This position will be reviewed as the new Local Plan progresses and will be subject to the outcome of any evidence and future viability work with the intention of trying to secure more affordable housing in the Town Centre.

2.4.8 The General Permitted Development Order (GPDO) is also relevant to the wider strategy. Currently, this allows certain Town Centre uses to change to residential uses subject to a prior approval determination (i.e. it does not require a full planning application for the Council to consider). This removes the ability of the Local Planning Authority to control several important planning matters, such as parking, space standards and impact on amenity, etc. The Council will need to consider the impact of this as part of the next iteration of the Local Plan.

2.4.9 Whilst the Council recognise the importance of new housing in terms of the long-term success of the Town Centre, it also recognises that resilient town centres also need to provide a balance of land uses to foster a vibrant mixed-use environment. The range of non-residential uses, such as retail, leisure or new office opportunities, shall be

determined at a later stage of the plan making process through specific evidence which shall need commissioning.

2.4.10 Also, as the Local Plan progresses, the Council will continue to engage with key infrastructure providers to determine how more residential development in the Town Centre can be adequately supported.

2.4.11 Detailed traffic modelling will also be commissioned to understand the impact of new development on the local and wider road network. Where improvements are required to accommodate new growth, the Council will consider how these can be delivered through site specific and/or other policies in the next iteration of the Local Plan.

Defining a spatial structure for Ashford Town Centre

2.4.12 This Local Plan proposes to establish a distinct urban structure for the Town Centre, through the creation of four 'zones', (see diagram below) as a means of providing a clear framework to manage change effectively.

2.4.13 The zones have been defined having regard to common characteristics including their historic role, primary uses within the zone, their broad character, the nature of the built form and building types, the current function and role and the potential future role they could play.

2.4.14 The zones are not intended to be treated independently of one another reflected through the overarching Policy Intention for the Town Centre below. They merge at their boundary edge, but each have their own unique character and purpose which is emphasised here as a means of ensuring a greater sense of coherence in the way that the Council plan for development i.e. different land uses, buildings and public realm.

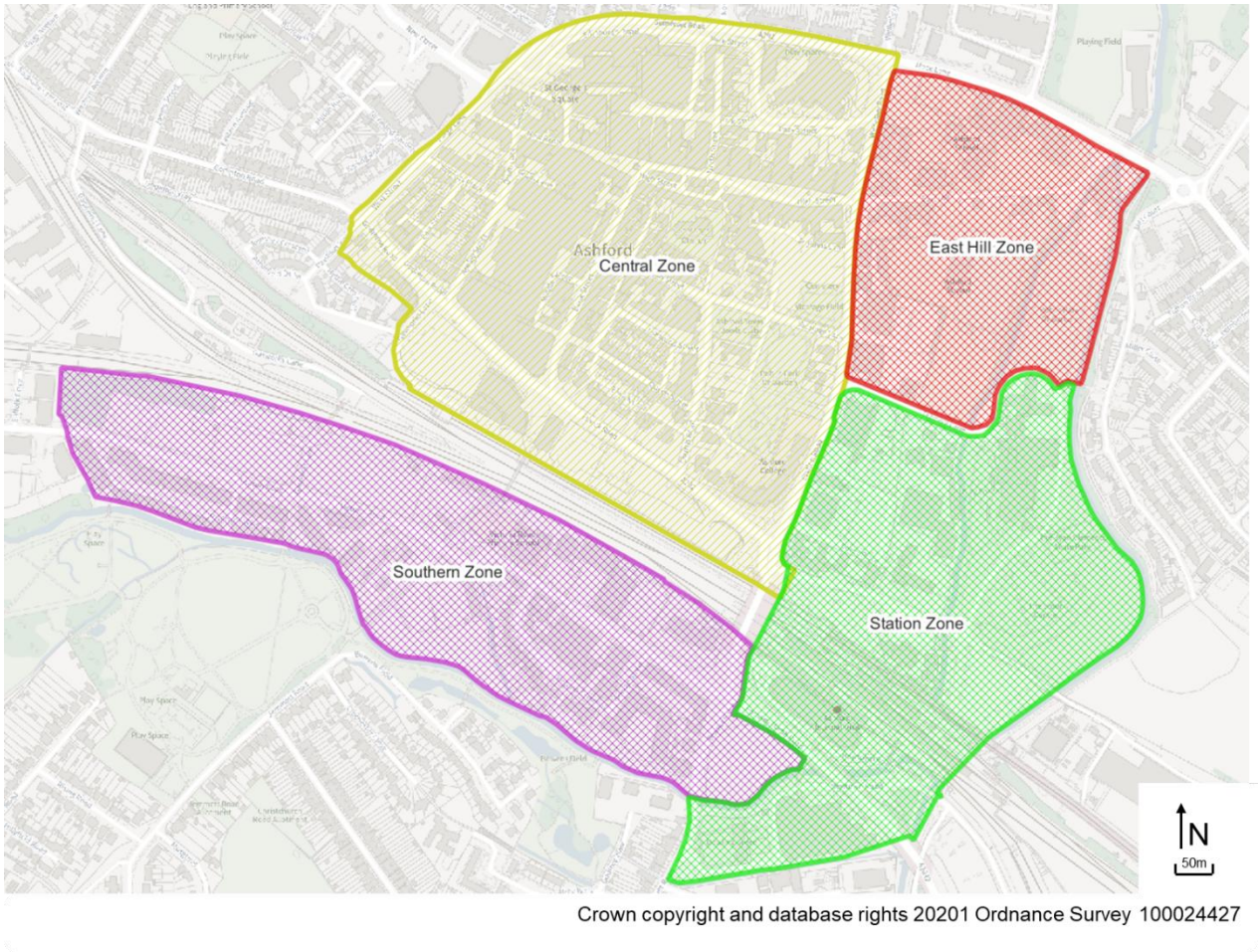


Figure 4 Zones of the Town Centre

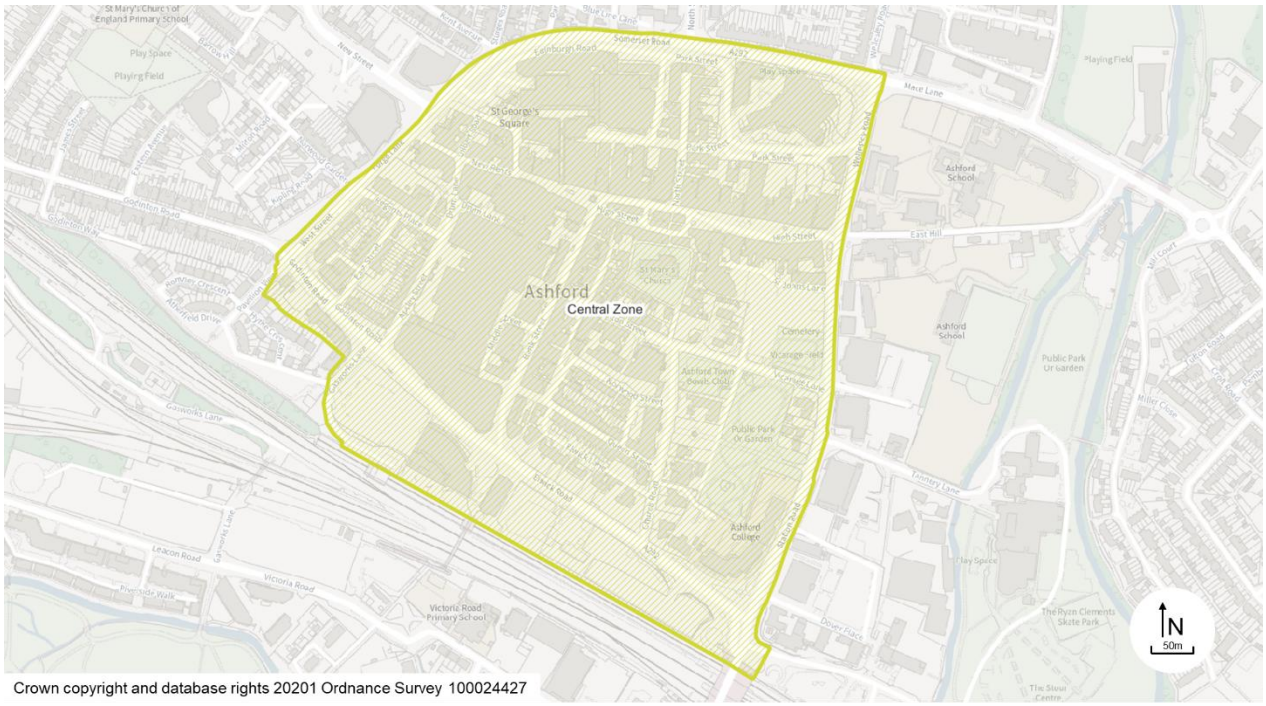
Policy Intention 5 – Ashford Town Centre

The delivery of a vibrant, resilient and mixed-use Town Centre that includes residential, retail, leisure, health, community and entertainment uses is a key spatial objective for the Local Plan 2042.

As the most accessible and sustainable location in the borough, the delivery of high quality new residential development in the Town Centre shall play an important role in achieving this objective.

To guide and manage change, the Ashford Town Centre shall be divided into four distinctive 'zones' – defined by their existing role, context and characteristics, as well as the role new development shall play in these zones.

Zone One – The Central Zone



Existing Character and Context

2.4.15 The Central zone is at the heart of the town centre. It is highly accessible, contains Ashford's historic core and the priority intervention areas identified in the Ashford Town Centre Reset (ATCR) and Action Plan. These are Upper High Street, Middle Row, Bank Street and Elwick Place.

2.4.16 The zone has a range of town centre uses such as retail, leisure, restaurants, cafes, tourism, offices, banks and education facilities (including Ashford College and Ashford Gateway (central library)). Two shopping malls lead off Upper High Street: Park Mall to the north and the larger County Square to the south. Along the southern border of the zone lies Elwick Place, the town's flagship leisure and entertainment destination.

2.4.17 The zone has a strong identity that is rich in history with a number of Listed Buildings, a large Conservation Area and a designated area of archaeologic interest. The Grade I Listed St Mary's Church is a landmark building situated at the heart of the town and visible from all approaches. The gradient within this area slopes from north to south with St Mary's Church at the centre. With the exception of Memorial Gardens, which is an attractive public open space serving the wider town centre, there is limited green space.

Future Role and Opportunities

2.4.18 The Central zone will continue to be a mixed-use hub. New residential development will play an important role in this regard. This zone is also likely to be the continued focus for town centre uses such as retail, leisure and entertainment. These types of uses shall help create a vibrant and resilient town centre and complement the night-time and leisure economy.

2.4.19 Development in this zone will need to respond to its strong identity by preserving or enhancing the distinctive historic character. To improve accessibility within this zone, the Council will encourage opportunities to improve connectivity to enhance routes into adjoining zones and locations beyond the town centre boundary.

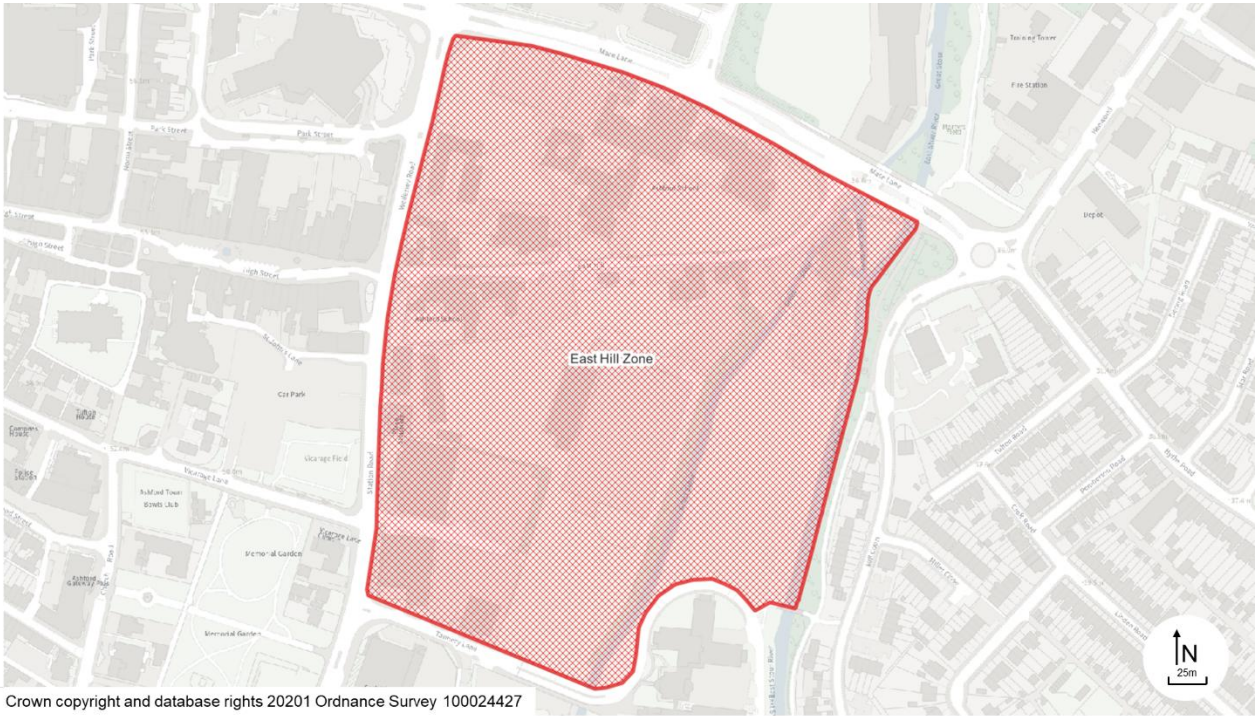
Policy Intention 6 – Central Zone

In the Central zone a range of primary and secondary town centre uses shall be encouraged, including residential, retail, leisure and community uses.

Development shall respect the existing scale, height, form and established historic character contained within the zone, with specific regard to views of St Mary's Church. Taller buildings may be justified in urban design terms in certain locations.

Opportunities to re-establish or strengthen building lines to preserve the urban grain shall be encouraged. The Council will also expect major new development to seek opportunities to improve connectivity to enhance routes through this zone and into adjoining areas.

Zone Two – East Hill Zone



Existing Character and Context

2.4.20 The East Hill zone includes the large playing fields of Ashford School. The buildings fronting Station Road are of a commercial nature and include a series of medium scale office developments, some retail with residential above and leisure use (the bowling alley).

2.4.21 This zone forms a transitional area between the Central zone and residential development to the east. It has an attractive sense of place, with the presence of the River Stour and 'North Park' – a pleasant informal green space that is protected by its designation within the Green Corridor.

2.4.22 The East Hill area forms an attractive entrance to the Town Centre and includes a well-used pedestrian link that is aligned with several Listed Buildings and situated within the Town Centre Conservation Area. The East Hill zone is also within easy walking distance of Ashford International and Ashford domestic railway stations, the Stour Leisure Centre and the Queen Mother Park which links to residential areas beyond the Town Centre.

Future Role and Opportunities

2.4.23 The East Hill zone is likely to have limited options for new housing growth over the plan period. The Council's intention here is to focus on encouraging the re-development of brownfield sites and/or bringing vacant buildings back into use.

2.4.24 It will be important to retain and enhance the area's more open character around the river corridor, (which is protected by the Green Corridor designation) and the preservation or enhancement of the designated heritage assets and their setting. Opportunities to improve the public realm and enhance existing pedestrian and cycle routes will be encouraged.

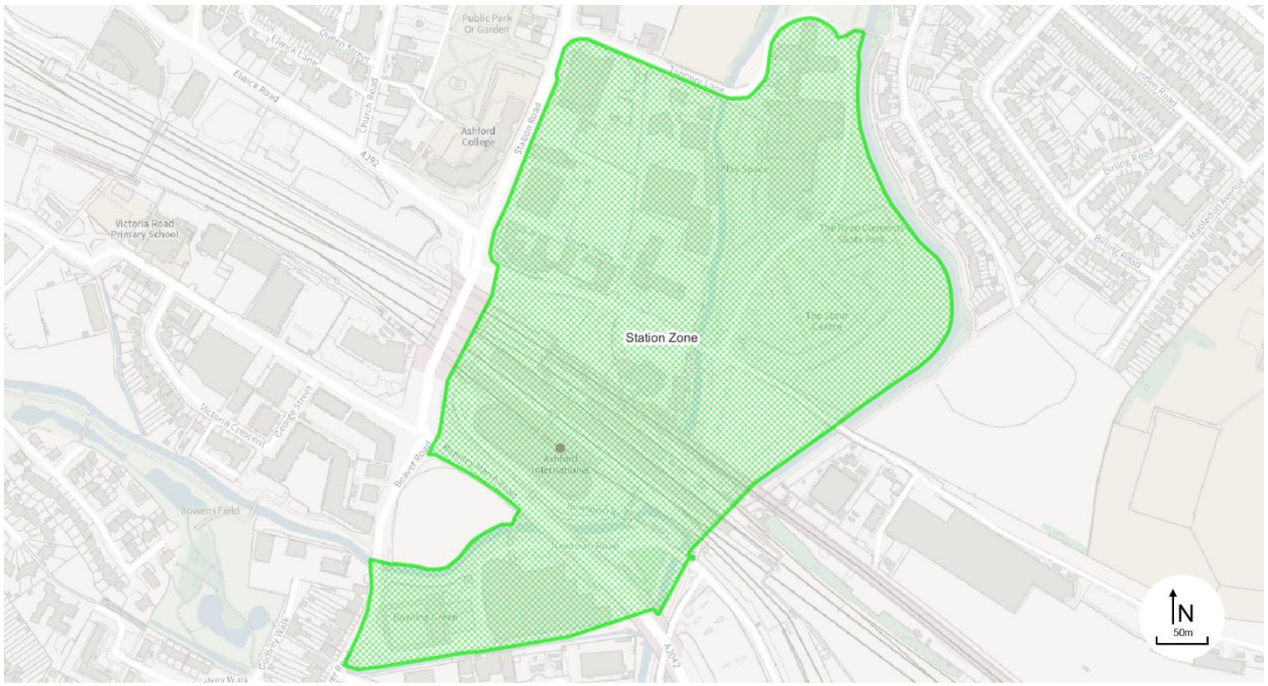
Policy Intention 7 – East Hill Zone

New residential development in the East Hill zone is likely to be focused on the re-use of buildings on brownfield sites which the Council shall encourage, in principle.

Development here shall need to preserve or enhance the various heritage assets that contribute to the zone's overall character.

Development shall be expected to enhance the Green Corridor, improve the public realm and enhance pedestrian and cycle routes to increase the overall accessibility of the town centre for non-car-based users.

Zone Three – Station Zone



Existing Character and Context

2.4.25 The buildings and infrastructure associated with Ashford International and domestic railways stations are a dominant feature of this zone. This zone is commercial in nature and is characterised by employment uses and other secondary uses including leisure and small-scale retail.

2.4.26 The zone includes the Stour Leisure Centre, the Civic Centre and the former Kent Woolgrowers – a large brownfield site that contains the derelict Grade II* Listed Building (Whist House).

2.4.27 To the southwest of these, are areas of open space with the River Stour running through. Open space here is protected by its designation within the Green Corridor. The topography means that the land is much lower when compared to other areas of the Town Centre.

2.4.28 Access to the south of the railway line can be achieved through an underpass to the west of the domestic station, however, despite upgrades it is still relatively unattractive to use, particularly at night. The underpass connects to the residential areas of South Ashford and to the Ashford Designer Outlet.

2.4.29 The busy Romney Marsh Road runs through the zone to the south and gives it a traffic dominated character. Given the visual prominence of the Romney Marsh Road, the volume of traffic using it, and the lack of active frontages, this area has low pedestrian activity. This serves to exaggerate the apparent distance of the Designer Outlet Centre from the station and the Central zone. As a result, there is a lack of integration between the Designer Outlet and the rest of the Town Centre.

Future Role and Opportunities

2.4.30 Policy S1 'Commercial Quarter' of the current Ashford Local Plan 2030 (adopted 2019) covers a large land parcel within Station zone. It promotes office use and states that '*other secondary uses such as residential apartments, small-scale retail and/or leisure uses and a hotel would also be appropriate*'. This position continues to be adopted policy.

2.4.31 However, since 2019, it is recognised that there have been substantial changes to the economy and retail market. These changes are highlighted in Chapters 3.4 and 3.5 of this Local Plan. This shall require the Council to review whether new residential development should play a more predominant role over the plan period.

2.4.32 The lower lying nature of the land parcels near the river, present an opportunity for taller buildings in this part of the zone.

2.4.33 Development shall be expected to enhance the Green Corridor and seek opportunities to improve the public realm and accessibility to reduce reliance on cars.

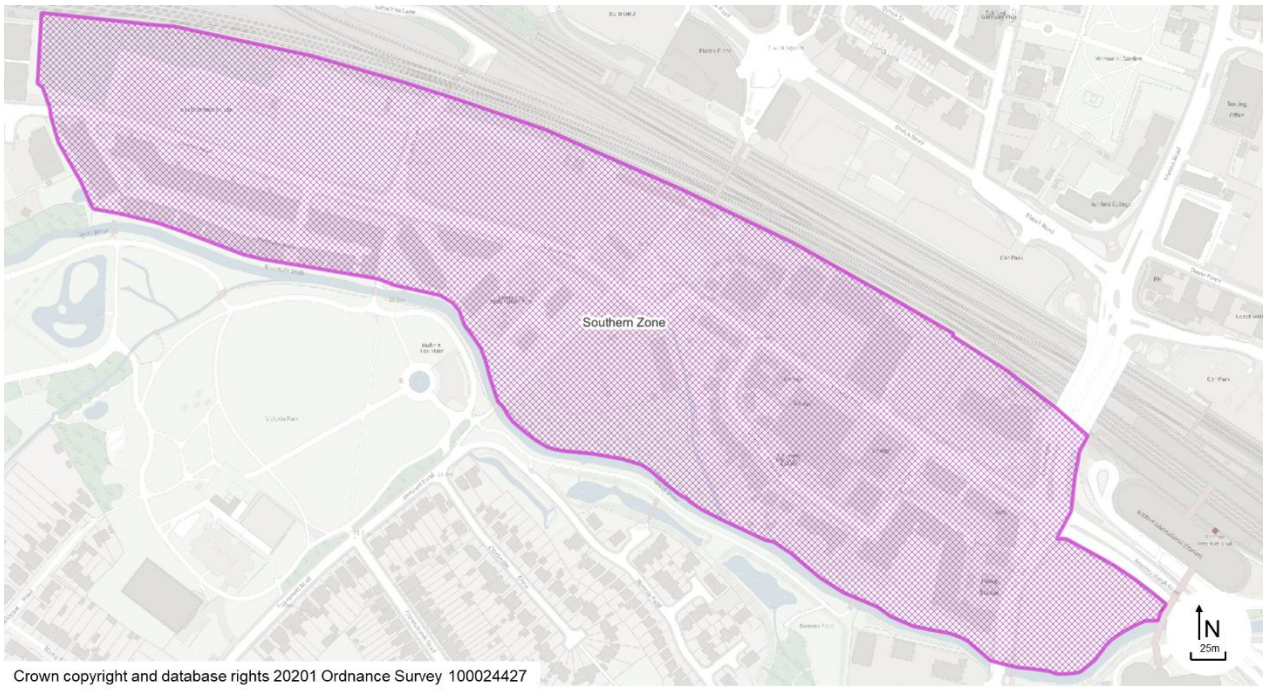
Policy Intention 8 – Station Zone

The Station zone shall continue to be a primary location for the creation of new jobs within the wider Town Centre. Other secondary uses such as small-scale retail and/or leisure use would also be appropriate. New residential development shall play an important role in providing a vibrant mixed-use environment.

Development shall respect the existing scale, height and established built form contained within the zone. Taller buildings may be justified in urban design terms, in certain locations.

Development shall be expected to enhance the Green Corridor, improve the public realm and enhance pedestrian and cycle routes to increase the overall accessibility of the town centre for non-car-based users.

Zone 4 – Southern Zone



Existing Character and Context

2.4.34 The Southern zone lies to the south of the railway line and has recently undergone major change and regeneration. Investment and subsequent changes to the road layout system provide a new high-quality urban boulevard with grass verges and street trees.

2.4.35 The character of the area is now influenced by substantial new residential development to the south of Victoria Road. In addition to residential, the area still contains a mix of other uses including a former gasworks, primary school, hotel, supermarket, and a brewery which acts as a landmark building on the corner of the junction with Beaver Road.

2.4.36 The southern edge to this zone is aligned by the River Stour. A number of attractive cycleways and footpaths run along the river corridor which form part of the Green Corridor designation. A large area of public open space at Victoria Park, lies to the south. Victoria Park is one of the borough's most important green space destinations.

2.4.37 Despite recent investment and public realm improvements it is recognised that the railway line remains a barrier to connectivity particularly for pedestrians and cyclists. There are still locations where routes are unattractive and not particularly legible (i.e. Gasworks Lane underpass).

Vision and Future Opportunities

2.4.38 The Council considers that there is potential in this zone to further increase the amount of residential development. In addition, there may also be scope to include some employment development to provide a transition from an industrial to a more residential character. Complementary small-scale office and retail use may also be appropriate.

2.4.39 Development in this zone will be expected to seek opportunities to enhance existing pedestrian and cycle routes to encourage movements into and out of the Town Centre.

Policy Intention 9 – Southern Zone

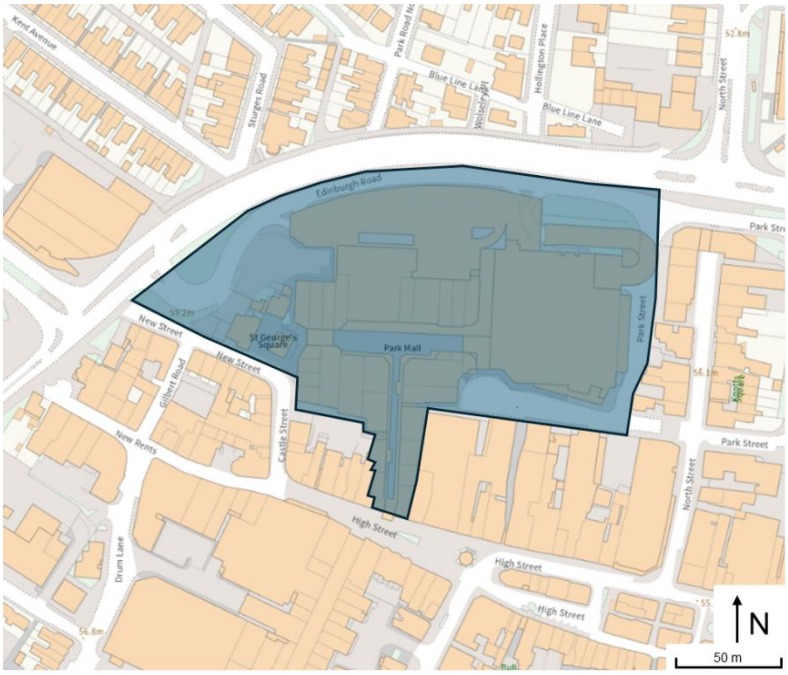
New residential development in the Southern zone, which utilises existing brownfield sites, shall be encouraged.

Development shall respect the existing scale, height and established built form contained within the zone. Taller buildings may be justified in urban design terms, in certain locations.

Development shall be expected to enhance the Green Corridor, improve the public realm and enhance pedestrian and cycle routes with a specific focus on improving the accessibility between this zone and the Central zone particularly connections across the railway lines.

Opportunity Areas in the Town Centre area

Park Mall



2.4.40 The Council's commitment to re-develop Park Mall has been widely advertised, including in the Council's Borough Plan and the Ashford Town Centre Reset Strategy and Report. The size of the site – which spans Park Mall and the Edinburgh Road multi storey car park – offers an opportunity to deliver major development that is intended to be residential

led, complemented by other town centre uses. It will generate significant footfall movements that will help support the variety of shops, services and facilities in the nearby area. As the site extends to the outer edge of the Town Centre boundary, it also offers opportunities to significantly improve permeability into the Town Centre.

Vicarage Lane and the Odeon

2.4.41 The Odeon and Vicarage Lane car park represents an opportunity to provide a scheme that enhances the mix of uses in the heart of the town centre. This could include a combination of new residential, leisure and/or community uses. Re-development here also provides an opportunity to improve connectivity to Lower High Street.

Civic Centre

2.4.42 The Civic Centre site, located in the Station zone, represents an opportunity to deliver a high quality residential led scheme. How development should respond to the site's location within the Green Corridor and location in the Flood zone will also need to be carefully considered.

Spatial Area 2 – Ashford Urban Area

2.4.43 This Policy Intention refers to the Ashford Urban Area which is diagrammatically reflected on Strategic Diagram 2 (see Appendix 1).

2.4.44 As with most medium sized market Towns that have steadily grown over time, Ashford has developed and evolved over many years and as such has a highly varied built form. This built form is predominantly residential in nature and is a mix of older, historic properties (some of which are listed, or lie within Conservation Areas), combined with much newer properties which include a mix of traditional family style housing and flatted accommodation.

2.4.45 The evolution of the built form has tended to create distinct places, that form 'pockets' of different character areas within the wider built fabric of the town, such as clustered terraced type housing newer build cul-de-sacs and modern estates.

2.4.46 This residential focus is intersected with an equally varied and substantial mix of non-residential uses that form part of the wider character and nature of the town. This mix of uses ranges significantly and includes key services from the William Harvey Hospital and Julie Rose Stadium to the Ashford Designer Outlet, industrial estate of Cobbs Wood, and retail park at Orbital Park. These services can be accessed by road, public transport and using, footpaths, public rights of way and cycleways that connect the town of Ashford.

2.4.47 Open spaces are also dispersed across the Ashford Urban Area. These spaces vary in character, role and scale. They include the Green Corridor areas, landscape buffers, strategic parks and play and recreation spaces. The Great Stour River, connecting waterways and associated flood plains are also dominant features in key locations that provide natural, calm and tranquil environments away from busier areas.

2.4.48 With regards to the role the Ashford Urban Area could play in terms of accommodating new housing growth, Policy Intention 2 'The spatial distribution of new housing land allocations across the borough' sets out that the delivery of around 600 to 800 new dwellings is a realistic ambition. This is in addition to the dwellings that form part of the wider 'planning commitments' in this broad area which are identified in Appendix 2 – List of Housing Commitments.

2.4.49 Given the context above, the Ashford Urban Area, provides relatively few new opportunities for new housing growth – certainly of a significant scale. Many of the opportunities that do exist, are sites that already have planning permission or sites that are currently allocated in the adopted Local Plan and are currently considered to be deliverable and developable.

2.4.50 However, the Call for Sites exercise undertaken in September 2023 does illustrate that there is still a strong desire from the market to focus new development in the Ashford Urban Area. Some of these sites are proposing new housing in areas which are constrained, such as being in the Green Corridor or in the identified flood zone. The suitability of all the sites submitted shall form part of the considerations for the next iteration of the Local Plan.

2.4.51 In tandem, the Council will also review the sites that form part of the wider 'planning commitments' to see whether there has been any change in context or circumstances which might warrant the reconsideration as to the scale of housing being proposed, and whether seeking to provide more housing is a realistic, deliverable and sustainable option.

2.4.52 Furthermore, it is anticipated that other sites will come forward as the plan progresses. These may come forward as a direct result of consultation on this draft Local Plan.

Policy Intention 10 – Land allocations in the Ashford Urban Area

New land allocations shall be identified in the next iteration of the Local Plan, which in combination, shall deliver between 600 and 800 new dwellings over the plan period in the Ashford Urban Area.

New land allocations shall take into account the need to respond to the local character and nature of the surrounding built form, and will need to demonstrate how any landscape, open space, green space (including Green Corridor), heritage or biodiversity interests have been taken into account.

New land allocations shall deliver and/or contribute towards the delivery of infrastructure or other facilities needed to support the scale of new residential development being proposed. These facilities and infrastructure include those associated with education, health, community, recreation, sport and leisure uses.

Where relevant, development on new land allocations shall enhance the Green Corridor, improve the public realm and enhance pedestrian and cycle routes to increase the overall accessibility around the town.

Spatial Area 3 – Edge of Ashford

2.4.53 In strategic plan-making terms, land around the edge of Ashford has long formed part of the spatial strategy for the borough. They are areas which are near to the wide range of services, jobs, facilities and infrastructure that the town of Ashford has to offer.

2.4.54 These areas are locations where large scale developments can be identified that can yield high numbers of dwellings per year. They can also create clearly distinctive new places that utilise good placemaking in a way that can 'create' accessible connections. However, large scale development presents several challenges in terms of how it interacts with existing and distinct villages that surround the town and the need to ensure that sufficient infrastructure is put in place, at the right time, in a way that is consistent with what has been planned before. There is also the impact on the wider landscape to consider, and they are often sites which are greenfield in nature.

2.4.55 Balancing these wider considerations is always a difficult challenge and one which the Local Plan 2042 shall need to address.

2.4.56 Policy Intention 2 'The spatial distribution of new housing land allocations across the borough' establishes that the 'edge of Ashford' area shall accommodate around 2,500 to 2,700 dwellings over the plan period, via new land allocations.

2.4.57 At this stage of plan preparation, the Council is not seeking to identify specific site allocations to achieve this range. Instead, this iteration of the Local Plan identifies some broad 'areas of search' (see below) where the Council shall initially explore, as part of the detailed site assessment work that will inform the next iteration of the Local Plan.

2.4.58 The areas of search are broadly cognisant of the range of sites submitted by the market through the 2023 Call for Sites exercise, although the site identification stage shall not be solely limited to these sites. When viewing the ‘areas of search’, they should not be viewed as having a 'defined' edge at this stage. The purpose of showing them diagrammatically is to indicate broad land areas. It may well be the case that not all ‘areas of search’ shall be required to accommodate new housing allocations in the next iteration of the Local Plan.

Areas of Search

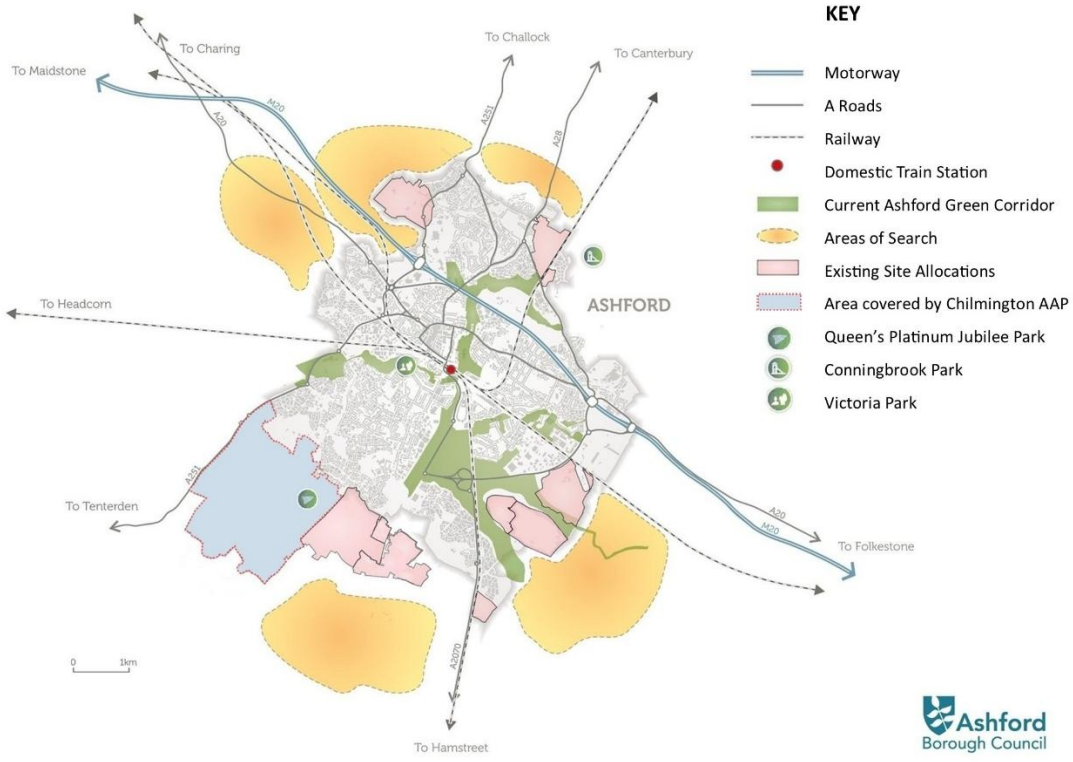
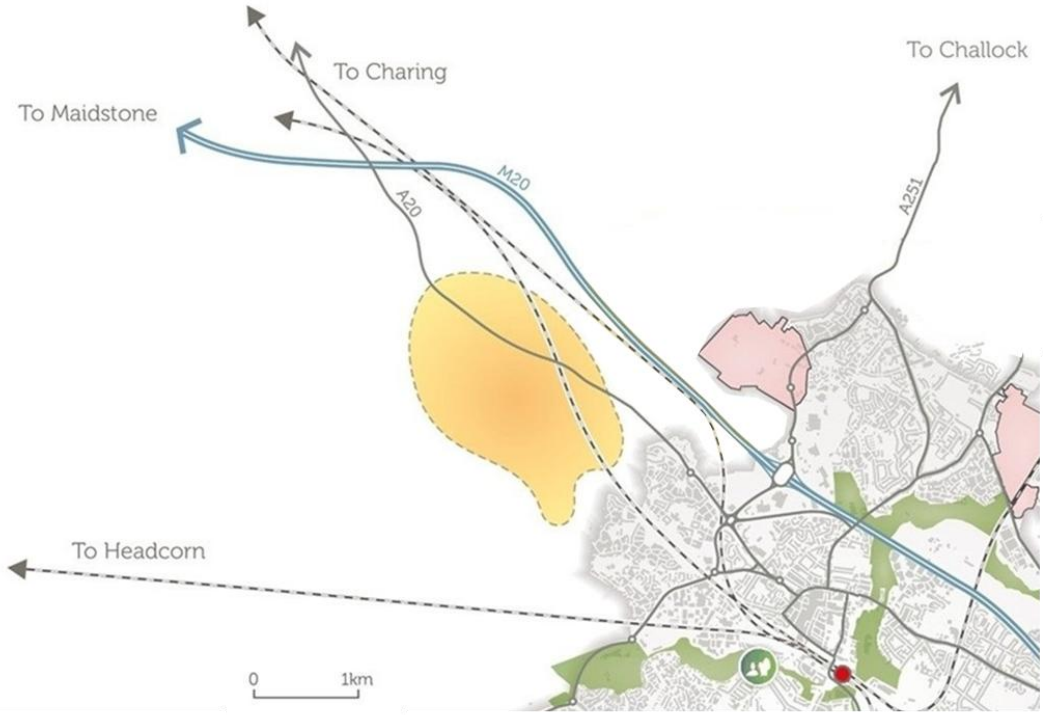


Figure 5 Inset of Areas of Search as shown on Strategic Diagram 2 in Appendix 1

North West Ashford

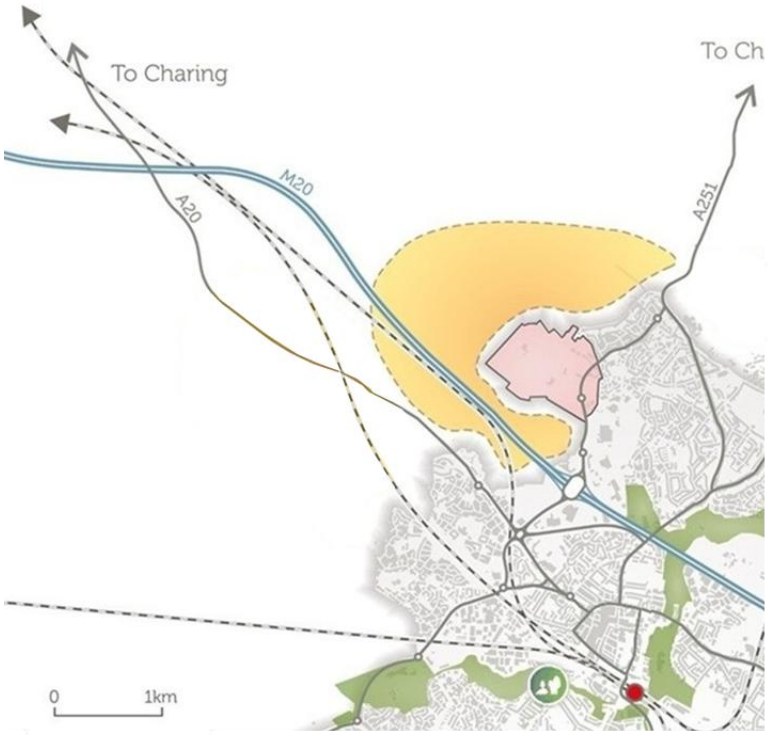


Area of search taken from Strategic Diagram 2 in Appendix 1

2.4.59 The area of search to the north west of Ashford is punctuated by the A20, which connects Charing to Ashford. Either side of the A20 is characterised by undulating countryside that includes pockets of dispersed built form.

2.4.60 To the north is the Kent Downs National Landscape, the setting of which is an important consideration. The area includes woodland located at the edge of Ashford some of which is designated as Ancient Woodland. Hothfield Common, which is a Site of Special Scientific Interest (SSSI), is located to the west. These designations are also important and will need to be taken into consideration when looking at potential site allocations in the next iteration of the Local Plan.

North Ashford



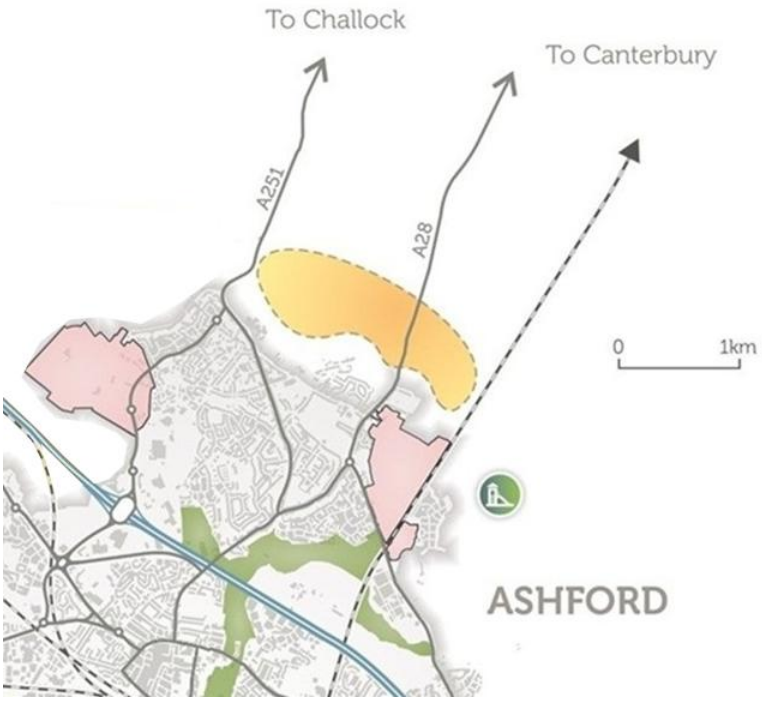
Area of search taken from Strategic Diagram 2 in Appendix 1

2.4.61 The area of search to the north of Ashford is located at the edge of the communities of Goat Lees and Kennington. The area of search includes Sandyhurst Lane and land to the south of existing site allocation Policy S20 'Eureka Park' of the current Local Plan 2030 (adopted 2019). Land to the south of Eureka Park is intersected by the M20.

2.4.62 Sandyhurst Lane is characterised by a predominantly linear built form, particularly on the eastern side of the road. It currently provides a clear separation from countryside to urban area, with fields and the recreation ground located on the western side. The Kent Downs National Landscape lies to the north of Sandyhurst Lane, the setting of which shall be an important consideration.

2.4.63 Land to the south of 'Eureka Park' is currently occupied by Ashford Golf Course and so is predominately open. To the south of the Golf Course on the opposite site of the M20 lies The Warren and Hoads Wood woodlands. Parts of these woodlands are designated as Ancient Woodland which will be an important consideration when looking at potential site allocations in the next iteration of the Local Plan.

North East Ashford



Area of search taken from Strategic Diagram 2 in Appendix 1

2.4.64 The area of search to the north east of Ashford is located at the edge of the community of Kennington and to the north of existing Policy S2 'Land North-East of Willesborough Road, Kennington' of the current Local Plan 2030 (adopted 2019). This site is now under construction.

2.4.65 The 'area of search' is predominately agricultural fields which are generally flat and bounded by the railway line to the east. The A28 connecting Ashford to Canterbury runs through the area of search. The Kent Downs National Landscape wraps around the area of search to the north west, north and north east, the setting of which shall be an important consideration.

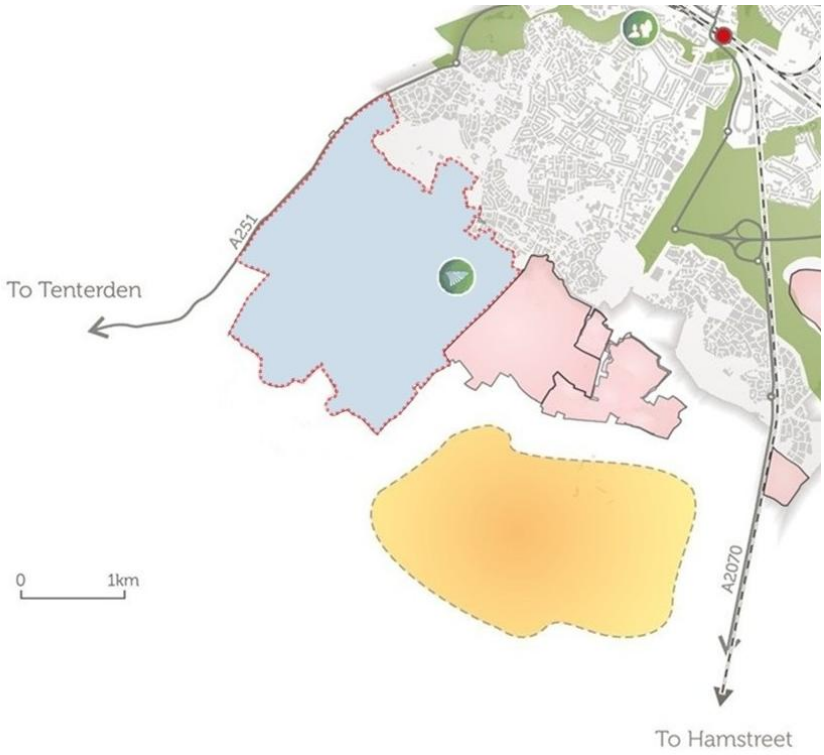
South East Ashford

Area of search taken from Strategic Diagram 2 in Appendix 1

2.4.66 The area to the south east of Ashford, is predominately characterised by a network of agricultural fields, hedgerows and trees, alongside a series of rural lanes.

2.4.67 The area adjoins the new community at Finberry. This will deliver over 1,000 homes, local centre, primary school, employment space, and sports facilities. To date, the primary school and approximately 780 dwellings have been built. The development of Waterbrook, planned for 364 homes, is also located north of the 'area of search' which adjoins the 'Ashford International Truck Stop'. The village of Mersham is located to the northeast.

South Ashford



Area of search taken from Strategic Diagram 2 in Appendix 1

2.4.68 The area of search to the south of Ashford forms part of a series of wider land parcels that are agricultural in nature. Ashford Road runs through the area of search and provides connections between Ashford and Hamstreet. Within the area of search development along Ashford Road is more sporadic.

2.4.69 Directly to the north of this 'area of search' lies the South of Ashford Garden Community, which is formed of Chilmington Green (5,750 homes, primary and secondary schools and local centres), Court Lodge (planned for 950 dwellings in Local Plan site allocation S3 'Court Lodge') and Kingsnorth Green (planning permission for 550 dwellings).

Strategic Considerations relevant to the 'edge of Ashford'

2.4.70 When choosing which sites to promote in the next iteration of the Local Plan, the Council will need to balance several 'considerations', as follows.

Strategic Consideration 1 – Site specific issues

2.4.71 These shall include:

- the ability to accommodate an appropriate scale, mix and density of new housing development;
- the impact on local character, existing built form, landscape features and wider setting;

- a particular focus on designated areas and their setting, such as National Landscapes, Conservation Areas and specific heritage assets;
- the impact on the natural environment, such as biodiversity, flooding, ancient woodland and issues associated with climate and energy resilience;
- the ability to maximise access to public transport, cycling and walking to encourage non-car-based travel; and
- the ability to generate safe highways access.

Strategic Consideration 2 – Infrastructure Delivery

2.4.72 Large sites at the edge of Ashford provide opportunities to deliver specific infrastructure projects, on site. Types of infrastructure that may need to be delivered can range from schools, community buildings, a local centre, health facilities, sports provision, informal open space and allotments.

2.4.73 Previous Local Plans have been successful in this regard, with several important new services and facilities being delivered in response to specific allocated site policy requirements. The Local Plan 2042 process provides similar opportunities. The Council will work closely with infrastructure providers to determine what infrastructure is needed. The Council will also work with land promoters of those sites it intends to allocate, to make sure sufficient land for infrastructure is safeguarded as part of any specific site policy.

Strategic Consideration 3 – Integration with existing or planned new areas

2.4.74 New development at the 'edge of Ashford' provides the opportunity to deliver high-quality, mixed-use schemes, that are clearly informed by local character and context. These new places can create their own distinct character; however, this must be achieved in a way that enables a development to integrate successfully with existing and emerging communities.

2.4.75 This can be achieved through the creation of new links such as extensions to the Green Corridor and integration of green buffers which facilitate walking and cycling. Large development can also result in the creation of new bus routes offering an alternative to car-based travel. Connectivity will be an important consideration when selecting which sites to allocate in the next iteration of the Local Plan.

Strategic Consideration 4 – Delivering services on-site

2.4.76 Larger scale proposals can provide a critical mass that can sustain local shops and services, particularly those which relate to more 'everyday' needs. In turn, this can encourage residents to walk to the provision, as opposed to using private cars especially if attractive footpaths and cycle routes are provided. Such a mix of uses can also have a significant placemaking benefit and create activity and vibrancy in key locations. These issues shall be considered as part of the next iteration of the Local Plan.

Chilmington Green

2.4.77 Chilmington Green is a significant development located at the southeast edge of Ashford. It shall create a new community of up to 5,750 homes and is proposed to generate facilities that will support 1,000 jobs.

2.4.78 It shall be supported by a District Centre, shops, healthcare provision and sport and leisure facilities – much of which shall be focused within a new strategic park that will play a key sport and recreational role for the Town (the Queen's Platinum Jubilee Park – formerly known as Discovery Park). A new secondary school has been built and is due to open for the academic year 2025/26, and a further 4 primary schools shall also form part of the development (the first of which opened in September 2023).

2.4.79 The Chilmington Green area is covered by the Council's Chilmington Green Area Action Plan (adopted 2013). This Action Plan remains part of the development plan. However, the land covered by the Action Plan now benefits from the outline planning permission (reference 12/00400/AS). Reserved matters applications for Phase 1 and 2 have been submitted and construction has started on site.

2.4.80 Accordingly, the Council's intention is that the Local Plan 2042 shall cover the whole borough area, and in doing so supersede the Chilmington Green Area Action Plan. However, this draft iteration of the Local Plan does not carry sufficient planning 'weight' to supersede the Action Plan at this stage.

2.4.81 This is not to suggest that the Chilmington Green development does not have a significant and important role to play up to 2042 and beyond. The Chilmington Green development will:

- Deliver around 2,480 homes by 2042. The delivery of housing is based on 327 dwellings which are anticipated to be delivered in the period 2024 – 2029, as set out in the Council's published five-year housing land supply position statement and a further 2,150 dwellings up to 2042, based on likely delivery rates.
- Play the primary role in the delivery of the strategic Queen's Platinum Jubilee Park to the east of the development, which will provide a leisure and recreation hub for residents of the borough.
- Contribute towards an important component of the South of Ashford Garden Community, the delivery of which remains a strong ambition of the Council.
- Deliver the A28 improvements as a means of serving the traffic needs of the development.

2.4.82 At the time of publishing this Local Plan, it is acknowledged that the developer is challenging the Section 106 Legal Agreement and many of the contributions agreed therein. This is commonly referred to as the 'S106b appeal'. Any consequences arising from the appeal decision that affect the Council's strategy for planning for development in the borough will be addressed in the next iteration of the Local Plan.

Policy Intention 11 – Land allocations at the Edge of Ashford

Appropriate new land allocations for larger scale development, which in combination shall deliver between 2,500 and 2,700 new dwellings over the plan period, shall be focused at the Edge of Ashford.

Five 'areas of search' have been identified in this Local Plan as a means of identifying where new land allocations may be targeted through the next iteration of the Local Plan. The exact composition of these new land allocations shall be influenced by a variety of strategic planning considerations.

Spatial Area 4 – Tenterden

2.4.83 Tenterden provides a range of jobs, shops, services and facilities. It plays an important rural service centre role for the nearby area, which includes a large rural hinterland made up of villages, hamlets and farmsteads. Tenterden is an attractive and historic market town which contributes to the wider appeal of this part of the borough. It is a focal point for tourism and is an important contributor to the rural economy.

2.4.84 The town's northern hinterland, between St Michaels and High Halden does not contain any national landscape designations. Much of the area is open countryside punctuated with woodlands, well established field boundaries, and sporadic built development along the A28 – a key strategic corridor that runs through the borough.

2.4.85 Elsewhere, Tenterden is largely 'contained' by the High Weald National Landscape which provides a dominant landscape feature. It abuts the town to the east and west, and much of the southern area, apart from a distinguishable 'gap'. This 'gap' to the south of Tenterden is a location that previous Local Plans identified as being suitable to sustainably extend the town, and an area which is again the focus of this Local Plan.

2.4.86 In recent years, Tenterden has seen around 360 homes delivered, mainly from the developments at 'TENT1A' (Southern Extension Phase A) and 'Tilden Gill', planning permission references 14/00757/AS and 14/01420/AS, respectively. Other developments in the planning pipeline include 141 dwellings at the development known as 'Limes Land' or 'Wates', planning permission reference 21/00790/AS. This shows that there is a strong market desire to deliver in this area but also highlights the need to create a balanced strategy that reflects the scale and pace of change.

2.4.87 The town of Tenterden is covered by the Tenterden Neighbourhood Development Plan 2013 – 2030. Made in 2024, the Neighbourhood Plan sets a vision for the parish up to 2030 and includes a series of planning policies on matters such as protection of Local Green Spaces, biodiversity, high quality design and heritage assets, such as the Tenterden, St Michaels, Smallhythe, and Reading Street Conservation Areas. The

relationship between the Local Plan and Neighbourhood Plans is detailed in Chapter 1.6 of this Local Plan.

2.4.88 The Council recognise the importance of balancing all the factors above to promote a suitable strategy for the town, up to 2042. This Local Plan proposes two areas, in sustainable locations, that effectively seek to 'consolidate' the northern and southeastern parts of the town. See below.

The approach to TENT1B

2.4.89 In 2010, the Council's Tenterden and Rural Sites Development Plan Document included site policy TENT1, principally for housing. The site area TENT1 was subdivided into two land parcels – phase A (for 300 dwellings) and phase B (for 175 dwellings). See figure below.

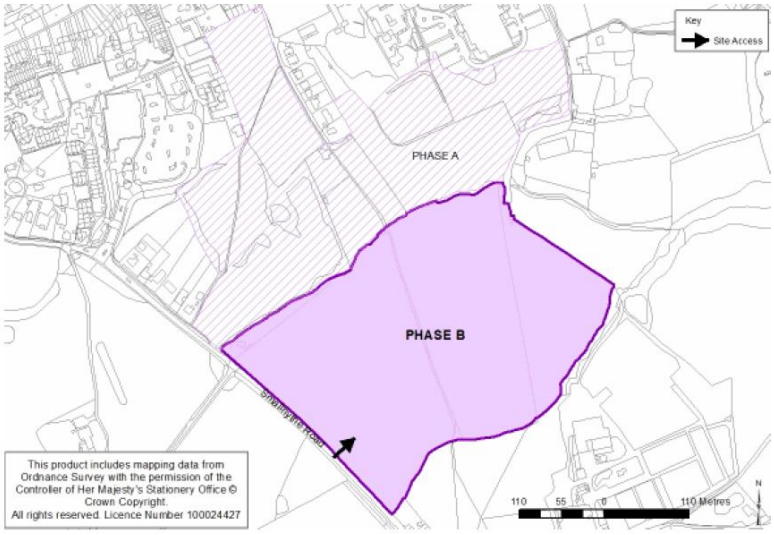


Figure 6 TENT1B as identified in the Tenterden and Rural Sites Development Plan Document (2010)

2.4.90 The TENT1 land parcel provided a strategic opportunity to create a plan-led, suitably scaled, urban extension to the town in a sustainable location. The land sat outside of any designated landscape area. Phase A has delivered 255 dwellings.

2.4.91 However, the Phase B land parcel has not been built. There have not been any pre-application discussions, nor has a planning application been submitted for consideration by the Council. It is now over fifteen years since it was first allocated in an adopted plan.

2.4.92 This lack of planning activity was one of the reasons that the Planning Inspector allowed a planning appeal for 141 dwellings (and a country park) on land between Woodchurch and Appledore Road, commonly known as the 'Wates' or 'Limes Land' proposal. At the time of the appeal (March 2022) the Inspector stated that the TENT1B site *'has been unable to provide clear evidence that the site would be able to deliver'.*

2.4.93 The TENT1B site has been submitted through the 2023 Call for Sites exercise, and the Council have engaged with the promoters, who have expressed a desire for the site to be considered again.

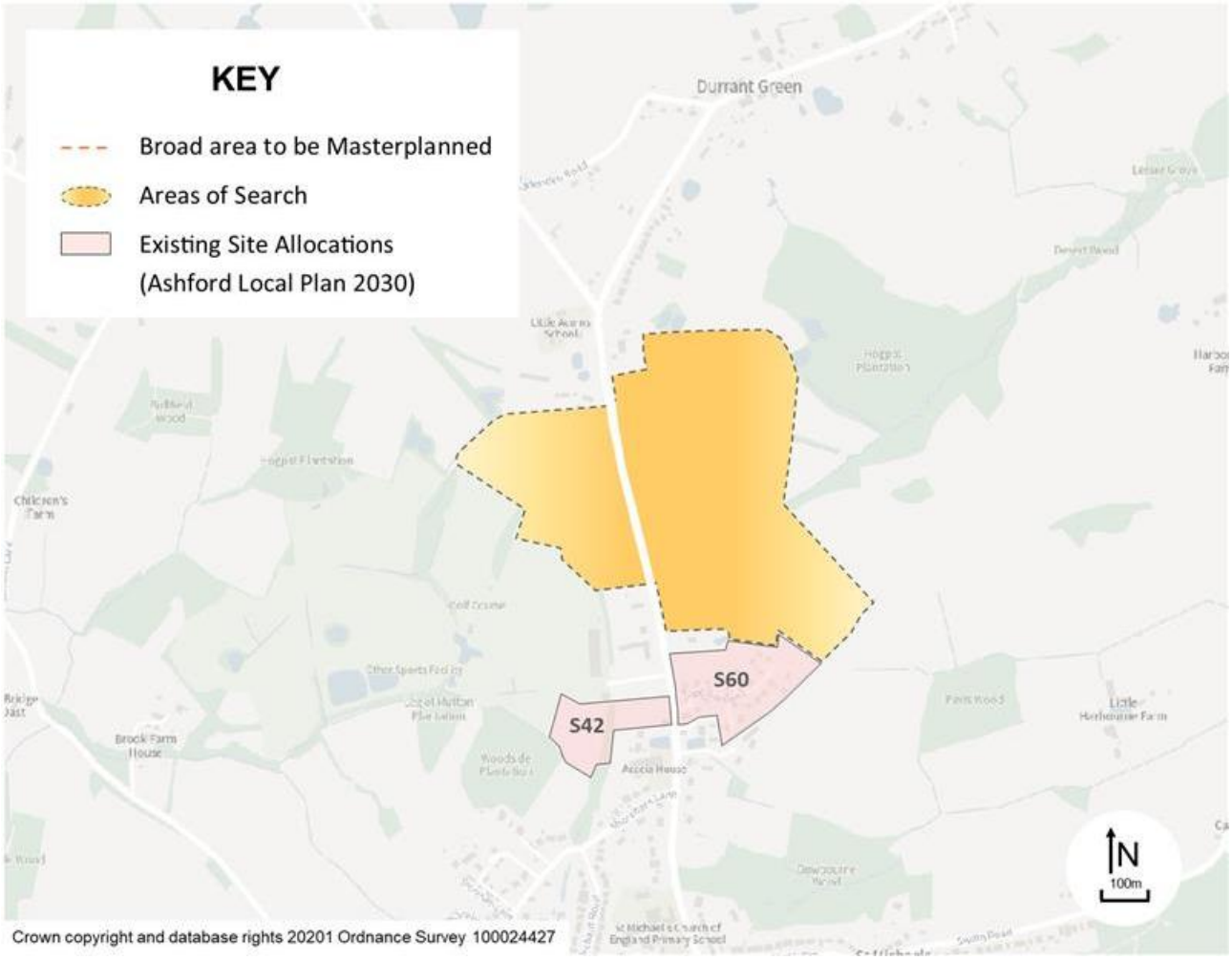
2.4.94 However, the Council do not feel that sufficient evidence has been provided, at this point, to alleviate the concerns around delivery. Accordingly, at this stage, the Council has decided not to rely on the TENT1B site coming forward over the plan period – i.e. it has not been included in the 'planning commitments' that derive the residual housing requirement figure (see Chapter 2.1 and Appendix 2 of this Local Plan).

2.4.95 In due course, the Council intend to de-allocate the TENT1B site from the development plan. Although this draft iteration of the Local Plan does not, in itself, carry sufficient planning weight to achieve this, the Council's intention is clear.

2.4.96 Should new evidence be presented as the Local Plan progresses, clearly demonstrating that TENT1B will come forward in the early stages of the plan period, then the Council may review this position. The evidence would need to be compelling, particularly as recent proposals at Tenterden show that the area has strong market interest, and other schemes are delivering quickly.

2.4.97 If the Council is persuaded, then the expectation shall be for the promoters of the TENT1B land parcel to work in collaboration with the land promoters of the Hopes Grove Nurseries site (see below), to ensure that the southern area of Tenterden is planned holistically, as part of an agreed masterplan process.

Land north of St Michaels



2.4.98 Land north of St Michaels has been identified in this Local Plan as an 'area of search'. A number of individual land parcels have been promoted in this area as part of the 'Call for Sites' exercise in 2023, which shows a desire from the market to develop in this broad location.

2.4.99 In strategic terms, this area presents an opportunity to adopt a plan-led approach to development to create a carefully considered attractive and distinct built form. This holistic approach would help 'consolidate' the northern part of the town.

2.4.100 A landscape led proposal is envisaged, to be supported by new, policy-protected green buffer areas to respond to the natural features which include large open fields and woodland areas that contribute to the areas predominantly open character. Development here will require significant landscaping to provide a suitable transition into the countryside beyond. This will be important to provide a clear distinction between existing settlement boundaries.

2.4.101 Development here shall form a new edge to the north of the town. In addition to the landscaping considerations above, an appropriate gradation of housing densities shall be

needed, with much lower densities at the northern part of the area of search, where it transitions to the countryside.

2.4.102 The A28 that runs through the middle of the site is a dominant feature. A built form is envisaged that spans both the eastern and western land parcels of the A28. Proposals shall need to demonstrate how development will respond to this, whilst delivering good placemaking.

Land assembly and the next iteration of the Local Plan

2.4.103 At this early stage of plan making, the Council have chosen to show a broad area, as reflected in the 'area of search' above. This provides greater flexibility and choice in terms of the specific land parcels that could be selected to deliver a holistic form of development. The Council will need to further explore and refine land assembly options, as part of the next iteration of the Local Plan.

2.4.104 The Council recognise that the area includes several existing properties and a range of currently active businesses and uses. Given this and the wider sensitivities of the area, a masterplan shall be needed to help inform any site policy in the next iteration of the Local Plan. This will ensure that the whole area is planned holistically and that good placemaking principles are embedded in the approach from the outset. The masterplan would need to set out how the existing uses and properties shall be considered alongside new development.

2.4.105 The masterplan shall also help determine the likely scale of new housing, once realistic and deliverable land parcels have been identified. At this point, it is envisaged that a scale of 250 dwellings may be appropriate. A range of complementary uses may also be appropriate, such as workshop employment opportunities, business incubator hubs, or office space for people who want to work out of the office, but not at home.

2.4.106 Additional evidence shall also be needed to inform the masterplan, relating to the infrastructure needs generated by the development, and wider traffic modelling work.

2.4.107 The extent of the area to be covered by the masterplan is reflected indicatively in the figure above. Detail land assembly and/or future site assessment work might require the extension or reduction of the spatial area to be masterplaned.

Policy Intention 12 – Land North of St Michaels

Land north of St Michaels is identified as an 'area of search'. Further work, as part of the next iteration of the Local Plan shall be undertaken to identify what land parcels should be promoted to form a holistic and comprehensively planned development in this area.

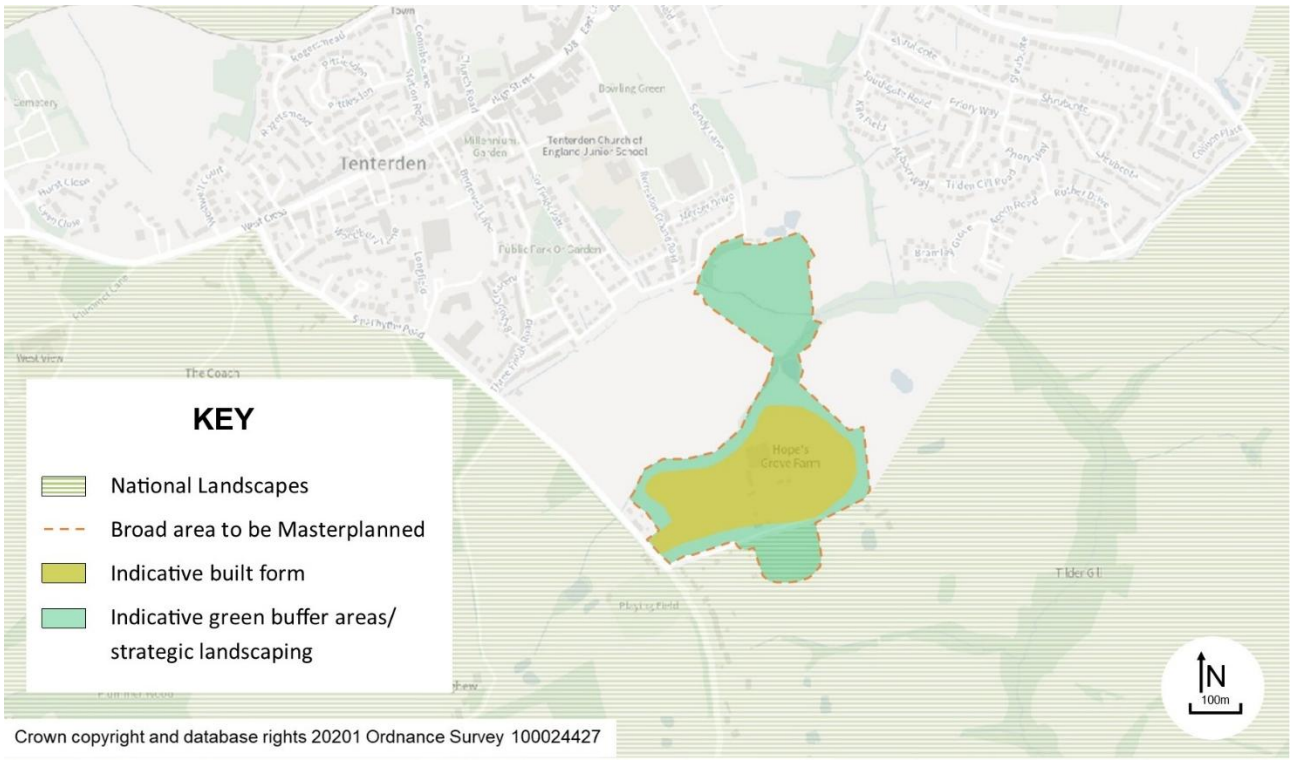
The site shall be masterplanned, to be agreed with the Council, prior to the determination of a planning application. Development proposals for the area shall be designed and implemented in accordance with the agreed masterplan.

The final composition of the masterplan shall be agreed with the Council. It shall identify:

- **The extent of the site to be allocated through the next iteration of the Local Plan;**
- **The number of dwellings to be allocated (currently envisaged to be up to 250 dwellings);**
- **The location of any complementary uses;**
- **The extent of the built footprint either side of the A28;**
- **How the existing properties and uses have been considered and reflected,**
- **How the transition between countryside and built form shall be treated; and**
- **The extent of new green buffers areas at the edge of the built form.**

Proposals that come forward in way that undermines the agreed masterplan will not be supported.

Development at Hopes Grove Nurseries



2.4.108 Land at Hopes Grove Nurseries provides the opportunity to expand the town in a sustainable way, on land that lies outside of any designated landscape area. The site is proposed for up to 250 dwellings. Complementary other uses may also be acceptable.

2.4.109 The site is close to the TENT1A development and is connected to the wider part of the town via Public Rights of Way. The site lies within easy walking distance to the town services and facilities.

2.4.110 The broad character of the wider area is a combination of open agricultural fields that are relatively flat and open, most of which lie within the High Weald National Landscape – a dominant landscape feature to the south and east. To the north of the site, the environmentally sensitive areas of the Tilder Gill riverine network, Local Wildlife Site and ancient woodland are important features.

2.4.111 Development of this site shall create a new southeastern edge to the town, and this will require a highly sensitive approach to ensure a suitable transition into the National Landscape designation is achieved. This shall include an appropriate gradation of housing densities, with much lower densities required along the eastern border of the site.

2.4.112 The Public Rights of Way network that runs through the site shall need to be respected and should become a key placemaking feature of the scheme. Opportunities to create active travel routes, through pathways and cycle routes should also be explored.

2.4.113 To the north, the built form shall need to respect and enhance, where possible, the variety of sensitive environmental features. Landscaping, planting, new green buffers and/or new Biodiversity Net Gain (BNG) areas could form part of the considerations here.

2.4.114 Proposals shall only be supported in this area, if the whole site area (reflected diagrammatically above) has been comprehensively masterplanned, and agreed by the Council, prior to any application being determined. This is to ensure that the area is planning holistically, given the wider sensitivities of the site.

2.4.115 It will need to be demonstrated how the existing nursery use, currently on site, is to be re-located within the borough as part of discussions around the wider proposals. Additional evidence shall also be needed to inform the masterplan, relating to the infrastructure needs generated by the development, and wider traffic modelling work.

Policy Intention 13 – Land at Hopes Grove Nurseries

Land at Hopes Grove Nurseries is proposed for residential development for up to 250 dwellings. Complementary uses may also be acceptable.

The site shall be comprehensively masterplanned, to be agreed with the Council, prior to the determination of a planning application. Development proposals for the area shall be designed and implemented in accordance with the agreed masterplan.

The final composition of the masterplan shall be agreed with the Council. It shall identify:

- **The extent of the built footprint,**
- **The location of any complementary uses,**
- **How the importance of the setting of the High Weald National Landscape has been considered,**
- **The extent of new green buffer areas to complement the wider proposals,**
- **How the northern part of the site will reflect the more environmental sensitive constraints and considerations, and**
- **How existing Public Rights of Way and other modes of active travel on site shall be delivered.**

Proposals that undermine the aspirations of an agreed masterplan shall not be supported.

Spatial Area 5 – The villages

2.4.116 The villages of the borough are varied in size and function. In combination, the villages greatly contribute to the attractive nature of the rural parts of the borough. Many of the villages are rich in heritage assets, having evolved over a number of years as important destinations for their communities. The overall policy objective for the villages is one of protection and enhancement.

2.4.117 The villages contain a range of features and services which tend to support more locally based, everyday needs, including shops, community facilities (such as village halls and places of worship), play areas, and dedicated green spaces. Villages also have good access to the wider countryside from a network of Public Rights of Ways and walkways to natural features such as rivers, streams and ancient woodland.

2.4.118 Several of the villages within the borough are located wholly or partially within the High Weald and Kent Downs National Landscape areas. These areas have been nationally identified for their unique and intrinsic landscape importance and the villages, and their setting contribute to this status.

New housing growth in the villages from future land allocations

2.4.119 New housing growth at villages can allow them to grow incrementally over time and in doing so can help support local everyday services and facilities (which is echoed in paragraph 83 of the NPPF). It can also help to deliver needed affordable housing, provide opportunities for local people to remain in the village and can help fund local projects and infrastructure through contributions from new development.

2.4.120 New housing growth at villages also allows them to contribute to a broader role of meeting the wider housing requirement figure over the plan period. This Plan clearly focuses most change at the more sustainable locations of the borough, i.e. the town of Ashford and its surrounds. However, the villages also need to play a part, albeit on a much smaller scale to reflect their wider sensitivities.

2.4.121 Historic trends have shown that development sites in the villages tend be small in nature, with a few larger ones. This, and the fact these broad locations tend to be viable for the market, means that new housing tends to be delivered quickly in this broad area.

2.4.122 Accordingly, new housing growth in the villages has also tended to play an important role in terms of ‘deliverability’ – i.e. they tend to be the sites that can be relied upon during the early years of a plan period. Whilst this draft Local Plan is not seeking to identify a specific supply of housing sites to be delivered in the first five years, as detailed site allocations are not being proposed, the overall strategy needs to be cognisant of this wider context.

2.4.123 Previous Local Plans have consistently sought to allocate higher numbers of new housing at the larger rural settlements in the borough. These have tended to be the service centres of Charing, Hamstreet and Wye (all of which have services such as train stations and GP surgeries). Below this tier, the primary settlements within the parishes have tended to be

looked at next, in a strategic context. This overall approach has largely been driven by a 'settlement/parish hierarchy', prepared on a parish level.

2.4.124 This approach has planning merit in strategic terms; on the basis that the larger the size of a village, the more services and facilities are located there. As an approach it has also been found to be 'sound' by the Planning Inspectorate for previous Local Plans.

2.4.125 However, continually following a strict hierarchical approach would merely lead to the larger villages getting larger. This could be damaging to the nature of those villages over time, as the villages could start to lose their unique identity. It would also mean that the smaller villages don't benefit from appropriately planned new housing growth, and the wider planning benefits that can bring.

2.4.126 Accordingly, it is the Council's clear intention, to move away from a strict hierarchical approach as a starting point for the next iteration of the Local Plan. In doing so, a far greater range of villages that may be able to accommodate new land allocations in the Local Plan 2042 are being identified at this stage.

2.4.127 This approach effectively seeks to increase the range and types of villages that could accommodate new land allocations, before reviewing sites on a case-by-case basis in a finer grain of detail. By increasing the number of villages considered at this stage, the impact from new housing growth shall be shared more equitably and across a larger range of locations, allowing that area to absorb such change more easily.

Establishing the list of villages

2.4.128 The current Local Plan 2030 (adopted 2019) includes Policy HOU3a 'Residential windfall development within settlements' which already identifies several villages. Whilst, these villages have been identified for the purposes of accommodating windfall housing growth, they are clearly identified as villages, in the wider planning context. Accordingly, these villages represent a suitable starting point for potential new land allocations for the Local Plan 2042.

2.4.129 It is recognised that the level of services and facilities within each of the villages may have changed since the last Local Plan was adopted in 2019, e.g. in the form of a local shop closing. As part of the work for the next iteration of the Local Plan, the Council shall produce a village 'matrix' that will provide a snapshot in time of the range of services and facilities present.

2.4.130 However, the Council are content, at this stage, that there has been no substantial change in the context or nature of the villages that would suggest a removal of a village, in principle, from the list below.

2.4.131 As part of the evolution of this Policy Intention, and the desire to maximise the range of villages that could accommodate housing growth, the Council have also reviewed whether additional villages should be considered. This has included reviewing villages that were previously identified by the Council at the early stages of preparation of the current Local Plan 2030 (adopted 2019).

2.4.132 In this context, the villages of Bilsington, Crundale, Godmersham, Molash and Shottenden have been included in the Policy Intention below. These were villages that were removed by the Inspector that oversaw examination of the Local Plan 2030 (adopted 2019) as he felt the opportunities for 'infill' development were limited following evidence presented at that time.

2.4.133 However, this judgement was largely made within the context of whether such villages had the opportunity to accommodate windfall housing growth (i.e. whether they had 'infill' opportunities). The considerations at that time were not about whether these were villages that have suitable land parcels located next to the village for new land allocations, which will be one of the tests when the detailed site work is conducted as part of the next iteration of the Local Plan. Accordingly, the Council see no reason to not revisit these locations as a starting point and these villages have been included in the Policy Intention below.

Strategic considerations

2.4.134 The purpose of this Policy Intention is not to suggest that every village shall have land identified for new housing in the Local Plan 2042. Nor is it to suggest that there will be an 'equal share' of new dwellings distributed evenly across all the villages listed.

2.4.135 Instead, the purpose of the Policy Intention is to identify where the Council shall look, as the starting point. Self-evidently, providing a broader list of possible locations gives the Council far greater flexibility and choices. The following strategic considerations shall influence the Council's approach for site allocation, at the next stage of the Local Plan process.

Strategic Consideration 1 – site specific issues

2.4.136 These shall include:

- the ability to accommodate an appropriate scale, mix and density of new housing development;
- the impact on local character, existing built form, landscape features and wider setting;
- a particular focus on designated areas and their setting, such as National Landscapes, Conservation Areas and specific heritage assets;
- the impact on the natural environment, such as biodiversity, flooding, ancient woodland and issues associated with climate and energy resilience;
- the ability to maximise access to public transport, cycling and walking to encourage non-car based travel; and
- the ability to generate safe highways access.

Strategic Consideration 2 – Relationship to the village

2.4.137 The second strategic consideration shall be the broader relationship of any new land allocation with the nearby village. Considerations shall include the size of the village, the level of services and facilities present and how new communities shall successfully integrate with existing communities.

2.4.138 The Council are aware that some villages have recently accommodated new housing growth. This can impact the villages in terms of the scale of the overall change, and the pace of any change. It can also generate significant pressure on existing infrastructure. The Council have not considered this issue at this stage, to not limit the options. However, recent growth levels shall be considered as part of the wider site assessment work when land parcels are identified in the next iteration of the Local Plan.

Strategic Consideration 3 – Delivery of affordable housing and role of developer contributions

2.4.139 Currently, sites that are a minimum of 10 dwellings or 0.5 hectares are required to deliver on-site affordable housing and contribute to justified local infrastructure projects. For those sites which sit within the National Landscapes, the threshold may be set lower (to be explored as part of the next iteration of the Local Plan) to reflect wider affordability in these areas, in accordance with paragraph 65 of the NPPF.

2.4.140 The ability to deliver these planning benefits shall be a consideration as part of the site selection process for the next iteration of the Local Plan.

Policy Intention 14 – The villages

Appropriately sized new land allocations, which in combination shall deliver around 1,000 new dwellings over the plan period, shall be identified within or adjoining a selection of the following villages:

Aldington, Appledore, Appledore Heath, Bethersden, Biddenden, Bilsington, Boughton Lees, Brabourne Lees/Smeeth, Brook, Challock, Charing, Charing Heath, Chilham, Crundale, Egerton, Egerton Forstal, Godmersham, Great Chart, Hamstreet, Hastingleigh, High Halden, Hothfield, Kenardington, Kingsnorth, Little Chart, Mersham, Molash, Newenden, Old Wives Lees, Pluckley, Pluckley Thorne, Pluckley Station, Rolvenden, Rolvenden Layne, Ruckinge, Shadoxhurst, Shottenden, Smarden, Stone in Oxney, Warehorne, Westwell, Wittersham, Woodchurch, and Wye.

Future land allocations shall be identified and robustly justified as part of the next iteration of the Local Plan and shall be influenced by a variety of strategic planning considerations.

CHAPTER 3 POLICY AMBITIONS

3.1 The natural environment

Biodiversity Net Gain

What has happened?

3.1.1 The biodiversity net gain principle has been incorporated into the National Planning Policy Framework (NPPF) since 2012, where the initial emphasis was a focus on *'minimising the impacts on biodiversity and providing net gains where possible'*. In 2018, the 25 Year Environment Plan was published which sought to require the planning system to play a more proactive role in improving the environment. It led to an update to the NPPF whereby plans should *'identify and pursue opportunities for securing measurable net gains for biodiversity'* (NPPF 2018 – para 174b).

3.1.2 The Environment Act 2021 built upon the Environment Plan by establishing a set of legally binding targets and duties to ensure that its goals were achieved. The Act recognised that nature recovery requires targeted, co-ordinated and collaborative action, thereby legislating for the preparation of a series of Local Nature Recovery Strategies (LNRS). These are a new type of spatial strategy for nature that are prepared for their designated area, by a centrally appointed 'Responsible Authority', and when combined shall provide complete spatial coverage of England. They will map priorities for nature recovery and propose actions in locations where it would have the greatest benefit.

3.1.3 In addition to Local Nature Recovery Strategies, the Act also required mandatory 10% net gains, achieved by using a statutory biodiversity metric to measure biodiversity and by following the biodiversity gain hierarchy, as a condition of most new development.

What is the current picture?

3.1.4 In 2022, the Kent Nature Partnership published its 'State of Nature in Kent' report. The group of local businesses, organisations and individuals have been granted with Local Nature Partnership status and are responsible for supporting driving positive environmental change in the county.

3.1.5 Like much of the country, the headline conclusion showed a downward trend in nature, specifically that:

- 31% of SSSIs are not achieving a favourable condition;
- 79% of rivers and lakes are not of 'good' ecological status or higher;
- there has been increased fragmentation and loss of connectivity of habitats through development; and
- 10% of species are now classified as being threatened with extinction.

3.1.6 Ashford is the largest land mass authority in Kent and has a significant biodiversity resource, hosting many national and local designated sites, large areas of ancient woodland, as well as a wide range of broad and priority habitats – including some of

Kent's most scarce habitats such as the Lowland Fens, and the Purple Moor Grass and Rush Pastures. It also includes chalk rivers and streams such as the Great Stour, which are considered to be rare and ecologically valuable habitats owing to their ability to support a diverse ecosystem.

3.1.7 In response to the provisions made in the Environment Act, Kent County Council (KCC) is the appointed 'Responsible Authority', charged with preparing the LNRS for Kent and Medway that will:

a) Agree priorities for nature's recovery;

b) Map the most valuable existing habitat for nature using the best available data; and

c) Map specific proposals for creating or improving habitat for nature and wider environmental goals.

3.1.8 The draft Kent and Medway Local Nature Recovery Strategy was published for public consultation in January 2025 with a view to be formally adopted later in the year. In essence, the Kent & Medway Local Nature Recovery Strategy will help to guide the delivery of mandatory Biodiversity Net Gain across the county and more locally Ashford, by providing a strategic framework for where and how nature recovery can be best achieved.

3.1.9 Meanwhile, since February 2024, development proposals have been required to demonstrate a minimum 10% uplift in habitat value (unless exempt) using Natural England's Biodiversity Metric. The metric assigns numerical values to different habitat types, adjusted subject to their size, condition and proximity; and incentivises local interventions for habitat creation or enhancement, as well as where it meets the priorities in the Local Nature Recovery Strategy. This has paved the way for the emergence of a new 'green economy' in the form of 'Habitat Banks'. This describes a site where habitat creation or enhancement projects generate 'biodiversity units' which can be sold to developers to offset their biodiversity impact elsewhere if they are unable to adequately mitigate on-site.

Where does the Council want to get to?

3.1.10 Mandatory Biodiversity Net Gain is still in its infancy as a new and evolving policy area. In time, Local Plans are expected to have an important role to play in its success, becoming a component part of the broader Biodiversity Net Gain framework, setting out an approach to net gain, how it will be achieved, and which areas present the greatest opportunities to support nature's recovery.

3.1.11 In relation to plan-making, the Environment Act and the Planning Practice Guidance on 'Protecting and enhancing the natural environment' mandates that all Local Planning Authorities in England must '*have regard*' to their Local Nature Recovery Strategy (LNRS).

3.1.12 The primary purpose of a Local Nature Recovery Strategy is to map out areas valuable for nature, set priorities for its recovery, and propose specific actions to drive that recovery, alongside wider environmental benefits. Local Nature Recovery Strategies will guide Biodiversity Net Gain by identifying priority areas and habitat types for nature recovery and incentivise developers to locate their Biodiversity Net Gain projects in these strategic locations.

3.1.13 The Council will consider the emerging Kent and Medway Local Nature Recovery Strategy as part of the preparation of the next iteration of the Local Plan. National Planning Practice Guidance also encourages LPAs to prepare locally specific policies as part of the Local Plan process. At this stage of plan making, the following considerations are relevant.

Consideration 1 – Sites to be safeguarded

3.1.14 The LNRS will map broad 'areas of particular importance for biodiversity (APIBs)' which are areas already recognised for their high biodiversity value and largely align with existing ecological designations and sites with irreplaceable habitats such as Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and ancient woodlands.

3.1.15 Accordingly, these areas shall be treated in the same way that they are now – i.e. the Council will need to ensure that new development is directed to suitable locations that minimise harm to and retain the integrity of the designation in question. Potential impacts on these ecological designations already form part of any detailed site assessment work and will form part of the Council's thinking at the next iteration of plan making when potential development sites are considered more fully.

Consideration 2 – Sites, wider ecological networks and areas for habitat management enhancement, restoration or creation.

3.1.16 A further consideration shall be whether it is suitable to seek new land allocations in 'areas that could become of particular importance for biodiversity' (ACIBs) as identified and broadly mapped by the LNRS. These are areas assessed as having high potential for habitat creation, enhancement, or restoration, and where targeted action could lead to significant biodiversity gains.

3.1.17 When deciding the location, scale and type of development to allocate in the next iteration of the Local Plan, the Council will need to consider whether to target stronger safeguarding of these areas, in addition to the APIBs. Conversely, it may also be the case that development proposals could play a role in helping to realise the potential of these priorities through the delivery of Biodiversity Net Gain requirements on site, or nearby.

Consideration 3 – Stacking BNG units and Nutrient Neutrality credits

3.1.18 The next iteration of the Local Plan could identify locations that are to play a certain 'role' such as meeting both the requirements of Biodiversity Net Gain and nutrient neutrality through integrated nature-based solutions. For example, wetland creation or woodland

enhancements could be identified to generate both biodiversity 'units' and nutrient 'credits' i.e. 'stacking', either as part of a broader development or as a standalone site. The benefits and disbenefits of allocating such sites will be explored. Similarly, where a standalone new 'Habitat Bank' is proposed, the Council will also consider whether an allocation in the Local Plan is beneficial.

Consideration 4 – Seeking a higher than 10% target

3.1.19 Although the 10% requirement is the national minimum, a consideration being explored by several Local Planning Authorities as part of the preparation of their Local Plans is whether to adopt a higher 20% target.

3.1.20 It is not currently the Council's intention to deviate from the national position. The Planning Practice Guidance for Biodiversity Net Gain states that plan-makers *'should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified'* (Planning Practice Guidance Paragraph 006 Reference ID: 74-006-20240214).

3.1.21 A local policy that seeks more than 10% could put pressure on the ability of development to fund other requirements which are important to the Council, including affordable housing, health services and facilities, social and community infrastructure (including schools) and sport and recreation facilities. In addition, the wider Stodmarsh impediment is also a key consideration in that there is a cost associated in ensuring new housing development can be 'nutrient neutral'.

3.1.22 The next iteration of the Local Plan will need to be informed by whole plan viability evidence which will shape the Council's thinking further.

What are the wider considerations?

3.1.23 Biodiversity Net Gain has extensive social, economic, and environmental benefits beyond simply protecting biodiversity. It is deeply intertwined with the wider planning policies such as climate change mitigation, the promotion of good placemaking, and benefits for health and wellbeing.

3.1.24 The introduction of Biodiversity Net Gain and Local Nature Recovery Strategies has the potential to facilitate the creation of a new green employment sector via the need to manage, enhance, and monitor habitats, and educating others about these environmental initiatives.

Policy Ambition 1 – Biodiversity Net Gain

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that:

- **Signals the Council's commitment to Biodiversity Net Gain as a means of leaving the environment in a better position from development;**
- **Ensures that the relevant priorities of the Kent and Medway Local Nature Recovery Strategy are taken into account;**
- **Requires that qualifying developments shall deliver a minimum of 10% net gain;**
- **Explore how Biodiversity Net Gain can deliver other environmental benefits, including 'stacking' nutrient neutrality and carbon sequestration.**

Nutrient Neutrality

What has happened?

3.1.25 This Chapter should be read as a whole with the Stodmarsh overview in the Introduction (Chapter 1.8).

3.1.26 In July 2020, Natural England notified the Council that the nationally and internationally protected lakes at Stodmarsh (located in neighbouring Canterbury district) were in an 'unfavourable' condition. To mitigate against the impact of development on the Stodmarsh Lakes, certain qualifying development (e.g. housing) is required to demonstrate that it can achieve nutrient neutrality.

3.1.27 This neutrality requirement applies to development located within the Stour catchment which generates a net additional population from new overnight accommodation (see diagram below). Additionally, developments which are located outside the Stour catchment but where the wastewater is sent to a Wastewater Treatment Works in the catchment will also be required to achieve nutrient neutrality.

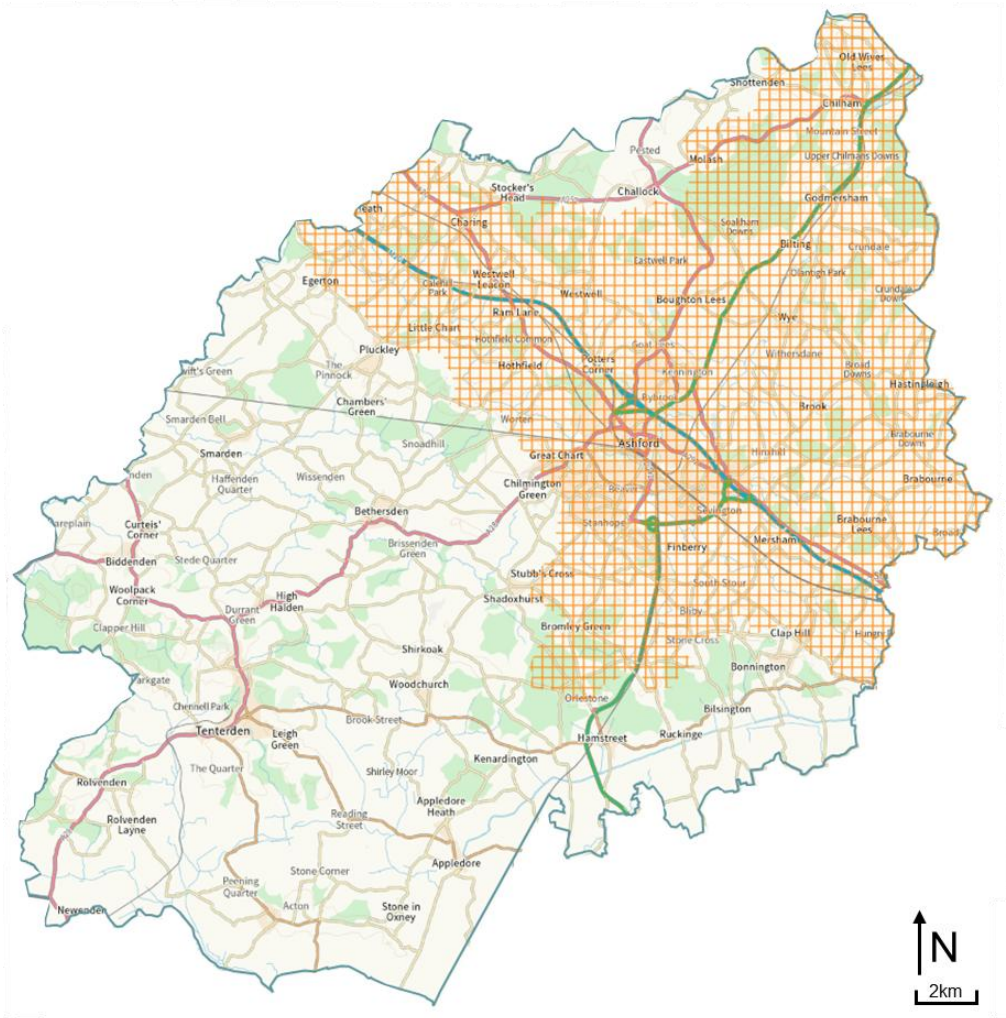


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Figure 7 Stour catchment, shown in orange hatching

3.1.28 Further details about nutrient neutrality, including the most recent Natural England advice can be found on the Council's nutrient neutrality webpages.

What is the current picture?

3.1.29 To ensure that new development, affected by this issue, does not have an impact on the protected Stodmarsh Lakes, developments are required to achieve nutrient neutrality. This may require nutrient mitigation to be delivered as part of the development.

3.1.30 Common forms of nutrient mitigation include:

- Sustainable Urban Drainage Systems,
- Wetland creation,
- Taking land out of agricultural uses,
- Upgrades to poorly performing septic tanks and Package Treatment Plants, and
- Purchase of 'nutrient credits' from strategic mitigation schemes within the catchment.

3.1.31 Since the issuing of the nutrient neutrality advice from Natural England, progress has been made on nutrient neutrality through the following measures:

Nutrient credit schemes

3.1.32 The market has started to work towards establishing strategic sources of nutrient mitigation which can be sold to developments. These credit trading platforms will seek to deliver large scale mitigation which could be utilised by developments that are unable to achieve nutrient mitigation through on-site measures.

3.1.33 An example of a proposed credit trading platform is Stour Environmental Credits Limited, which is a joint venture company established by Ashford Borough Council and Canterbury City Council. Further details can be found on the website.

Wastewater Treatment Works upgrades

3.1.34 In recognition of the challenges of nutrient neutrality, the Government introduced legislation to improve Wastewater Treatment Works infrastructure. The Levelling Up and Regeneration Act (LURA) 2023 requires certain Wastewater Treatment Works (within nutrient neutrality areas) to upgrade to tighter permits for nitrogen and phosphorus by 1 April 2030.

3.1.35 This applies to a number of Wastewater Treatment Works within the Stour catchment. For housing proposals connecting to these Wastewater Treatment Works, the nutrient mitigation requirements will decrease after 2030, making it easier for development to achieve nutrient neutrality. Whilst this will not universally affect all development, it will help to minimise the burden of nutrient neutrality on development in these locations.

Nature Restoration Fund & Environmental Delivery Plans

3.1.36 The Government is also seeking to respond to nutrient neutrality by developing new legislation. The Planning and Infrastructure Bill introduces a proposed Nature Restoration Fund.

3.1.37 If enacted, this Fund will ensure the delivery of environmental measures to rectify the unfavourable condition of the Stodmarsh Lakes. The series of projects and measures to meet these goals would be identified through an Environmental Delivery Plan, to be prepared by Natural England.

3.1.38 Developer contributions would be directed towards the Nature Restoration Fund to deliver the projects identified in the Environmental Delivery Plan. In doing so, the Planning & Infrastructure Bill indicates that this would satisfy the requirements of nutrient neutrality and the Appropriate Assessment process.

Catchment strategy

3.1.39 The Council has been and continues to work with Kent County Council and other affected East Kent Local Planning Authorities to prepare a catchment-wide strategy. This work is ongoing and is not yet published.

Where does the Council want to get to?

3.1.40 As stipulated above, nutrient neutrality is an evolving policy area. This iteration of the Local Plan sets out some of the important considerations relating to nutrient neutrality as follows.

Maximise delivery of on-site nutrient mitigation

3.1.41 The mitigation hierarchy is a core principle of environmental protection and reflected in the NPPF. The hierarchy focuses on ensuring that developments avoid and reduce adverse impacts before considering other measures such as mitigation or compensatory measures.

3.1.42 These principles will form the basis of the Council's approach to nutrient mitigation. The expectation will be that development will seek to deal with nutrient neutrality as close to the point source (e.g. the housing) as possible. In practical terms, this means that developments will need to robustly demonstrate that all suitable on-site mitigation measures have been utilised and exhausted to minimise the nutrient mitigation requirements before considering other sources of mitigation located outside the development boundary.

3.1.43 Previous experience on nutrient neutrality has shown that measures such as Sustainable Urban Drainage Systems and 'stacking' benefits from Biodiversity Net Gain can help to significantly reduce the nutrient mitigation requirements for developments. In larger sites, such as sites above 300 dwellings, mitigation can typically be provided fully through on-site measures such as greenspace creation and on-site Wastewater Treatment Plants.

3.1.44 However, the Council acknowledges that in some circumstances it may not be possible to achieve nutrient neutrality via on-site measures only. For example, it may be harder for smaller or brownfield sites. Notwithstanding, the Council would expect development to clearly demonstrate that it is not possible to achieve nutrient neutrality on-site, before considering other mitigation measures. Other mitigation measures could include other land within the developer's ownership or nutrient credits from established trading platforms.

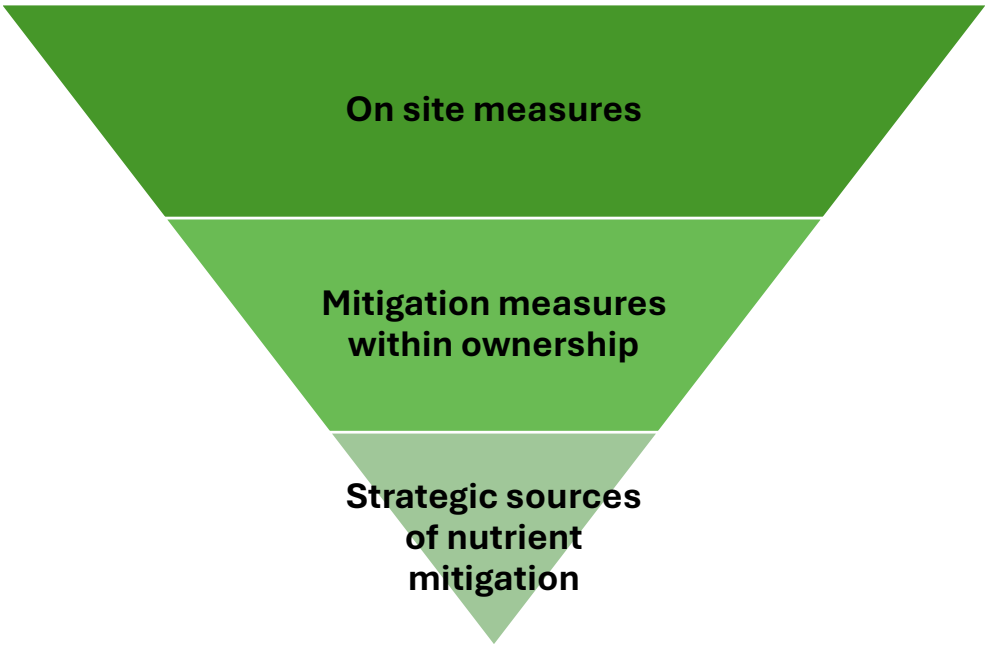


Figure 8 Nutrient neutrality mitigation hierarchy

Identify land for nutrient mitigation

3.1.45 A second consideration is whether the Council should allocate land for nutrient neutrality purposes through the Local Plan. Presently, the Council does not consider it to be necessary to allocate any sites for this purpose, as they can be delivered without the Local Plan playing a role.

3.1.46 The decision about whether to allocate land for nutrient neutrality purposes in the next iteration of the Local Plan will also need to reflect the status of Environmental Delivery Plans, driven by the Planning & Infrastructure Bill, and the availability of nutrient credit platforms. However, the Council welcome views on this proposed approach.

Design principles for nutrient mitigation

3.1.47 The next iteration of the Local Plan may consider it appropriate to set a policy framework which provides guidance for developers about how to deliver high quality nutrient mitigation.

3.1.48 This may be driven through new planning policies or via supporting and supplementary planning guidance, set out in Supplementary Planning Documents. The guidance should focus on key design considerations for common types of nutrient mitigation to guide developers to deliver high quality housing in the borough which successfully integrates nutrient mitigation and provides multi-functional benefits where possible.

What are the wider considerations?

3.1.49 Nutrient mitigation can deliver other social and environmental benefits. Land based solutions, such as Sustainable Urban Drainage Systems, woodlands, wetlands and greenspace creation can all deliver benefits such as reductions in flood risk, biodiversity gains, habitat enhancements and open space provision. Open space creation can also

increase access to nature and support the health and wellbeing of residents by increasing the opportunities for recreation within developments. The multi-functionality of mitigation measures and the 'stacking' of other environmental benefits, including Biodiversity Net Gain and carbon sequestration, will be essential to deliver high quality places within the borough whilst making the most effective and efficient use of land.

Policy Ambition 2 – Nutrient Neutrality

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that:

- **Sets out how the nutrient neutrality issue is being dealt with at the strategic level;**
- **Sets out a mitigation hierarchy that encourages onsite mitigation where possible, particularly for the larger schemes;**
- **Promotes a number of suitable on-site mitigation measures to be utilised, before considering off-site mitigation measures;**
- **Provides a detailed and clear approach to follow, where off-site mitigation measures are required; and**
- **Explore ways in which any nutrient mitigation can deliver wider environmental benefits (i.e. Biodiversity Net Gain and carbon sequestration).**

The role and importance of the Ashford Green Corridor

What has happened?

3.1.50 The Ashford Green Corridor designation has been a central part of Ashford's planning strategy since 1994. It offered and continues to offer a unique opportunity to utilise natural, open, features to complement the urban environment of the town. Since the mid-1990s, the resulting undeveloped 'green fingers' have extended to reach right from the heart of Ashford Town Centre, through to the more peripheral areas of the town. It incorporates areas of meadow, woodland, orchard and parkland, as well as spaces for formal and informal play and recreation.

What is the current picture?

3.1.51 Currently, the Ashford Green Corridor has become a multi-functional space that is a hugely important part of Ashford's Green Infrastructure provision, providing both residents and visitors with a chance to escape the busy urban environment into the peaceful

tranquillity of nature. Undoubtably, the Ashford Green Corridor makes a positive contribution to their health and wellbeing, providing opportunities for physical activity and social interaction. It also plays a crucial role in the town's sustainable travel strategy, incorporating a comprehensive network of pedestrian routes and cycleways which foster a culture for active travel.

3.1.52 The current Local Plan 2030 (adopted 2019) includes Policy ENV2 'The Ashford Green Corridor'. This should be read in conjunction with the 'Ambition' set out below.

Where does the Council want to get to?

3.1.53 The Council is supportive of the Ashford Green Corridor. Its protection and enhancement are a key spatial objective of the current Local Plan 2030 (adopted 2019) and shall continue to form an integral part of the overall planning strategy for the Local Plan 2042.

3.1.54 The Council is interested to explore ways in which the existing Green Corridor could be expanded and enhanced further – including looking at:

- the 'role' it could play regarding opportunities to address nutrient neutrality and BNG;
- promoting greater sustainability by increasing accessibility to and within the Green Corridor;
- improving integration with existing transport infrastructure by incorporating or improving existing walking and cycle paths;
- exploring opportunities for recreation; and
- exploring how the Green Corridor can play a role in delivering the aims of the Council's Climate Action Strategy and Plan.

3.1.55 The current Local Plan 2030 (adopted 2019) identified new areas for extending the Ashford Green Corridor, as well as proposing opportunity areas for 'potential future additions' to be considered. The broad direction of travel of these 'future additions' were informed by the Green Corridor Action Plan 2017, which will need to be reviewed as part of the updated evidence base that will help shape the next iteration of the Local Plan.

3.1.56 As part of this work, it will be necessary to ascertain whether the indicative areas remain valid, or whether there have been any changes in circumstance that would necessitate a change in direction.

3.1.57 In practice, the delivery mechanism for extensions to the Green Corridor shall likely be from new housing developments that abut or lie adjacent to the existing Green Corridor areas. Please see Policy Intention 11 – Land allocations at the Edge of Ashford.

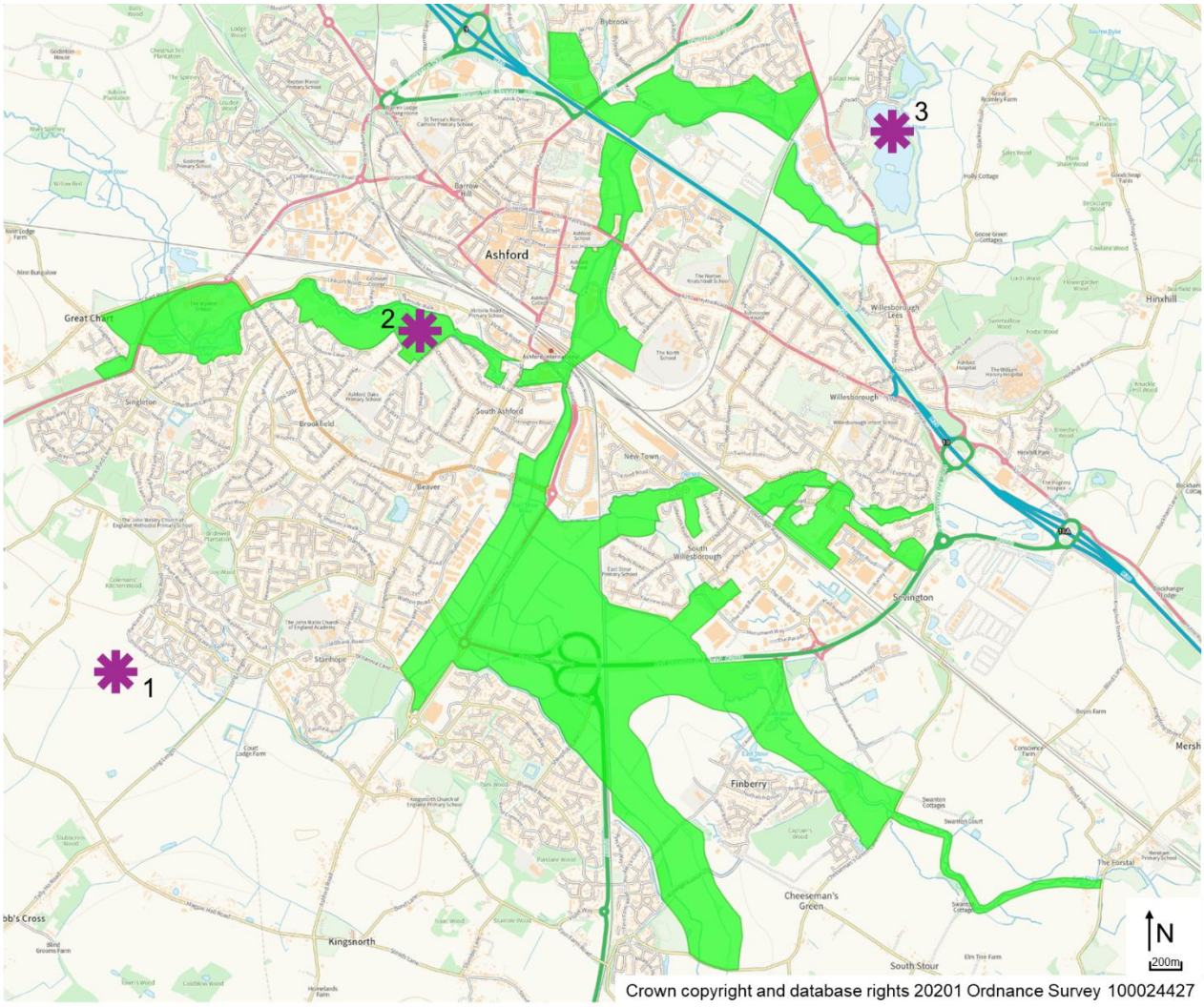


Figure 9 Ashford Green Corridor

3.1.58 A longer term, and wider ambition, of the Council is to seek to connect the rural villages and wider countryside (i.e. areas beyond the 'edge of Ashford') with the town through accessible, car-free, routeways that would form part of a much wider integrated 'network' of green and blue infrastructure.

3.1.59 Existing and natural features present an opportunity to explore this desire more fully, such as following the river Stour network, or tracking existing Public Rights of Ways, to incorporate and link environmental designations and/or support nature recovery.

What evidence does the Council need?

3.1.60 The Council shall 'audit' the quantity, quality and accessibility of the current Ashford Green Corridor area as part of the next iteration of the Local Plan. This shall highlight, amongst

other issues, the deficiencies within the network and the opportunities for enhancements and extensions to green or blue spaces.

3.1.61 This work will update the existing Green Corridor Action Plan and will be used to help guide future investment in, and development of, the Green Corridor network to achieve multi-functionality (where appropriate) to address issues including climate change, loss of biodiversity and improvements to health and well-being.

3.1.62 Due to the multi-dimensional function of the Green Corridor, consideration will also need to be had for a range of current and emerging strategies and plans. This shall include the Kent and Medway Local Nature Recovery Strategy, the Ashford Climate Action Strategy, the Ashford Open Space Strategy and the Kent Local Cycling and Walking Infrastructure Plan.

Policy Ambition 3 – The role and importance of the Green Corridor

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that:

- **Reaffirms the Council's commitment to the overall protection and enhancement of the Ashford Green Corridor;**
- **Establishes the roles to be played by the Ashford Green Corridor, including its 'complementary' role in providing space for existing and future residents, but also the role it shall play for nature enhancement; and**
- **Identify areas where the Green Corridor should be expanded beyond its current extent and how these areas shall connect to the existing network of footpaths and cycleways.**

Green Buffers

3.1.63 Green buffers, in the context of this policy ambition, are areas of land that can create separation from two different areas (i.e. built form to countryside) in a way that generates a distinct physical and visual barrier. They can also be areas which have a multi-functional role such as containing publicly accessible open space or dedicated areas for wildlife and ecology to flourish.

What is the current picture?

3.1.64 This policy ambition should be read in conjunction with the Council's current Local Plan 2030 (adopted 2019) Policy SP7 'Separation of Settlements' which seeks to prevent development that would result in the coalescence of separate settlements, or which would

significantly erode a gap, resulting in the loss of individual identity or character. Green buffers are a mechanism to deliver the aspirations of this policy.

3.1.65 However, it is not simply about coalescence. New green buffers can also form part of the good placemaking of a development, and in doing so can raise the overall quality of an area. This has a direct correlation with wider planning matters relating to the layout of the overall scheme, for example where the built form, biodiversity areas and open space are best located.

3.1.66 Specific 'buffer' areas already exist in Ashford, such as the Park Farm Buffer Zone and Park Farm East Country Park area. In part, this green buffer acts to minimise coalescence of the Ashford urban area with Kingsnorth village through the creation of an open space which forms a 'break' in the pattern of development.

3.1.67 The current Local Plan 2030 (adopted 2019) also identifies the need for 'buffers' within Policy S4 'Land North of Steeds Lane and Magpie Hall Road' to create a strategic open gap or buffer to protect the setting of Kingsnorth village and create a sense of separation from the new development. Within the context of this buffer area the protection and enhancement of existing landscaping was considered a key policy objective.

3.1.68 Policy HOU5 'Residential windfall development in the countryside' of the current Local Plan 2030 (adopted 2019) also requires that windfall (non-allocated) housing development integrate green buffers. Criterion f(iii) of the policy requires that windfall housing proposals should include '*an appropriately sized and designed landscape buffer to the open countryside'*.

Where does the Council want to get to?

3.1.69 The Council's ambition is to develop a policy framework (including through new land allocations) which seeks to promote and safeguard 'green buffer' areas as part of the overall spatial strategy for this Local Plan. These shall likely be a mixture of 'standalone' buffers that have one or two 'roles' or could come forward as an amalgamation of other place-making considerations (see below) to create multi-functional areas.

3.1.70 ***Biodiversity Net Gain:*** Policy Ambition 1 covers Biodiversity Net Gain (BNG). Whilst land delivered for BNG has a primarily environmental role, the land could also act as a 'buffer' or part of a 'buffer' as the land shall likely have an 'open' character and attractive visual appeal.

3.1.71 ***Ashford Green Corridor:*** As set out in Policy Ambition 3, the Ashford Green Corridor is an important part of Ashford's wider green and blue infrastructure network. Much of the land designated as 'Green Corridor' is publicly accessible and the Council's ambition is that the Green Corridor shall be extended to provide further publicly accessible areas including new cycleways and footpaths. Such Green Corridor extensions could also act, in part, as a buffer area, particularly for land parcels around the 'edge of Ashford' – see Policy Intention 11 'Land allocations at the Edge of Ashford'.

3.1.72 ***Landscaping and Open Space:*** Landscaping already plays an important placemaking role for new development in that it adds character, softens the overall visual impact of a development and can also generate an appropriate transition into the countryside for those schemes on the edge of a settlement.

3.1.73 The requirement for informal open space already forms part of the Council's requirements in a policy context. By its nature, informal open space tends to be multifunctional and could include elements of woodland, wetland, heath land, and publicly accessible open spaces. This is reflected through the Council's Public Green Space and Water Environment Supplementary Planning Document (SPD) (2012) which requires informal natural green space to be delivered as a form of infrastructure as a means of improving the quality and adding to green space to meet the growing needs of the borough. As part of a review of the SPD, the Council will explore whether there is scope to introduce a 'dedicated' typology and subsequent 'standard' for 'green buffers'.

3.1.74 In addition, the next iteration of the Local Plan shall explore the opportunities to map, or diagrammatically represent, any 'green buffer' areas to come forward as part of new site allocations, where appropriate.

Policy Ambition 4 – Green Buffers

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that shall deliver dedicated 'green buffer' areas as part of the wider spatial strategy. This shall include mapped green buffer areas as part of future site allocation policies, where appropriate.

In doing so, the framework will show how the aspirations of Policy SP7 'Separation of Settlements' are being met and how wider placemaking considerations are being delivered as part of new development.

The role and importance of trees

What has happened?

3.1.75 Since 2021, national planning policy has referenced trees specifically, recognising their role in improving the quality of existing and new urban spaces and their role in mitigating and adapting to climate change. The NPPF, seeks to *'ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and existing trees are retained wherever possible'* (NPPF 2024, para 136).

3.1.76 The Council support the specific focus on trees and recognise the role they can play in terms of creating more attractive places, regulating temperature through shading, improving air quality, managing flood risk and how they can greatly enhance public spaces more generally (such as tree lined footpaths and cycleways).

What is the current picture?

3.1.77 Protecting and planting new trees in and around towns and cities is a key objective of Natural England's Green Infrastructure Framework. Updates to the National Design Guide (2021) and the National Model Design Code (2021) also strongly support the inclusion of street trees.

3.1.78 In July 2023, Kent County Council's Canopy Cover Assessment revealed that Ashford has a significant tree cover, approximately 16% of the borough. This high figure can largely be attributed to the presence of the Kent Downs and High Weald National Landscapes, both of which are known for their substantial wooded areas that extend into Ashford. Despite its extensive woodland resource, the study found that only 13.1% of the borough's population are thought to be within 500m of a 2+ha accessible woodland.

3.1.79 Aspirations to protect and enhance woodland, trees and hedgerows and improve their accessibility are identified as key priorities in the Kent and Medway Local Nature Recovery Strategy (see the Biodiversity Net Gain section of Chapter 3.1) and will play an important role in meeting Biodiversity Net Gain requirements.

Where does the Council want to get to?

3.1.80 The Council have a clear ambition to promote a policy framework in the next iteration of the Local Plan that will specifically promote trees, including the role they can play within new developments. The following considerations shall apply to this wider issue.

Consideration 1: Good design and placemaking

3.1.81 Retaining prominent and important trees within a development is an important element of good placemaking and can ensure that new developments properly reflect local character. Mature trees especially can make a significant contribution to the visual interest and distinctiveness of a proposal and can provide a reference point for other important design features.

3.1.82 New trees also play an equally important role in placemaking and should be an integral part of the overall design of a scheme. Proposals will need to demonstrate that adequate root protection areas are planned for, as this is crucial for maintaining the health and stability of new trees.

Consideration 2: Larger schemes delivering increased tree coverage

3.1.83 The Council shall explore the scope for larger developments to play a role in actively increasing tree coverage as part of their wider design proposals. The levels of tree planting could be achieved by setting 'standards' for new developments – i.e. some sort of ratio between tree, or canopy coverage, set against the scale of dwellings proposed.

3.1.84 Larger schemes also provide opportunities to look at how tree lined streets can be incorporated along any 'main street' as part of the wider design process. A further option is to explore whether a mature tree could form a 'centrepiece' feature in an area of open space.

Consideration 3: Viability and management and maintenance

3.1.85 Any new policy framework, in the next iteration of the Local Plan, will need to be tested against whole plan viability to ensure that what is being asked from developments is proportionate and justified. It will also need to demonstrate how new trees shall be suitably managed and maintained over time, including 'who' is intended to take on this role. The NPPF recognises the challenges associated with this wider issue and it will need careful consideration.

3.1.86 Where new trees are proposed on land that impacts the highway, Kent County Council will need to be engaged. Such an approach can lead to certain, and specific challenges, such as the obstruction of views, blocking of important signage, the degradation of the road surface and reducing visibility splays for traffic.

Consideration 4: Development of a Trees Supplementary Planning Document

3.1.87 The Council aim to produce specific guidance relating to trees. This could help developers, landowners and residents in understanding how trees are managed through the planning system and the roles that they can play within developments. It could also provide guidance on how to assess an existing trees' importance based on characteristics such as its size, cultural or historic significance, and landscape, ecological or amenity value; as well as recommendations for new tree planting including species variety, maturity and intended purpose, along with maintenance best practice to ensure their establishment and long-term health.

Policy Ambition 5 – The role and importance of trees

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that acknowledges the important role played by trees and whether a 'ratio' between new dwellings and new tree planting areas could be established for new developments.

Within this context, the Council shall set out how new developments shall be expected to accommodate existing and new trees, as part of good placemaking and how their long-term management and maintenance will be achieved.

The Council also intends to explore the production of specific guidance on trees to assist developers, land promoters, landowners and residents.

3.2 Climate change and energy resilience

What has happened?

3.2.1 Local authorities play a pivotal role delivering climate action, acting as both enablers and implementers of national and local climate goals. Within this context, Local Plans are uniquely positioned to help drive climate action.

3.2.2 Ashford Borough Council recognises that addressing the climate crisis is not simply about reducing emissions. It is also about shaping a resilient, inclusive, and thriving future for local communities. It is about achieving social and economic benefits for residents through more energy efficient homes, green jobs and the growth of clean energy infrastructure, whilst mitigating environmental impacts for the future.

3.2.3 How the Council responds is a key priority and a huge challenge – one which everyone is responsible for. This is reflected through the Council's Borough Plan 2024 – 2028 which references 'Planet' as a key priority area.

3.2.4 The Council is steadfast in its desire to do whatever it can to tackle the issues associated with climate change. The ambition is that the Local Plan 2042 should provide a clear policy framework for new development that promotes all it reasonably can through the planning system to mitigate and adapt to the impacts of climate change.

3.2.5 This Chapter sets out the Council's aspirations for tackling climate change in a number of key ways. This includes an aspiration to remove fossil fuels in new developments, support the generation and use of renewable energy, particularly where it directly benefits local communities, and encourage a new clean energy economy in Ashford.

3.2.6 The national planning system already seeks to tackle elements of climate change where they relate to new development. The Planning and Compulsory Purchase Act 2004 requires Local Plans to include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change (Section 19(1A)). This requirement is reflected in the NPPF at Chapter 14 'Meeting the challenge of climate change, flooding and coastal change' which is clear that the planning system should support the transition to net zero by 2050.

3.2.7 Associated National Planning Policy Guidance is also clear that addressing climate change is one of the core land use planning principles. To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the NPPF (Paragraph: 001 Reference ID: 6-001-20140306).

3.2.8 With regards to new development, the whole life cycle of a building from construction, through to occupation, renovation, extension and eventual demolition require resources such as fuel, energy, water and different types of materials. All of this has an impact and leaves a 'footprint' on the environment.

3.2.9 Establishing clear and transparent requirements on the design and construction of new buildings is a way of minimising this 'footprint' and creating a more sustainable built form for the future.

3.2.10 However, it is not all about the buildings themselves. Where to locate significant new development is at the centre of the Local Plan process. Directing change to sustainable locations which can benefit from existing infrastructure connections and promote non-car-based travel where possible (such as near to cycle routes or footways) will be a key consideration when sites are selected through the next iteration of the Local Plan.

3.2.11 When selecting which sites to allocate in the next iteration of the Local Plan, the ability to connect to existing, or create new forms, of 'strategic' green energy generation to serve the direct needs of the development will be a key consideration.

3.2.12 Opportunities for new developments that are of a sufficient scale, in that they are large enough to create and sustain nearby services and facilities that are within 'walking distance' will also be taken into account when selecting which sites to allocate in the next iteration of the Local Plan.

What is the current picture?

3.2.13 The current Ashford Local Plan 2030 (adopted 2019) contains a broad range of policies that satisfied the legislative requirements for climate change at the time of Examination of the Plan (2018). These include policies aimed at tackling the impact on biodiversity, promotion and enhancement of green spaces, water efficiency, flood risk, sustainable design and construction and policies that encourage a modal shift to more sustainable less carbon emitting forms of transport.

3.2.14 Many of these policies remain relevant and should be read in conjunction with the Policy Ambition below. It may be that these policies need to be refreshed and renewed to make sure they remain 'up to date', and this will be explored as part of the next iteration of the Local Plan.

3.2.15 Since 2019, the change in climate, and how development can positively respond, has become more defined and prominent. In addition, there has been increasing recognition that Local Authorities have a strategic role in the delivery of wider national energy policies and supporting decentralised localised energy, e.g. through community led, community benefit energy projects.

3.2.16 The Council have undertaken a great deal of work in the past few years to develop strategies and ideas, and while many of these sit outside the planning system, those that fall within planning's wider remit (i.e. those relevant to land use matters), have helped inform and shape the Policy Ambition below.

3.2.17 Further information about climate change and what the Council are doing to respond can be viewed on the Council's climate change webpages.

Where does the Council want to get to?

3.2.18 The Council wish to explore a future policy framework in the next iteration of the Local Plan that focuses on the following topic areas. Other topics may materialise over time, and the Council will respond accordingly.

Reduced Energy Consumption in Domestic New Builds

3.2.19 The Council have a strong desire to ensure that new homes stand the test of time and are fit for a net-zero carbon future. The Council's aspiration is to ensure that new homes are climate resilient and contribute to decarbonisation with a focus on renewables and a fabric first approach, as opposed to providing development that will require significant modification or retrofitting later. Constructing buildings to be low carbon from the outset is substantially cheaper and delivers more effective outcomes.

3.2.20 The desire to build better more energy efficient homes is already reflected through the Future Homes Standard and associated interim changes to Building Regulations (Approved Documents F 'Ventilation', L 'Conservation of Fuel and Power' and O 'Overheating') which came into force in June 2022.

3.2.21 In 2025, the Government intend to introduce further mandatory legislation through the Future Homes Standards. This is aimed at ensuring that new homes built will produce 75% – 80% less carbon emissions than homes built under the current Building Regulations. The intention is that homes built under Future Homes Standards will be zero carbon ready. This means that in the longer term no further retrofit work for energy efficiency will be needed as the electricity grid continues to decarbonise. However, the Future Homes Standards are not expected to take effect until autumn 2025 and there is no clear guarantee of that date being met. Furthermore, details of transitional arrangements contained in the 2023 Future Homes Standards consultation suggests that it will be at least 2027 before the standards apply to new buildings.

3.2.22 The Council want new development to be as energy efficient as possible and include technology that contributes towards energy resilience and security, such as solar and air source heat pumps. Accordingly, the Council's ambition is to explore the ability to set local planning policies that require development to achieve higher building fabric and energy efficiency standards than currently proposed through the 2025 Future Homes Standards.

3.2.23 The Council are not suggesting a 'target' percentage increase to any future standard, at this point. This will need to be explored through evidence as to what is reasonable and feasible for the industry to achieve. In addition, wider 'whole plan viability' matters will also need to be considered in the next iteration of plan making which may influence what targets might be justifiable.

3.2.24 For decision making purposes, the Council considers that it should act sooner rather than later, and so it is the Council's intention to afford weight to any such policies at the earliest opportunity in accordance with the parameters set out in paragraph 49 of the NPPF.

3.2.25 The Council are adopting this position whilst accepting that other Local Planning Authorities wishing to set energy efficiency standards for new homes that go beyond Building Regulations have, in recent years, faced a complex and often contradictory policy context from national government.

3.2.26 This is reflected through the December 2023 Written Ministerial Statement (WMS) 'Planning – Local Energy Efficiency Standards Update' which seeks to constrain Local Planning Authorities in setting energy efficiency standards that go beyond current Building Regulations. The WMS is currently the subject of an appeal against a High Court judgement that rules in favour of the WMS i.e. restricting energy efficiency targets to Building Regulation standards.

3.2.27 Any future policy framework to be pursued by the Council in this area shall need to be cognisant of any ruling on this matter, with a focus on the 'principle' issues for adopting such a policy, rather than any specific issues associated with that case.

Sustainable Siting and Design

Siting

3.2.28 The location of development can greatly affect the emission of greenhouse gases. This is especially the case in rural areas where reliance on the car is often greater as people need to travel to access services and facilities. When exploring possible suitable sites to allocate in the next iteration of the Local Plan, the Council will look to locate development in the most sustainable locations where walking, cycling and public transport options are, or can be made, available to access local shops and services.

3.2.29 The Council will also consider the ability of future sites to minimise and increase resilience to the effects of climate change by reducing the contribution to greenhouse gas emissions. For example, whether a site can connect to existing, or create new forms, of 'strategic' green energy generation to meet the demands of the development over its lifetime.

Design

3.2.30 Adopting passive design strategies is another avenue that can help to optimise a building's performance, comfort and energy efficiency. Unlike systems that rely on mechanical interventions, passive strategies harness natural resources to reduce the need for heating, cooling, artificial lighting and ventilation systems. This can include measures like building orientation, well placed windows, vents, skylights, strategically placed architectural elements like overhangs and external shading devices. Landscaping can also help intercept and manage exposure to the sun. There will be a need to balance climate-responsive design with other aspects of achieving well-designed places. The Council's ambition therefore is to explore what role passive building design might play and when and where this might apply.

3.2.31 In tandem, the Council will explore the role of the energy hierarchy, see Figure 10 below. The Council's aspiration is that the energy hierarchy should inform the design

construction and operation of new buildings. The purpose of the hierarchy is to require buildings to be designed to comply with the hierarchy in priority order. For example, the starting point in the hierarchy is to avoid the needless consumption of energy. Where energy is required, it shall be used efficiently and from clean sources i.e. renewable. The least desirable option in the hierarchy is the use of sources, such as fossil fuels, which should only be used when all other options have been exhausted and where measures to counteract the emissions are implemented.

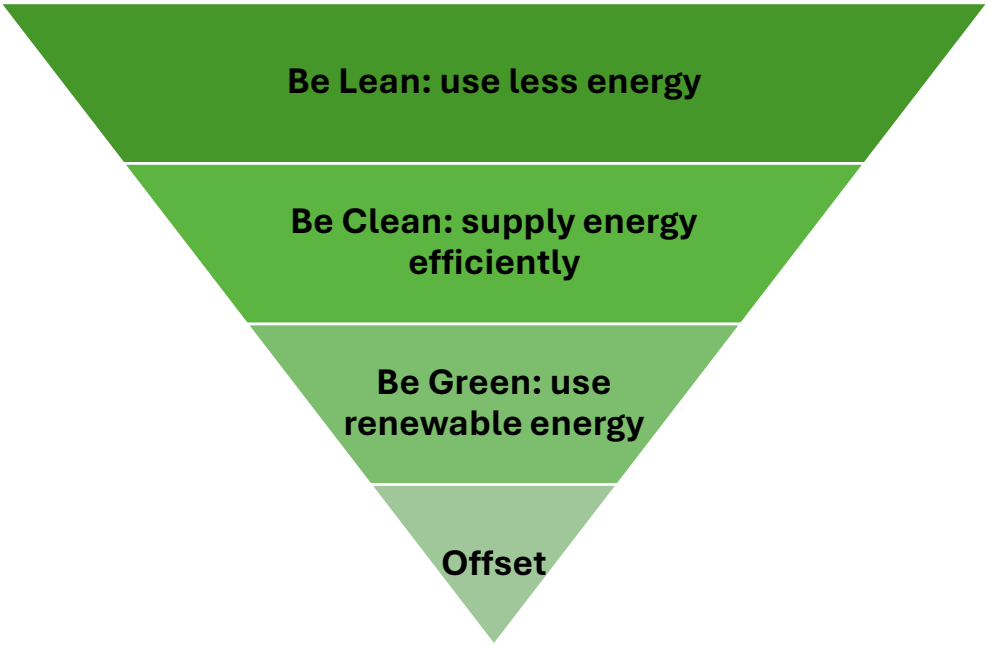


Figure 10 The energy hierarchy diagram

3.2.32 Where the Council introduces policy requirements in the new Local Plan, it will expect development to demonstrate how it has been designed to comply with these through the submission of an Energy Statement. The Council will also explore whether to introduce a Sustainability checklist.

3.2.33 The Council are keen to receive feedback on its proposals to balance the siting and design of new buildings with the need to tackle climate change.

Generation of Renewable Energy

3.2.34 At a national level, the revised NPPF 2024 marks a shift in planning policy fostering renewable energy development as it strengthens the policy framework for renewable and low carbon energy projects. The Council welcomes this shift and are committed to exploring ways in which the Local Plan can do more to support the effective delivery of clean energy projects.

3.2.35 The current Local Plan 2030 (adopted 2019) includes Policy ENV10 'Renewable and Low Carbon Energy' which is a permissive policy that sets out how the Council will consider proposals for renewable and low carbon energy generation. Encouraging the use of renewable energy will be needed if the Council are to achieve net zero targets.

3.2.36 It is therefore the Council's ambition to continue to positively promote both domestic and non-domestic renewable and low carbon energy schemes through the planning system. Within this context, Policy ENV10 'Renewable and Low Carbon Energy' remains relevant and should be read in conjunction with the wider 'ambitions' set out below.

3.2.37 Current thinking is that the most viable renewable technologies for the borough are district heat networks running on waste heat, air or ground source heat pumps and solar photovoltaic (PV) panels.

Heat Networks

3.2.38 Heat networks, also known as district heating, transport heat to power buildings via underground pipes. This heat is generated centrally from heat, air or ground source heath pumps. They eliminate the need for individual heating systems making them much more efficient and reducing running costs, thus enhancing energy security and resilience for consumers. The next iteration of the Local Plan will consider how it can support communities to benefit from this technology, alongside ensuring the siting and design of energy centres is appropriate. Consideration will also be given to future proofing developments to join up to larger transmission pipework as heat networks develop, and schemes are consolidated for even greater efficiency over time.

Solar

3.2.39 With regards to solar, the Council recognise the wider benefits of delivering this type of technology at scale and recognise the market's desire to bring such proposals forward.

3.2.40 Accordingly, a key role of the next iteration of the Local Plan shall be to explore where such technology would be best located within the borough, in terms of balancing the need and benefits of such a use, with the need to ensure that the impact on the natural and built environment is appropriate. This includes the exploration of standalone large-scale proposals, as well as the cumulative impact that is generated through a combination of smaller proposals.

3.2.41 This overall approach is necessary for Ashford, as it is predominately rural in character with a large, expansive and attractive countryside which greatly contributes to the overall feel and character of the place as a whole.

3.2.42 To support future policies in the Local Plan 2042, the Council are also considering issuing clear guidance for developers to replace its existing guidance produced in 2013 'Domestic and Medium Scale Solar PV Arrays' and 'Large Scale Solar PV Arrays'.

Other forms of renewable energy

3.2.43 Recent policy changes regarding onshore wind means that there could now be greater potential for wind generation as well. Battery Energy Storage Systems are also thought to have potential to play a key role in the decarbonisation of energy systems, from small scale domestic batteries up to large capacity energy storage sites used for grid balancing. The Council support the use of these technologies in principle and will explore whether

they require a bespoke policy approach as part of the work undertaken around climate change.

The promotion of new Electric Vehicle (EV) charging points

3.2.44 The promotion of infrastructure for electric vehicles is seen as a crucial component of combating climate change and encouraging the shift towards EV ownership, for private residents and businesses alike. Widespread removal of combustion engine vehicles will go a long way to significantly reduce carbon emissions from the transportation sector, and this is recognised nationally by the Government through their intention to phase out the sale of new petrol and diesel cars.

3.2.45 In 2022, Approved Document S Infrastructure for the Charging of Electric Vehicles took effect, which mandates specific levels of requirements for different uses as opposed to requiring every parking space to be provided with a charging point. In December 2022, the Council issued 'Climate Change Guidance for Development Management' reinforcing the Building Regulation requirements so far as they relate to new residential development.

3.2.46 The Council intends to explore a future policy approach that provides further clarity for new residential development and the ratio of EV charging points to be delivered on the ground, as prescribed by the Building Regulations.

3.2.47 One such example is to introduce a form of 'offsetting fund' to cater for the scenario where new residential development cannot achieve an 'accessible' and 'complete' EV charging point on-site. For instance, where a scheme can only achieve an 'EV ready' status, a proportionate and reasonable contribution shall be sought from the developer to go towards an 'active' EV charging point at a public facility. This will deliver more usable charging points, as opposed to merely having infrastructure installed to be 'ready' at some point in the future. Further evidence will be gathered to establish whether such an approach can be justified.

3.2.48 In addition, given the rise in electric vehicles and the need to properly plan for the infrastructure required to support these, the Council's ambition is to introduce policy to ensure that EV charging points are well situated so that they are readily accessible to future users, minimise obstruction and minimise visual impact.

The case for 'retrofitting'

3.2.49 Existing buildings contribute significantly towards carbon emissions in the borough. A total of 42% of the borough's emissions come from buildings and 28% of that is from housing stock. The age of a property is generally the single biggest factor in the energy efficiency of homes. Retrofitting buildings therefore presents a significant opportunity to contribute towards tackling the climate change issue and helping to achieve the Council's aspirations to drive down carbon emissions.

3.2.50 Accordingly, the Council intend to explore ways in which to introduce a policy framework that aims to promote the retrofitting of existing buildings where development requires

planning permission. This includes the sensitive retrofitting of Listed Buildings which must also contribute to a greener future and be fit for purpose for the people who live in them.

3.2.51 One way the Council might seek to achieve this is to suggest that all major residential and non-residential refurbishment schemes achieve a BREEAM rating under the BREEAM Domestic and Non-Domestic Refurbishment Scheme.

3.2.52 In addition, a more general regime might be possible with regards to retrofitting given the amount of carbon emissions which they contribute to. This could, for example, consider the ability to lever development money to contribute towards the retrofitting of public buildings.

What evidence does the Council need?

3.2.53 A range of evidence will be needed to support the approach in the new Local Plan. Some evidence will already exist having been produced nationally and/or by professional organisations. On the other hand, some evidence will need to be locally specific and therefore commissioned as the Local Plan progresses. Documents already produced by and/or for the Council may also inform the future approach, such as the Local Area Energy Plan 2024.

Policy Ambition 6 – Climate Change and Energy Resilience

The Council shall promote a policy framework in the next iteration of the Local Plan that:

- **Clarifies the energy efficiency standards for new buildings that the Council expect developers to adhere to;**
- **Establishes design, accessibility and sustainability principles for new development which seeks to ensure that new development can adapt to and mitigate against climate change;**
- **Establishes a policy framework which promotes renewable and low carbon energy whilst reaffirming the Council's commitment to the overall protection of the natural and built environment;**
- **Clarifies the quantum, design requirements and any offsetting proposals for the provision of Electric Vehicle charging points; and**
- **Clarifies the approach to retrofitting and any associated proposals for carbon offsetting.**

3.3 Affordable housing

What has happened?

3.3.1 The Ashford Local Plan 2030 (adopted 2019) was informed by a Strategic Housing Market Assessment (SHMA) first prepared in 2014 and then updated in 2015 and 2017.

3.3.2 The Local Plan and its evidence base reflected the most up to date NPPF at the time, which prioritised affordable home ownership models over affordable rent and in particular social rent in preparing affordable housing policies.

3.3.3 The SHMA identified an overall need for affordable housing in Ashford borough over the course of the plan period as between 45-50% of the Objectively Assessed Need for all housing. However, the viability assessment recognised that this level of delivery would be unviable. It is important to note that this is not unusual, particularly in London and the south-east.

3.3.4 Policy HOU1 'Affordable Housing' in the current Local Plan sets out an affordable housing policy that recognises different areas or zones of the borough where viability varies. It also reflects a mix of affordable housing types in each of those zones where local needs and national policy ambitions can be achieved.

3.3.5 In brief, the policy requires a total of 20% affordable housing on major residential proposals (over 10 units or 0.5Ha) in Zone A (Ashford Town Centre and central area); 30% in Zone B (Ashford Urban Area outside of Zone A); and 40% in the rest of the Borough. The mix of affordable housing types also varies, with affordable home ownership options only in Zone A and the addition of some affordable/social rent in Zones B and C (equating to 10% of the total affordable ask).

3.3.6 For the next iteration of the Local Plan, a new SHMA has been commissioned. Early findings show that over the eight-year period between 2016-24 around 905 (15%) of the total residential completions were affordable (SHMA, 2025). Half of these are rented, with the majority being affordable rent and 15% socially rented. Overall, there are higher levels of social rented affordable housing in Ashford compared to the rest of the borough.

3.3.7 In the 2023/24 annual monitoring year, out of the total 471 net housing completions 59 (12.5%) were affordable.

3.3.8 As with the general trend in the south-east, house prices in Ashford have increased and over the 2014-24 decade, the affordability ratio in the borough increased by 13%, from 8.95 to 10.15.

3.3.9 In summary, there has been progress in delivering affordable housing since the last Local Plan was adopted in 2019, including social rented properties (despite the focus on affordable home ownership models in the NPPF at that time), but this has been below what Policy HOU1 'Affordable Housing' envisaged.

3.3.10 In addition, there have been significant, unforeseen changes documented elsewhere in this draft Local Plan (e.g. leaving the European Union in 2021 and the impacts of the Covid-19 Pandemic 2020/21) that have directly or indirectly contributed to the increase in the affordability ratio.

What is the current picture?

3.3.11 The latest version of the NPPF (December 2024) has been amended to respond to the Government's aspirations for affordable housing following the General Election in July 2024. This has effectively reset the priorities for Local Planning Authorities and developers giving less weight to affordable home ownership products in favour of affordable and social rented options.

3.3.12 For example, the NPPF states:

> *64. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:*
>
> *a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
>
> *b) the agreed approach contributes to the objective of creating mixed and balanced communities.*
>
> *66. Where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.*

3.3.13 The Glossary of the NPPF also puts these options first in its description of affordable housing (which previously listed affordable home ownership first).

Key points identified from the outcomes of the Strategic Housing Market Assessment

3.3.14 The early findings from the latest SHMA suggest that the majority of need in Ashford borough is from households who are unable to buy or rent and therefore points particularly towards a need for rented affordable housing rather than affordable home ownership. However, certain products (such as shared ownership) could potentially be made available to households at a cost below the cost of privately renting and would therefore meet some of the need from those unable to access any form of market housing (without subsidy).

3.3.15 Ashford is a relatively affluent borough with a housing stock that tends to be of larger and detached homes. Detached dwellings are the most common dwelling type, accounting for 33% of the housing stock and social rented housing makes up a small proportion of the dwelling stock.

3.3.16 Ashford has had a 13% increase in population over the previous 10 years, which is a higher percentage change than Kent and the south-east. It is an increasingly ageing population with the highest percentage population change during the 2013-23 period in the 65+ age group.

3.3.17 It is projected that there will be an increase of 14,000 households over 2023-42 period, at an average of 734 per annum.

3.3.18 Ashford has followed the national trend of growth in median house prices. The percentage house price increase in Ashford is lower than across Kent and the south-east.

3.3.19 As of April 2024, there were 1,457 households on the Council's Housing Register and in September 2024, there were 231 households in temporary accommodation.

3.3.20 It is estimated that 1,176 new households will form each year and around three-fifths will be unable to afford market housing; equating to a total of 737 newly forming households that will have a need per annum on average – the majority are households unable to rent or buy.

3.3.21 Including existing households, analysis shows there is an annual need for 475 affordable homes for households unable to buy or rent. Excluding those living in existing accommodation, there is a need for 312 homes per annum.

3.3.22 Data on size of social/affordable rented housing needed shows that 51% of those on the Housing Register needed 1-bedroom homes and 24% require 3 or more bedrooms.

3.3.23 These findings and the changes in the NPPF may be helpful for formulating affordable housing policy in the next iteration of the Local Plan.

Where does the Council want to get to?

3.3.24 The amendments to national policy for affordable housing provide an opportunity to refine the Local Plan policy approach to prioritise affordable rent over affordable home ownership for the next iteration of the Local Plan, while recognising that affordable home ownership also has a part to play. It is unlikely that the general policy approach in the current Local Plan 2030 (adopted 2019) for the number of new affordable homes making up the total housing requirement will change significantly. This is due to the viability issues noted earlier, although the mix and tenure can be adjusted to prioritise those in most need by prioritising social rent.

3.3.25 This consultation provides an opportunity to invite comments from communities about the types and mix of affordable housing that could contribute to meeting future needs, for example, whether there is scope for community-led housing as part of rural exception sites or Park Home accommodation as an affordable alternative to more traditional forms of elderly persons housing.

3.3.26 The Borough Council is in a stronger position than most of the Council's neighbours who no longer retain their housing stock and will have to rely on private sector developers to meet their affordable housing needs.

3.3.27 Further work will be needed to get the balance right and there may be important developments arising from the ongoing national planning reforms mentioned elsewhere in this document, for example, in the Planning and Infrastructure Bill and the secondary legislation for the Levelling Up and Regeneration Act 2023, especially the awaited National Development Management Policies.

What evidence does the Council need?

3.3.28 The SHMA will be the key piece of evidence for determining the overall affordable housing need and mix and this will be finalised in time for the next iteration of the Local Plan.

3.3.29 Further evidence may be necessary for assessing the need for affordable housing in the rural areas, for example, local needs assessments play an important part in justifying rural exception sites. Where Neighbourhood Plans exist or are being prepared, this will also be a useful evidence base for the next iteration of the Local Plan.

3.3.30 The whole plan viability assessment, which comes later in the plan making process, will be key to determining what is deliverable.

Policy Ambition 7 – Affordable housing

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that is evidence led and reflects the changes in national policy towards more affordable rental options, including social rent. The policy framework will need to be supported by viability evidence to justify the approach.

The Council will work closely with Registered Providers, Parish Councils and other important stakeholders as part of the preparation of the future policy framework.

As part of this wider work area, the Council will review the current Rural Exceptions Site policy HOU2 'Local Needs / Specialist Housing' in the Local Plan 2030 (adopted 2019).

3.4 Employment and economic development

What has happened since the current Local Plan 2030 was adopted (2019)?

3.4.1 Policy SP3 'Strategic Approach to Economic Development' in the current Local Plan (adopted 2019) identifies a need for 63 hectares of employment space and 11,100 new jobs over the period 2014 to 2030. This equates to an annual average of 694 new jobs.

3.4.2 According to the Business Register & Employment Survey statistics (BRES) prepared by Kent County Council between 2015 and 2023, 7,500 new jobs were created in Ashford borough (an average of 833 per year). In the years since adoption of the Local Plan in 2019 up to 2023, 4,000 new jobs were created in Ashford borough, an average of 800 each year. Therefore, in terms of overall job creation progress appears to be exceeding the growth planned in the current Local Plan.

3.4.3 However, these statistics obscure other changes in the local job market and wider economy that have been taking place since 2019.

3.4.4 For example, the anticipated need for office employment and floorspace at the time the Local Plan was being prepared has declined, partly due to a change in working practices with an increase in remote or hybrid working.

3.4.5 There have been good news stories since 2019, for example, the location of the Inland Border Facility at Sevington, new employment uses coming forward at Waterbrook and more recently the interest shown by Brompton Bicycles in locating their global headquarters in Ashford, although the former and the latter would not have been known at the time the current Local Plan was being prepared.

3.4.6 A recent study by Transport for the South East into Warehousing and Distribution across the region identifies unmet need arising in the Ashford to Dover corridor, suggesting 20 hectares of new development could be needed in Ashford, Dover and Folkestone and Hythe up to 2030.

3.4.7 The next iteration of the Local Plan will require a fresh look at the evidence underpinning the employment and economic development needs of the borough up to 2042.

What will the next Local Plan have to take into consideration?

3.4.8 There have been some significant events and changes affecting the way in which Local Plans plan for future employment and economic development needs, including the following:

Brexit and Covid-19

3.4.9 The impacts of leaving the European Union on 31 January 2020 and the implications of the coronavirus lockdowns between March 2020 and 2021 were unknown at the time of preparing the current Local Plan (adopted in February 2019).

3.4.10 The former changed the way the UK trades with the EU and the rest of the world, while the latter altered working practices towards a more hybrid pattern and accelerated the transition to on-line shopping. The increases in working from home and on-line shopping has resulted in reduced demand for office and retail floorspace than was anticipated.

3.4.11 These events have also contributed to other unforeseen developments that would not have been taken into account at the time, for example, the construction of the Inland Border Facility at Sevington and Eurostar's decision to cease stopping services at Ashford.

The rise of Artificial Intelligence

3.4.12 In addition to these developments, the increasing use of artificial intelligence (AI) in all walks of life is starting to have an impact on more traditional employment patterns, replacing some jobs that would have formed part of the current Local Plan's needs assessment. This trend is expected to continue and grow.

Government Planning Reforms

3.4.13 These are explained in some detail in Chapter 1 of this document. In respect of employment and economic growth, it is worth reiterating that the Government has been implementing its manifesto commitments to increase growth nationally, which has been reflected in the latest iteration of the NPPF.

3.4.14 For example, NPPF Chapter 6 entitled 'Building a strong, competitive economy' encourages Local Plan policies to facilitate development to meet the needs of a modern economy by identifying suitable locations for uses such as laboratories (for scientific research, experimentation or testing), data-centres (these are specialised facilities that house and manage computer systems, servers and other IT infrastructure), giga-factories (these are typically large scale battery manufacturing plants primarily focused on producing batteries for electric vehicles), digital infrastructure and freight and logistics (See NPPF Paragraph 86 (c)).

3.4.15 Promotion and encouragement of renewable energy projects elsewhere in the NPPF is intended to improve the UK's energy resilience from fossil fuels sourced overseas and help combat the effects of climate change.

3.4.16 The anticipated consultation on National Development Management Policies (NDMPs) during 2025 could also result in some of the current employment and economic development policies in the Local Plan being replaced by NDMPs in the next Local Plan.

Where does the Council want to get to?

3.4.17 Given the changes that have taken place since 2019, it is right that the employment and economic development needs for the borough up to 2042 should now be revisited.

3.4.18 The NPPF encourages Local Plans and decision making to create the conditions in which business can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

3.4.19 Clearly, putting in place the right conditions to encourage good quality, well paid local employment opportunities alongside new planned housing growth is also a more sustainable solution than increasing commuting to access jobs further afield.

3.4.20 This will require specialist evidence to identify what those conditions might be going forward, for example, which employment sectors to attract and ensure the necessary accompanying infrastructure is delivered at the right time and in the right places.

3.4.21 Improving mobile phone signal and internet speeds across all parts of the borough will remain a priority for the Council. The Council's commitment to delivering broadband connections is already reflected in the current Local Plan within its innovative fibre to the premises Policy EMP6 'Promotion of Fibre to the Premises' but there are further improvements to be made.

3.4.22 It is likely that there will have to be changes to the direction of travel in the current Local Plan 2030 (adopted 2019), recognising that anticipated growth in more traditional office development may need revising downwards to reflect the trends seen in recent years and compensate this with policies that take into consideration the shifts seen towards working from home more often.

3.4.23 New evidence can also drill down below the overall job numbers to identify which sectors have seen growth since 2019 and whether this could or should be encouraged further. The Transport for South East Warehouse study shows that there is a need for more of this type of employment in the area, but this needs to be balanced with the desire for higher skilled and paid jobs going forward. This could form the basis of a wider strategy working with neighbouring Local Authorities such as Folkestone and Hythe and Dover, to ensure the approach is properly pitched.

3.4.24 Equally, new employment sectors may provide opportunities not previously thought viable, for example in the growing renewable energy sector or the industries promoted by the Government as part of its national ambitions by creating the infrastructure needed for growth (e.g. Data Centres, Laboratories and Giga-Factories).

3.4.25 The rural economy is not exempt from these enquiries, for example, the increased interest in viniculture across the southern counties of England could be a longer-term investment as growing conditions improve.

Next Steps

3.4.26 This consultation provides an opportunity to hear the views of residents, local businesses and developers within the sector to better understand the aims and ambitions for the next plan period.

3.4.27 Evidence is being commissioned to provide the baseline position and explore options going forward to inform a more detailed discussion in the next iteration of the Local Plan, when there will be a further opportunity to comment.

Policy Ambition 8 – Employment and Economic Development

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that:

- **Reflects the borough's strong local employment and economic development sectors, but also promotes and encourages new growth areas in response to up to date evidence;**
- **Identifies new land allocations that are supported by accompanying infrastructure and services to foster economic growth. This shall include fibre to the premises, reliable broadband and mobile phone coverage and local education courses in relatable fields;**
- **Promotes sectors and opportunities to encourage higher skilled jobs wherever possible to offer alternatives to commuting; and**
- **Promotes opportunities for existing business to re-locate to more appropriate, well serviced areas, with opportunities to expand as businesses grow.**

Where larger developments are proposed, the expectation shall be that appropriate provision is made to support local employment opportunities and include services and facilities that serve the day-to-day needs of that community, to provide alternatives to commuting.

3.5 Retail and Town Centres

What has happened since the current Local Plan was adopted?

3.5.1 As noted in Chapter 3.4 Employment and Economic Development, the Covid-19 restrictions in 2020 accelerated the shift to on-line retail, which has resulted in the decline of some traditional forms of town centre retailing. The remote working and hybrid working patterns during and since have also had an impact on workers supporting other businesses in town centres during the working week.

3.5.2 In addition, permitted development rights have been amended since the current Local Plan 2030 was adopted in 2019. These rights enable certain changes of use to take place without the need for planning permission. The legislative context setting out these rights is in the form of the General Permitted Development Order (GPDO) and the Use Classes Order, both of which have been amended to introduce important changes since the Local Plan was adopted in February 2019.

3.5.3 The Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020 introduced a new Use Class E grouping together with a number of previous classes, including A1(shops), A2 (financial and professional services), A3 (restaurants and cafes), B1 (business), D1 (non-residential institutions) and D2 (assembly and leisure).

3.5.4 Effectively this means that changes of use within the new Use Class E no longer require planning permission, unless permitted development rights have been removed by an Article 4 Direction.

3.5.5 This has the effect of making some of the policies in the Local Plan 2030 (adopted 2019) out of date. For example, Policy EMP7 'Primary and Secondary Shopping Frontages in Ashford Town Centre', which sets out the criteria for changes of use between classes A1 to A5 within the primary shopping frontage in Ashford Town Centre.

3.5.6 The changes mean that shops (A1), financial and professional services (A2) and restaurants and cafes (A3) are all now in the same Use Class E, while pubs and bars (A4) and takeaways (A5) are now sui generis (without use class – this means they will need planning permission for any change of use). Use Class E also includes a wide range of other uses. For example, a shop can now convert to a gym or a nursery without requiring planning permission.

3.5.7 In August 2021, a further change introducing a new Use Class MA, permits changes of use from Class E to Class C3 (residential dwelling house) subject to a prior approval determination. From the 5 March 2024, a further amendment removed previous requirements that a commercial premises (all Class E uses are considered to be commercial) remain vacant for 3 months before applying for a prior approval and for proposals to be limited to a floor space of 1,500 sqm.

3.5.8 Town centres across the UK have faced ongoing challenges ranging from online shopping to the costs of doing business. Although this is not unique to the Ashford borough, it is felt more locally because retail is one of the top sectors by employee numbers. This is particularly driven by Ashford and Tenterden Town Centres as well as the Ashford Designer Outlet.

3.5.9 The Ashford Designer Outlet alone, which expanded in 2019, employs 1,800 people of which, approximately 74% are residents of Ashford. The Designer Outlet provides a high-end shopping experience for around 3.5 million visitors every year. The offer does however include elements that would traditionally be placed in, and thus benefit, the Town Centre. Particularly, any expansion of some retail, food & drink, wider hospitality and leisure offers and pop-up events, would be in conflict with Ashford Town Centre. To ensure complementarity, the principle should be that the Designer Outlet offers the high-end retail shopping offer whereas Ashford Town Centre provides retail targeted for local residents, the main food & drink offer, entertainment and leisure, local services and the main space for events.

3.5.10 In response to the impact of the Covid pandemic, in September 2020, Ashford Borough Council launched the Town Centre Reset Strategy. This document plays an important role in delivering the revitalisation of the Town Centre, as outlined in the Local Plan 2030 (adopted 2019).

3.5.11 In recent years, Ashford has seen the introduction of new eateries, a cinema and hotels within the Town Centre to provide a changing offer. It will need to continue to evolve to provide a destination and focal point that attracts residents to meet, for face-to-face services, retail and entertainment to be provided, and for businesses to thrive.

3.5.12 The Town Centre Reset Strategy suggests four key intervention areas around Elwick Place, Bank Street and Lower High Street, with the highest priority area being the ‘T’ around the junction of Bank Street, High Street and Middle Row by the bandstand.

Figure 11 'The T' identified in the Town Centre Reset. Image taken from the Ashford Town Centre Reset: Strategy and Projects 2022

3.5.13 The Town Centre Reset Strategy also assesses the role that County Square Shopping Centre should have within the wider context of Ashford Town Centre. The Strategy identifies County Square remaining as the main indoor retail and leisure centre and the considers its future, particularly focussing on the former Debenhams unit. The Strategy envisages County Square's extension as a potential anchor for indoor leisure uses, complementing the existing use and character of Elwick Place.

Figure 12 Elwick Place identified in the Town Centre Reset, known as 'the T'. Image taken from the Ashford Town Centre Reset: Strategy and Projects 2022

3.5.14 Beyond Ashford, Tenterden plays a distinctive and valuable role in the retail landscape of the borough. Known for its picturesque high street and independent shops, Tenterden has earned national recognition, being ranked among the top 30 retail centres in the UK by Newmark Retail's Vitality Rankings. Tenterden has seen investment from national brands in recent years such as Dominos and Lounges, as well as local startup and fledgling businesses. The town's success is also supported by strategic planning initiatives such as the Tenterden Neighbourhood Plan and relevant policies in the current Local Plan 2030 (adopted 2019).

What is the current picture?

3.5.15 As of April 2025, Ashford Town Centre had a vacancy rate over 18%, which was above the national average of 14% (UK Retail at a Glance, CBRE). A survey of the Town Centre found that of 344 premises with a frontage in the Town Centre, 63 were vacant.

3.5.16 By comparison in January 2025, Tenterden Town Centre had a vacancy rate of just over 7%, which is significantly below the national average. A survey of Tenterden Town Centre found that out of 221 premises with a frontage in the Town Centre, 16 were vacant.

3.5.17 The Town Centre Reset Strategy is looking to address this and other challenges facing Ashford Town Centre by utilising grants, events planning and environmental improvements to stimulate footfall and retain and encourage appropriate town centre businesses.

3.5.18 Despite the changes seen since 2019, the latest version of the NPPF published in December 2024 has not been updated in respect of Section 7 'Ensuring the Vitality of Town Centres'. In fact, the national policy for planning for town centres and retail development has been largely unchanged since the first iteration of the NPPF in 2012.

3.5.19 Therefore, the current guidance for plan makers is that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

3.5.20 The NPPF (paragraph 90) goes on to set out what Local Plan policies should include:

- define a network and hierarchy of town centres and promote their long-term vitality and viability;
- define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead;

- where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre; and
- recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

3.5.21 The 'sequential test' is also retained, giving additional weight in planning decisions for such uses to be located first in town centres, then edge of centre and lastly out-of-centre. Applicants must demonstrate that they have been unable to locate in town centres in accordance with the sequence of town centre first.

3.5.22 The lack of a response to the significant challenges facing town centres outlined above, suggests that something may be forthcoming either in the form of the anticipated National Development Management Policies (NDMPs) or the next iteration of the NPPF (expected to follow the introduction of the NDMPs later this year).

3.5.23 For the purposes of the Local Plan 2042, which has to take account of the latest NPPF, the guidance is to follow a similar approach to that used for the current Local Plan 2030 (adopted 2019), requiring specialist consultants to assess the retail needs for convenience (food) and comparison (non-food) shopping up to 2042.

Where does the Council want to get to?

3.5.24 This Local Plan covers the period up to 2042, during which time town centres and high streets will continue to evolve to provide a social and economic hub of activity as identified by national guidance.

3.5.25 The relaxation of permitted development rights provides greater flexibility for the market to respond swiftly to changes in retail trends and create the new spaces and 'attractors' to sustain traditional town centres, but this also makes it more difficult for Local Planning Authorities to identify and protect core and secondary retail frontages, which has traditionally been the approach and still features in the most recent NPPF.

3.5.26 Retail uses, whether located in a town centre, edge-of-centre or out-of-centre will most likely continue to compete with a growing online retail service.

3.5.27 According to the ONS, as of May 2025, 26% of all UK sales were online purchases. This has increased significantly compared to pre-Covid in 2018-19, when that rate was approximately 20%. During Covid-19 in 2020-2021, online purchases averaged 30% of all sales as people could not shop traditionally.

3.5.28 This trend may continue or may change direction, which may result in smaller core/secondary shopping areas in future with alternative uses taking up the vacated spaces, such as leisure and recreation or even housing.

3.5.29 Evidence will be needed to explore these trends locally in more detail and an assessment of future retail needs for convenience and comparison shopping to accompany planned new growth will form a part of that.

3.5.30 This draft Local Plan provides an opportunity to invite responses from businesses and local communities to inform the approach moving forward. In tandem, the Council will be commissioning work by consultants to help to frame an emerging position and provide the basis of a policy response in the next iteration of the Local Plan.

Policy Ambition 9 – Retail and Town Centres

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that is evidence led. This shall identify future retail needs over the plan period and shall reflect the 'town centre first' approach in the NPPF.

3.6 The role of infrastructure and developer contributions

3.6.1 Ensuring that the right amount of infrastructure is provided, at the right time, to adapt to change is crucial to ensure new communities are supported and allows those new communities to be successfully integrated with existing ones. Failure to do this is often cited by existing residents as one of the main complaints about development in general, as it can lead to pressures on existing facilities and services which can be unsurmountable. It can also lead to sterile, unsustainable and unattractive places.

3.6.2 The Council's Borough Plan 'Our Plan for the Borough 2024 – 2028' was subject to public consultation before being published. Making sure infrastructure and jobs keep up with the growing population was recognised by respondents as a key challenge.

3.6.3 The Local Plan 2042 provides the Council with an opportunity to provide a policy framework to ensure that delivering timely infrastructure is at the heart of the strategy. It will do this by steering development to sustainable locations, and through the identification of policies which lever appropriate levels of developer contributions to be targeted towards identified projects.

3.6.4 The Council's approach to infrastructure is reflected in the current Local Plan 2030 (adopted 2019) through Policy IMP1 'Infrastructure Provision' and Policy IMP2 'Flexibility, Viability and Deferred Contributions'. Policy IMP1 'Infrastructure Provision' confirms that the Council will continue to work with infrastructure providers to identify and deliver supporting infrastructure to accompany planned developments. Delivery of said infrastructure is to be through Section 106 Agreements and 278 Agreements (for highways improvements) in the main.

3.6.5 Policy IMP2 'Flexibility, Viability and Deferred Contributions' explains that where all the infrastructure requirements set out in the current Local Plan 2030 (adopted 2019) cannot

be met, viability evidence will be needed to justify any shortfall in contributions. Where a shortfall is accepted, the Council will require that a deferred payments approach is engaged. The advantage of a deferred payments approach is that it enables some developments, that would otherwise be refused planning permission, to proceed on the basis that should the value of the development increase beyond an agreed benchmark in future, some or all of the previously under-funded contributions will be made up.

3.6.6 Policies IMP1 and IMP2 of the Local Plan (adopted 2019) are a useful starting point and should be read in conjunction with the Policy Ambition below.

3.6.7 As part of the preparation of the new Local Plan 2042, the Council will also need to update the developer 'asks' to cater for new policy areas and reflect changes in the national system, such as the introduction of Biodiversity Net Gain and how the industry might respond to nutrient neutrality. Existing infrastructure providers such as Kent County Council and the NHS have also revisited their current range of 'asks' to reflect changes in service delivery and costs since the current Local Plan 2030 was adopted in 2019.

3.6.8 The next iteration of the Plan shall provide further details as to the 'what' the Council wants to see delivered and any future approach shall be informed by whole plan viability to ensure that the developer 'asks' sit within the remit of the legal obligations established within the planning system.

What is the current picture?

3.6.9 The Council currently utilises the Section 106 regime for collecting and securing developer contributions. Section 106 Agreements are legally binding agreements between the Council (as Local Planning Authority) and a developer. In simple terms, they are used to secure financial contributions or other obligations in kind from developments to mitigate the impact of that development.

3.6.10 A range of strategic projects are identified in the Council's 2017 Infrastructure Delivery Plan (IDP), which supports the Local Plan 2030. A new Infrastructure Delivery Plan will be needed to support the next iteration of the Local Plan, once more is known about the sites that are likely to be promoted by the Council.

Our Partner Organisations

3.6.11 As part of the overall process, the Council works in partnership with a number of other public bodies through a variety of forums, such as:

- **The Ashford Strategic Delivery Board** (This is a collaborative body comprising Ashford Borough Council, Kent County Council, Homes England, the Environment Agency, Southern Water and other agencies. Its main role is to ensure major projects are progressing as planned, by working together to address local challenges such as nutrient neutrality); and
- **The East Kent Health and Care Partnership** (part of the NHS and Medway Integrated Care Board, the partnership is made up of a wide range of organisations

across east Kent including health care providers, local councils and Healthwatch representatives).

3.6.12 In addition, the Council's partners also produce their own evidence through a variety of strategies. Kent County Council have produced a Developer Contributions Guide (2023) and the NHS have produced the Kent and Medway Developer Contributions Guide (March 2025). These will form the basis of the discussions the Council will have with partners as this new Local Plan progresses.

3.6.13 The Duty to Cooperate also requires the Council to work proactively and collaboratively with neighbouring Local Authorities on cross boundary or strategic issues. One of the most important of which is strategic infrastructure, where for example a hospital or secondary school located near to a borough boundary, has a catchment area extending into more than one Local Authority. The same is true when planning major new housing developments close to boundaries as the accompanying infrastructure may be in the neighbouring authority.

What does the Council regularly seek in terms of contributions for the current Local Plan?

3.6.14 The Council regularly seeks contributions for the following items:

- Housing (including affordable, local needs and Self and Custom Build);
- Community Buildings;
- Sports Provision (indoor and outdoor);
- Arts and Creative industries;
- Voluntary Sector Contributions;
- Public realm;
- Fibre to the Premises;
- Natural and Informal Open Space;
- Children's and young people's play space;
- Strategic Parks;
- Green infrastructure, Biodiversity and Green Corridor;
- Allotments;
- Cemeteries; and
- S106 Monitoring fees.

3.6.15 These contributions are predominantly for improving or delivering community infrastructure, delivered by Ashford Borough Council or Parish Councils. Policies COM1 'Meeting the Community's Needs' and COM2 'Recreation, Sport, Play and Open Spaces' in the current Local Plan (adopted 2019) provide more information. Infrastructure to meet the needs of the community is the subject of the next theme in this document.

3.6.16 The Council also collects the following contributions on behalf of other partners:

Kent County Council	Other organisations
• Community Learning; • Libraries;	• Strategic Highways (M20 J10a) – National Highways

Kent County Council	Other organisations
• Adult Social Care; • Education (Primary and Secondary); • Youth Services; • Travel Plan monitoring fee; • Public Rights of Way; and • Parking.	• Rail – Rail companies and Rail Track; • Sustainable Travel (Bus Companies, SUSTRANS, Kent County Council); and • Healthcare (NHS).

Where does the Council want to get to?

3.6.17 As part of the Local Plan 2042 process, the Council will work closely with partners to manage expectations for what can reasonably be delivered from developer contributions and as part of that discussion establish what the priorities are for infrastructure. In some cases, it may be possible to improve, extend or enhance existing infrastructure before considering new, standalone facilities. Therefore, an audit of existing infrastructure will also form part of the evidence gathering for the next iteration of the Local Plan.

3.6.18 These discussions with partners and service providers also need to focus on 'how' certain services are managed or could be managed in the future. Governance models are constantly changing to respond to changing needs, and the costs associated with delivering and managing services and facilities.

3.6.19 The current approach very much focuses on the role of 'public facilities' i.e. provision that is led by the public sector, or an equivalent 'trust' arrangement. This has tended to mean that bespoke new facilities are sought, or that investment is targeted towards existing civic sports facilities such as the Julie Rose Stadium and the Stour Centre in Ashford, and/or Tenterden Leisure Centre.

3.6.20 Whilst these types of facilities will no doubt continue to play a hugely important role for communities moving forward, the Council are also keen to explore other opportunities to maximise the provision that is available to both existing and future residents. For example, there are several educational sites in the borough that include high quality sports and recreational provision. Understandably, these existing facilities and services are ringfenced for members and students.

3.6.21 However, the Council are actively looking at ways as to whether such provision could play a broader, more complementary role for the wider community and how that might work in practice i.e. whether the Council enter some sort of partnership approach with the operators to increase hours of use and generate greater accessibility for more people.

3.6.22 Clearly, this presents some challenges – not least what sort of contractual arrangement could be reached with these bodies and whether they want to work in partnership or not – therefore it is very much an emerging idea that the Council want to explore. However,

it does not seem sensible to not explore these options, especially as financing standalone 'public' buildings is expensive and will only get more expensive as time progresses.

The potential for Community Infrastructure Levy

3.6.23 The preparation of a new Local Plan is an opportunity to revisit the option of introducing a Community Infrastructure Levy (CIL) in place of the current Section 106 regime. Both collecting regimes have strengths and weaknesses.

3.6.24 It should be noted that even where CIL is in place, there may be circumstances specific to a site where Section 106 agreements are still required. To clarify CIL is a charge on new development to fund a wide range of infrastructure projects that support the area's growth. Section 106 agreements, on the other hand, are legally binding agreements between a local planning authority and a developer, focusing on site-specific impacts and mitigation measures. However, there are no circumstances where a developer is required to effectively 'pay twice' for the same piece of infrastructure.

3.6.25 The Section 106 process is very prescriptive, but developers and local communities can see tangible evidence of the types of infrastructure provided to mitigate the impacts of a development (for example, in the form of a new classroom at the local primary school or a play area in the vicinity of the new development). Section 106 agreements are usually only applied to major developments (over 10 residential units or sites of over 0.5 hectares). The agreements can also take some time to be negotiated and signed, and the funding can take years to be released (for example, once a certain number of houses in a new development have been built and occupied).

3.6.26 CIL on the other hand is more like a 'roof tax' drawing contributions across a wider range of qualifying developments, which is pooled and then redistributed to infrastructure projects across an area depending on priority, determined by a governing body.

3.6.27 This has the advantages of providing more certainty to developers and speed in terms of the contributions collected. It can also potentially generate greater contributions than Section 106 agreements, in the longer term. However, depending on the scale of development, it can take some time for the pooled contribution to reach a critical mass (in London where land values and development pressures are high, this can generate significant sums, but in rural areas with lower values and less development this can take much longer, delaying new infrastructure).

3.6.28 The tangible link between development and infrastructure is also less clear with Community Infrastructure Levy. If the priorities are not in the locality of the developments, funding may be redirected to where it is most needed.

3.6.29 The Policy Ambition below refers to this option, and the Council are actively seeking views from stakeholders about the merits of such an approach.

3.6.30 One of the Council's considerations when proposing such an approach, is the level of uncertainty surrounding the national Local Government Re-organisation, and the Council are aware that some of the neighbouring Local Planning Authorities (whom Ashford might

end up merging with) have already adopted a Community Infrastructure Levy (CIL) regime. It therefore seems sensible to explore it as an option at this stage.

What evidence does the Council need?

3.6.31 A range of evidence will be needed once the locations of future site allocations have been identified. However, the Council will continue to work in a holistic way, by:

- Developing the next Infrastructure Delivery Plan as the Local Plan progresses;
- Continuing to work closely with partners and neighbours; and
- Working together with local communities and infrastructure providers to identify priorities for infrastructure.

What are the wider considerations?

3.6.32 As noted earlier, viability will be a key consideration when it comes to infrastructure delivery. Baseline studies and viability assessments will be needed to test the deliverability of significant developments and/or infrastructure. These assessments will be carried out alongside the preparation of the Local Plan. When the Local Plan is more advanced and nearing the final draft stage, the Council will commission a whole plan viability study. Put simply, this whole plan viability assessment will establish whether the Local Plan is deliverable. This study will form a key piece of evidence at the Examination of the Local Plan.

Policy Ambition 10 – The role of infrastructure and developer contributions

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that requires qualifying developments to meet the needs generated by their proposals through the delivery of effective and timely infrastructure. It shall identify the extent of physical, social, health and community infrastructure to be delivered, via proportionate and justified contributions.

As part of this wider topic area, the Council shall update the Infrastructure Delivery Plan that will identify the projects that the Council intends to see delivered.

The Council shall continue to use platforms such as the Strategic Delivery Board and the NHS and Medway Integrated Care Board, as a tried and tested way of getting partner organisations together to deliver common goals and provide holistic solutions.

Active engagement with neighbouring Local Planning Authorities is also necessary to ensure that any cross-boundary issues are addressed.

3.7 Meeting the needs of the community

3.7.1 A significant amount of community provision is likely to be needed to support new development. The Council will work closely with providers to determine the specific types of services and facilities needed and how they should be managed and maintained. This includes the Council, as well as a mix of partner agencies such as Kent County Council and the NHS Kent and Medway Integrated Care Board. Various groups which make up the voluntary sector also play an important role within the borough.

3.7.2 The national Local Government Re-organisation will undoubtedly impact 'who' the organisation might be. It is likely that Kent shall have more than one unitary authority moving forward and therefore some of the current county wide services shall be led by a new public body/unitary authority. However, this re-organisation shall not fundamentally shift the responsibilities away from the public sector.

3.7.3 The Council's Local Plan 2030 (adopted 2019) includes a policy framework under 'Chapter 10 – Community Facilities' which should be read in conjunction with this Policy Ambition. Much of the approach advocated in Chapter 10 remains valid and consistent with the Council's objectives, including the in-principle desire to meet the needs of

communities as they evolve, as well as resisting the loss of existing facilities (where appropriate).

3.7.4 The Policy Amibition below focuses on providing an update on the progress of a range of infrastructure types and establishes where and what the Council intends to focus on in the future, through the next iteration of the Local Plan. It also focuses on the range and types of evidence that shall be needed to inform the future position. This is crucial as it provides the means by which the Council, as collecting authority, can lever in development monies to support its ambitions.

Education

3.7.5 The Council continues to liaise with Kent County Council as the primary provider of educational facilities within the borough. When new development comes forward, it will generate a requirement for new school places in both primary and secondary schools. This will either be achieved by expansion of existing facilities or the provision of new facilities.

3.7.6 The Council has a strong track record in facilitating the delivery of new schools on allocated sites through various past iterations of the Local Plan, most recently the new Primary and Secondary Schools at Chilmington Green.

3.7.7 The Council will continue to work closely with the Kent County Council Education Authority to establish what might be the future needs for education arising from the next iteration of the Local Plan. There will also be a conversation to have with larger site promoters to identify locations for any new facilities that might be required.

3.7.8 Ashford Borough Council is aware that Kent County Council updated their 'developer contributions guide' in 2023, as a means of identifying their 'asks' of the development industry. The Council welcomes the opportunity to discuss these as part of the preparation of the new Local Plan. In part, this guide has been supported by the Council and that is reflected through ongoing discussions as part of the planning application process.

3.7.9 However, there are some 'asks' which are not supported by the Council as it does not consider that the wider case for applying the figures referenced in the 'developer contributions guide' is justified through the evidence produced at this point.

3.7.10 The Council will continue to work closely with Kent County Council on such matters, as they remain a key stakeholder in the process.

Health

3.7.11 As highlighted earlier in this document, the Kent and Medway NHS Integrated Care Board (ICB) has also recently published an update of its 'asks' for health provision. Similarly to the Kent County Council Developer Guide, the NHS developer guide includes an increased range of 'asks'. Again, the Council welcomes the opportunity to discuss these

with the Kent and Medway NHS Integrated Care Board (ICB) as part of the preparation of the new Local Plan.

3.7.12 The NPPF identifies linkages between planning, health and wellbeing. The Council fully recognise these linkages and shall explore ways in which development can maximise opportunities to address health and wellbeing.

3.7.13 The Local Plan 2042 will do this by focusing on the more 'prevention' elements relating to health and wellbeing, such as:

- Promoting a policy framework and distribution strategy that delivers new growth opportunities in sustainable locations, with services and facilities nearby, supported by active travel routes wherever possible;
- Ensuring that new developments are designed and laid out in a way that encourages non-car based travel and the larger proposals have a defined 'centre' where a range of day-to-day facilities can be located within easy walking distance from most new homes; and
- Making best use of key areas that enjoy public access, such as opportunities to enhance and expand the Green Corridors and by enhancing important strategic green space areas at Conningbrook Lakes, the Queen's Platinum Jubilee Park and Victoria Park.

3.7.14 The Local Plan 2042 shall also promote health and wellbeing by identifying needed capital projects, in liaison with providers, such as:

- Delivering space and buildings and land for encouraging healthy lifestyles;
- Primary Care facilities, such as Hospitals and GP surgeries to meet the needs of current and future communities; and
- Expanding and enhancing existing facilities where there is an identified need.

3.7.15 The Covid-19 pandemic showed the importance of blue light services and the critical role they play. Therefore, the Council are progressing thoughts around adding delivery of these services as part of any future developer 'asks'. Any projects are identified would need to be compliant with the relevant CIL regulations.

3.7.16 Clearly it will be important to ensure that there is sufficient health infrastructure across the borough to serve both the existing and future communities over the life of the Local Plan and the Council will work closely with the NHS and developers to ensure that the evidence is robust and that the agreed 'asks' are justified.

Sport, recreation and play

3.7.17 Opportunities to encourage 'activity' through sport, recreation and play, can greatly contribute to healthier lifestyles and become focal points for communities. The current

Local Plan 2030 (adopted 2019) already sets out, under Chapter 10, a variety of spatial targets up to 2030 and these remain valid at this time.

3.7.18 It also establishes a broad spatial approach as to how this space should be delivered across the borough. In broad terms, the policy seeks to target provision at a range of 'urban hubs' which are distributed around the town of Ashford. Doing so, allows the provision to be targeted in a way that makes best use of 'economies of scale' and allows for the sharing of facilities, such as car parking and changing rooms etc.

3.7.19 In line with this approach, the current Local Plan 2030 (adopted 2019) also identifies two 'Strategic Parks' called the Queen's Platinum Jubilee Park (formerly Discovery Park) and Conningbrook Park to the southwest and northeast of Ashford, respectively (see Strategic Diagram 2 in Appendix 1). Since 2019, Victoria Park, to the south of the Town Centre, has received significant investment and improvements including substantial new play facilities and a new community building that includes a café. The consequence of these recent improvements is that the park now clearly plays an enhanced recreational role, not just for nearby residents, but for the wider town as a whole. Victoria Park should therefore now be considered as the third 'strategic park' location that serves the wider town.

3.7.20 For the rural area, the approach tends to be more local in nature and involves ongoing dialogue with Parish Councils in terms of enhancements to existing or new facilities.

3.7.21 In principle, these broad spatial approaches remain valid and will continue to be the approach of the Council. However, the Local Plan 2042 does provide the opportunity to refine the approach further, and make sure it remains fit for purpose, responding to the changing needs of the community in terms of how they adopt 'active' practices.

The need for evidence

3.7.22 As part of the Local Plan 2042, the Council will need to update and review a variety of evidence to generate total spatial targets for the plan period and establish the sorts of governance approaches that work best.

3.7.23 This shall include an update and review of the following:

- Indoor sports facility strategy and action plan (2017) – which provides more detail in respect of Policy COM2 'Recreation, Sport, Play and Open Spaces';
- Open space strategy (2017) – which focuses on what is important for Ashford's open space provision up to 2030; and
- Green Corridor Action Plan (2017) – The action plan, first envisaged in 2000, which sets out a structure for mapping out the Ashford Green Corridor, identifying projects and funding to fill gaps.

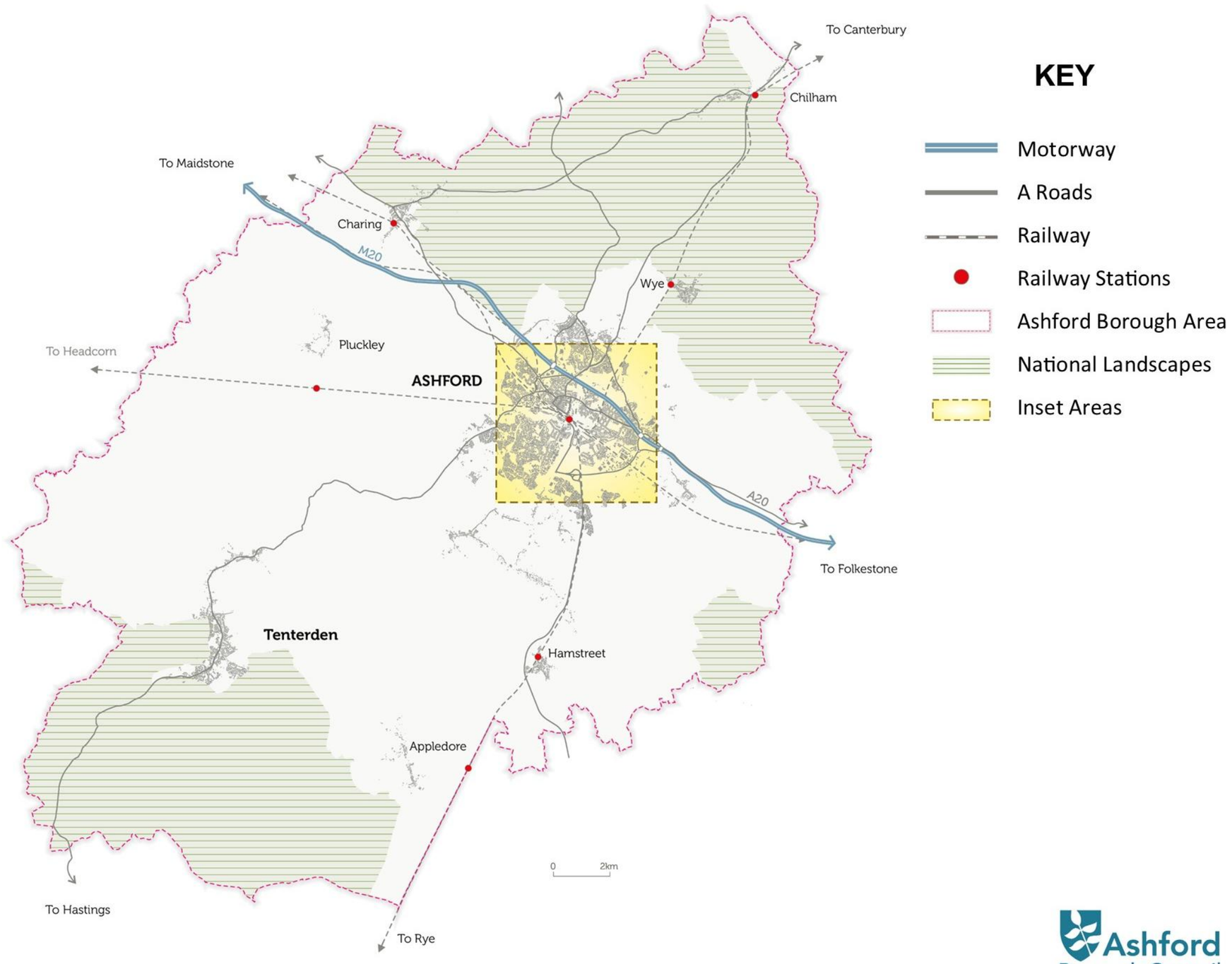
Policy Ambition 11 – Meeting the needs of the community

The Council's ambition for the next iteration of the Local Plan is to establish a policy framework that identifies the types of provision, services and facilities that are needed to support existing and new communities as they evolve.

Evidence shall be produced that shall ensure the provision is fit for purpose, caters for changing needs, reflects the Council's environmental ambitions and has been appropriately costed.

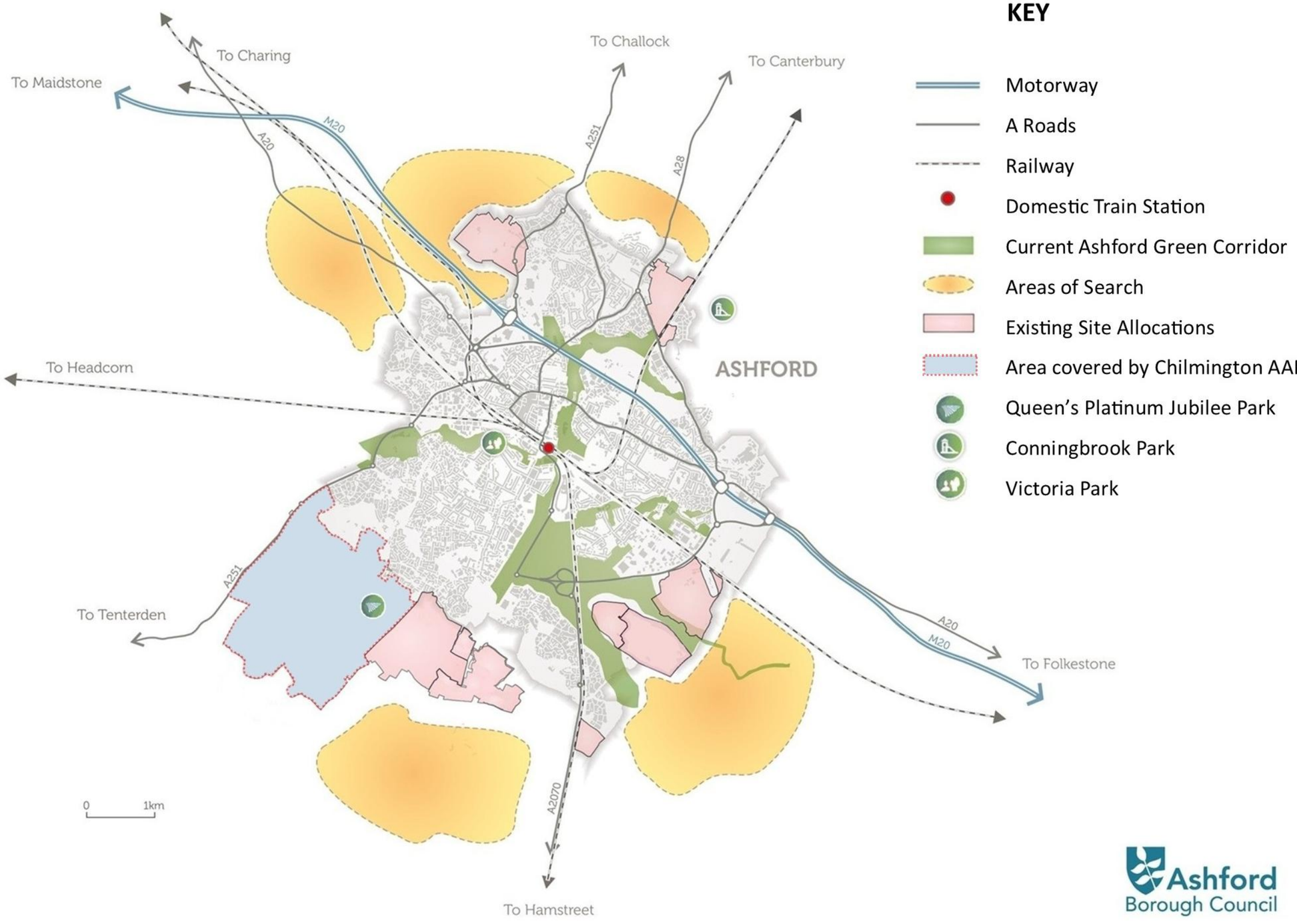
APPENDIX 1 – STRATEGIC DIAGRAMS

Strategic Diagram 1 (District Diagram)



Ashford Borough Council

Strategic Diagram (Ashford Urban Inset)



Ashford Borough Council

APPENDIX 2 – LIST OF HOUSING COMMITMENTS

Site Name	Number of dwellings to be delivered 2024 – 2042		
	Five Year Supply (2024 – 2029)	2030 – 2042	Total
Ashford Town Centre			
Commercial Quarter (S1)	90	80	170
Elwick Road Phase 2 (VC14)	200	0	200
Former Powergen	256	0	256
Homeplus	216	0	216
New Rents	10	0	10
Northdown House	24	0	24
The Old Flour Mills	53	0	53
Swanton House	34	0	34
Assorted minor windfalls as set out in the Housing Land Supply	32	0	32
Ashford Urban Area			
Chart Road (S46)	25	23	48
Conningbrook Residual Phase 2 (S19)	90	80	170
Eureka Park (S20)	90	285	375
Finberry	321	0	321
Finberry North West (S15)	30	270	300
Former Ashford South Primary School (S13)	90	20	110
Former Klondyke (S7)	30	0	30
Former Newtown Works (S6)	0	364	364
Land East of Lantern House	15	0	15
Land NE of Willesborough Road, Kennington (S2)	175	571	746
Land south of Brockmans Lane, Bridgefield (S45)	90	10	100
Land south-west of junction of, Bullfinch Avenue, Finberry	63	0	63
Linden Grove	60	181	241
Lower Queens Road (S8)	40	0	40
Mabledon Avenue	20	0	20
Oakleigh House	18	0	18
Orchard Cottage, Tile Kiln Road, Kennington	14	0	14
Repton Park	36	0	36
Waterbrook (S16)	150	214	364
Assorted minor windfalls as set out in the Housing Land Supply	22	0	22

Site Name	Number of dwellings to be delivered 2024 – 2042		
	Five Year Supply (2024 – 2029)	2030 – 2042	Total
Edge of Ashford			
Chilmington Green	327	2150	2477
Court Lodge (S3)	150	850	1000
The Gables, Great Chart	39	0	39
Land east of Ashford Road, Kingsnorth	15	0	15
Land north of Steeds Lane and Magpie Hall Road, Kingsnorth (S4)	270	280	550
Land south of Pound Lane, Kingsnorth (S5)	(see S4)	(see S4)	(see S4)
Possingham Farm	0	655	655
Assorted minor windfalls as set out in the Housing Land Supply	1	0	1
Tenterden and periphery			
Breton Court	12	0	12
Land between Woodchurch Road and Appledore Road	141	0	141
Little Dawbourne	36	0	36
London Beach Golf Club	12	0	12
Assorted minor windfalls as set out in the Housing Land Supply	18	0	18
Villages			
Aldington – Land north of Church View (S51)	6	0	6
Aldington – Land South of Goldwell Court (S52)	11	0	11
Appledore – The Street (S26)	6	0	6
Bethersden – Ashford Golf Complex	5	0	5
Biddenden – Land North East of 74, North Street	50	0	50
Challock – Land at Clockhouse (S54)	19	0	19
Challock – Land to the South East of High Tree Lodge, Buck Street	13	0	13
Charing – Northdown Service Station, Maidstone Road (S28)	12	0	12
Charing – Land south of Arthur Baker Playing Field (S29)	59	0	59
Charing – Land Adjacent to Poppyfields (S55)	90	41	131
Charing – Neighbourhood Plan Allocation – Swan Street	5	0	5
Charing – Neighbourhood Plan Allocation – Parsons Mead	0	42	42

Site Name	Number of dwellings to be delivered 2024 – 2042		
	Five Year Supply (2024 – 2029)	2030 – 2042	Total
Chilham – Branch Road (S56)	10	0	10
Egerton – Land on New Road (S30)	9	0	9
Egerton – Land rear of 7 to 14 Harmers Way	13	0	13
Egerton – Neighbourhood Plan Allocation – Orchard Nurseries	9	0	9
Hamstreet – Land north of St. Mary's Close (S31)	78	0	78
Hamstreet – Warehorne Road (S57)	3	0	3
Kingsnorth – Briars, Church Hill	10	0	10
Mersham – Land adjacent to Village Hall (S35)	7	0	7
Pluckley – Neighbourhood Plan Allocation – Pluckley Brickworks	20	0	20
Rolvenden – Neighbourhood Plan Allocation – Redwood	8	0	8
Shadoxhurst – Delcroft	12	0	12
Shadoxhurst – Farley Close	22	0	22
Shadoxhurst – Land south east of Criol Barn	10	0	10
Smeeth – Land south of Church Road (S38)	35	0	35
Woodchurch – Land at Front Road (S40)	30	10	40
Woodchurch – Land off Appledore Road (S62)	23	0	23
Woodchurch – Woodchurch House	10	0	10
Wye – Land at Luckley Field (WYE2)	25	0	25
Wye – Neighbourhood Plan Allocation – Conversion of College	40	0	40
Wye – ADAS	20	0	20
Wye – WYE3	40	0	40
Assorted minor windfalls as set out in the Housing Land Supply – Villages & Countryside	241	0	241
TOTAL	**4266**	**6126**	**10,392**

Developments allocated in the Ashford Local Plan 2030 (adopted 2019) that are not included in the list of commitments in the table above and will require further consideration and assessment

Site Allocation reference	Site
S9	Kennard Way, Henwood
S10	Gasworks Lane
S11	Leacon Road
S24	Tenterden Southern Extension B
S32	Hamstreet – Land at Parker Farm
S59	Mersham – Land at Old Rectory Close

APPENDIX 3 – LIST OF ABBREVIATIONS AND GLOSSARY

List of Abbreviations

Abbreviation	Name
AA	Appropriate Assessment
ACIB	Areas that could become of particular importance for biodiversity
AI	Artificial Intelligence
APIBs	Areas of Particular Importance for Biodiversity
ATCR	Ashford Town Centre Reset
BNG	Biodiversity Net Gain
BRES	Business Register & Employment Survey
CIL	Community Infrastructure Levy
DPD	Development Plan Document
EIP	Examination in Public
EV	Electric Vehicle
GTAA	Gypsy and Traveller Accommodation Assessment
GPDO	General Permitted Development Order
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitats Regulations Assessment
ICB	Integrated Care Board
IDP	Infrastructure Delivery Plan
IFS	Infrastructure Funding Statement
KCC	Kent County Council
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
LURA	Levelling Up and Regeneration Act 2023
NDMPs	National Development Management Policies
NHS	National Health Service
NNR	National Nature Reserves
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
PROWs	Public Rights of Way
PV	Photovoltaic
S106	Section 106 Legal Agreement
SA	Sustainability Appraisal
SDS	Spatial Development Strategy
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
WMS	Written Ministerial Statement

Glossary

Term	Definition
Affordable housing	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following: affordable housing for rent; starter homes; discounted market sales housing; other affordable routes to home ownership.
Allocated site	Land that is allocated in the Local Plan for a particular use.
Ancient or Veteran Tree	A tree which, because of its age, size and condition, is of exceptional biodiversity cultural or heritage value.
Ancient Woodland	Group of native woodland habitats which have been retained since at least 1600 and the soils are relatively undisturbed by people.
Biodiversity	The variety of life in a particular habitat or ecosystem.
Biodiversity Net Gain (BNG)	An approach required by the Environment Act (2021) which request habitats for wildlife to be left in a measurably better state than prior to development.
Brownfield Land	See 'Previously Developed Land'
Building Regulations	Minimum standard for design, construction and alterations that are required for most building work in the UK.
Climate Change adaptation	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Climate emergency	A declaration made by the Council that urgent action is required to reduce or halt climate change and avoid potentially irreversible environmental damage as a result.
Conservation (heritage)	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
Conservation Area	Areas designated for their special architectural or historic interest, the character or appearance of which is desirable to conserve and, where possible, enhance.
Deliverable	To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
Density	In the case of residential development, a measures of the number of dwellings per hectare.
Developable	To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viable developed at the point envisaged.
Development Management	The process by which planning applications are determined.

Term	Definition
Development Plan	Includes adopted Local Plans and Neighbourhood Plans and is defined by Section 38 of the Planning and Compulsory Purchase Act 2004.
Economic Development	Development, including those within E Use Classes, public and community uses and main town centre uses (but excluding housing development).
Employment Land	Land in use or last used by a trade or business. This includes office, industrial, storage and distribution uses.
European Sites	This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in Regulation 8 of the Conservation of Habitats and Species Regulations 2017.
Evidence base	The information and data gathered by the Council to justify the 'soundness' of the policy approach set out in the Local Plan.
Green Corridor	Ashford's Green Corridor is a policy designation, made up of parks, recreation grounds and other green spaces alongside the rivers that flow through Ashford.
Greenfield	Any land that is not classified as previously development land. Greenfield land can include countryside and open spaces in urban areas.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the Local Planning Authority (including local listing).
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Housing Delivery Test	Government published measurement of the net additional dwellings provided in the borough against the homes required.
Housing Mix	The provision of housing to meet the needs of the community as a whole include affordable and market homes of the type, size and tenured needed by the residents and demand in the market.
Habitat Regulations Assessment	Assessment process as set out in the Conservation of Habitats and Species Regulations 2017 (as amended) for the protection of European Sites and the protection of 'European protected species'.
Iteration of the Local Plan	The next version of the Local Plan which will be informed by the outcomes of the consultation on this version of the Local Plan and further work on supporting evidence, such as site assessment.

Term	Definition
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area.
Local Plan	A plan for the future development of a local area, drawn up by the Local Planning Authority in consultation with the community, under the Town and Country Planning (Local Planning) (England) Regulations 20212. A Local Plan can consist of either strategic or non-strategic policies, or a combination of the two.
National Landscapes	Areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000.
National Planning Policy Framework	The Government's statement of planning policy which all Local Plans must be in conformity with. Where a Local Plan is silent on an issue planning decisions will be made in accordance with national policy.
Neighbourhood Plan	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Nutrient Neutrality	Principle in environmental law, underpinned by the Conservation of Habitats and Species Regulations 2017, where there is no net increase in the levels of nutrients (nitrogen and phosphorus) released because of the development.
Open Space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, land and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Plan Period	The period covered by policies in the Local Plan
Planning Condition	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990).
Planning Practice Guidance	Supporting guidance to the National Planning Policy Framework (NPPF).
Policy Ambition	Policy ambitions are emerging policy areas that the Council wants to see delivered.
Policy Intention	Policy intentions focus on a conscious choice by the Council and have a deliberate and targeted focus. The purpose is to inform stakeholders on the policy areas that the Council intends to deliver.
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Previously Developed Land	Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the

Term	Definition
	whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Regulation 18 consultation	Consultation held on the draft Local Plan in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Section 106 Legal Agreement (S106)	A legally enforceable obligation entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
Site of Special Scientific Interest (SSSI)	Sites designated by Natural England under the Wildlife and Countryside Act 1981.
Special Areas of Conservation (SAC)	Areas given special protection under the Habitats and Conservation of Species Regulations 2017.
Special Protection Areas (SPA)	Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.
Self-build and custom-build housing	Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.
Spatial Development Strategy (SDS)	A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended).

Term	Definition
Strategic Environmental Assessment (SEA)	A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
Supplementary planning documents (SPD)	Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design.
Sustainable transport modes	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.
Sustainable Urban Drainage Systems	A collection of water management systems, such as swales and retention ponds, which collect surface water and mimic natural water drainage to minimis flood risk and improve water quality.
Town Centre	Area including the primary shopping area and areas predominately occupied by main town centre uses within or adjacent to the primary shopping areas. References to town centres or centres apply to town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Existing out of centre developments, comprising or including main town centre uses, do not constitute town centres.
Viability	The Planning Practice Guidance indicates that a site is viable if the value generated by its development is more than the costs of developing it.
Windfall sites	Sites which have not been specifically identified as available in the Local Plan process. They normally comprise sites that have unexpectedly become available.

Ashford Borough Council

International House, Dover, Place, Ashford, Kent, TN23 1HU

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