





SUSTAINABILITY STATEMENT

Residential development 52 New Street, Ash, Canterbury, Kent

> Prepared for: Classicus Estates Ltd

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1. INTRODUCTION

1.1 Background

Sol Environment Ltd ('Sol' hereafter) were engaged by Classicus Estates Ltd to undertake a sustainability assessment and produce a Sustainability Statement for the proposed new development at 52 New Street, in Ash, the site comprises some scrub land, with an area of hardstanding in the south of the Site and an existing house used as Offices associated with the previous occupants of the Site.

This report has been prepared by Sol Environment Ltd in cooperation with the applicant and in accordance with the following policies and guidance:

- National Planning Policy Framework (July 2021)
- Dover District Council Core Strategy (Adopted February 2010)
- Ash Parish Council Neighbourhood Plan 2018-2037 (Adopted September 2021)
- Draft Dover District Council Local Plan to 2040 (Reg 19 version October 2021)

1.2 Proposed Development

The proposed development will consist of up to 52 residential Units. ranging from 1 to 4 bed homes, with disabled parking, cycle storage and resident amenity space. The proposed development has the following description:

"Outline planning permission with all matters reserved (except for access) for the demolition of existing buildings, including 51-53 Sandwich Road, and the erection of up to 52 new homes, including affordable, access from New Street and Sandwich Road, together with associated parking, open space, landscaping, drainage and associated infrastructure"

A site plan showing the proposed development is provided overleaf. Note, only the area edged in red is relevant to this report.





Fig 1.1: Proposed Site Plan prepared by Taylor Roberts Ltd. NOTE: only the area edged in red is relevant to this report.



2. PLANNING POLICY & LEGISLATIVE REVIEW

There are a number of international and national policy drivers for sustainability, increased energy efficiency and reduced Carbon Dioxide (CO_2) emissions, which have been introduced to address the issue of global warming and the implications of climate change. On an international level this includes the Kyoto Protocol, to which the UK government has made a commitment and developed national policies such as the Energy White Paper and the NPPF.

At the local level, the current Local Plan in particular remains a material consideration. These policies and documents are described in further detail within the section below.

2.1 National Guidance

2.1.1 National Planning Policy Framework (July 2021)

The revised National Planning Policy Framework (NPPF) was published in July 2021, replacing the previous NPPF that was adopted in February 2019. The revised NPPF sets out the Government's planning policies for England and how they are expected to be applied. It sets out a framework that aims to achieve sustainable development throughout the planning system with three overarching objectives – economic, social and environmental.

At the heart of the NPPF is a 'presumption in favour of sustainable development', which requires Local Authorities as part of any plan-making or decision-making, to provide clear guidance on how the presumption should be applied locally.

The NPPF sets out how to deliver sustainable development under 17 subheadings. Subheading 14 of the NPPF outlines how the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.



2.2 Local Planning Policy

2.2.1 Ash Parish Council Neighbourhood Plan 2018-2037 (Adopted September 2021) The following policies are relevant to the proposed sustainability criteria of the development:

Policy ANP4 – Biodiversity

- Developments should provide biodiversity net gains of not less than 10% (as set out by the DERFA metric) at all stages of the mitigation processes. Developers must demonstrate that they have followed the mitigation hierarchy.
- New developments present an opportunity to maximise the benefits for biodiversity and should therefore seek to maximise these while ensuring there is no detriment to the Sandwich Bay and Thanet Coast SPA, SAC and Ramsar sites, the Pegwell Bay NNR and the Stodmarsh SSSI.
- Developments should seek to avoid any harm and to minimise any adverse impact upon the local biodiversity, habitats and wildlife. Where necessary and appropriate, proposed development should demonstrate that the conservation of protected and rare species will be maintained, including that of their foraging habitat. Compensatory provision elsewhere should be the last resort and used only if the development demonstrates an overriding benefit to the local community.
- Where necessary and appropriate, development should incorporate additional features for the support of protected species, such as bird and bat boxes, swift bricks and roosting sites and access routes for wildlife (e.g. hedgehogs).
- Developments will only be supported when they provide an independent survey report that is supported by the local planning authority, which agrees a robust mitigation plan that identifies there are no alternatives, or that appropriate mitigation measures can be put in place.
- Developments will only be supported if they comply with the most recent mitigation strategies relating to the Thanet Coast and the Sandwich Bay SPA and Sandwich Bay SAC, where applicable.
- Developments can evidence they will not cause an adverse effect on the integrity of any European Site within the proximity of the Plan area.
- Development can achieve nutrient neutrality regarding the Stodmarsh SAC/SPA/Ramsar site, as described at paragraph 150 of the Plan.

Policy ANP5 – Climate Change

• Proposals for new development will be supported where it is evident that they seek to meet the following criteria:



- a) are designed to minimise vulnerability to the range of impacts arising from climate change by maximising energy efficiency, utilising low carbon energy and reduce greenhouse emissions;
- b) are resilient to climate change and demonstrate how the development will respond to climate change adaption measures;
- c) incorporate one or more low carbon technologies;
- d) do not increase, and where possible, reduce surface water run-off through increased permeability of surfaces and the use of Sustainable Drainage Systems;
- e) incorporate, where appropriate, bio-diverse green roofs and green walls;
- f) provide public or private open space that is accessible to shade and shelter and is multi-functional;
- g) provide opportunities to encourage local food sources, recycling and composting;
- h) adopt the Home Quality Mark and Passivhaus design standards;
- i) provide electric vehicle car charging points; and
- j) provide good quality pedestrian/cycle infrastructure.
- New developments should reduce greenhouse gas emissions by the use of renewable and low carbon energy and heat by reflecting the Government's policy for national technical standards.
- New developments should submit a positive strategy as part of the planning application, demonstrating how the development will achieve carbon sequestration. It should also demonstrate how low energy consumption will be achieved based upon low carbon technologies (e.g. air/ground source heat pumps, photovoltaic panels, solar water heating, rainwater harvesting etc.). If a positive strategy cannot be achieved, a statement outlining the reasons why it cannot be achieved will be required

Policy ANP6 – Developments and Conservation

Proposals for new development in the Plan area should comply with all relevant Policies in this Plan. Proposals which assist in delivering the social and environmental aims of the Plan will be supported. In particular, proposals will be supported which:

- Demonstrate a high standard of design which respects and reinforces the local distinctiveness of its location, surroundings and the individual character areas of the Parish, as described in the Ash Character Assessment (2018). 6.2 Building design should respect and respond to the village setting, taking account of the Ash Design Guide, in relation to:
 - a) scale, density, massing, height of nearby buildings, orientation, use of local natural materials, fenestration, landscape layout and access; and
 - b) the scale, design and materials of the street furniture in the public realm (highways, footways, open spaces and landscape).



- Buildings should take account of landform, layout, building orientation, massing and landscape to minimise energy consumption.
- All new developments should be designed to avoid increased vulnerability to the impacts of climate change by:

a) ensuring development schemes demonstrate how adaption measures and sustainable development principles have been incorporated into the design and proposed implementation;

b) planning applications which use the Home Quality Mark and Passivhaus design standards will be positively supported;

c) conversions and extensions of 500 sq.m. of residential floorspace or above, or five or more dwellings, to achieve 'excellent' in BREEAM domestic refurbishment; and

d) expect non-domestic developments over 500 sq.m. of floorspace or above, to achieve 'excellent' in BREEAM assessments and encouraging zero carbon in new developments from 2021.

- All new developments must provide facilities for cycle storage and in the case of dwellings for the disabled and older persons, suitable access for mobility scooters.
- Provision for electric charging points to either each dwelling or one point per five dwellings.
- Respects, conserves and enhances the settings of Listed Buildings and street frontages as described in the Ash Character Assessment.
- Respects the integrity, character and appearance of the conservation areas.
- All development works should review the possibilities of archaeological finds within the site confines and seek early discussions with the Kent County Council Heritage Conservation team

Policy ANP3 - Green and open spaces in new developments

Developments of five or more dwellings should provide appropriate green and open spaces, in accordance with the District Council's standards, for residents' health and well-being and recreational use, and:

- Provide high quality, open green spaces and opportunities for recreational space and/or access to these via green routes, as a priority of all developments, and developers should refer to the Kent County Council ROWIP, PRoW's and "Access Good Design Guidance";
- Provide green infrastructure linking new developments to existing corridors and provide access by foot or cycle to and around the village and public amenities; and
- Should be sensitive to the rural setting, relate to the existing landscape and enhance the built environment.

Policy ANP13 – Off-Street Parking

Development proposal in the Plan area should:

Provide parking in accordance with the Kent County Council Standards and not less than: 1.5 parking spaces independently accessible for each 1 and 2 bed dwelling; - 2 parking
spaces independently accessible for each 3 and 4 bed dwelling; - 1 parking space



independently accessible for each specialist dwelling; or - a communal car park. The above requirements excludes garages.

- Not result in a net loss of on-site parking space;
- Not result in the loss of off-road public parking space through the need for cross over and / or visibility splays: and
- Not lead to over-spill parking on to public areas

Policy ANP15 – Transport:

Development proposals within the Plan area should include measures to minimise and make acceptable the impacts on the local road network by:

- Demonstrating how walking and cycling opportunities have been prioritised and new connections have been made to existing routes.
- Encouraging the use of sustainable transport, such as public transport, and including new and enhanced pedestrian/ cycle routes within the development leading to the existing public transport network and, where necessary, the provision of new bus infrastructure.
- Ensuring that development does not lead to adverse impacts upon air quality. Proposals that either adversely affect existing walking and cycle routes or do not encourage appropriate new walking and cycling opportunities, will not be supported.

2.2.2 Dover District Council Core Strategy (Adopted February 2010)

Policy CP 5 Sustainable Construction Standards

New residential development permitted after the adoption of the Strategy should meet Code for Sustainable Homes level 3 (or any future national equivalent), at least Code level 4 from 1 April 2013 and at least Code level 5 from 1 April 2016.

New non-residential development over 1,000 square metres gross floorspace permitted after adoption of the Strategy should meet BREEAM very good standard (or any future national equivalent).

Where it can be demonstrated that a development is unable to meet these standards, permission will only be granted if the applicant makes provision for compensatory energy and water savings elsewhere in the District.

The Council will encourage proposals for residential extensions and non-residential developments of 1,000 square metres or less gross floorspace to incorporate energy and water efficiency measures.



2.2.3 Draft Dover District Council Local Plan to 2040 (Reg 19 version October 2021)

Policy CC1: Reducing Carbon Emissions

In the event that the Future Homes Standard is required to be delivered through the planning system, all new residential dwellings must achieve, as a minimum, a reduction in carbon as required by this Standard.

This should be achieved using the measures set out below:

- a. An increase in fabric standards to deliver a 'fabric first' approach to new development; and
- b. The use of on-site renewable and low carbon energy technologies.

Until the introduction of the Future Building Standard, all new non-residential buildings must achieve BREEAM 'Very Good' standard overall, including Very Good for addressing maximum energy efficiencies under the energy credits.

Development proposals subject to this policy must submit an Energy Statement in the case of residential applications and a BREEAM pre-assessment for commercial developments as part of a planning application to demonstrate how the policy requirements above have been complied with. Policy requirements will be secured by condition.

Policy CC2: Sustainable Design and Construction

In order to mitigate against and adapt to the effects of climate change all new buildings should:

- a. Utilise layout, orientation, massing and landscaping to make the best use of solar energy, passive heating and cooling, natural light and natural ventilation;
- b. Prioritise the use of low embodied carbon and energy efficient building materials and construction techniques;
- c. Consider the lifecycle of the building and any associated public spaces, including how they can be easily modified to meet changing social and economic needs and how materials can be recycled at the end of their lifetime;
- d. Provide measures to adapt to climate change, including the provision of water efficiency measures in accordance with Policy CC4, green infrastructure in accordance with Policies CC8, PM1 and PM3 and Strategic Policies SP2 and SP14, sustainable drainage systems (SuDS) in accordance with Policy CC6, suitable shading of gardens and other open spaces, rainwater harvesting, drought resistant landscaping; and in the case of major developments, the shading of pedestrian routes and the provision of opportunities for growing food.
- e. Minimise waste and promote recycling, during both construction and occupation.

All applications for new buildings should be accompanied by a Sustainable Design and Construction Statement demonstrating how the requirements of this Policy have been met.



Policy CC3: Renewable and Low Carbon Energy

Development to generate energy from renewable and low carbon sources will be supported where it is demonstrated that:

- a. The environmental, social and economic benefits of their proposals are made clear;
- b. It will not result in significant harm to the surrounding area, landscape character, natural or heritage assets, habitats, biodiversity, or wildlife (particularly protected species), having special regard to the natural beauty of the Kent Downs AONB;
- c. There is no significant loss of amenity to local residents by virtue of visual impact, noise, disturbance or odour;
- d. The proposals will conserve and enhance the natural environment through measures such as improvements to biodiversity;
- e. There is no loss of the best and most versatile agricultural land, unless that it can be demonstrated that no alternative lower grade land is available;
- f. It will not result in an unacceptable impact on the local transport network that cannot be satisfactorily mitigated;
- g. Any fuel required is sustainably sourced.

All applications for renewable and low carbon energy developments should include a supporting statement setting out how the proposals meet the criteria of this policy.

Policy CC4: Water Efficiency

All new dwellings must be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations, to achieve a maximum use of 110 litres per person per day.

The Council will strongly support proposals that seek to reduce daily water consumption even further, through the use of additional measures such as rainwater harvesting.

For non-residential development, development must achieve BREEAM 'Very Good' standard overall, including Very Good for addressing maximum water efficiencies under the mandatory water credits, unless it can be demonstrated that it is not technically feasible and viable.

Policy CC5: Flood Risk

Development on sites at risk of flooding must comply with the National Planning Policy Framework and associated guidance and will only be permitted as an exception and where it is demonstrated by a site-specific Flood Risk Assessment (FRA), carried out in accordance with the requirements set out in the Council's Strategic Flood Risk Assessment, that it would not result in an unacceptable risk of flooding on the site itself or elsewhere.

The FRA should be prepared in accordance with the guidance set out in the Council's 'Sitespecific Guidance for Managing Flood Risk'. For development identified by the FRA to be at risk of flooding from any source, flood mitigation should be implemented in accordance with the



Flood Risk Management hierarchy outlined in the document 'Site-specific Guidance for Managing Flood Risk'.

Where development does go ahead, all floor levels for living and sleeping accommodation should be set at a minimum of 300mm and 600mm above the flood level for Flood Zones 2 and 3 respectively, including an allowance for climate change.

Policy CC6: Surface Water Management

All new development should replicate natural ground and surface water flows and decrease surface water run-off through the use of Sustainable Drainage Systems, in accord with the following criteria and the NPPG:

- a. Proposals must follow the hierarchy of methods for discharge set out in the Council's Site-specific Guidance for Managing Flood Risk (2019):
 - i. Into the ground, infiltration: the preferred method for discharging surface water run-off
 - ii. To a surface water body, subject to appropriate pollution control measures
 - iii. To a surface water sewer, highway drain or another drainage system
 - iv. To a combined sewer
- b. SuDS design and robust long-term maintenance plan must be considered as an integral part of the master-planning and design process, and should where possible provide multi-functional benefits.
- c. No surface water connection to a foul only sewer will be permitted.
- d. The discharge of surface water runoff into a public surface or combined sewer will only be acceptable if infiltration or discharge into a surface water body are shown not to be possible, an assessment of the capacity of the sewer has been undertaken, and the evidence demonstrates that there is no increased flood risk.
- e. In Groundwater Source Protection Zones 1 and 2 SuDS will only be permitted if adequate safeguards against possible contamination are provided or where it can be demonstrated than there will be no environmental risks to water quality and adequate mitigation measures can be implemented.

For major development, the following criteria also apply:

- f. Drainage must be integrated into on-site multifunctional open space and landscape provision.
- g. Proposals should be informed by guidance produced by the Lead Local Flood Authority.
- h. Approval for the design and long-term maintenance of SuDS will be required prior to the development being permitted.

Where SuDs are required, a sustainable drainage strategy containing proportionate information on the proposed sustainable drainage systems must be submitted as part of any planning application.



Policy Tl1: Sustainable Transport and Travel

Development should, in so far as its size, characteristic and location:

- a. a Be designed so that opportunities for sustainable transport modes are maximised and provide for;
- b. b a variety of forms of transport as alternatives to travel by private motorised vehicle;
- c. c Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles;
- d. d Be readily accessible by sustainable transport modes through the provision of high quality, engineered, safe and direct walking and cycling routes within a permeable site layout;
- e. e Contribute to sustainable transport proposals including off-site improvements to cycling and walking routes and public transport facilities, and to proposals within the Dover Infrastructure Delivery Plan;
- f. and
- g. f Make provision for secure cycle parking and storage in accordance with the Parking Standards.

The Council will safeguard the Public Rights of Way network, and other existing cycle and walking routes, from development that would compromise their use and will encourage their enhancement and extension.

2.3 Summary of Policy and Legislative Requirements

Box 2.1 provides an overview of Policy and Legislative Requirements and their applicability to the proposed development.

Box 2.1: Overview of Policy / Legislative Requirements

Policy ANP5 Climate Change

New developments should reduce greenhouse gas emissions by the use of renewable and low carbon energy and heat by reflecting the Government's policy for national technical standards.

- Policy CC1: Reducing Carbon Emissions All new residential dwellings must achieve, as a minimum, a reduction in carbon as required by the Future Homes Standard (or Part L 2021). This should be achieved using the measures set out below:
 - An increase in fabric standards to deliver a 'fabric first' approach to new development; and
 - The use of on-site renewable and low carbon energy technologies.
- Policy CC4: Water Efficiency



New build housing must be built to the higher water efficiency standard under Regulation 36 of the Building Regulations, so as to achieve a maximum use of 110 litres per person per day.



3. SUSTAINABILITY ASSESSMENT

This section comprises the sustainability assessment for the proposed development. The Sustainability Statement outlines the measures proposed in order to ensure compliance with the Local Authority requirements with a particular focus on the following parameters:

- Energy Use
- Flood Risk
- Water use
- Materials
- Biodiversity and Ecology
- Sustainable Travel
- Noise

3.1 Energy Use

In accordance with Ash Parish Council Neighbourhood Plan Policy ANP5 and Draft Dover District Council Local Plan Policy CC1, the development aims to achieve, as a minimum, a reduction in carbon as required by the Future Homes Standard (as required by the emerging Local Plan) which will also meet current Part L 2021 requirements.

A proposed High Level Energy Strategy for the development has been prepared in accordance with the energy hierarchy by Sol Environment and has been included as a part of the planning application.

Classicus Estates Ltd have deliberately sought to design their development to contribute meaningfully towards local, regional and national carbon reduction targets. Their approach aims to follow the energy hierarchy, which places good thermal performance second only to good passive design.

Due to the outline nature of the proposal only an indicative high-level energy strategy has been prepared. The following is a summary of the recommendations include within the energy strategy in accordance with the Energy Hierarchy.

- In accordance with the Energy Hierarchy an energy strategy has been developed for the New Street, Ash development using the Be Lean, Be Clean, Be Green methodology with results that achieve all relevant local and national energy and low carbon policy.
- A fabric first approach has been agreed and a good specification for building fabric, driven by achieving necessary values of Dwelling Fabric Energy Efficiency (DFEE), the development aims to achieve, as a minimum, a reduction in carbon as required by the Future Homes Standard (as required by the emerging Local Plan) which will also meet current Part L 2021 requirements.



- It is recommended that space and hot water heating could be provided by high efficiency Air Source Heat Pumps.
- Where further energy savings are required to meet planning policy and Part L 2021 requirements it is recommended that an array of roof mounted solar PV is installed.
- *NOTE:* Although ASHPs are recommended a gas boiler could still meet the Future Homes/Part L 2021 requirements. If a gas boiler heating system is the client's preferred solution this is likely that the development will need to install significantly more PV to meet the minimum standards.

The above strategy is based on high level documentation only. It is recommended that a detailed energy strategy is prepared during the reserved matters application to confirm the energy performance of the development once the detailed documentation is prepared.

For more details, please refer to the detailed Energy Strategy prepared by Sol Environment.

3.2 Flood Risk

Planning has a key role to play in managing flood risk for climate adaptation as water stress and extreme weather events are likely to become more severe in future.

The Application Site lies within Flood Zone 1 (low risk of flooding) and there are no watercourses in the vicinity. The proposals are appropriate in terms of flood risk. Based on modelled flood level data and updated peak river flow allowances from the EA, the proposed buildings remain comfortably outside and above the estimated flood extent. Surface water flood risk will be mitigated by the proposed surface water strategy.

Areas of green space have been incorporated into the layout to allow the inclusion of above ground SuDS. This will include an attenuation basin, bio-retention areas, rain gardens and tree pits which will provide source control features, water quality treatment, encourage evaporation and transpiration. Wherever practicable, runoff will first be directed to these features before draining into the geo-cellular storage.

The proposed drainage strategy utilises geo-cellular storage to ensure that surface water runoff rates for the proposed development are limited to the 5.3 l/s for all events up to and including the 1 in 100 year plus 45% CC event.

The FRA demonstrates that the proposed development will be safe and that it would not increase flood risk elsewhere. The residential development has been classified as 'more vulnerable' to flooding within the FRA. In addition, the land use is considered appropriate in relation to the flood risk vulnerability classifications set out in Table 3 of the PPG. Subsequently the development should be considered acceptable in planning policy terms.



For more details, please refer to the Flood Risk Assessment prepared by RMA Environmental.

3.3 Water Use

The conservation of water resources and maximising resource efficiency is a central theme within the Core Strategy, particularly the Dover District Councils Policy CP 5: Sustainable Construction Standards.

To reduce the consumption of potable water from all sources and limit the water consumption to no more than 110 litres per person per day in the homes, it is recommended that the following water using features are installed with similar or better flow rates.

Residential Components	Rate	Units
Taps (flow rate)	4.5	litres/min
Bath (volume to overflow)	140	litres
Showers (flow rate)	6	litres/min
Dishwasher	12	litres/cycle
Washing Machine	40	litres/use
WC (dual flush volume)	3/4.5	litres
Kitchen Sink Taps (flow rate)	5	litres/min

To further reduce the water consumption of the development smart water metering and the use of alternative water supplies such as rainwater harvesting shall be considered.

3.4 Materials

All materials associated with the development shall be sourced with consideration for the embodied construction impacts. As such the site and building shall comprise, where possible, of sustainably sourced materials of a sufficiently robust construction to ensure a long life without the need for regular maintenance or replacement.

In selecting other materials, the following issues will be considered. The design and construction team will:

- Preferentially selected those materials with a lesser environmental impact;
- Review alternative materials that have a lower environmental impact when developing material specification, including recycled materials; and
- Review the embodied energy within potential building materials and reduction of the embodied energy where feasible.



3.5 Biodiversity and Ecology

In accordance with *Policy ANP4 – Biodiversity* new development should protect and promote biodiversity, ensuring that any building works are sensitive to the surrounding environment. Where new landscaping is proposed, specifying of species rich plants and shrubs within the amenity space will enhance biodiversity within the local area.

An ecological assessment has been conducted by KB Ecology Ltd. A review of the existing baseline conditions concluded that the current site consist of the following:

- o buildings, hard standing,
- overgrown 'more intensively managed orchard' C1e (under the UK Habitat Classification System), covered in bramble scrub, with some trees,
- o an area of bramble scrub (h3d) with some trees in the south-east corner,
- 4m tall hawthorn hedge along the north boundary and along part of the east and west boundaries.

Following their review, the ecologist suggested a number of biodiversity enhancements, listed below, as a palette for the developer to choose from to suitably enhance the sites biodiversity:

- Provision of hedgehog nesting boxes.
- If any close board fencing is to be installed around the new development, we recommend that at least 13 x 13 cm holes should be cut into the base of the fences (one per garden) to allow greater permeability across the site to benefit ground-based terrestrial animals (such as hedgehog).
- Provision of ready-made bird boxes on retained trees (where trees are being retained);
- Provision of integrated 'swift bricks' in new buildings (as these are often occupied by other small cavity-nesting birds). A ratio of at least two per residential dwelling is generally accepted now as good practice (see BS 42021:2022). It is suggested better to install them in small groups of 2/6 approx. one metre+ apart in suitable locations at a minimum height of 4 metres (5 metres is better).
- Provision of integrated bat boxes on new buildings or bat boxes on retained mature trees (where trees are being retained).
- o Tree / shrub/ hedgerow planting (native species to be used only).
- Planting of hedges with dormouse friendly species (using native species)
- o Establish climbing plants on walls and other vertical structures.
- Establish wildflower plug/bulb planting in amenity grassland and private gardens.
- Consider using grid mesh system (or Ground Reinforcement Grids) with topsoil and seeding with a wildflower species mix, to car parking areas and new access drives to retain some vegetation as well as drainage, or Gravel turf.
- o Establish Fruit Espaliers.
- Wildflower-rich Grassland Creation
- The landscape project team should refer to the 'Kent Design Guide'.



Priority should be given to habitats and species present on the Kent Biodiversity Strategy and it is recommended that the project team should follow advice from the recently published 'Biodiversity in new housing developments: creating wildlife-friendly communities', which sets out approaches to design and development that work with nature to deliver multiple benefits – for people and wildlife.

For more detail, please refer to the Preliminary Ecological Appraisal prepared by KB Ecology Ltd included as part of the planning application.

3.6 Sustainable Travel

The site is located within walking distance from the local facilities in the centre of Ash Village and close to public transport nodes.

Bus stops are located on both New Street and Sandwich Road servicing the wider area. There are a number of bus services which run from outside of the site towards Ash village centre and towards Sandwich.

Sufficient cycle parking will be provided in accordance with the adopted standard and all dwellings with off-street parking will be supplied with electric vehicle charging points.

Amenities around the site include educational, employment and leisure facilities which will not require the use of single occupancy vehicle trips.

3.7 Noise

Noise pollution from the development has been considered as part of this sustainability statement.

An assessment of the potential noise impacts attributable to the existing ambient environment has been undertaken by noise consultants for the Proposed Development with the following conclusions.

Ambient noise levels are calculated to achieve the criteria provided within BS 8233:2014 and the WHO Guidelines for Community Noise.

Typical insulated double glazing and attenuated trickle ventilation has been calculated to be sufficient across the site, although it would be prudent to ensure items are selected to achieve a reduction of at least 30 dB RW+Ctr at dwellings overlooking roads. However, windows are not



required to be sealed and may remain openable for rapid or purge ventilation or to be opened at the occupant's discretion.

In addition, external amenity noise levels have been calculated to fall below guideline level for external amenities and thus no mitigation strategies are required.

For more detail, please refer to the design and access statement prepared by ENTRAN.

3.8 Green & Open Space

In response to Neighbourhood Plan Policy ANP3 the proposal includes an appropriate amount of open space within the site providing provision for recreational and play opportunities.

Pedestrian routes are also incorporated through the site, connecting to a wider network of paths and other recreational opportunities.



4. STATEMENT SUMMARY

The Local Authority is committed to achieving sustainable development. As a result, the current planning policies emphasise the importance of sustainable growth with particular emphasis on the encouragement of energy efficiency and sustainable travel.

It is important, therefore, that the proposed development site contributes to the Council's sustainability aims as well as meeting regional and national objectives for sustainable development.

This sustainability statement demonstrates that the proposal satisfies a number of key objectives, responding to local needs and requirements and conforming to current good practice.

In summary, the sustainability statement has informed the design process by identifying opportunities and constraints for sustainable development, and the process has highlighted the proposals sustainability performance against national, regional and local planning policy.