Sustainability Appraisal Scoping for Maidstone Borough Local Plan Review

Scoping Report

Prepared by LUC
January 2019

Project Title: Maidstone Local Plan Review Sustainability Appraisal

Client: Maidstone Borough Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	14/12/18	Draft for client comment	Olivia Dunham	Jon Pearson Jeremy Owen	Jeremy Owen
2.0	15/01/19	Revised draft	Olivia Dunham	Jeremy Owen	Jeremy Owen
3.0	28/01/19	Final	Olivia Dunham	Jeremy Owen	Jeremy Owen

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1   Introduction

1.1   Maidstone Borough Council (the Council) commissioned LUC in November 2018 to carry out a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) of their Local Plan Review.

1.2   SA is an assessment process designed to consider and communicate the significant sustainability issues and effects of emerging plans and policies, including their alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.

1.3   The purpose of a Scoping Report is to provide the context for and determine the scope of the SA of the Local Plan Review and to set out the assessment framework for undertaking the later stages of the SA.

1.4   The Scoping Report starts by setting out the policy context of Maidstone Borough's Local Plan Review, before describing the current and likely future environmental, social and economic conditions in the Borough. This contextual information is used to identify the key sustainability issues and opportunities that the Local Plan Review can address. The key sustainability issues and opportunities are then used to develop a framework of SA Objectives used to appraise the likely significant effects of the constituent parts of the Local Plan Review, including strategic policies, site allocations and development management policies. The purpose of this consultation is to seek views on this framework in particular:

1) Whether the scope of the SA is appropriate as set out considering the role of the Maidstone Local Plan Review to help meet and manage Maidstone's growth needs and development ambition.

2) Whether there are any additional plans, policies or programmes that are relevant to the SA policy context that should be included.

3) Whether the baseline information provided is robust and comprehensive, and provides a suitable baseline for the SA of the Maidstone Local Plan Review.

4) Whether there are any additional SA issues relevant to the Local Plan Review that should be included.

5) Whether the SA Framework is appropriate and includes a suitable set of SA objectives and site-based assumptions for assessing the effects of the options included within the Maidstone Local Plan Review and reasonable alternatives.

Maidstone Borough Local Plan Review

1.5   Maidstone Borough Council adopted its current Local Plan on 25 October 2017, which set out the planning strategy for the Borough up to 2031. Although the Plan was adopted recently, an early review is being commenced in order to ensure that it remains up to date and can meet future needs for development. The end date for the Local Plan Review has not yet been set but will be 2037 at the earliest to ensure the plan has a 15 year time horizon at adoption.

1.6   The next stage of the Local Plan Review, the Issues and Options consultation is due to be published in 2019. The consultation is designed to gather feedback on key issues of particular concern in the Borough today, the matters most likely to grow in importance over the next 20 years and options for addressing key issues and providing for future needs.

1.7   The location of Maidstone Borough is shown on **Figure 1.1** below.

Figure 1.1: Maidstone
District & Surrounding Local
Authorities

☐ Maidstone Borough

☐ Neighbouring Local Authority
Boundary

Bexley
London
Boro

Thurrock

Sittingbourne

A126

A206

A2000 A207 A2026

A2018

A282

A296

A226

Dartford
District

Gravesham
District

A289

A250

A2500

Bromley
London
Boro

A231

Medway

Swale
District

A2

Canterbury
District

A227

A229 A230

A278

A249

M25

A224

M26

A25

Sevenoaks
District

A26

M2

A225

Tonbridge and
Malling
District

Maidstone
District

M20

A20

A252

A21

A274

Ashford
District

A2014

A228

A264

A262

A28

Tunbridge
Wells
District

A2070

Wealden
District

A267

Rother
District

A268

Shepway
District

A265

↑N

0   5   10
                    km

Map Scale @ A4:   1:280,000

LUC

Chelmsford

Albans

London

Cante

ord

Brighton
& Hove

Sustainability Appraisal and Strategic Environmental Assessment

1.8   Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment Directive (European Directive 2001/42/EC), as transposed into law in England by the SEA Regulations[1]. Therefore, it is a legal requirement for the Local Plan Review to be subject to SA and SEA throughout its preparation.

1.9   The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance[2]), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Maidstone. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.10   The SA process comprises a number of stages, with scoping being Stage A as shown in **Figure 1.2** below:

Figure 1.2 Main stages in Sustainability Appraisal

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Stage B: Developing and refining options and assessing effects

Stage C: Preparing the Sustainability Appraisal Report

Stage D: Consulting on the Local Plan Review and the SA report

Stage E: Monitoring the significant effects of implementing the Local Plan Review

Key International Plans, Policies and Programmes

1.11   At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Local Plan. These processes should be undertaken iteratively and integrated into the production of the Local Plan in order to ensure that any potential negative environmental effects (including on international nature conservation designations) are identified and can be mitigated.

1.12   There are a wide range of other international agreements and EU Directives, which have been transposed into UK law and national policy, which are summarised in the relevant subject area chapters.

National Planning Policy Framework

1.13   The most significant national policy context for the Local Plan Review is the National Planning Policy Framework (NPPF) which was originally published in 2012 and revised in 2018[3]. The Local Plan Review must be consistent with the requirements of the NPPF, which states:

"Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."

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[1] The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

[2] https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

[3] Ministry of Housing, Communities and Local Government (July 2018) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

1.14   The NPPF sets out information about the purposes of local plan-making, stating that plans should:

- *"Be prepared with the objective of contributing to the achievement of sustainable development;*

- *Be prepared positively, in a way that is aspirational but deliverable;*

- *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*

- *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*

- *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*

- *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area"*.

1.15   The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- *"Housing (including affordable housing), employment, retail, leisure and other commercial development;*

- *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

- *Community facilities (such as health, education and cultural infrastructure); and.*

- *Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation".*

1.16   The NPPF also promotes well-designed places and development, as well as protection and enhancing beneficial use of the Green Belt.

1.17   Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development, including qualitative aspects such as design of places, landscapes, and development.

1.18   The NPPF also states that:

"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."

Neighbourhood Plans

1.19   The Localism Act (2011) sought to move decision-making away from central government and towards local communities. Part of this included the introduction of Neighbourhood Planning.

1.20   Neighbourhood Plans must be consistent with the requirements of the NPPF and, once adopted, Neighbourhood Pans form part of the statutory development plan for the district or borough within which they are located. The NPPF sets out information about the purposes of Neighbourhood Plan-making, stating that:

    "Neighbourhood planning gives communities the power to develop a shared vision for their area."

1.21   The NPPF also states that Neighbourhood Plans "*can shape, direct and help to deliver sustainable development*", but they should not promote less development than set out in the strategic policies in a Local Plan covering the neighbourhood area. Within this context, Neighbourhood Plans typically include policies to deliver:

- Site allocations for small and medium-sized housing.

- The provision of infrastructure and community facilities at a local level.

- Establishing design principles.

- Conservation and enhancement of the natural and historic environment.

1.22   There are 17 designated neighbourhood areas (including 1 designated neighbourhood forum North Loose Residents Association) within the Borough of Maidstone, of which Loose, Lenham, Marden, Headcorn, and Broomfield & Kingswood are all within the process of creating Neighbourhood plans. The Neighbourhood Plans of North Loose and Staplehurst have been 'made', in January 2016 and September 2016, respectively.

Approach to Scoping

1.23   **Figure 1.3** below sets out the tasks involved in the Scoping stage.

Figure 1.3 Stages in SA Scoping

Stage A1: Setting out the policy context for the SA of the Maidstone Local Plan Review, i.e. key Government policies and strategies that influence what the Local Plan and the SA needs to consider.

Stage A2: Setting out the baseline for the SA of the Maidstone Local Plan Review, i.e. the current and likely future environmental, social and economic conditions in Maidstone.

Stage A3: Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities ('issues') that the Local Plan Review and SA should address.

Stage A4: Drawing on A1, A2 and A3, develop a framework of SA Objectives and assessment criteria to appraise the constituent parts of the Local Plan Review in isolation and in combination.

Stage A5: Consulting on the scope of the SA.

1.24   This Scoping Report fulfils the requirements set out above with a view to establishing the likely significant effects of constituent parts of the Local Plan Review in isolation and in combination. In accordance with National Planning Practice Guidance (PPG), published on-line by the Government, the Scoping Report is proportionate and relevant to the Maidstone Local Plan Review, focussing on what is needed to assess the likely significant effects.

Meeting the Requirements of the SEA Regulations

1.25   **Table 1.1** below signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the SA of the Maidstone Local Plan Review). This table will be included in the full SA Report at each stage of the SA to show how the requirements of the SEA Regulations have been met through the SA process.

Table 1.1 Meeting the Requirements of the SEA Regulations

SEA Regulations' Requirements	Covered in this Scoping Report?
Environmental Report	
Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of: implementing the plan or programme; and reasonable alternatives taking into account the objectives and	The full SA Report produced to accompany consultation on the Maidstone Local Plan Review will constitute the 'environmental report' as well, and will be produced at a later stage in the SA process.

SEA Regulations' Requirements	Covered in this Scoping Report?
geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).	
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	**Chapters 1** to **9**.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	
The environmental characteristics of areas likely to be significantly affected.	
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.	
The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	
The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).	Requirement will be met at a later stage in the SA process.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Requirement will be met at a later stage in the SA process.
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Requirement will be met at a later stage in the SA process.
A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Requirement will be met at a later stage in the SA process.
A non-technical summary of the information provided under paragraphs 1 to 9.	Requirement will be met at a later stage in the SA process.
The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: current knowledge and methods of assessment; the contents and level of detail in the plan or programme; the stage of the plan or programme in the decision-making process; and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.	This Scoping Report and the Environmental Reports will adhere to this requirement.

SEA Regulations' Requirements	Covered in this Scoping Report?
(Regulation 12 (3))	
Consultation	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))	This Scoping Report will be published on Maidstone Borough Council's website for a minimum of five weeks and the three statutory bodies (the Environment Agency, Historic England, and Natural England) informed of the consultation.
Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation. As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall: send a copy of those documents to each consultation body; take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees"); inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent. The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents. (Regulation 13 (1), (2), and (3))	Public consultation on the Local Plan and accompanying SA Reports will take place as the Local Plan Review develops.
Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion: notify the Secretary of State of its opinion and of the reasons for it; and supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. (Regulation 14 (1))	Unlikely to be relevant to the Local Plan Review, as there will be no effects beyond the UK.
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall: make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge. (Regulation 16(1))	Requirement will be met at a later stage in the SA process.
As soon as reasonably practicable after the adoption of a plan or programme: the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of	Requirement will be met at a later stage in the SA process.

SEA Regulations' Requirements	Covered in this Scoping Report?
State, that the plan or programme has been adopted, and a statement containing the following particulars: how environmental considerations have been integrated into the plan or programme; how the environmental report has been taken into account; how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; how the results of any consultations entered into under regulation 14(4) have been taken into account; the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	
Monitoring	
The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))	Requirement will be met after adoption of the new Local Plan Review.

Habitats Regulations Assessment

1.26   The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010[4] and again in 2012[5] and 2017[6]. The regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.

1.27   The HRA will be undertaken separately but the findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

Structure of the Scoping Report

1.28   This chapter describes the background to the production of the Maidstone Local Plan Review and the requirement to undertake SA and other assessment processes. The remainder of this Scoping Report is structured around a set of SA subject areas designed to draw out the full range of possible sustainability effects generated by the Maidstone Local Plan Review, including all the SEA topics listed in Schedule 2 of the SEA Regulations (2004)

1.29   Each chapter sets out the policy context and baseline for each SA subject area. The subject area chapters are as follows:

- **Chapter 2**: Population Growth, Health and Wellbeing.

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[4] The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version.

[5] The Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927.

[6] *The Conservation of Habitats and Species Regulations 2017* (Statutory Instrument 2017 No. 1012) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments.

- **Chapter 3**: Economy.

- **Chapter 4**: Transport Connections and Travel Habits.

- **Chapter 5**: Air, Land and Water Quality.

- **Chapter 6**: Climate Change Adaptation and Mitigation.

- **Chapter 7**: Biodiversity.

- **Chapter 8**: Historic Environment.

- **Chapter 9**: Landscape.

1.30   SEA Guidance recognises that data gaps will exist, but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis.

1.31   Relevant baseline information will be updated during the SA process as and when data is published.

1.32   The end of **each chapter** highlights the key sustainability issues for Maidstone informed by the preceding chapter and sets out their likely evolution without the new Local Plan Review. **Chapter 10** sets out the SA Framework and explains how this has been developed.

2 Population, Health and Wellbeing

Policy Context

International

2.1 **United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention')** (1998): Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

2.2 **United Nations Declaration on Sustainable Development (Johannesburg Declaration)** (2002): Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

2.3 **European Environmental Noise Directive** (2002): Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

National

2.4 **National Planning Policy Framework (NPPF)** [7] contains the following:

- The NPPF promotes healthy, inclusive and safe places which; promote social integration, are safe and accessible and enable and support healthy lifestyles.

- One of the core planning principles is to "*take account of and support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community*".

- Plan should "*contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible*". To determine the minimum number of homes needed strategic policies should be informed by the application of the standard method set out in national planning guidance, or a justified alternative approach.

- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities.

- The NPPF states "*good design is a key aspect of sustainable development*" and requires development to add to the overall quality of the area over its lifetime. The importance of good architecture and appropriate landscaping to reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places is emphasised.

- The NPPF promotes the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.

- Ensure that developments create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.

- There is a need to take a "*proactive, positive and collaborative approach*" to bring forward development that will "*widen choice in education*", including sufficient choice of school places.

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[7] Ministry of Housing, Communities and Local Government (July 2018) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

- Health and wellbeing should be considered in local plans. They should promote healthy lifestyles, social and cultural wellbeing and ensure access by all sections of the community is promoted.

- Paragraph 72 states that "*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure and facilities*".

2.5 **National Planning Practice Guidance (PPG)**[8] contains the following:

- Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

2.6 **Select Committee on Public Service and Demographic Change report Ready for Ageing?**[9]: warns that society is underprepared for the ageing population. The report states "*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises*". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

2.7 **Fair Society, Healthy Lives**[10]: investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*".

2.8 **Planning Policy for Traveller Sites**[11]: Sets out the Government's planning policy for traveller sites, replacing the older version published in March 2012. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

2.9 **Housing White Paper 2017 (Fixing our broken housing market)**[12]: Sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.

- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.

- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.

- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

2.10 **Laying the foundations: a housing strategy for England**[13]: Aims to provide support to deliver new homes and improve social mobility.

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[8] Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance

[9] Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] Available at: https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf

[10] The Marmot Review (2011) Fair Society, Healthy Lives. [online] Available at: http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf

[11] Department for Communities and Local Government (2015) Planning policy for traveller sites [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

[12] Department for Communities and Local Government (2017) Fixing our broken housing market [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

[13] HM Government (2011) Laying the Foundations: A Housing Strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf

2.11 **Healthy Lives, Healthy People: Our strategy for public health in England**[14]: Sets out how our approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.

- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing, and tackle the wider factors that influence it.

- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.

- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.

- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

2.12 **A Green Future: Our 25 Year Plan to Improve the Environment**[15]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:

  o Embed an 'environmental net gain' principle for development, including housing and infrastructure.

- Connecting people with the environment to improve health and wellbeing:

  o Help people improve their health and wellbeing by using green spaces including through mental health services.

  o Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.

  o 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.

  o Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

Sub-national

2.13 **Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**[16]: Provides a view of emerging development and infrastructure requirements to support growth across Kent and Medway. Some of the main sustainability issues for Maidstone itself are set out:

- The highway network across Kent and Medway is severely congested including in the major centre of Maidstone.

- Maidstone has experienced one of the largest net inflows of internal (with UK) migration from 2011 to 2016 within the County.

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[14] HM Government (2010) Healthy Lives, Healthy People: Our strategy for public health in England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf

[15] HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

[16] Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework [online] available at: http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

- There are gaps in current facility distribution against the focus areas of housing growth within Maidstone.

- Maidstone is expected to grow significantly in the coming years.

2.14   The document also sets out the main challenges for North Kent (which includes Maidstone) and include:

- Some of the most deprived localities in the South East.

- Significant annual net migration into the area from London and population growth placing pressure on local services.

- Deficiencies in early years, primary and secondary education, especially in areas of growth.

- Healthcare provision struggling to keep up with growth.

2.15   **Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**[17]: The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the MBLP and to outline how and when these will be delivered.

2.16   **Strategic Plan 2015-2020 Action Plan**[18]: Sets out the vision, "Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential." In addition, numerous strategies and projects are outlined that respond to the following objectives, which are grouped by theme:

Embracing Growth and Enabling Infrastructure:

- The Council leads master planning and invests in new places which are well designed.

- Key employment sites are delivered.

- Housing need is met including affordable housing.

- Sufficient infrastructure is planned to meet the demands of growth.

Safe, Clean and Green:

- People feel safe and are safe.

- A Borough that is recognised as clean and well cared for by everyone.

- An environmentally attractive and sustainable Borough.

- Everyone has access to high quality parks and green spaces.

Homes and Communities:

- A diverse range of community activities is encouraged.

- Existing housing is safe, desirable and promotes good health and well-being.

- Homelessness and rough sleeping are prevented.

- Community facilities and services in the right place at the right time to support communities.

A Thriving Place:

- A vibrant leisure and culture offer, enjoyed by residents and attractive to visitors.

- Our town and village centres are fit for the future.

- Skills levels and earning potential of our residents are raised.

- Local commercial and inward investment is increased.

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[17] Maidstone Borough Council (2016), Maidstone Borough Local Plan Infrastructure Delivery Plan [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0016/121129/SUB-011-Infrastructure-Delivery-Plan-May-2016.pdf
[18] Maidstone Borough Council, Strategic Plan 2015-2020 Action Plan, Draft Vision, Priorities and Outcomes [online] Available at: https://meetings.maidstone.gov.uk/documents/s63864/Appendix%20A.pdf

Cross cutting objectives:

- Heritage is respected.

- Health inequalities are addressed and reduced.

- Deprivation is reduced and social mobility is improved.

- Biodiversity and Environmental sustainability is respected.

A complete updated version of the action plan is expected to be released February 2019.

2.17 **Contaminated Land Strategy 2016-2021**[19]: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in the Borough. The objectives are as follows:

- To take a proportionate approach to the risks raised by contamination whilst ensuring that any unacceptable risk of human health or the wider environment is resolved.

- All investigations and risk assessments will be site specific, scientifically robust and will ensure only land that poses a genuinely unacceptable risk is determined as contaminated.

- The Council will consider the various benefits and costs of taking action, with a view to ensuring that corporate priorities and statutory requirements are met in a balanced and proportionate manner.

- The Council will seek to maximise the net benefits to residents taking full account of local circumstances.

- The Council will seek to assist and enable residents who live on potentially contaminated sites to gather further information when that site is not scheduled for investigation by the council in the short term.

- The Council will develop a hardship policy to ensure fair allocation of costs, in accordance with the Secretary of State's Guidance.

2.18 **Maidstone's Parks & Open Spaces -10 Year Strategic Plan 2017-2027**[20]: This plan sets out a route map for the short, medium and longer term, deals with the management of parks and open spaces and considers significant challenges, such as, housing growth and its pressure on public services.

2.19 **Green and Blue Infrastructure Strategy**[21]: Sets out a vision for the Borough's green and blue infrastructure for the next 20 years. The vision is for greener, healthier, attractive towns and villages sustainably connected to the rich tapestry of distinctive landscapes, wildlife habitats and waterways – valued, enjoyed and cared for by local people. The strategy sets out seven key themes:

- Mitigating and adapting to climate change.

- Integrating sustainable movement and access for all.

- Promoting a distinctive townscape and landscape.

- Maintaining and enhancing biodiversity, water and air quality.

- Providing opportunities for sport, recreation, quiet enjoyment and health.

- Retaining and enhancing a quality environment for investment and through development.

- Providing community involvement and opportunities for education.

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[19] Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf
[20] Maidstone Borough Council (2017) Maidstone's Parks & Open Spaces – 10 Year Strategic Plan 2017-2027 [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf
[21] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at:
https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf

2.20   **Maidstone Green and Blue Infrastructure Strategy: Action Plan**[22]**:** This plan builds off of the adopted Green and Blue Infrastructure Strategy from 2016 (mentioned above). The plan aims to deliver multiple projects centred on the same themes set out in the Green and Blue Infrastructure Strategy.

2.21   **Homelessness Strategy 2014-2019**[23]: This strategy sets out how the Council will deal with homelessness within the Borough until 2019. It provides an overall plan of how the Council plans to prevent homelessness and to ensure sufficient provision of accommodation and support for households who are homeless or at risk of homelessness. The key issues considered are:

- The increasing importance of the private rented sector in reducing homelessness and the barriers to providing a sustainable affordable housing solution.

- The increasing number of landlord possessions in the private rented sector contrasted with the reduced ability for prospective tenants to access private rented accommodation.

- The relationship between the Allocation Scheme and encouraging homeless applicants into employment, voluntary work or training.

- The reduction in referrals to Kent County Council's Supporting People programme for homelessness services despite the increasing levels of homelessness in Maidstone.

- The increase in mortgage possession orders granted but not yet enforced which may result in a future spike in homelessness as the property market recovers.

2.22   **Housing Strategy 2016-2020**[24]: This strategy guides the Council and its partners in tackling the major housing challenges facing the Borough. It sets out the priorities and outcomes to achieve and provide a clear strategic vision. The Strategy contributes to the Council's corporate priorities for Maidstone 'to keep the Borough an attractive place for all and to secure a successful economy.' It sets out three key priorities that the Council and its partners need to address:

- Enable and support the delivery of quality homes across the housing market to develop sustainable communities.

- Ensure that existing housing in the Maidstone Borough is safe, desirable and promotes good health and well-being.

- Prevent homelessness, secure provision of appropriate accommodation for homeless households and supporting vulnerable people.

2.23   **Low Emissions Strategy (December 2017)**[25]: Sets out the aims of Maidstone Borough Council to achieve a higher standard of air quality across Maidstone. One of the key drivers behind the strategy is public health. The strategy also recognises that air quality issues often affect those in more deprived communities and vulnerable people who have pre-existing health conditions.

Current Baseline

Population

2.24   The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area.[26] Maidstone Borough occupies a central location within the County of Kent.

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[22] Maidstone Borough Council (2017) Maidstone Green and Blur Infrastructure Strategy: Action Plan. [online] Available at: http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODIzMiUyRkFwcGVuZGl4JTIwMSUyMEdCSV0cmF0ZWd5QWN0aW9uUGxhbjIwMTcucGRmJmFsbD0x

[23] Maidstone Borough Council, Homelessness Strategy 2014-2019 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0005/164669/Homelessness-Strategy-2014-2019-Sept-2014.pdf

[24] Maidstone Borough Council, Maidstone Housing Strategy 2016-2020 [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0004/9517/Housing-Strategy-2016-20.pdf

[25] Maidstone Borough Council (2017) Low Emission Strategy [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf

[26] Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf

The River Medway flows through the western part of the Borough including through Maidstone itself.[27]

2.25 Maidstone's population in mid-2017 was estimated as 167,730 persons compared to 155,764 in 2011, an estimated rise of 11,966 or 7.7%. In 2017 the estimated population was made up of 51% females and 49% males. The two largest age groups in 2017 were 45-49 and 50-54 and they made up 15% of the total population. Comparisons between 2011 and 2017 show that in both years the proportion of persons drop in the age range 20-24 and that the highest proportion of residents has changed from 45-49 in 2011 to 50-54 in 2017.[28] The overall population is expected to increase between the years 2018-2038, from 169,200 persons to 196,300 persons; a percent increase of 16.02%.[29]

2.26 The average age of Maidstone is 40.1, compared to the average for England as a whole of 39.3. There is an expected overall increase in all ages in Maidstone from 2018 to 2038, which is in line with the expected population increase within the same time period.[30]

2.27 From 2002/03 to 2015/16 the average total net migration inflow per year was 1,382 people. Having increased sharply since 2011/12, net migration fell for the first time in four years in 2015/16. However, this is not as low as the levels of 2003/04 and 2004/05. Internal (within UK) migration makes up the greater proportion of all net migration to Maidstone at 54%, which is similar in comparison to 55% in 2011/12. The cumulative net inflow to Maidstone between 2003/04 and 2015/16 was 17,969 persons.[31] At the county level, all districts have experienced net inflows of internal migration from 2011 to 2016 and Maidstone has seen the largest flow along with Canterbury and Swale.[32]

2.28 Population density in Maidstone is 3.9 persons per hectare, which is lower than that of Kent as a whole, which has a population density of 4.1 persons per hectare.[33]

Housing

2.29 Since 2011, there has been a 6.3% rise in total dwellings in Maidstone, rising from 65,530 to 69,700 dwellings, compared to a 4.8% rise in Kent (excluding Medway) and a 4.2% rise in England. The tenure of private sector dwelling stock in Maidstone is 87% which is similar to Kent and England, however, Maidstone has a very small amount of local authority owned dwellings compared to Kent and England and has a much higher number of private dwellings provided by registered providers. The average household size in Maidstone is 2.4 people, which is comparable to household sizes across the county, region and nation.[34]

2.30 Since 2011 house prices in Maidstone have been steadily increasing, detached dwellings are showing the highest price rise and flats/maisonettes showing only a minimal rise. In 2017 the average housing price in Maidstone had risen to the same average as Kent. The total number of house sales per annum increased steadily between 2011 and 2014, in 2016 there was a sharp decrease which was followed by a significant jump to a 7 year high. This extraordinary trend was also seen in Kent and the South East. Terraced and semi-detached housing continue to be the two predominant types of dwelling sold in Maidstone, and they regularly average two thirds of the

[27] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf
[28] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports
[29] Sourced from ONS 2016-based projections for local authorities available at:
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2
[30] Office for National Statistics, 2016-based subnational population projections for local authorities and higher administrative areas in England [online] Available at:
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2
[31] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports
[32] Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework [online] available at:
http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf
[33] UK Census Data (2011) [online] available at: http://www.ukcensusdata.com/maidstone-e07000110#sthash.diAdxxtt.dpbs
[34] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

total dwellings sold.[35] Maidstone saw 3,127 property sales during 2017. This was the highest number of sales within a Kent local authority.

2.31   The average property price in Kent during 2017 was £323,591. This is higher than the national average of £292,151 but lower than the average in the South East which was £371,404. Property prices in Kent in 2017 rose 6.1% compared to the year before. The average price rise across the County varied from 9% in Maidstone to 5.3% in Canterbury. Out of all the local authorities of the South East, only Maidstone and Folkestone & Hythe saw an increase in property sales in 2017 compared to 2016. The overall average price paid per property in Maidstone was £324,684.[36] The house price to earnings ratio has risen sharply by over 2% between 2011 and 2017, meaning that house prices have increased in that time period while earnings have remained the same. This trend is laid out in the graph below.[37]
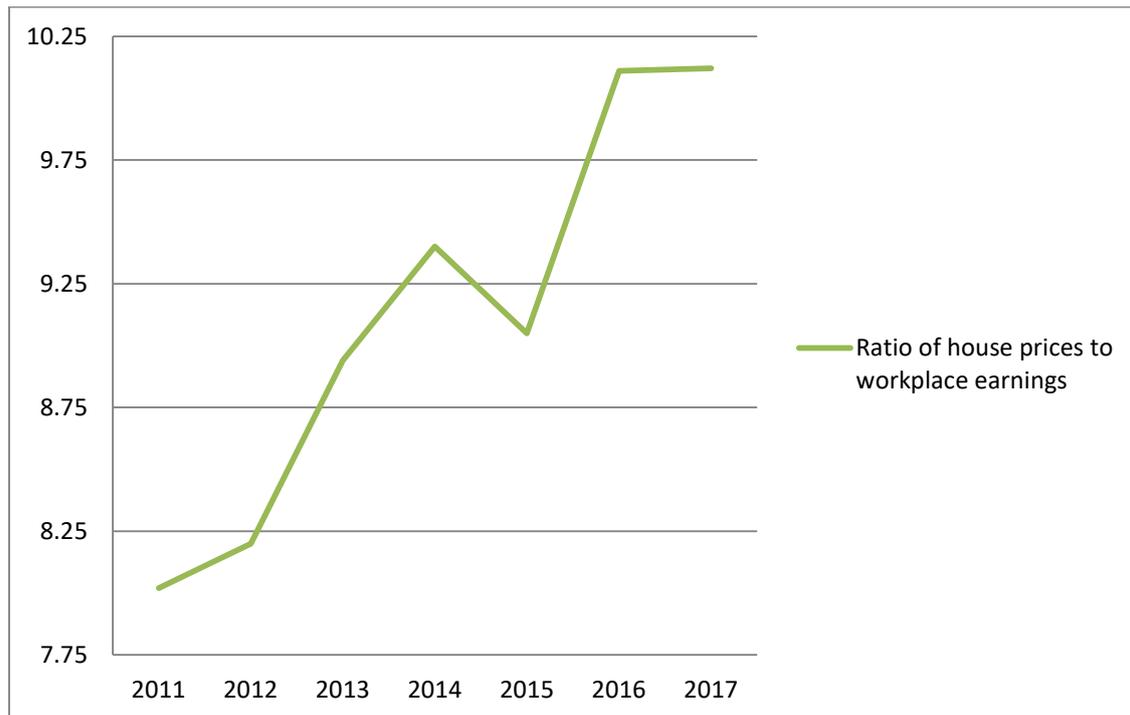
2.32   There has been a 33% fall in vacant dwellings in Maidstone between 2011 and 2017, a trend higher than in Kent and England. Long term vacancy rates have fallen in Maidstone for two consecutive years up to 2017, whereas the trend has been inconsistent in Kent and England. Vacant dwellings in Maidstone make up 1.51% of total dwelling stock if 69,700 homes, which is a lower trend than Kent 2.41%, and England 2.53%.[38]

2.33   There has been a significant drop in the number of applications on the housing register, since 2011, however the number of homeless households within the Borough has risen by 26% between 2011 and 2016.[39]

2.34   The Council is continuing to meet its objectively assessed needs for housing, and as of 1 April 2018, it has 6.5 years' worth of readily available housing sites. [40]

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[35] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[36] Kent County Council (2018) Business Intelligence Statistical Bulletin: Property Prices & Sales in Kent: 2017 [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0004/28354/house-price-annual-bulletin.pdf

[37] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[38] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[39] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

2.35   **Table 2.1** shows that compared to 2016/17, in 2017/18 the allocated sites in the Local Plan 2017 delivered dwellings at a lower rate than the anticipated delivery rates set out within the Local Plan trajectory. While delivery on allocated sites was below anticipated levels, overall completions almost reached the anticipated level. The Local Plan 2017 trajectory for 2017/18 was 1,287 compared to actual completions of 1,286. In addition, there was an increase of contributions from windfall during 2017/18, which was larger than expected, with a total of 339 dwellings delivered.[41]

Table 2.1 Completed dwellings on allocated sites measured against Local Plan trajectory[42]

Year	Local Plan Target	Actual	% Target
2017/18	939	767	82%
2016/17	470	473	101%

2.36   For the past seven years a total of 5,291 dwellings have been completed which represents a shortfall of 890 dwellings against the seven year target of 6,181 dwellings; this shortfall is set to be delivered over the next eight years, 2019 to 2027.

2.37   The current Local Plan sets out 5 and 20 year housing targets. The total five year delivery target (as of 1 April 2018 to 31 March 2023) is 4,415 dwellings. The 20 year housing land target is 17,660 dwellings which equates to an annual need of 883. The table below sets out the various elements of the Local Plan housing land supply and demonstrates a surplus of 693 dwellings.

Table 2.2 20 Year Housing Land Supply 1 April 2011 to 31 March 2031[43]

20 Year Housing Land Supply 1 April 2011 to 31 March 2031	Dwellings (net)	Dwellings (net)
Local Plan housing target		17,660
Completed dwellings 1 April 2011 to 31 March 2018	5,291	
Extant planning permissions as at 1 April 2018 (including a 5% non-implementation discount)	6,665	
Local Plan allocated sites (balance of Local Plan allocations not included in line 3 above)	2,574	
Local Plan broad locations for future housing development	2,333	
Windfall sites contribution	1,490	
Total housing land supply		18,353
Housing land supply surplus 2011/2031		693

[40] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[41] Housing land supply update, Analysis paper (1 April 2018) [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0004/144967/Housing-Land-Supply-Paper-1-April-2018.pdf

[42] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[43] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

2.38   Between 2015/16 and 2017/18 there has been a considerably higher number of windfall permissions granted within the town centre and urban area compared to targets set out within the Local Plan 2017.[44]

2.39   Affordable housing is being secured in accordance with Local Plan 2017 policies, and completion rates are, over the Local Plan period 2011 to 2018, in line with the target. Between 2011/12 and 2017/18 Maidstone has completed 1,583 affordable dwellings, an average total of 30% of all completed dwellings.[45]

Gypsy, Traveller and Travelling Showpeople

2.40   Between 1 April 2017 and 31 March 2018 there has been permission for:

- 31 Permanent non-personal pitches.

- 3 Permanent personal pitches.

- 0 Temporary non-personal pitches.

- 5 Temporary personal pitches.[46]

2.41   Between 2011 and 31 March 2018 some 140 pitches were granted permanent planning permission. These pitches contribute to the target in the Maidstone Borough Local Plan of 187 pitches needed by 2031.

2.42   The Ministry of Housing, Communities and Local Government's 'Planning policy for traveller sites' requires Local Plans to identify a supply of 5 years' worth of deliverable sites against the Plan's pitch target. As of 1 April 2018, Maidstone can demonstrate 5.2 years' worth of deliverable planning pitches.[47] An updated Gypsy and Traveller and Travelling Showpeople Accommodation needs study is expected to be completed in Spring 2020.

Education

2.43   Of the 125,476 residents aged 16 and over in the Borough in 2011, 20.7% have no qualifications, 14.6% have Level 1 qualifications, 17.6% have Level 2 qualifications, 4.1% are in an apprenticeship, 12.2% have Level 3 qualifications and 25.6% have Level 4 qualifications and above.[48]

2.44   In 2011 there were 3,463 school children and full time students in the Borough, and 3,356 students aged 18 and over. [49]

2.45   The birth rate has risen for the past three years, ending 5 points above County and National rates. There is significant pressure on Year 1 to Year 3 places in Maidstone town area largely due to the inward migration from London Boroughs, the reduction in places at Jubilee Primary (Free) School and the delayed opening of the New 2 Form Entry Maidstone North Free School. Secondary School forecasts indicate a deficit of Year 7 places from 2018-2019, becoming significant by 2019-2020. Further demand for Year 7 places, including from new housing developments, will require the expansion of existing schools from 2020/21. Figures in the Kent Commissioning Plan for Education Provision 2018-22 shows that Maidstone Central and South and Marden and Yalding may experience a deficit in all year groups from 2019/20 onwards. Maidstone North is also expected to experience a deficit from 2018/19 onwards. [50]

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[44] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[45] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[46] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[47] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[48] NOMIS – Local Area Report (2011) – Maidstone [online] Available at: https://www.nomisweb.co.uk/reports/localarea?compare=1946157316

[49] NOMIS – Local Area Report (2011) – Maidstone [online] Available at: https://www.nomisweb.co.uk/reports/localarea?compare=1946157316

[50] Kent County Council (2018) Commissioning Plan for Education Provision in Kent [online] available at: https://www.kent.gov.uk/__data/assets/pdf_file/0003/66990/Kent-Commissioning-Plan-for-Education-Provision-2018-22.pdf

2.46   According to the Commissioning Plan for Education Provision in Kent, the number of primary age pupils is expected to continue rising significantly from 123,027 in 2016-17 to 128,905 in 2021-22, which is just fewer than 6,000 extra pupils over the next five years. In the same period the number of secondary age pupils in Kent schools is expected to rise significantly from 79,110 in 2016-17 to 91,520 in 2021-22, an increase of 12,000 pupils. Kent County Council (KCC) will aim to address these increasing school pupil numbers by expanding existing schools and creating new primary, secondary and special schools.

2.47   Overall there is a need for additional school places across the County. Whilst the Government has provided funding towards the provision of school places KCC still estimates a funding shortfall of £101m in respect of places required by 2020.[51]

Deprivation

2.48   When considering all Indices of Deprivation (2015), the Borough of Maidstone falls within the 50% of least deprived areas in the country. However, as shown in **Figure 2.1**, it contains a mix of areas of higher deprivation and areas with low deprivation. Maidstone is ranked 198 out of the 326 authorities in England.

2.49   The Maidstone urban wards of Park Wood, Shepway South and High Street contain the highest levels of deprivation in the borough and rank in the top 10% in Kent. There are some pockets within the urban wards of North and Shepway North that do not fall within the top 10% in Kent; they are the 6th and 7th most deprived wards in Maidstone. The most deprived Lower Super Output Areas (LSOA) in Maidstone are clustered within the inner urban area, and the least deprived LSOAs are located on the edge of the urban area and in the rural hinterland.[52]

Health

2.50   Maidstone (68.1%) has a consistently higher percentage of adults who consider themselves physically active than Kent (66.6%) and nationally (66.1%).[53] The 2011 Census statistics suggest that health in the Borough is reasonably good with 83.2% of the population reporting themselves to be in very good, or good health. Some 12.4% state they are in fair health, with only 3.4% and 1% in bad or very bad health respectively. Furthermore, 84.2% of the population reported that their day to day activities are not limited by their health, 8.9% state that they are limited a little and 6.9% limited a lot. Some 10% of the population receive paid care.[54]

2.51   Average life expectancy in Maidstone is slightly above the national average, being 80.6 for males and 83.6 for females.[55] Life expectancy is 8.1 years lower for men and 4.4 years lower for women in the most deprived areas of Maidstone than in the least deprived areas.

2.52   Estimated levels of adult excess weight are worse in the Borough, with an average of 68.9%, than the England average of 61.3%.[56]

Open spaces, sports and recreation

2.53   27% of the Borough forms part of the Kent Downs Area of Outstanding Natural Beauty (AONB), which is an important informal recreational resource.[57] Maidstone contains 425 hectares of

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[51] Kent County Council (2018) Commissioning Plan for Education Provision in Kent [online] Available at: http://www.kent.gov.uk/education-and-children/schools/education-provision/education-provision-plan#

[52] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[53] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[54] NOMIS – Local Area Report (2011) – Maidstone [online] Available at: https://www.nomisweb.co.uk/reports/localarea?compare=1946157316

[55] Life Expectancy at birth by Sex, UK 2014-2016 [online] Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyatbirthandatage65bylocalareasuk

[56] Public Health England (2017) Maidstone District: Health Profile 2018 [online] Available at: https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132696/pat/6/par/E12000008/ati/101/are/E07000110

[57] Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf

greenspace, 30 large parks, 80 Neighbourhood greenspaces, 68 play areas, 700 allotment plots across 12 sites and 4 Green Flag parks.[58]

2.54   In 2014 an updated audit of the quantity of public accessible green space across the Borough was carried out. Publicly accessible green space was defined as all open access land which is owned by Maidstone Borough Council, Kent County Council, Forestry Commission, Woodland Trust, parish councils, housing associations or 'open access' land, or land which has been voluntarily deemed as publicly accessible by the landowner through other legal means. **Table 2.3** shows the quantity of publicly accessible green space based on category and amount within urban and rural wards. Overall, there is more open space, of each category, within the urban wards of the Borough compared to the rural wards.

Table 2.3 Quantity (m^2) of publicly accessible green space

	Allotments	Amenity	Natural	Play	Sports	Ward Totals
Urban Ward Total	225,028	784,552	7,059,723	98,379	951,933	9,119,615
Rural Ward Total	91,871	611,337	2,896,473	28,974	182,798	3,811,453
Green Space Type Total	541,927	2,180,441	17,015,919	225,732	2,086,664	12,931,068

2.55   An assessment of the quality of the publicly accessible green spaces was carried out in 2014/15 on 140 sites across the Borough including amenity green spaces, natural and semi-natural green spaces and allotments. The assessment was based on the quality and accessibility aspects of the Green Flag Award programme. Of the 140 sites assessed 8 were scored to be in Poor condition, 62 as Fair, 57 as Good and 1 as Very Good.[59]

2.56   In 2017/18, there were 16 major sites that qualified to make provision for open space, resulting in an additional 12.93ha of open space. There has been no loss of designated open space as a result of development during the monitoring year 2017/18.[60]

Crime

2.57   Between 2011 and 2017 Maidstone did not follow County trends in crime statistics and reported a lower increase in all reported crime. However, over the 7 year period there has been a substantial higher rise in crime in Maidstone and Kent compared to England and Wales. The High Street Ward in 2017 reported a steep rise in crime during the summer months compared to the previous two years. The two winter months of December and January have consistently been the lowest months for reported crime.[61]

2.58   Within Kent, anti-social behaviour and violent crime are two principal contributors of crime together accounting for over half of all crimes committed.[62]

[58] Maidstone Borough Council (2017) Maidstone's Parks & Open Spaces – 10 Year Strategic Plan 2017-2027 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf
[59] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf
[60] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports
[61] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports
[62] UK Crime Stats (2018) Kent Police http://ukcrimestats.com/Police_Force/Kent_Police

2.59   Nationally, average crime rates are lower in rural areas than urban areas. For example, in 2016/17, the rate of violence against the person was 14.1 per 1,000 population in predominantly rural areas compared with 22.2 per 1,000 population in predominantly urban areas. This would suggest that the rural areas of Maidstone would similarly have a lower rate of violence than the more built up areas.[63]

Air and noise pollution

2.60   Air and noise pollution are issues for the health of residents and workers in the town centre of Maidstone due to the convergence of a number of roads, the constrained nature of the town centre, and because the town of Maidstone is surrounded by higher land, meaning that air pollution can become trapped. **Chapter 5** addresses air pollution in the Borough in more detail.
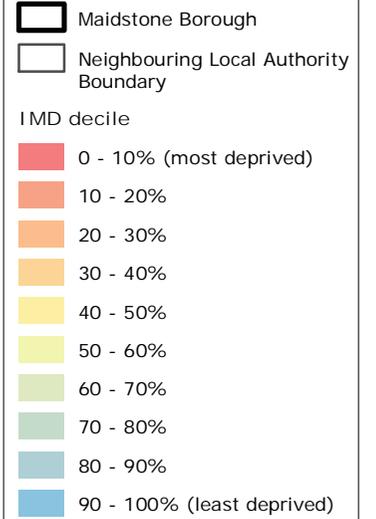
Table 2.4 Key sustainability issues for Maidstone and likely evolution without Local Plan Review

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
Population growth and demographic change will place additional demand on key services and facilities such as health, education and social care. In particular, there are currently capacity issues with schools (SA Framework objective SA 2).	Without the Local Plan Review it is likely that services and facilities will still be delivered. However, it is less likely that these will be in appropriate locations, or of sufficient quality and quantity to keep pace with demand arising from new residential development. The Local Plan Review offers an opportunity to deliver these in a coherent, sustainable manner alongside development. Population growth and demographic change is accounted for throughout many policies within the current Local Plan.
Housing prices and the number of homeless households in Maidstone have been increasing steadily since 2011. The ratio between average wages and house prices has continued to increase. House prices are expected to continue to increase while wages remain stagnant. (SA Framework objective SA 1).	Without the Local Plan Review it is likely that house prices will continue to rise across the Borough. The Local Plan Review offers the opportunity to facilitate and expedite the delivery of affordable housing. Policy SP19 of the current Local Plan highlights the need for the delivery of sustainable mixed communities including affording housing.
There is a need to reduce the inequalities gap between those living in the most deprived areas of Maidstone and those living in the least deprived areas of Maidstone. (SA Framework objectives SA 4 and 5).	Without the Local Plan Review it is possible that the gap between the most and least deprived areas in the Borough will remain or grow. The Local Plan Review presents the opportunity to address this through the planning for jobs, and for new and improved communities and infrastructure, particularly within the areas that are amongst the most deprived in the country. Policy SP1 of the current Local Plan sets out to support development that will improve the social, environmental and employment well-being of those living in identified areas of deprivation.

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[63] Crime, January 2018 [online] Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/676118/Crime_Jan_2018.pdf
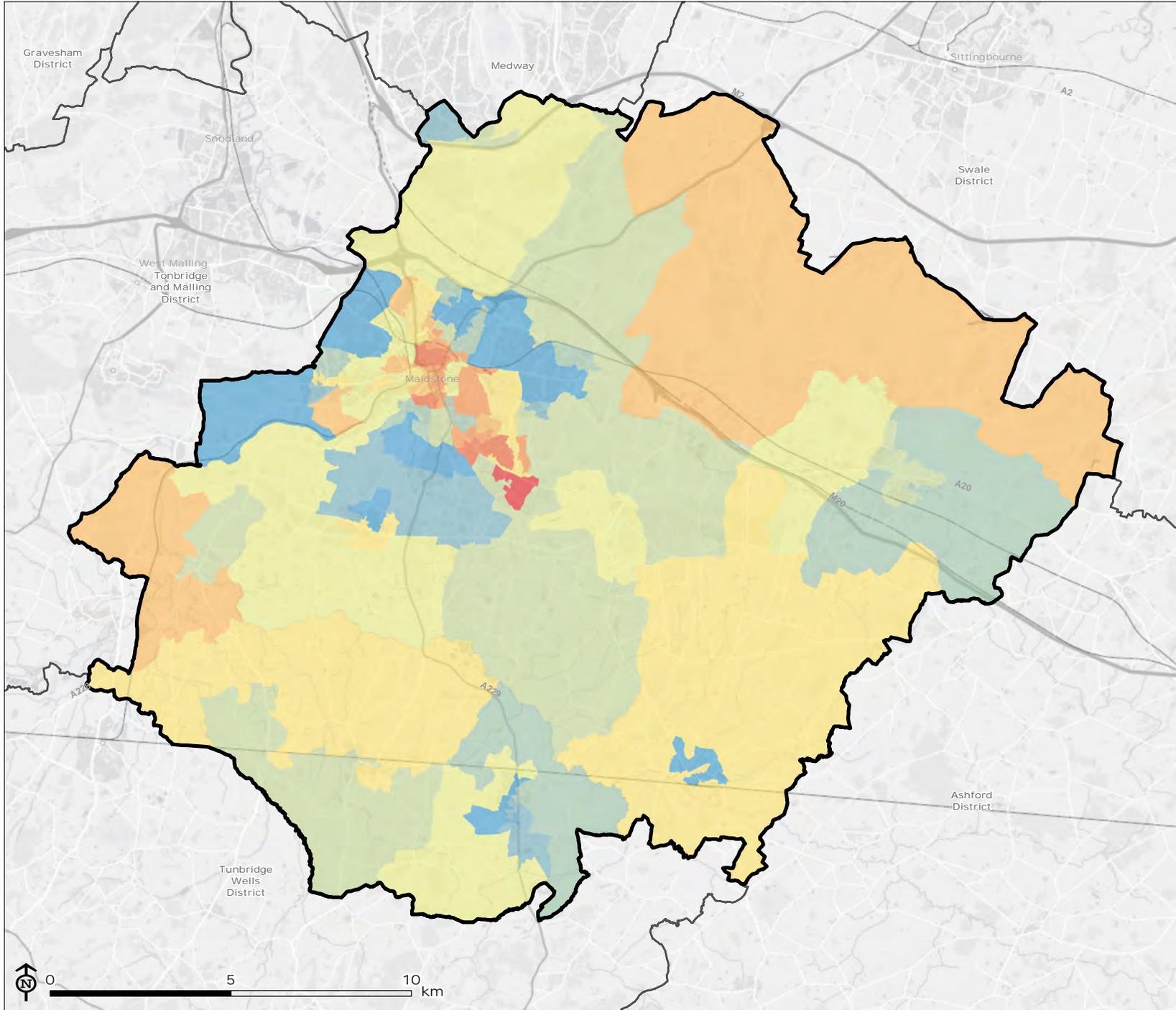
Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
Levels of obesity in the Borough exceed the national average (SA Framework objective SA 4).	Without the Local Plan Review levels of obesity in the Borough may continue to rise, although national campaigns may work to reduce this. The Local Plan Review could further contribute to tackling obesity through policies that encourage active travel and access to green space and other recreation opportunities. The topic of health is intertwined with many policies throughout the current Local Plan.
More than half of the open space sites that were assessed in 2014/15 were given a score of poor or fair condition. (SA Framework objectives SA 2 and 4).	Without the Local Plan Review it is likely that the quality of open spaces will deteriorate. The Local Plan Review offers the opportunity to address this by ensuring that the accessibility and quality of open space is high and new local green spaces are planned alongside new development. The current Local Plan sets out detailed provision for open space in Policy DM19, stating that the Council will seek to secure publicly accessible open space provision for new housing and mixed use development sites in accordance with quantity, quality and accessibility standards, which are also set out within the policy.
As with the County as a whole, total crime in Maidstone has risen and violent crime makes up the largest proportion of the increase (SA Framework objective SA 3).	The Local Plan Review would provide a contribution, alongside other local and national measures, to locally reduce crime through policies which aim to make the local environment and streets safer, for example by 'designing out' crime. Policy DM1 of the current Local Plan sets out to reduce crime by incorporating good design principles that should address the functioning of an area.

Figure 2.1: Index of Multiple
Deprivation (IMD)

☐ Maidstone Borough

☐ Neighbouring Local Authority
Boundary

IMD decile

- 0 - 10% (most deprived)
- 10 - 20%
- 20 - 30%
- 30 - 40%
- 40 - 50%
- 50 - 60%
- 60 - 70%
- 70 - 80%
- 80 - 90%
- 90 - 100% (least deprived)

Source: DCLG

Map Scale @ A4:   1:150,000

LUC

3   Economy

Policy Context

International

3.1   There are no specific international or European economic policy agreements relevant to the preparation of the Local Plan Review and the SA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade within the European Union (subject to changes post-Brexit) and with other nations.

National

3.2   **National Planning Policy Framework (NPPF)**[64] contains the following:

- The economic role of the planning system is to contribute towards building a "*strong, responsive and competitive economy*" by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

- Planning policies should address the specific locational requirements of different sectors.

- Local planning authorities should promote long term viability and vitality of town centres and take a positive approach to their growth, management and adaption. Recognise that residential development has a role to play in supporting these ambitions.

- When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings.

- The NPPF requires Local Plans to "*set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.*"

3.3   **National Planning Practice Guidance (PPG)**[65]: Reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

3.4   **The Local Growth White Paper (2010)**[66]: Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

3.5   **Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)**[67]: Sets out the Government's Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.

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[64] Department for Communities and Local Government (2018) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf
[65] Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance
[66] Department for Business, Innovation and Skills (2010) Local Growth: Realising Every Place's Potential. Available at: https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961
[67] HM Government (2000) Rural White Paper (Our Countryside: the future – A fair deal for rural England) [online] Available at: http://www.tourisminsights.info/ONLINEPUB/DEFRA/DEFRA%20PDFS/RURAL%20WHITE%20PAPER%20-%20FULL%20REPORT.pdf

- To maintain and stimulate communities, and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.

- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).

- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

Sub-national

3.6 **Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**[68]: Provides a strategic framework across Kent and Medway for identifying and prioritising investment across a range of infrastructure, for planned growth up to 2031. The Framework does not set out specific issues for Maidstone but highlights a number of economic challenges faced by North Kent:

- Congestion of highway networks in town centres and arterial routes.

- Capacity limitations of the M2.

- Rail capacity on the North Kent line is stretched and will shortly be overcapacity.

- Growth in retail and hospitality sectors rather than in knowledge industries with their potential for high value added growth.

3.7 **Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**[69]: The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the current Local Plan and to outline how and when these will be delivered.

3.8 **Strategic Plan 2015-2020 Action Plan**[70]: Sets out the vision, "Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential." In addition, numerous strategies and projects are outlined that respond to the following objectives, which are grouped by theme:

Embracing Growth and Enabling Infrastructure:

- The Council leads master planning and invests in new places which are well designed.

- Key employment sites are delivered.

- Housing need is met including affordable housing.

- Sufficient infrastructure is planned to meet the demands of growth.

A Thriving Place:

- A vibrant leisure and culture offer, enjoyed by residents and attractive to visitors.

- Our town and village centres are fit for the future.

- Skills levels and earning potential of our residents are raised.

- Local commercial and inward investment is increased.

Cross cutting objectives:

- Heritage is respected.

- Health inequalities are addressed and reduced.

- Deprivation is reduced and social mobility is improved.

- Biodiversity and Environmental sustainability is respected.

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[68] Kent County Council, Kent and Medway Growth and Infrastructure Framework 2018 Update (2018) [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

[69] Maidstone Borough Council (2016), Maidstone Borough Local Plan Infrastructure Delivery Plan [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0016/121129/SUB-011-Infrastructure-Delivery-Plan-May-2016.pdf

[70] Maidstone Borough Council, Strategic Plan 2015-2020 Action Plan, Draft Vision, Priorities and Outcomes [online] Available at: https://meetings.maidstone.gov.uk/documents/s63864/Appendix%20A.pdf

A complete updated version of the action plan is expected to be released February 2019.

3.9   **Maidstone Economic Development Strategy 2015-2031**[71]: This strategy sets out a vision to be achieved by 2031 and five priorities. This vision: *"A model 21ˢᵗ century county town, a distinctive place, known for its blend of sustainable rural and urban living, dynamic service sector-based economy, excellence in public services and above all, quality of life."* The five priorities are as follows:

- Retaining and attracting investment.

- Stimulating entrepreneurship.

- Enhancing Maidstone town centre.

- Meeting the skills needs.

- Improving infrastructure.

3.10 **The Kent Environment Strategy**[72]**:** Sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the sustained austerity on public sector finances and the need to work more efficiently. This means identifying opportunities to deliver across outcomes, working in partnership and accessing external funding wherever possible to deliver priorities.

3.11 **Housing Development & Regeneration Investment Plan**[73]: Prepared in 2017, this sets out opportunity sites that the Council have discussed and approved as having high priority for regeneration within the Town Centre.

Current Baseline

3.12 Wholesale and retail trade (including the repair of motor vehicles) makes up the largest industry in the Borough with 16.3% of the working population employed in this industry. The next largest industries are human health and social work activities 11.6% and construction with 10.6%. [74]

3.13 In terms of occupation, professional occupation workers are the largest employment group for Maidstone (20%) followed by both manager directors and senior officials (17%). Maidstone Borough has a low wage economy, and there is a disparity between residence earnings and work place earnings. Average residence earnings of £29,468 compared to the average workplace earnings of £28,891.[75] There is a projected increase across all sectors from 2012 to 2031 except for the public administration sector which is projected to have a decrease of 19%.[76]

3.14 From the seven local authorities surrounding Maidstone, 49% of the total commuting flows are workers coming into Maidstone Borough. There is a higher proportion of workers commuting out to Tonbridge and Malling (58%) and all London metropolitan boroughs (83%) compared to the proportion of workers commuting in from these locations. Medway has the highest proportion of workers commuting into Maidstone (65%). These patterns reflect Maidstone's strong transport links with the M20 motorway junctions 5, 6, 7 and 8, three railway lines across the Borough and public transport links with the Medway towns. Overall, Maidstone Borough has a net commuting flow of -1,454.[77]

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[71] Maidstone Borough Council (2015), Maidstone Economic Development Strategy 2015-2031 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0011/164657/Economic-Development-Strategy-2015-31-June-2015.pdf

[72] Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

[73] Maidstone Borough Council (2017) Housing Development & Regeneration Investment Plan [online] Available at: https://meetings.maidstone.gov.uk/documents/s56183/Housing%20Development%20Regeneration%20Investment%20Plan.pdf

[74] NOMIS – Local Area Report (2011) – Maidstone [online] Available at: https://www.nomisweb.co.uk/reports/localarea?compare=1946157316

[75] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[76] GVA Economic Sensitivity Testing and Employment Land Forecast for Maidstone Borough Council [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0003/47640/Economic-Sensitivity-Testing-and-Employment-Land-Forecast-February-2014.pdf

[77] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

3.15   Maidstone has shown steady growth in the number of businesses from 2011 to 2017 a trend reflected in Kent and the South East. Medium size businesses (50 to 249 employees) in Maidstone saw the largest percentage growth of 26.3% during the period, with micro businesses (0 to 9 employees) seeing the smallest growth at 19.9%.[78]

3.16   Between 2014 and 2016 the number of nights stayed by overseas visitors to Maidstone increased by 6%. There has been a steady increase in visiting friends or relatives by overseas visitors as the reason to visit, whilst visits for holidays has seen a slight decrease.[79]

3.17   Between 1 April 2017 and 31 March 2018 there has been an increase of 2,142sqm in net sales area of comparison and convenience retail floor space from completed permissions. However, consent permissions result in a loss of 6,878sqm net sales area.[80]

3.18   In regard to unemployment, in 2018 there was a decrease in claimants (people claiming benefit principally for the reason of being unemployed) in the Borough compared to a continued rise in Kent, the South East and England. The percentage of people claiming Job Seekers Allowance in Maidstone is 3.3% a decrease of 1.8% since 2011.[81]

3.19   There has been a steady rise in the number of jobs within Maidstone Borough. Between 2011 and 2016 there has been an increase of 7,000 additional jobs created, from 84,000 to 91,000 jobs.[82]

3.20   The UK is due to leave the European Union in March 2019. It is uncertain what effect this will have on the Maidstone economy, particularly given its excellent transport links to the continent and the rest of the UK.

Table 3.1 Key sustainability issues for Maidstone and likely evolution with the Local Plan Review

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
Maidstone needs to ensure a future supply of jobs and continued investment to ensure identified employment development opportunities are taken forward and deprivation issues tackled, especially since the Borough has a negative net commuting flow (SA Framework objective SA 5).	It is uncertain how the job market will change without the implementation of the Local Plan Review and some degree of change is inevitable, particularly given the uncertainties posed by Brexit. However, the Local Plan Review offers the opportunity to create and safeguard jobs through the allocation and promotion of employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all. Policy SP21 of the current Local Plan sets out how the Council will support and improve the economy of the Borough.

[78] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[79] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[80] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[81] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

[82] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

4 Transport Connections and Travel Habits

Policy Context

International

4.1 **The Trans-European Networks (TEN)**: Created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

National

4.2 **National Planning Policy Framework (NPPF)**[83]**:** Encourages local planning authorities to consider transport issues from the earliest stages of plan making so that; opportunities to promote sustainable transport are identified, the environmental impacts of traffic and transport infrastructure can be identified and assessed, and opportunities from existing or proposed transport infrastructure are realised.   States that the planning system should actively manage growth patterns in support of these objectives.

4.3 **National Planning Practice Guidance (PPG)**[84] **:** Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

4.4 **Department for Transport, The Road to Zero (2018)**[85]: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

Sub-national

4.5 **Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031**[86]: Sets out Kent County Council's Strategy and Implementation Plans for local transport investment for the period 2011-31. Transport priorities for Maidstone include the following:

- M20 Junctions 3-5 'smart' (managed) motorway system.

- Maidstone Integrated Transport Package, including M20 Junction 5 and northwest Maidstone improvements.

- Thameslink extension to Maidstone East by 2018 giving direct services to the City of London.

- A229/A274 corridor capacity improvements.

- Public transport improvements on radial routes into town.

- Leeds and Langley Relief Road.

- M20 Junction 7 improvements.

- Bearsted Road corridor capacity improvements.

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[83] Department for Communities and Local Government (2018) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf
[84] Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance
[85] Department for Transport, The Road to Zero (2018) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf
[86] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

- Public transport improvements (redevelop Maidstone East, refurbish Maidstone bus station, and bus infrastructure improvements).

- Maidstone walking and cycling improvements.

- Junction improvements and traffic management schemes in the Rural Service Centres.

4.6 **Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**[87]: Provides a view of emerging development and infrastructure requirements to support growth across Kent and Medway. Issues highlighted in the Framework for Maidstone include:

- The highway network across Kent and Medway is severely congested especially in the major centre of Maidstone.

- Maidstone has experienced one of the largest net inflows of internal (within UK) migration from 2011 to 2016 within the County.

- Maidstone is expected to grow significantly in the coming years.

4.7 More widely issues for North Kent include:

- Congestion on highway networks in town centres and arterial routes.

- Capacity limitation of the M2.

- Stretched rail capacity on the North Kent Line.

4.8 **The Kent Design Guide**[88]: Seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. With regard to transport, the Design Guide promotes a sustainable approach to development which requires that location, transport connections, mix of uses and community facilities, together with careful husbanding of land and energy resources all combine to produce social and economic benefits: healthier living and working environments; improved efficiency and productivity in use; and reduction of fuel costs and the costs of vehicle ownership.

4.9 **Network Rail South East Route: Kent Area Route Study (May 2018)** [89]**:** Sets out the strategic vision for the future of this part of the rail network over the next 30 years. The study builds on the recommendation in the Shaw Review that the railway is planned based on customer, passenger and freight needs. The Route Study seeks to identify capacity requirements in the medium and long term to allow the railway to play its part in delivering economic growth, in addition to improving the connections between people and jobs and businesses and markets. It identifies some potential sources of capacity to meet needs into the early 2020s but uncertainty remains beyond that.

4.10 **Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**[90]**:** The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the adopted Local Plan and to outline how and when these will be delivered.

4.11 **Maidstone Borough Council Integrated Transport Strategy 2011-2031**[91]**:** The strategy assesses the principal existing and future challenges affecting the transport network, including taking account of jobs and housing growth, and recognises that the populations of the urban area and dispersed villages bring different challenges and solutions. The strategic priorities are as follows: reduce demand for travel; change travel behaviour; promote modal shift; and improve network efficiency.

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[87] Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

[88] Kent Design Initiative (2008) The Kent Design Guide [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0014/12092/design-guide-foreword.pdf

[89] Network Rail (2018) South East Route: Kent Area Route Study [online] Available at: https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf

[90] Maidstone Borough Council (2016), Maidstone Borough Local Plan Infrastructure Delivery Plan [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0016/121129/SUB-011-Infrastructure-Delivery-Plan-May-2016.pdf

[91] Maidstone Borough Council, Maidstone Integrated Transport Strategy 2011-2031 [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0008/164672/Integrated-Transport-Strategy-2011-31-September-2016.pdf

4.12 **Maidstone Walking and Cycling Strategy 2011-2031**[92]: The strategy identifies the improvements required to deliver a comprehensive and well-connected cycle network (rather than focusing in detail on pedestrian-only facilities), which will help to make both cycling and walking more attractive alternatives for journeys within the Borough. It will act as a tool to assist in the delivery of the Transport Vision for Maidstone and in support of the five main ITS objectives as follows;

- Enhancing and encouraging sustainable travel choices.

- The enhancement of strategic transport links to, from and within Maidstone Town.

- Ensure the transport system supports the growth projected by the Maidstone Borough Local Plan.

- Reducing the air quality impacts of transport.

- Ensure the transport network considers the needs of all users, providing equal accessibility by removing barriers to use.

4.13 **Strategic Plan 2015-2020 Action Plan**[93]: Sets out the vision, "Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential." In addition, numerous strategies and projects are outlined that respond to the following objectives, which are grouped by theme:

Embracing Growth and Enabling Infrastructure:

- The Council leads master planning and invests in new places which are well designed.

- Key employment sites are delivered.

- Housing need is met including affordable housing.

- Sufficient infrastructure is planned to meet the demands of growth.

A complete updated version of the action plan is expected to be released February 2019.

4.14 **Low Emission Strategy (December 2017)**[94]: Sets out the aims of Maidstone Borough Council to achieve a higher standard of air quality across Maidstone, to assist the Council in complying with relevant air quality legislation, to embed an innovative approach to vehicle emission reduction through integrated policy development and implementation in Maidstone and across the region, to improve the emissions of the vehicle fleet in Maidstone beyond the 'business as usual' projection, through the promotion and uptake of low and ultra-low emissions vehicles, and to reduce emissions through an integrated approach covering all appropriate municipal policy areas. Under each area, the specific actions aimed at reducing emissions will be developed. The strategy is divided into a number of themes:

- Transport.

- Planning.

- Procurement.

- Carbon management.

- Public health.

4.15 **Air Quality Annual Status Report (2018)**[95]: Contains an action plan for the Borough of Maidstone that outlines many projects varying in topic and timeframe. Some include: transport, planning, carbon management and public health, with timeframes ranging from 1-3 years to 5+ years.

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[92] Maidstone Borough Council, Maidstone Walking and Cycling Strategy 2011-2031 [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0008/131849/Walking-and-Cycling-Strategy-2011-31-September-2016.pdf
[93] Maidstone Borough Council, Strategic Plan 2015-2020 Action Plan, Draft Vision, Priorities and Outcomes [online] Available at: https://meetings.maidstone.gov.uk/documents/s63864/Appendix%20A.pdf
[94] Maidstone Borough Council (2017) Low Emission Strategy [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf
[95] Maidstone Borough Council (2018) Air Quality Annual Status Report, [online] Available at: http://www.kentair.org.uk/Pagesfiles/Maidstone%20ASR%202018.pdf

4.16   **Kent and Medway Air Quality Planning Guidance (2015)**[96]: Developed to:

- Introduce a method for assessing the air quality impacts of a development which includes the quantification of impacts, calculation of damage costs and the identification of mitigation measures to be implemented to negate the impact of development on air quality.

- Tackle cumulative impacts.

- Provide clarity and consistency of the process for developers, the local planning authority and local communities.

4.17   **Green and Blue Infrastructure Strategy**[97]: Sets out a vision for the Borough's green and blue infrastructure for the next 20 years. The vision is for greener, healthier, attractive towns and villages sustainably connected to the rich tapestry of distinctive landscapes, wildlife habitats and waterways – valued, enjoyed and cared for by local people. The strategy sets out seven key themes, including:

- Integrating sustainable movement and access for all.

4.18   **Maidstone Green and Blue Infrastructure Strategy: Action Plan**[98]**:** This plan builds on the adopted Green and Blue Infrastructure Strategy from 2016 (mentioned above). The plan aims to deliver multiple projects centred on the same themes set out in the Green and Blue Infrastructure Strategy.

Current Baseline

4.19   Maidstone is the County Town of Kent and has a road and rail network that is based on the historic development of the town. The town centre is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20. The constrained nature of the town centre has contributed to peak period congestion and the designation of the wider urban area as an AQMA. A scheme to relieve congestion at the Bridges Gyratory has recently been implemented, although continued traffic growth on other parts of the network is expected to result in severe worsening delays for road users. These pressures are most evident on the congested A229 and A274 corridors in south and south eastern Maidstone and on the A20 corridor in north western Maidstone.[99]

4.20   Rail links across the Borough are comparatively poor, with Maidstone currently having no direct service to the City of London (although there is a proposed Thameslink extension) and a slow journey into Victoria. Bus services within the urban area are largely focused around serving the town centre and hospital. Many outlying suburban and rural communities are afforded a more limited level of service that does not provide a convenient travel option for many potential users.[100]

4.21   **Figure 4.1** shows the major transport links in the Borough.

4.22   The County of Kent is facing increased congestion on both road and rail. Major routes such as the M20/A20, M2/A2 and A21 form important local and strategic links, but when they are congested it results in a delay on the local network and can have an adverse impact on the wider strategic network.[101] Maidstone is experiencing increased congestion in its town centre and growth will be

[96] Kent and Medway Air Quality Partnership (2015) Air Quality Planning Guidance [online] Available at: http://kentair.org.uk/documents/K&MAQP_Air_Quality_Planning_Guidance_Mitigation_Option_A.pdf

[97] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf

[98] Maidstone Borough Council (2017) Maidstone Green and Blur Infrastructure Strategy: Action Plan. [online] Available at: http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sg_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODIzMiUyRkFwcGVuZGl4JTIwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uaW5UcGxhbjIwMTcucGRmJmFsbD0x

[99] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

[100] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

[101] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

constrained unless investment goes into increasing capacity or reducing the demand on the network.

4.23   One of the county wide priorities is sustainable transport. To achieve more sustainable modes of transport the County Council is progressing with transport schemes, for example the West Kent Local Sustainable Transport Fund which delivers schemes to promote the use of alternative modes of transport to the private car including Maidstone East Station improvements as well as other station improvements within the area.[102] The expected completion date for the range of projects is Spring 2021.[103]

4.24   In addition to issues with road capacity, rail capacity on the North Kent line is also stretched and is likely to be over-capacity in the near future. A number of the stations have access or safety issues and many are difficult to access by other forms of public transport. However, the LTP4 has identified a range of priorities that will improve travel within Kent including enhancement to the Medway Valley rail services to improve connectivity between Tunbridge Wells and Maidstone via Tonbridge.[104]

4.25   The Network Rail Kent Area Route Study also highlights capacity issues in the railways in Kent and states that the number of passengers using the railway across the route has increased substantially in recent years and further growth is forecast – up to 15% growth in passenger numbers between 2011 and 2024 and 47% up to 2044. Routes into London are particularly busy, with little capacity to operate additional services.[105]

4.26   In terms of mode of travel to work, of the 113,231 residents aged 16 to 74 in the Borough in 2011 Census, 47.7% use a private vehicle to get to work, 4.6% use the train, 8.0% walk, 0.83% cycle, 4.2% work from home, 2.6% use the bus, and 31% are not in work.[106]

4.27   The Maidstone Borough Local Plan includes measures to encourage a shift from dependency on car travel to more sustainable transport methods to reduce congestion, improve air quality and to support international and national policy responses to tackling climate change.

Table 4.1 Key sustainability issues for Maidstone and likely evolution without the Local Plan Review

Key Sustainability issues for Maidstone	Likely evolution without the Local Plan Review
Several main roads converge in Maidstone and provide connectivity to the M20. These experience high levels of congestion and delays. Rail capacity is also currently stretched. Population growth has the potential to exacerbate these problems (SA Framework objective SA 7).	Without the Local Plan Review it is anticipated that congestion will continue to rise with the rising population. The Local Plan Review presents the opportunity to address this through providing clarity for infrastructure providers, policy that promotes alternative forms of transport, sustainable locations for development that minimise the need to travel by car on the local network, and will complement measures taken by highways authorities to combat congestion on the strategic road network. Policy DM21 of the current Local Plan seeks to improve transport choice across the Borough and influence travel

[102] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

[103] South East Local Enterprise Partnership (2019) West Kent Local Sustainable Transport Fund [online] Available at: https://www.southeastlep.com/project/west-kent-local-sustainable-transport-fund-lstf/

[104] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

[105] Network Rail (2018) South East Route: Kent Area Route Study [online] Available at: https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf

[106] NOMIS method of travel to work (2011) Maidstone Borough [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=cell&cols=rural_urban

Key Sustainability issues for Maidstone	Likely evolution without the Local Plan Review
	behaviour as well as develop strategic and public transport links to and from Maidstone.
A high proportion of the Borough's residents drive to work. The uptake of more sustainable travel options is limited (SA Framework objective SA 7).	Without the Local Plan Review, car dependency will continue to be high. The Local Plan Review provides an opportunity to promote sustainable and active transport (based on sufficient population densities), sustainable development locations, and integrate new and more sustainable technologies, such as electric vehicles and their charging points, into the transport infrastructure of the Borough.

Figure 4.1: Transport Links

Maidstone Borough Council SA

Legend

- Maidstone Borough
- Neighbouring Local Authority Boundary
- ● Railway Station
- • Bus Stop
- — A Road
- — B Road
- — Motorway
- — Street
- —⊢ Railway Line
- ≡≡≡ Railway Tunnel

Source: OS, Department for Transport

Map Scale @ A4:   1:150,000

CB:MNi EB:Nicholson_M LUC Fig4-1_10509_Maidstone_Transport_A4L 12/12/2018

LUC
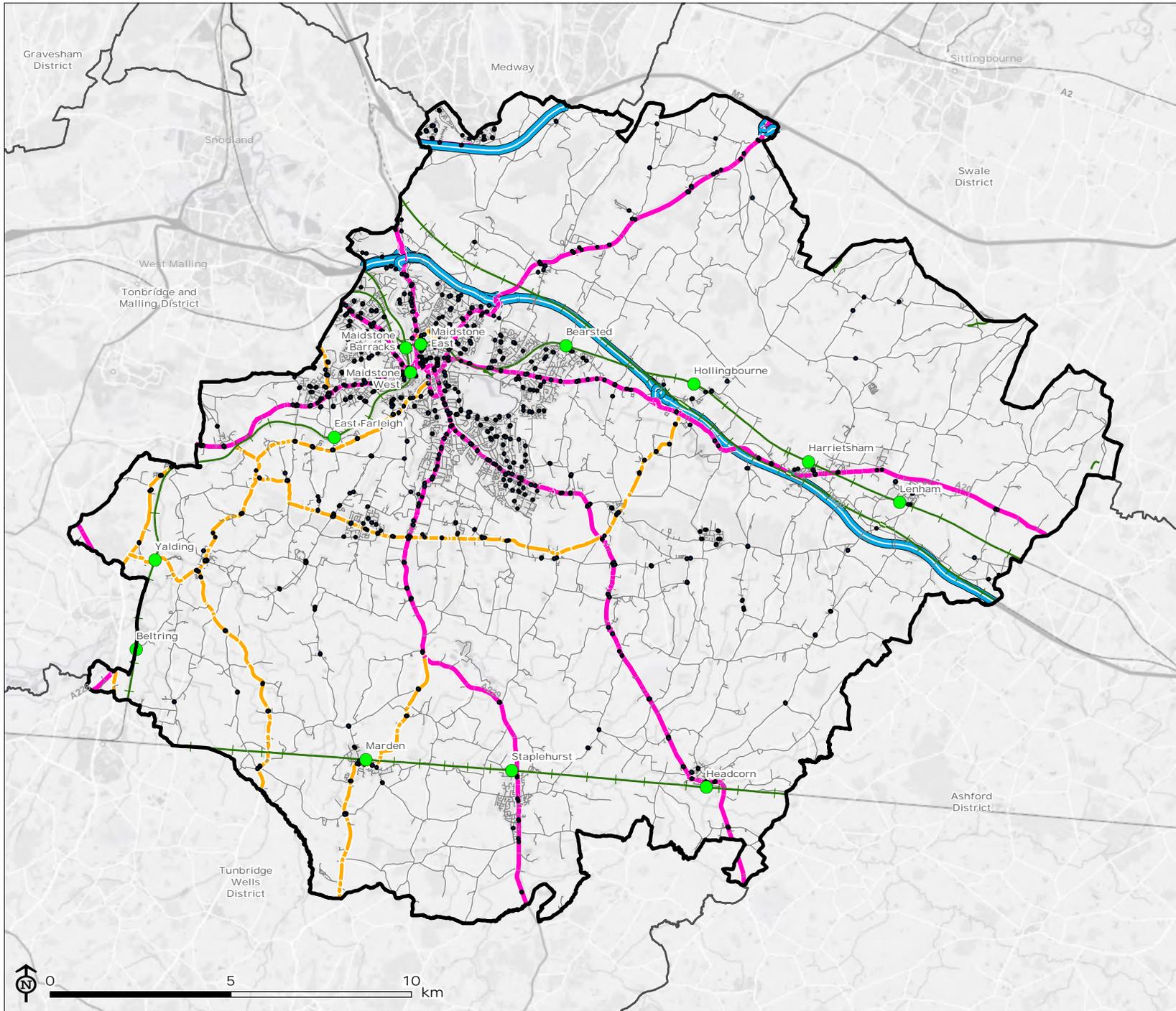
5 Air, Land and Water Quality

Policy Context

International

5.1 **European Nitrates Directive** (1991): Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

5.2 **European Urban Waste Water Directive** (1991): Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.

5.3 **European Air Quality Framework Directive** (1996) and **Air Quality Directive** (2008): Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

5.4 **European Drinking Water Directive** (1998): Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.

5.5 **European Landfill Directive** (1999): Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.

5.6 **European Water Framework Directive** (2000): Protects inland surface waters, transitional waters, coastal waters and groundwater.

5.7 **European Waste Framework Directive** (2008): Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.

5.8 **European Industrial Emission Directive** (2010): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

National

5.9 **National Planning Policy Framework (NPPF)**[107] contains the following:

- The planning system should protect and enhance soils in a manner commensurate with their quality identified in the development plan.

- New and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, soil, air, water or noise pollution or land instability.

- "*Despoiled, degraded, derelict, contaminated and unstable land*" should be remediated where appropriate.

- The NPPF encourages the reuse of previously developed land where suitable opportunities exist.

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[107] Department for Communities and Local Government (2018) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

5.10 **National Planning Practice Guidance (PPG)**[108]: Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development were it has been demonstrated that significant development is required on agricultural land.

5.11 **Waste management plan for England**[109]: Provides an analysis on the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

5.12 **National Planning Policy for Waste (NPPW)**[110]: Key planning objectives are identified within the NPPW, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.

- Ensure waste management is considered alongside other spatial planning concerns

- Provide a framework in which communities take more responsibility for their own waste

- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.

- Ensure the design and layout of new development supports sustainable waste management.

5.13 **Safeguarding our Soils – A Strategy for England**[111]: Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

5.14 **Water White Paper**[112]: Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

5.15 **Water for Life White Paper**[113]: Sets out how to build resilience in the water sector. Objectives of the White Paper are to:

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.

- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.

- Keep short and longer term affordability for customers at the centre of decision making in the water sector.

- Protect the interest of taxpayers in the policy decisions that we take.

- Ensure a stable framework for the water sector which remains attractive to investors.

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[108] Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance

[109] Department for Environment, Food and Rural Affairs (2013) Waste management plan for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

[110] Department for Communities and Local Government (2014) National Planning Policy for Waste [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

[111] Department for Environment, Food and Rural Affairs (2009) Safeguarding our Soils: A Strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf

[112] Department for Environment, Food and Rural Affairs (2012) The Water White Paper [online] Available at: https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf

[113] Department for Environment, Food and Rural Affairs (2011) Water for life [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf

- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.

- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.

- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

5.16 **The Air Quality Strategy for England, Scotland, Wales and Northern Ireland**[114]: Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.

- Provide benefits to health quality of life and the environment.

5.17 **Future Water: The Government's Water Strategy for England**[115]: Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

5.18 **A Green Future: Our 25 Year Plan to Improve the Environment**[116]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; recovering nature and enhancing the beauty of landscapes; and increasing resource efficiency, and reducing pollution and waste. Actions that will be taken as part of these three key areas are as follows:

- Using and managing land sustainably:

  o Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.

  o Protect best agricultural land.

  o Improve soil health, and restore and protect peatlands.

- Recovering nature and enhancing the beauty of landscapes:

  o Respect nature by using our water more sustainably.

- Increasing resource efficiency and reducing pollution and waste:

  o Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

5.19 **UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations**[117]: Sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra low emission vehicles (ULESvs), a £290 million National Productivity

[114] Department for Environment Food and Rural Affairs (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

[115] HM Government (2008) Future Water: The Government's water strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf

[116] HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

[117] Department for Environment Food and Rural Affairs and Department for Transport (2017) UK plan for tackling roadside nitrogen dioxide concentrations [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

5.20   **Draft Clean Air Strategy 2018**[118]: This draft strategy sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

5.21   **Department for Transport, The Road to Zero (2018)**[119]: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

Sub-national

5.22   **Kent Environment Strategy**[120] sets the following targets in relation to the quality of the environment:

- Decrease the number of days of moderate or higher air pollution and the concentration of pollutants (align with the Kent and Medway Air Quality Partnership and national monitoring standards).

- Work to reduce the noise exposure from road, rail and other transport.

- Reduce water use from 160 to 140 litres per person per day.

- 28 Kent and Medway water bodies will be at good status by 2021.

5.23   **Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**[121]: Sets out the fundamental infrastructure needed to support growth planned to 2031 across Kent and Medway. The document identifies water and waste water challenges across the region arising from new housing, jobs and associated infrastructure. These include the need to provide additional clean water supplies and the management of increased amounts of waste water. Additional demand will need to be met from the abstraction of existing ground or surface water resources or through the development of new resources. Kent and Medway is already an area of serious water stress.

5.24   **Kent Minerals and Waste Local Plan 2013-30**[122]: Describes (1) the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent; and (2) the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning. The Plan identifies a number of areas of minerals safeguarding across Maidstone. Some are already been developed or are identified for future development.

[118] DEFRA, Clean Air Strategy 2018 [online] Available at: https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/user_uploads/clean-air-strategy-2018-consultation.pdf

[119] Department for Transport, The Road to Zero (2018) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

[120] Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

[121] Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework [online] available at: http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

[122] Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30 [online] Available at: https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1

5.25 **Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**[123]: The primary purpose of the IDP is to identify the infrastructure schemes considered necessary to support the development proposed in the Local Plan and to outline how and when these will be delivered.

5.26 **Strategic Plan 2015-2020 Action Plan**[124]: Sets out the vision, "Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential." In addition, numerous strategies and projects are outlined that respond to the following objectives, which are grouped by theme:

Safe, Clean and Green:

- People feel safe and are safe.

- A Borough that is recognised as clean and well cared for by everyone.

- An environmentally attractive and sustainable Borough.

- Everyone has access to high quality parks and green spaces.

Homes and Communities:

- A diverse range of community activities is encouraged.

- Existing housing is safe, desirable and promotes good health and well-being.

- Homelessness and rough sleeping are prevented.

- Community facilities and services in the right place at the right time to support communities.

Cross cutting objectives:

- Heritage is respected.

- Health inequalities are addressed and reduced.

- Deprivation is reduced and social mobility is improved.

- Biodiversity and Environmental sustainability is respected.

A complete updated version of the action plan is expected to be released February 2019.

5.27 **Low Emission Strategy (December 2017)**[125]: Sets out the aims of the Council to achieve a higher standard of air quality across Maidstone, to assist the Council in complying with relevant air quality legislation, to embed an innovative approach to vehicle emission reduction through integrated policy development and implementation in Maidstone and across the region, to improve the emissions of the vehicle fleet in Maidstone beyond the 'business as usual' projection, through the promotion and uptake of low and ultra-low emissions vehicles, and to reduce emissions through an integrated approach covering all appropriate municipal policy areas. Under each area, the specific actions aimed at reducing emissions will be developed. The strategy is divided into a number of themes:

- Transport.

- Planning.

- Procurement.

- Carbon Management.

- Public Health.

5.28 **Green and Blue Infrastructure Strategy**[126]: sets out a vision for the Borough's green and blue infrastructure for the next 20 years. The vision is for greener, healthier, attractive towns and

[123] Maidstone Borough Council (2016), Maidstone Borough Local Plan Infrastructure Delivery Plan [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0016/121129/SUB-011-Infrastructure-Delivery-Plan-May-2016.pdf

[124] Maidstone Borough Council, Strategic Plan 2015-2020 Action Plan, Draft Vision, Priorities and Outcomes [online] Available at: https://meetings.maidstone.gov.uk/documents/s63864/Appendix%20A.pdf

[125] Maidstone Borough Council (2017) Low Emission Strategy [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf

[126] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf

villages sustainably connected to the rich tapestry of distinctive landscapes, wildlife habitats and waterways – valued, enjoyed and cared for by local people. The strategy sets out seven key themes, including:

- Maintaining and enhancing biodiversity, water and air quality.

- Retaining and enhancing a quality environment for investment and through development.

5.29 **Maidstone Green and Blue Infrastructure Strategy: Action Plan**[127]**:** This plan builds off of the adopted Green and Blue Infrastructure Strategy from 2016 (mentioned above). The plan aims to deliver multiple projects centred on the same themes set out in the Green and Blue Infrastructure Strategy.

5.30 **Contaminated Land Strategy 2016-2021**[128]: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in the Borough. The objectives are as follows:

- To take a proportionate approach to the risks raised by contamination whilst ensuring that any unacceptable risk of human health or the wider environment is resolved.

- All investigations and risk assessments will be site specific, scientifically robust and will ensure only land that poses a genuinely unacceptable risk is determined as contaminated.

- The Council will consider the various benefits and costs of taking action, with a view to ensuring that corporate priorities and statutory requirements are met in a balanced and proportionate manner.

- The Council will seek to maximise the net benefits to residents taking full account of local circumstances.

- The Council will seek to assist and enable residents who live on potentially contaminated sites to gather further information when that site is not scheduled for investigation by the council in the short term.

- The Council will develop a hardship policy to ensure fair allocation of costs, in accordance with the Secretary of States Guidance.

5.31 **Thames River Basin Management Plan 2009 (Updated December 2015)**[129]: The purpose of the plan is to provide a framework for protecting and enhancing the benefits provided by the water environment. The Medway catchment which is within the Thames River Basin District has identified four priority issues: the physical modifications to the river, water quality and water flows and availability.

Current Baseline

Air quality

5.32 The Kent Environment Strategy highlights Kent's unique challenge presented by the County's position between London and the continent. Easterly winds can bring pollution from cross-channel freight and the continent and westerly winds bring pollution from London. There are currently 40 Air Quality Management Areas (AQMA) in the County where air pollutants have been known to exceed objectives set by Government. [130]

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[127] Maidstone Borough Council (2017) Maidstone Green and Blur Infrastructure Strategy: Action Plan. [online] Available at: http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODIzMiUyRkFwcGVuZGl4JTIwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjIwMTcucGRmJmFsbD0x

[128] Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf

[129] Defra and Environment Agency (2015) Part 1: Thames river basin district River basin management plan [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718342/Thames_RBD_Part_1_river_basin_management_plan.pdf

[130] Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

5.33   The town centre of Maidstone is at the point where several main roads (A20, A26, A249, A274 and A229) converge and provide onward connectivity to four nearby junctions with the M20. The constrained nature of the town centre has contributed to peak period congestion resulting in air pollution issues. The Council designated the wider urban area as an AQMA in 2008 due to elevated concentrations of Nitrogen Dioxide (NO_2) at residential receptors in six areas of the Borough. However, in May of 2018 the AQMA within Maidstone was reconfigured to only follow the carriageways of the main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274. NO_2 levels at some key locations near major roads and junctions remain above the EU Limit Value with no discernible downward trend. A scheme to relieve congestion at the Bridges Gyratory has recently been implemented, although continued traffic growth on other parts of the network is expected to result in severe worsening delays for road users. These pressures are most evident on the congested A229 and A274 corridors in south and south eastern Maidstone and on the A20 corridor in north western Maidstone.[131]

5.34   There is potential for development in Tonbridge and Malling and Medway to adversely affect the AQMAs in Maidstone such as along the A20 and the A229. Similarly, development in Maidstone could affect the AQMAs in other local authorities, such as Tonbridge and Malling along the M20 and A20.[132] **Figure 5.1** shows the AQMAs that have been designated in Maidstone and the surrounding area.

5.35   There are still significant challenges ahead in order to achieve air quality objectives. Further reductions in NO_2 will be achieved through policy documents such as the DfT's The Road to Zero, which aims to put the UK at the forefront of the design and manufacturing of zero emission vehicles.

Geology and minerals

5.36   The underlying geology of Maidstone consists of four distinct rock types that define the landform and character of the area – Chalk, Gault Clay, Lower Greensand and Wealden Clay which run in bands varying in width in a north westerly to south easterly direction across the Borough.[133]

5.37   Around half of the Borough is covered by Mineral Safeguarding Areas designated in the Kent Minerals & Waste Local Plan (2013-30).   The minerals include: limestone, sandstone, river terrace deposits, silica sand and sub-alluvial river terrace deposits.[134] Geological mapping is indicative of the existence of a mineral resource. It is possible that the mineral has already been extracted and/or that some areas may not contain any of the mineral resource being safeguarded. Nevertheless, the onus will be on promoters of non-mineral development to demonstrate satisfactorily at the time that the development is promoted that the indicated mineral resource does not actually exist in the location being promoted, or extraction would not be viable or practicable under the particular circumstances.

5.38   The process of allocating land for non-mineral uses in local plans will take into account the need to safeguard minerals resources and mineral infrastructure. The allocation of land within a Mineral Safeguarding Area will only take place after consideration of the factors that would be considered if a non-minerals development were to be proposed in that location, or in proximity to it. The Minerals Planning Authority (Kent County Council) will support the District and Borough Councils in this process.[135]

Soils

5.39   Maidstone Borough contains a mix of different soils. To the north of Maidstone bands of Upper, Middle and Lower Chalk run in a south east to north west direction forming the North Downs.

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[131] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

[132] UK Air, Air Information Resource (2018) AQMA Interactive Map [online] Available at: https://uk-air.defra.gov.uk/aqma/maps

[133] Maidstone Borough Council with Jacobs Consulting (2013) Maidstone Landscape Character Assessment [online] Available at: http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf

[134] Kent County Council (2015) Kent Minerals and Waste Local Plan: Maidstone Borough Council – Mineral Safeguarding Areas [online] Available at: https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1

[135] Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-2030 [online] Available at: https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1

Shallow soils are found over the dry valleys of the dip slope, with other areas supporting well drained calcareous fine silty soils over chalk. The second distinct geological region is Gault Clay. Soils range in the Gault Clay Vale from the calcareous chalk soils to the north through to heavier clays and a mix of clay and sandy soils there they meet the Greensand to the south. Typically these soils are:

- Deep Loam to clay – some well drained and fine loamy over clayey soils, and some course and fine loamy over clayey soils with slowly permeable sub soils and slight seasonal water logging.

- Seasonally wet deep clay – slowly permeable seasonally waterlogged clayey soils with similar fine loamy over clayey soils. Some fine loamy over clayey soils with only slight seasonal water logging and some slowly permeable calcareous clayey soils.

5.40   The Greensand is overlain with soils of loam over limestone, constituting some deep well drained coarse and fine loamy soils and occasional shallower calcareous soils. South of Greensand is Wealden Clay. Here the soils comprise seasonally wet loam to clay over shale with deep loam to the east of Marden.[136]

5.41   The underlying soils give rise to a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 1, Grade 2 and Grade 4. Grade 1 and Grade 2 agricultural land represent the best and most versatile land for farming, along with Grade 3a agricultural land (the national maps of agricultural land classification do not distinguish between Grade 3a and Grade 3b agricultural land).[137]

Contaminated land

5.42   There are currently about 1,000 sites on Maidstone's contaminated land database. The vast majority of these are likely to be low risk sites for instance where small to medium areas of ground have been infilled with inert or unknown material over time.[138]

Water

5.43   The Kent Environment Strategy identifies Kent as one of the driest regions in England and Wales. Kent's household water use is above the national average (154 litres per person per day compared with 141 litres nationally) and its water resources are under continued pressure, requiring careful management and planning.[139] Water use within Maidstone is high by both national and international standards with approximately 164 litres per person per day.[140]

5.44   The Medway Catchment, which becomes a tidal estuary in Maidstone, has an extensive network of tributaries including the Eden, Teise and Beult. In terms of water quality the catchment achieved moderate ecological status for 43 of the 58 water bodies and good chemical status for 55 of the 58 water bodies.[141]

5.45   Pressures related to the provision of water supply and wastewater treatment are key contributors to the current status and future status of water bodies in Kent. In combination with other pressures, abstractions for public water supply and discharges of wastewater are impacting on key Water Framework Directive supporting elements which are critical to attaining overall Good Status; this includes impact on hydrological regime, biological quality and physico-chemical quality.[142]

[136] Maidstone Borough Council with Jacobs Consulting (2013) Maidstone Landscape Character Assessment [online] Available at: http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf
[137] Maidstone Borough Council with Jacobs Consulting (2013) Maidstone Landscape Character Assessment [online] Available at: http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf
[138] Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf
[139] Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf
[140] Maidstone Borough Council with Halcrow Group Limited (2010) Water Cycle Study – Outline Report [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0020/12089/Water-Cycle-Study-Outline-Report-Summary-2010.pdf
[141] Environment Agency (2016) https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3055/Summary
[142] Aecom (2017) Kent Water for Sustainable Growth Study

5.46   Kent's Water for Sustainable Growth Study found that a large proportion of water bodies in Kent are failing to meet the Water Framework Directive objective of 'Good Status'.   This is due to a number of reasons such as pressures ranging from physical modification, to pollution and over-abstraction. It found that catchments lower down the course of the River Medway (e.g. Medway at Maidstone) were found to be affected by a diversity of discharges including continuous diffuse and un-sewered discharges at all levels of activity certainty.[143]

5.47   The Environment Agency's River Basin Management Plans identify that the pressures are such that aiming to achieve improvement to 'Good Status' by 2027 in Kent is unlikely to be possible in many water bodies either due to technical infeasibility or improvement measures being disproportionately costly. [144]

Table 5.1 Key sustainability issues for Maidstone and likely evolution without the Local Plan Review

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
Maidstone has an Air Quality Management Area that is focused on the main roads within the Borough and parts of the M20, which has been designated because this area exceeds the annual mean Air Quality Strategy objective for NO_2 and $PM_{10,}$ caused primarily by road traffic emissions (SA Framework objective SA 11). Development in Maidstone could have impacts on AQMAs in neighbouring authorities and there could be a cumulative impact of development in neighbouring authorities with development in Maidstone on Maidstone's AQMAs.	How air quality will change in the absence of a Local Plan Review is unknown, given that the Borough accommodates a high volume of through traffic. Without the Local Plan Review, development may be located in less sustainable locations that increase reliance on car use, which is likely to increase air pollution. Recent national policies and the emergence of new technologies are likely to improve air pollution, for example, through cleaner fuels/energy sources. Nonetheless, the Local Plan Review provides an opportunity to contribute to improved air quality in the Borough through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations. Policy DM6 of the current Local Plan states that the Council will prepare an Air Quality Development Plan Document that takes into account the AQMA Action Plan, the Low Emission Strategy and national requirements, but it is intended that this will now be covered by the Local Plan Review.
The Borough contains a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 1 and Grade 2, which, where possible, should not be lost or compromised by future growth (SA Framework objective SA 9).	The Local Plan Review provides an opportunity to ensure these natural assets are not lost or compromised, by prioritising brownfield sites and lower quality agricultural land for development. Although the current Local Plan does not contain a policy that relates to preserving the best and most versatile agricultural land, the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by 'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and

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[143] Aecom (2017) Kent Water for Sustainable Growth Study

[144] Department for Environment Food & Rural Affairs (2016) River Basin Management Plans [online] Available at: https://www.gov.uk/government/collections/river-basin-management-plans-2015

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
	other benefits of the best and most versatile agricultural land.'[145]
The Borough contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth (SA Framework objective SA 8).	Without the Local Plan Review it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. Policy CSM5 of the Kent Minerals and Waste Local Plan 2013-30 ensures that sites are thoroughly consulted before development begins.
The Borough contains 1,000 sites of contaminated land (SA Framework objective SA 9).	The Local Plan Review provides an opportunity to ensure that land is remediated through the development process and additional land does not become contaminated as a result of development. Currently, there is no policy within the current Local Plan that addresses contaminated land. However, the NPPF encourages planning policies to 'remediate despoiled, degrade, derelict, contaminated or unstable land.'[146]
Some water bodies in Maidstone are failing to meet the Water Framework Directive objective of 'Good Status'. (SA Framework objective SA 10).	Without the Local Plan Review it is possible that un-planned development could be located in areas that will exacerbate existing water quality issues, although existing safeguards, such as the EU Water Framework Directive, would provide some protection. The Local Plan Review will provide the opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment and provide an opportunity to plan for adequate wastewater infrastructure. Policy DM3 of the current Local Plan ensures that water pollution is controlled where necessary and mitigated.
Water use in the Borough is very high by both national and international standards. These issues may be exacerbated by population growth (SA Framework objective SA 10).	Without the Local Plan Review it is possible that un-planned development could be located in areas that will intensify the strain on water resources. The Local Plan Review will provide the opportunity to ensure that development is located and designed to take into account the sensitivities of the water table and provide an opportunity to encourage better and more sustainable use of water resources. Currently, there is no policy within the current Local Plan that addresses use of water resources.

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[145] MHCLG (2018), National Planning Policy Framework pg. 49 [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

[146] MHCLG (2018), National Planning Policy Framework pg. 35 [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

Figure 5.1: Air Quality
Management Areas (AQMA)

☐ Maidstone Borough

☐ Neighbouring Local Authority
Boundary

🟦 Air Quality Management Area
(AQMA)

Dartford
District

Gravesham
District

Medway

Swale
District

Canterbury
District

Sevenoaks
District

M2

A2

Tonbridge
and Malling
District

Maidstone

M20

A20

A229

Ashford
District

A228

Tunbridge
Wells
District

Wealden
District

Rother
District

Shepway
District

Source: OS, DEFRA

Map Scale @ A4: 1:250,000

0   5   10
                    km

LUC
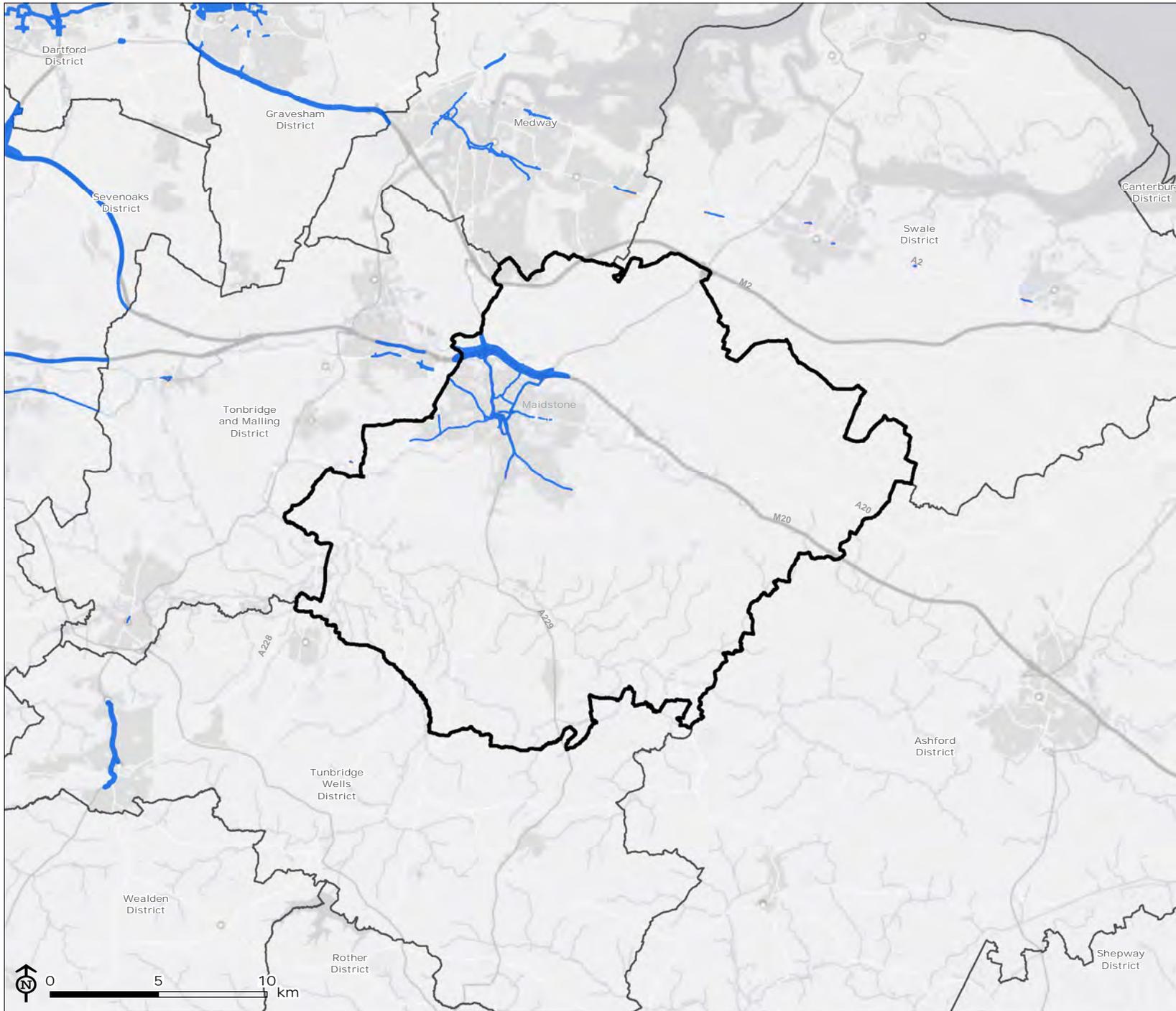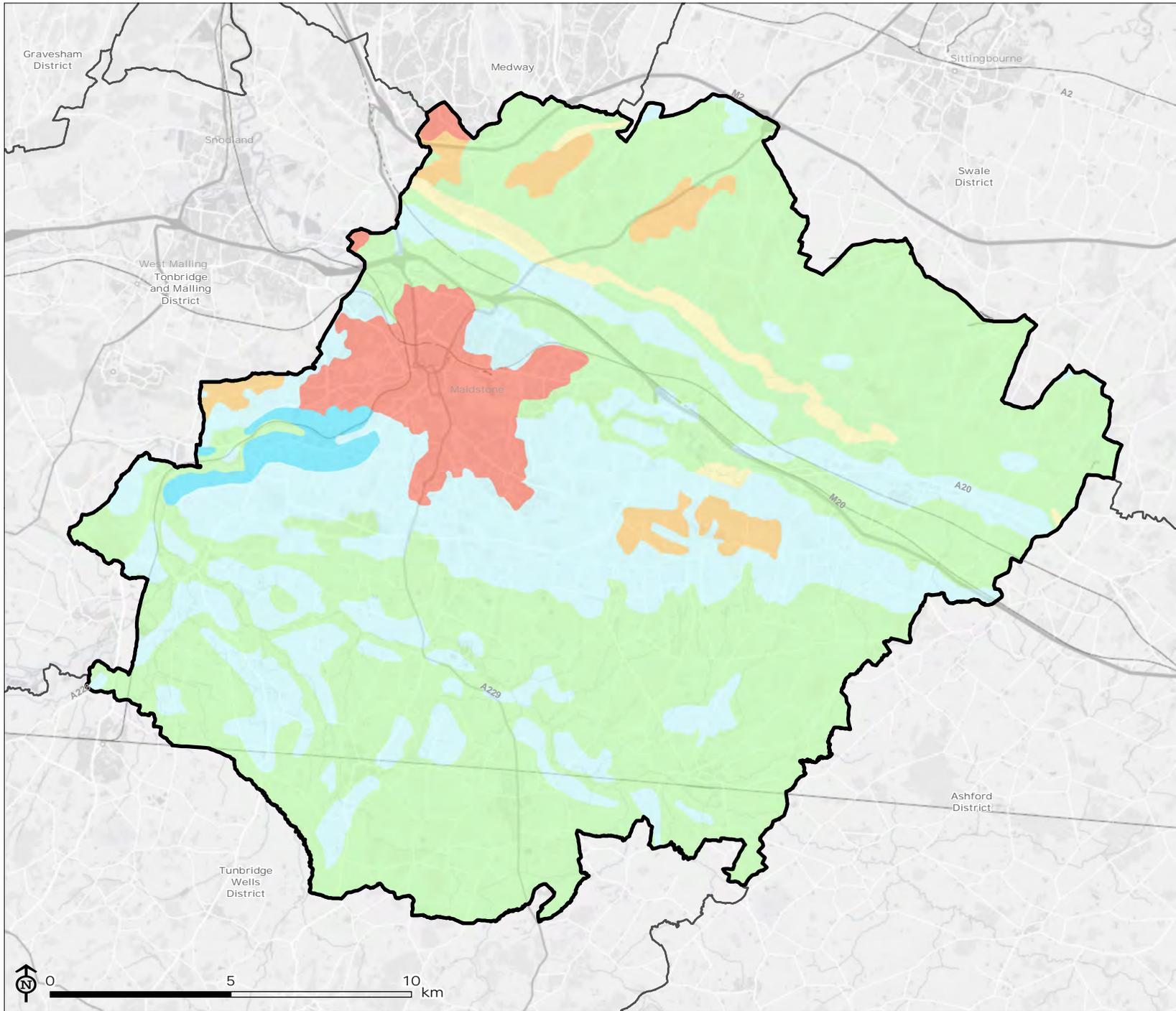
Figure 5.2: Agricultural Land
Classification

Maidstone Borough

Neighbouring Local Authority
Boundary

Agricultural Land Classification

GRADE 1

GRADE 2

GRADE 3

GRADE 4

NON AGRICULTURAL

URBAN

Source: Natural England

Map Scale @ A4:   1:150,000

6 Climate Change Adaptation and Mitigation

Policy Context

International

6.1 **European Floods Directive** (2007): A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

6.2 **European Energy Performance of Buildings Directive** (2010): Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

6.3 **United Nations Paris Climate Change Agreement** (2015): International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

6.4 **National Planning Policy Framework (NPPF)**[147]: Contains the following:

- One of the core planning principles is to *"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"*.

- Inappropriate development in areas at risk of flooding should be avoided. Where development is necessary, it should be made safe without increasing flood risk elsewhere.

- Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

6.5 **National Planning Practice Guidance (PPG)**[148]: Supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport.

6.6 **Climate Change Act 2008**[149]: Sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO_2 emission reductions of at least 26% by 2015, against a 1990 baseline.

6.7 **Flood and Water Management Act (2010)**[150]: Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

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[147] Department for Communities and Local Government (2018) National Planning Policy Framework [online] Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf
[148] Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:
https://www.gov.uk/government/collections/planning-practice-guidance
[149] HM Government (2008) Climate Change Act 2008 [online] Available at:
https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf
[150] HM Government (2010) Flood and Water Management Act 2010 [online] Available at:
http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf

6.8 **The UK Renewable Energy Strategy**[151]: Sets out the ways in which we will tackle climate change by reducing our CO_2 emissions through the generation of a renewable electricity, heat and transport technologies.

6.9 **The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK**[152]: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

6.10 **The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate**[153]: Sets out visions for the following sectors:

- People and the Built Environment – "*to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change…buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.*"

- Infrastructure – "*an infrastructure network that is resilient to today's natural hazards and prepared for the future changing climate*".

- Natural Environment – "*the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.*"

- Business and Industry – "*UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.*"

- Local Government – "*Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.*"

6.11 **Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England**[154]: This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.

- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.

- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

6.12 **A Green Future: Our 25 Year Plan to Improve the Environment**[155]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

[151] HM Government (2009) The UK Renewable Energy Strategy [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf

[152] Department of Energy & Climate Change (2012) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf

[153] HM Government (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf

[154] HM Government (2011) Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf

[155] HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

- Using and managing land sustainably:

  o Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.

- Protecting and improving our global environment:

  o Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

Sub-national

6.13 **Kent Environment Strategy**[156]: Sets the following targets in relation to climate change mitigation and adaptation:

- Reduce emissions across the County by 34% by 2020 from a 2012 baseline (2.6% per year).

- More than 15% of energy generated in Kent will be from renewable sources by 2020 from a 2012 baseline.

- Reduce the number of properties at risk from flooding.

6.14 **Growing the Garden of England: A strategy for environment and economy in Kent**[157]: Seeks to ensure that a future sustainable community strategy helps to achieve a high quality Kent environment that is low carbon, resilient to climate change, and has a thriving green economy at its heart. The Strategy is organised into three themes and ten priorities, of which the following are relevant to this chapter:

- Living 'well' within our environmental limits – leading Kent towards consuming resources more efficiently, eliminating waste and maximising the opportunities from the green economy:

  o Make homes and public sector buildings in Kent energy and water efficient, and cut costs for residents and taxpayers.

  o Ensure new developments and infrastructure in Kent are affordable, low carbon and resource efficient.

  o Turn our waste into new resources and jobs for Kent.

  o Reduce the ecological footprint of what we consume.

- Rising to the climate change challenge – working towards a low carbon Kent prepared for and resilient to the impacts of climate change:

  o Reduce future carbon emissions.

  o Manage the impacts of climate change, in particular extreme weather events.

  o Support the development of green jobs and business in Kent.

6.15 **Low Emission Strategy (December 2017)**[158]: sets out the aims of Maidstone Borough Council; to achieve a higher standard of air quality across Maidstone, to assist the Council in complying with relevant air quality legislation, to embed an innovative approach to vehicle emission reduction through integrated policy development and implementation in Maidstone and across the region, to improve the emissions of the vehicle fleet in Maidstone beyond the 'business as usual' projection, through the promotion and uptake of low and ultra-low emissions vehicles, and to reduce emissions through an integrated approach covering all appropriate municipal policy areas. Under each area, the specific actions aimed at reducing emissions will be developed. The strategy is divided into a number of themes:

- Transport.

[156] Kent County Council (2016) Kent Environment Strategy [online] Available at:
http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

[157] Kent Forum (2011) Growing the Garden of England: A strategy for environment and economy in Kent [online] Available at:
https://shareweb.kent.gov.uk/Documents/environment-and-planning/environment-and-climate-change/the-kent-environment-strategy-and-progress-reports/kent-environment-strategy.pdf

[158] Maidstone Borough Council (2017) Low Emission Strategy [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf

- Planning.

- Procurement.

- Carbon Management.

- Public Health.

6.16 **Green and Blue Infrastructure Strategy**[159]: sets out a vision for the Borough's green and blue infrastructure for the next 20 years. The vision is for greener, healthier, attractive towns and villages sustainably connected to the rich tapestry of distinctive landscapes, wildlife habitats and waterways – valued, enjoyed and cared for by local people. The strategy sets out seven key themes, including:

- Mitigating and adapting to climate change.

6.17 **Thames River Basin Management Plan 2009 (Updated December 2015)**[160]: the purpose of the plan is to provide a framework for protecting and enhancing the benefits provided by the water environment. The Medway catchment, which is within the Thames River Basin District, has identified four priority issues: the physical modifications to the river, water quality and water flows and availability. In regard to climate change, the latest UK climate projections show that temperatures will continue to rise, with increased winter rainfall and more rain falling in intense storms and continuing sea level rise. The impact on river flows, water quality and ecosystems is less clear. Studies to learn more about the effects of climate change on the river basin district are underway.

Current Baseline

6.18 Changes to the climate will bring new challenges to the Borough's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP09) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present[161]. Specifically:

- Under medium emissions, the increase in winter mean temperature is estimated to be 2.2°C; it is unlikely to be less than 1.1°C and is very unlikely to be more than 3.4°C.

- Under medium emissions, the increase in summer mean temperature is estimated to be 2.8°C; it is unlikely to be less than 1.3°C and is very unlikely to be more than 4.6°C.

6.19 A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species.

6.20 Flood risk within Maidstone is concentrated in the southern and south western part of the Borough. The primary source of fluvial flood risk in the catchment is associated with the River Medway. Other fluvial flood risk areas identified in the Borough are from the main tributaries of the River Medway (River Beult, River Teise and the Lesser Teise) and the confluence of these tributaries with the River Medway. The risk of flooding could be intensified due to climate change.

6.21 The most significant flood events reported to have affected the Borough occurred in 1927, 1963, 1968, 2000 and 2013/14, each of which included notable flooding from the River Medway. The December 2013/14 event ranked the largest flood event recorded in the River Medway catchment

[159] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf
[160] Defra and Environment Agency (2015) Part 1: Thames river basin district River basin management plan [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718342/Thames_RBD_Part_1_river _basin_management_plan.pdf
[161] UK Climate Projections (2014) 'Maps & key findings' [online] Available at: http://ukclimateprojections.metoffice.gov.uk/21708?projections=23833

at East Farleigh (upstream of Maidstone), whilst elsewhere in Maidstone Borough, the event ranked 1st or 2nd largest.[162]

6.22 Ordinary watercourses are reported to have contributed to past flooding in the Borough due to four common factors:

- Poor maintenance of watercourses.

- Blocked infrastructure, such as culverts.

- Insufficient channel capacity.

- High water levels in watercourses impeding the drainage of flows from their associated tributaries.[163]

6.23 The Borough has also experienced a number of historic surface water/drainage related flood events. The primary source of surface water flooding is attributed to heavy rainfall overloading highway carriageways and paved areas, drains and gullies, but other sources of flooding were associated with blockages and high water levels impeding free discharge from surface water drains and gullies.[164]

6.24 **Figure 6.1** shows areas at risk of flooding in the Borough, based on current Environment Agency flood zones.

6.25 The Government publishes data on the CO_2 emissions per capita in each local authority that are deemed to be within the influence of local authorities. Kent is committed to reducing greenhouse gas emissions by 34% by 2020 and 60% by 2030 from a 2005 baseline (current progress is a 21% reduction since 2005). In the context of planned growth of Kent's population and housing development, additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure Kent meets its targets and benefits from the opportunities for innovation in these sectors. Some 80% of the housing stock that will be used over the next few decades is already in place and so opportunities to retrofit energy technologies and support a change to low carbon lifestyles will be key to supporting residents in reducing costs and improving energy security.[165]

6.26 The Council produced a Carbon Management Plan with the aim of reducing CO_2 emissions from its activities by 20% from the 2008-2009 baseline by 2015. This equates to 5,295 tonnes CO_2 with a cumulative value of £1.6 million. The baseline emission for transport (fleet and business travel) is 2,024 tonnes. The graph below shows the actual annual CO_2 reductions that the plan achieved.[166] The Maidstone Carbon Management Plan ended in 2015 and has not been renewed. The Low Emission Strategy and action plan replace the Carbon Management Plan.

[162] Maidstone Borough Council and JBA Consulting (2016) Level 1 Strategic Flood Risk Assessment – Addendum Report [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0015/132810/CC-005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf

[163] Maidstone Borough Council and JBA Consulting (2016) Level 1 Strategic Flood Risk Assessment – Addendum Report [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0015/132810/CC-005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf

[164] Maidstone Borough Council and JBA Consulting (2016) Level 1 Strategic Flood Risk Assessment – Addendum Report [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0015/132810/CC-005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf

[165] Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

[166] Maidstone Borough Council (2017) Low Emission Strategy [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf

Reduction in Actual CO2 Emissions Compared to Target
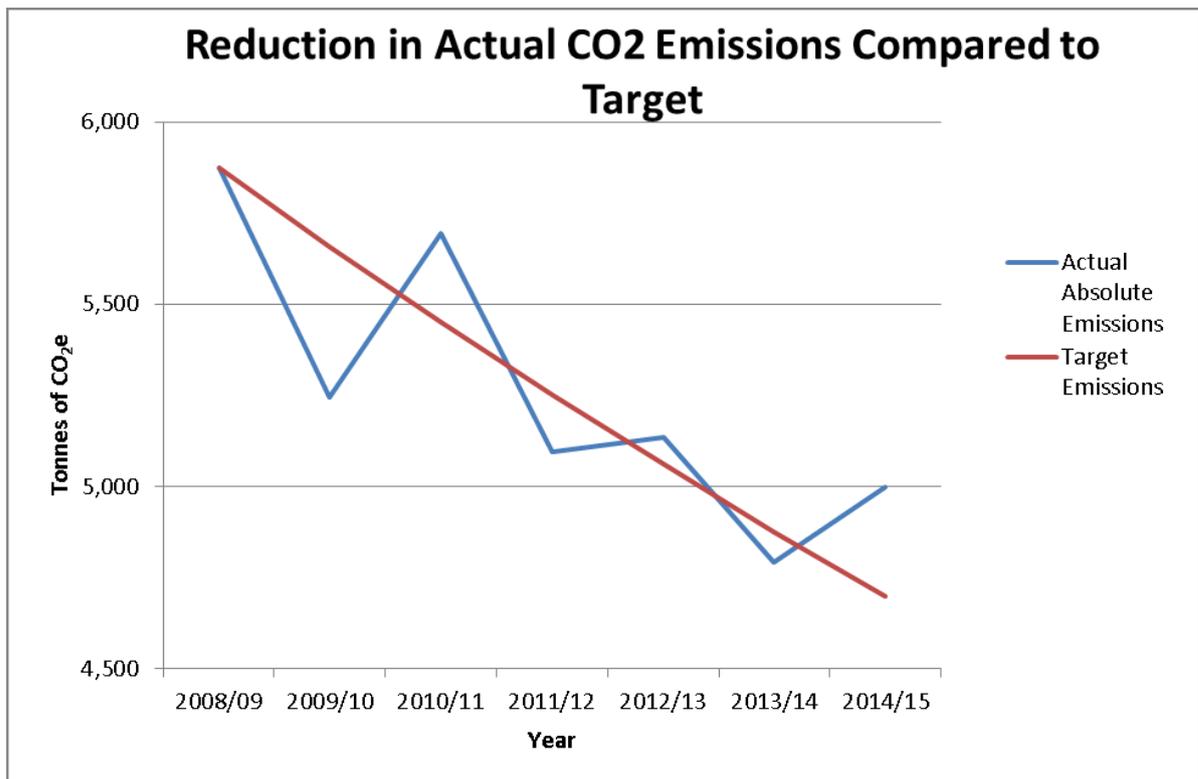
6.27   For the year 2005 Maidstone had an average rate of 7.8 tonnes of CO_2 emissions per capita, however in 2016 the rate decreased to 5.1 tonnes per capita. **Table 6.1** shows CO_2 (kilotonne) emissions for Maidstone for 2005 and 2016 across industrial, domestic and transport sectors. As can be seen in **Table 6.1**, there has been a reduction between 2005 and 2016 across all sectors and transport accounts for the largest amount of CO_2 emissions.[167]

Table 6.1 CO₂ emissions in Maidstone (shown as kt)

Year	Industrial and Commercial	Domestic	Transport	Total
2005	342.9	359.0	451.2	1,114.2
2016	211.5	250.8	427.2	843.0

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[167] UK Local Authority and Regional Carbon Dioxide Emissions National Statistics: 2005-2016 Available at: https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016

Table 6.2 Key sustainability issues for Maidstone and likely evolution without the Local Plan Review

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
Extreme weather events (e.g. intense rainfall, prolonged high temperatures) are likely to become more common and more intense. (SA Framework objective SA 13).	Whilst the Local Plan Review will not influence extreme weather events, it can encourage adaptation through design, such as tree planting and shelter in the public realm to reduce the impacts of such events and to allow local people the opportunity to take refuge from their effects.
Flood risk in Maidstone is dominated by fluvial flooding posing the most risk. The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding is increasing in the Borough due to climate change (SA Framework objective SA 12).	The Local Plan Review is not expected to reduce the likelihood of fluvial flooding. However, it does present the opportunity, alongside national measures, to mitigate the effects of potential future flooding and locate development in sustainable locations that would not be significantly impacted by flooding and ensure it is designed to be flood resilient where appropriate. Policy DM1 of the adopted Local Plan seeks to avoid inappropriate development within areas at risk from flooding and to mitigate potential impacts of new development within such areas through the principles of good design.
The Council has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings (SA Framework objective SA 13).	The Council will continue to have an obligation to reduce carbon emissions with or without the Local Plan Review. The Local Plan Review provides a way to contribute to these targets being met, by promoting sustainable development, for example by reducing the need to travel, and through encouraging low-carbon design, promotion of renewable energy and sustainable transport. Policy DM24 of the adopted Local Plan sets out guidelines for renewable and low carbon energy schemes. In addition, Policy DM2 of the adopted Local Plan encourages new non-domestic and non-residential development to meet BREEAM standards.

Legend:
- Maidstone Borough
- Neighbouring Local Authority Boundary
- River
- Lake
- Area Benefiting from Flood Defences
- Flood Zone 3
- Flood Zone 2

CB:MNi EB:Nicholson_M LUC Fig6-1_10509_Maidstone_FloodRisk_A4L 12/12/2018
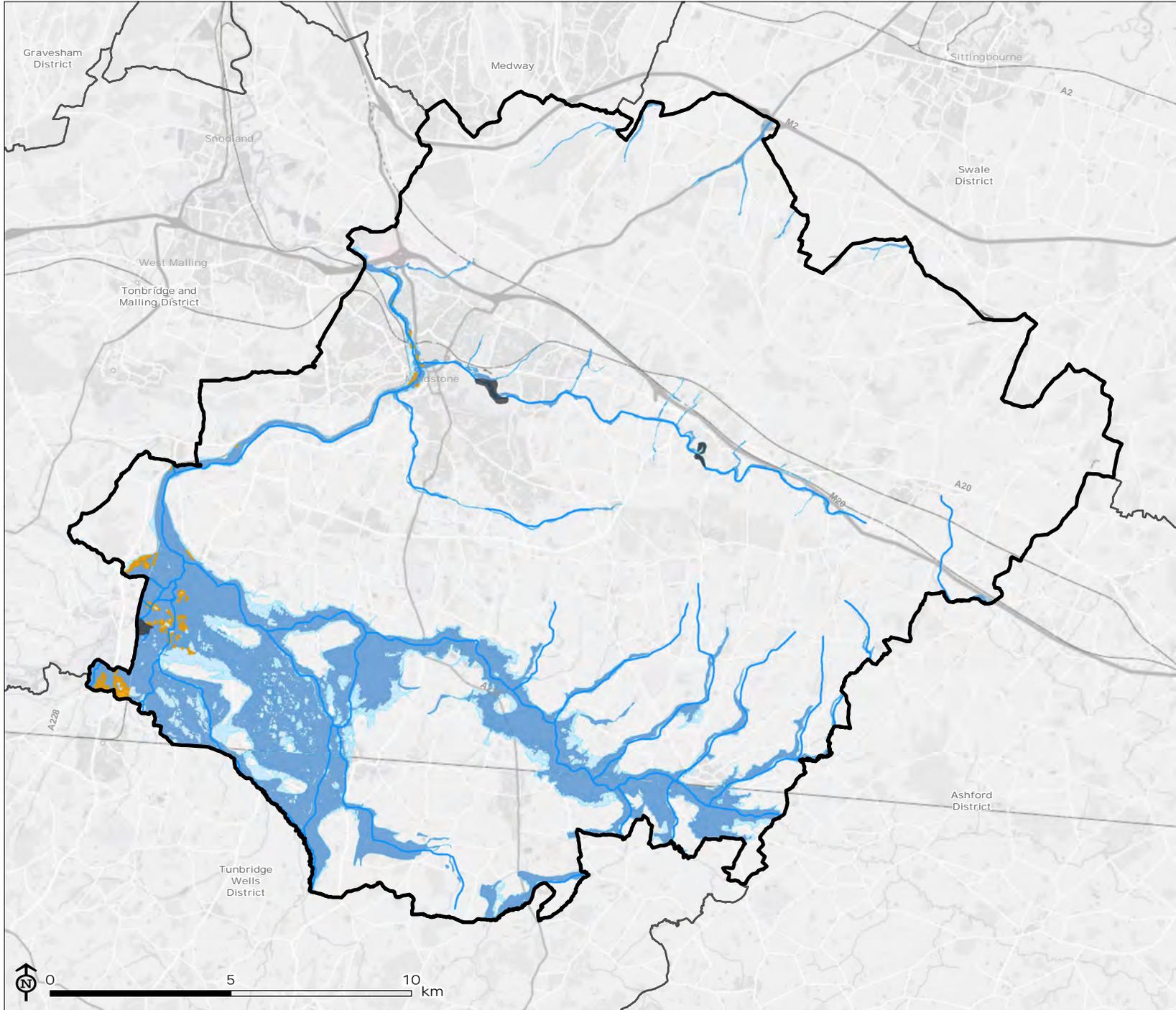
7   Biodiversity

Policy Context

International

7.1   **International Convention on Wetlands (Ramsar Convention)** (1976): International agreement with the aim of conserving and managing the use of wetlands and their resources.

7.2   **European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)** (1979): Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

7.3   **International Convention on Biological Diversity** (1992): International commitment to biodiversity conservation through national strategies and action plans.

7.4   **European Habitats Directive** (1992): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

7.5   **European Birds Directive** (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

7.6   **United Nations Declaration on Forests (New York Declaration)** (2014): international commitment to cut natural forest loss by 2020 and end loss by 2030.

National

7.7   **National Planning Policy Framework (NPPF)**[168]: Encourages plans to "*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation*". Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity.

7.8   **National Planning Practice Guidance (PPG)**[169]: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

7.9   **Natural Environment and Rural Communities Act 2006**[170]: Places a duty on public bodies to conserve biodiversity.

7.10 **Biodiversity 2020: A strategy for England's wildlife and ecosystem services**[171]: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss,

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[168] Department for Communities and Local Government (2018) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

[169] Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance

[170] HM Government (2006) Natural Environment and Rural Communities Act 2006 [online] Available at: http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf

[171] Department for Environment, Food and Rural Affairs (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

7.11 **Biodiversity offsetting in England Green Paper**[172]: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

7.12 **A Green Future: Our 25 Year Plan to Improve the Environment**[173]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:

  o Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.

- Securing clean, healthy, productive and biologically diverse seas and oceans:

  o Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.

- Protecting and improving our global environment:

  o Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

  o Support and protect international forests and sustainable agriculture.

Sub-national

7.13 **Kent Environment Strategy**[174]: Sets the following targets in relation to biodiversity:

- A minimum of 65% of local wildlife sites will be in positive management and 95% of SSSIs will be in favourable recovery by 2020.

- 60% of local wildlife sites will be in positive management.

- SSSIs will be in favourable or recovering status by 2020.

- Status of bird and butterfly specifies in Kent and Medway are quantified.

- Complete a natural capital assessment for Kent by 2017.

7.14 **A Living Landscape for the South East**[175]: Sets out a vision for the South East Ecological Network, which involves the restoration and rebuilding of the natural environment, bringing wildlife into our towns and cities, and addressing the challenge of conserving marine wildlife. The documents highlights the following issues:

- There is a need to increase the ability of the environment to protect us from flooding and to soak up carbon dioxide ('ecosystem services'). This will demand the restoration of extensive areas of natural habitat, particularly wetlands and woodlands.

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[172] Department for Environment, Food and Rural Affairs (2013) Biodiversity offsetting in England Green Paper [online] Available at: https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf

[173] HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

[174] Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

[175] The South East Wildlife Trusts (2006) A Living Landscape for the South East [online] Available at: http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf

- Better access to the natural environment helps improve mental and physical health, and improves quality of life. There is a need to bring wild places to more people, and bring more people into wild places.

- Isolated nature reserves and other protected sites are unlikely to be able to sustain wildlife in the long term. Sites will need to be buffered, extended and linked if wildlife is to be able to adapt to climate change.

- Outside protected sites, once common and widespread species are in catastrophic decline. Reversing this decline needs a new approach.

7.15 **Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019**[176]: Sets out measures to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised maintained and strengthened well into the future. The Kent Downs AONB unit is in the process of updating the management plan for late 2019.

7.16 **Green and Blue Infrastructure Strategy**[177]: Sets out a vision for the Borough's green and blue infrastructure for the next 20 years. The vision is for greener, healthier, attractive towns and villages sustainably connected to the rich tapestry of distinctive landscapes, wildlife habitats and waterways – valued, enjoyed and cared for by local people. The strategy sets out seven key themes, including:

- Maintaining and enhancing biodiversity, water and air quality.

7.17 **Medway Valley Strategic Landscape Enhancement Plan (2015)**[178]: Contains the Vision for the Strategic Landscape Enhancement Plan (SLEP), '*The SLEP will use landscape as the common thread to tie together cross-disciplinary aspirations and aims. It will act to cement, by knitting together disparate plans (e.g. Green Infrastructure Strategies, Local Plans etc.) which exist for an area, by generating clear and practical measures which can be realised…*' It also sets out opportunities for biodiversity and water quality enhancement:

- Enhance wildlife connectivity between sites.

- Improve the management of woodland, hedgerows and trees, and improve their resilient to climate change.

- Manage wetland sites, and expand them where practical to enhance biodiversity value and flood storage capacity.

- Increase the biodiversity value of rivers and streams.

- Work with developers and planners to achieve positive biodiversity gains through new development.

7.18 **Maidstone's Biodiversity Strategy: A Local Biodiversity Action Plan, Phase 1: 2009-2014**[179]: Provides the opportunity to review current activities and issues, identify aims and set specific objectives and targets for action by a wide range of internal and external partners and outlines projects that cover a range of work including research, monitoring, protocol development and capital one-off site projects.

Current Baseline

7.19 Maidstone contains 9 UK priority habitats. Arable and horticulture and improved grassland are the largest broad habitat types, occupying almost three-quarters of the Borough area.

[176] Kent Downs AONB Unit (2014) Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019 [online] Available at: http://www.kentdowns.org.uk/uploads/documents/1__The__Kent__Downs__AONB.pdf

[177] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf

[178] Kent County Council and Fiona Fyfe Associates Limited (March 2015) Medway Valley Strategic Landscape Enhancement Plan [online] Available at: http://healthsustainabilityplanning.co.uk/wp-content/uploads/2015/06/MVSLEP-Complete-FINAL-Low-Res-27.03.151.pdf

[179] Maidstone Borough Council, Maidstone's Biodiversity Strategy: A Local Biodiversity Action Plan Phase 1: 2009-2014 [online] Available at: https://maidstone.gov.uk/home/primary-services/council-and-democracy/primary-areas/your-councillors?sq_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1OTE3OCUyRk1haWRzdG9uZXMlMjBMb2NhbCUyMEjpb2RpdmVyc2l0eSUyMEFjdGlvbiUyMFBsYW4lMjAyMDA5LTIwMTQucGRmJmFsbD0x

Additionally, 11% of the Borough is broadleaved, mixed and yew woodland. Lowland mixed deciduous woodland and lowland wood pasture and parkland are the largest priority habitats within the Borough.[180]

7.20   Just over a quarter of the Borough is within the Kent Downs Area of Outstanding Natural Beauty (AONB), within which the internationally important North Downs Woodlands Special Area of Conservation (SAC) lies. The SAC was designated due to its existing and regenerating chalk grassland and mature beech and yew woodland. The AONB also contains a wide range of natural habitats and biodiversity.[181]

7.21   There are nine sites designated as Sites of Special Scientific Interest (SSSI) in the Borough.[182] The SSSIs are listed below with Natural England's SSSI condition summary from May 2018 shown in brackets after each SSSI[183]:

- Allington Quarry (SSSI) – unfavourable (declining).

- Hollingbourne Downs (SSSI) – favourable and unfavourable (recovering).

- Lenham Quarry (SSSI) – favourable.

- Marden Meadows (SSSI) – favourable.

- Oaken Wood (SSSI) - favourable.

- Purple Hill (SSSI) – favourable and unfavourable (recovering).

- River Beult (SSSI) – unfavourable (no change).

- Spot Lane Quarry (SSSI) - favourable.

- Wouldham to Detling Escarpment (SSSI) – favourable and unfavourable (recovering).

7.22   The Borough also contains a large number of locally designated wildlife sites, including four Local Nature Reserves (LNR) and 59 Local Wildlife Sites (LWS), It also contains 2,828 hectares of woodland (7.19% of the overall area), of which 85% is Ancient Woodland. The South East has approximately 40% of the ancient woodland in England, but this valuable resource is increasingly under threat from development pressures since it is a densely populated region.[184]

7.23   The Borough contains four Biodiversity Opportunity Areas (BOA) identified by the Kent Nature Partnership, comprising Greensand Heath and Commons, Mid Kent Greensand and Gault, Mid Kent Downs, Woods and Scarp and Medway and Low Weald Wetlands and Grasslands.

7.24   Parts of the Borough fall within the Wealden Great Crested Newt Important Area for Ponds (IAP) identified by the Environment Agency. Great crested newt populations thrive where there is high pond density and a well-connected landscape.[185]

7.25   **Figure 7.1** shows the biodiversity designations in the Borough.

7.26   Kent as a whole has not met its 2010 Biodiversity targets and, with biodiversity continuing to decline, it is unlikely that 2020 targets will be met without targeted interventions. Although there have been gains for wildlife in some areas, there is still a gradual loss of habitats and species in the County. For example, of the Local Wildlife Sites monitored over the past five years, 30% have been damaged and 2% lost. This represents a significant threat to the intrinsic value of Kent's natural environment and to the economic and social benefit that it provides.[186]

[180] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at:
https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf
[181] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at:
https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf
[182] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at:
https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf
[183] Natural England (2018) SSSI Condition Summary
[184] Weald and Downs Ancient Woodland Survey (2012) A revision of the Ancient Woodland Inventory for Maidstone borough, Kent [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0015/12084/Maidstone-Ancient-Woodland-Inventory-2012.pdf
[185] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at:
https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf
[186] Kent County Council (2016) Kent Environment Strategy [online] Available at:
http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

Table 7.1 Key sustainability issues for Maidstone and likely evolution without the Local Plan Review

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
The Borough contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity. The County as a whole has not met its 2010 Biodiversity targets and it is unlikely that it will meet its 2020 targets. (SA objective 14)	The Local Plan Review provides a way to create management, conservation and enhancement strategies in connection with development that could help the County meet its biodiversity goals. Policy DM 3 of the adopted Local Plan expects development proposals to perform an ecological evaluation of development sites to take full account of biodiversity present.

Figure 7.1: Biodiversity Designations

Maidstone Borough Council SA

Legend:
- Maidstone Borough
- Neighbouring Local Authority Boundary
- Ancient Woodland
- Local Nature Reserve (LNR)
- Local Wildlife Site (LWS)
- Site of Special Scientific Interest (SSSI)
- Special Area of Conservation (SAC)
- Biodiversity Opportunity Area

Source: Natural England, MBC

Map Scale @ A4: 1:150,000

CB:MNi EB:Nicholson_M LUC Fig7-1_10509_Maidstone_Biodiversity_A4L 15/01/2019
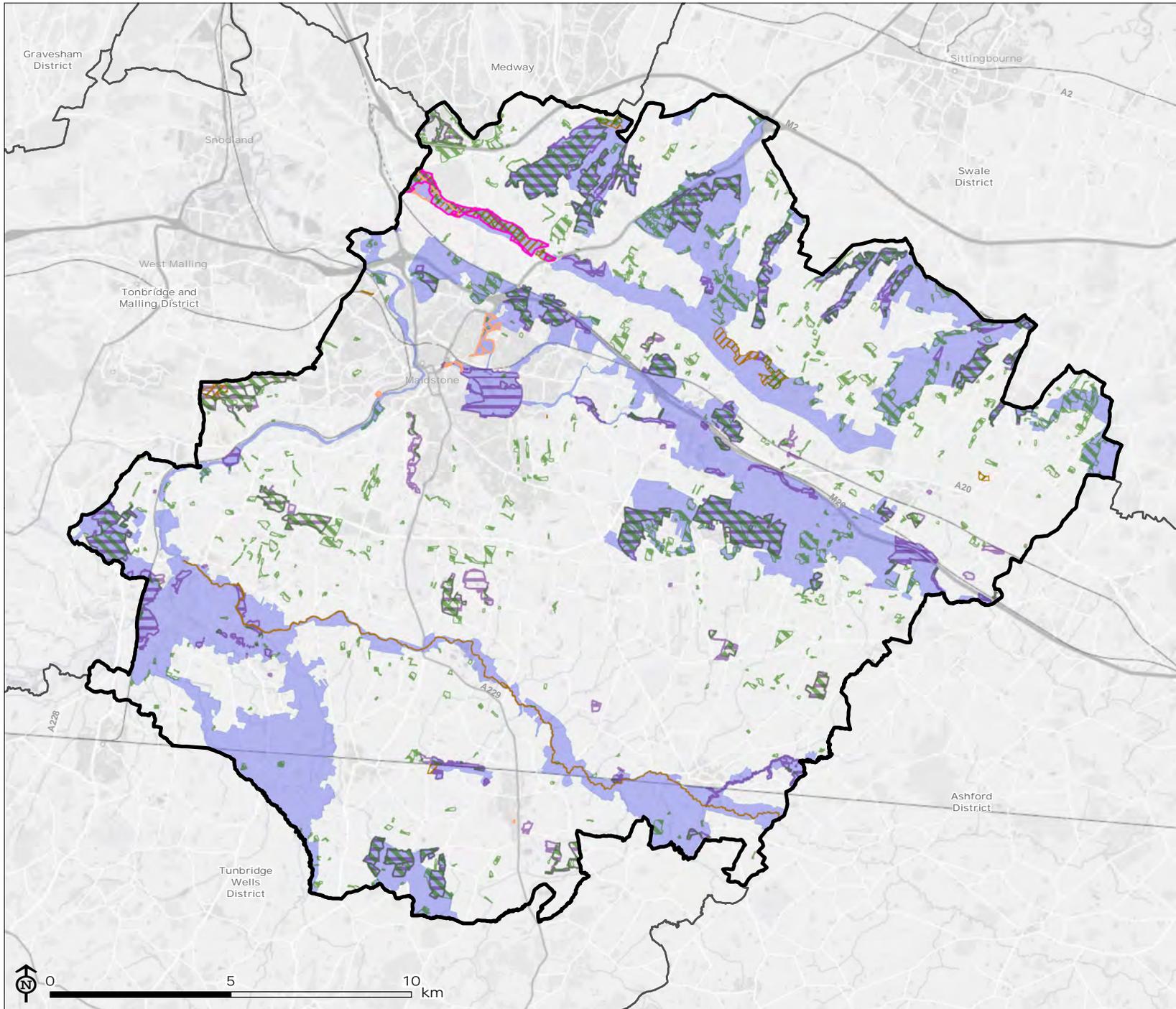
8   Historic Environment

Policy Context

International

8.1   **European Convention for the Protection of the Architectural Heritage of Europe** (1985): Defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

8.2   **Valletta Treaty** (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)[187]: Aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

National

8.3   **National Planning Policy Framework (NPPF)**[188]: Plans should *"set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place."

8.4   **National Planning Practice Guidance (PPG)**[189]: Supports the NPPF by requiring that Local Plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.

8.5   **The Government's Statement on the Historic Environment for England 2010**[190]: Sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

8.6   **The Heritage Statement 2017**[191]: Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to

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[187] Council of Europe (1992) Valletta Treaty [online] Available at: https://rm.coe.int/168007bd25
[188] Department for Communities and Local Government (2018) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf
[189] Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance
[190] HM Government (2010) The Government's Statement on the Historic Environment for England 2010 [online] Available at: https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england
[191] Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017 [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017__final_-_web_version_.pdf

maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

8.7 **Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8**[192]: Sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

Sub-national

8.8 **The Kent Design Guide**[193]: Seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. It aims to assist designers and others achieve high standards of design and construction by promoting a common approach to the main principles which underlie Local Planning Authorities' criteria for assessing planning applications. It also seeks to ensure that the best of Kent's places remain to enrich the environment for future generations. The guide does not seek to restrict designs for new development to any historic Kent vernacular. Rather it aims to encourage well considered and contextually sympathetic schemes that create developments where people really want to live, work and enjoy life.

8.9 **Strategic Plan 2015-2020 Action Plan**[194]: Sets out the vision, "Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential." In addition, numerous strategies and projects are outlined that respond to the following objectives, which are grouped by theme:

Embracing Growth and Enabling Infrastructure:

- The Council leads master planning and invests in new places which are well designed.

- Key employment sites are delivered.

- Housing need is met including affordable housing.

- Sufficient infrastructure is planned to meet the demands of growth.

A Thriving Place:

- A vibrant leisure and culture offer, enjoyed by residents and attractive to visitors.

- Our town and village centres are fit for the future.

- Skills levels and earning potential of our residents are raised.

- Local commercial and inward investment is increased.

Cross cutting objectives:

- Heritage is respected.

- Health inequalities are addressed and reduced.

- Deprivation is reduced and social mobility is improved.

- Biodiversity and Environmental sustainability is respected.

A complete updated version of the action plan is expected to be released February 2019.

8.10 **Medway Valley Strategic Landscape Enhancement Plan (2015)**[195]**:** contains the Vision for the Strategic Landscape Enhancement Plan (SLEP), '*The SLEP will use landscape as the common thread to tie together cross-disciplinary aspirations and aims. It will act to cement, by knitting*

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[192] Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 [online] Available at: https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/

[193] Kent Design Initiative (2008) The Kent Design Guide [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0014/12092/design-guide-foreword.pdf

[194] Maidstone Borough Council, Strategic Plan 2015-2020 Action Plan, Draft Vision, Priorities and Outcomes [online] Available at: https://meetings.maidstone.gov.uk/documents/s63864/Appendix%20A.pdf

[195] Kent County Council and Fiona Fyfe Associates Limited (March 2015) Medway Valley Strategic Landscape Enhancement Plan [online] Available at: http://healthsustainabilityplanning.co.uk/wp-content/uploads/2015/06/MVSLEP-Complete-FINAL-Low-Res-27.03.151.pdf

together disparate plans (e.g. Green Infrastructure Strategies, Local Plans etc.) which exist for an area, by generating clear and practical measures which can be realised…' It also sets out opportunities for the enhancement of the historic environment:

- Retain and enhance settings of landmark buildings and structures.

- Promote sensitive treatment of historic farmsteads.

- Extend protection of culturally significant but currently unprotected building and structures.

- Improve awareness of historic buildings.

- Protect the character of rural lanes.

- Retain the traditional character and integrity of the railway line.

- Record known buried archaeology.

Current Baseline

8.11   Parts of Maidstone Borough have been occupied since the Neolithic period, but more recently agriculture, industry and human activities have influenced the Borough's landscapes and townscapes.[196] Maidstone contains characteristic ragstone villages and hop and fruit-growing infrastructures of oast houses and orchards to historic parks and gardens. Many are nationally designated, but the Borough also contains many heritage assets of local significance.

8.12   There are 41 Conservation Areas throughout the Borough, mainly focused around traditional settlement centres.[197] There is a cluster of 5 Conservation Areas in Maidstone Town Centre, 16 in the rest of the urban fringe and an additional 4 that straddle the urban/rural boundary. The remaining 16 are focused in the villages of the rural area. A total of 12 of the 41 Conservation Areas have character appraisals and management plans have been produced for 9 Conservation Areas.[198]

8.13   The Borough contains 43 Grade I Listed Buildings, 104 Grade II* and 1,876 Grade II. Listings tend to be scattered by parish, but there are a few clusters, with 129 in Marden, 114 in Yalding and 111 in Staplehurst. The Borough also contains 26 Scheduled Monuments.[199]

8.14   Maidstone Borough contains 5 sites included on the national Register of Historic Parks and Gardens[200]:

- Leeds Castle.

- Linton Park.

- Boughton Monchelsea Place.

- Chilston Park.

- Mote Park.

8.15   The Borough's designated heritage assets are shown in **Figure 8.1.**

8.16   There are 13 entries for Maidstone on the 'heritage at risk' register; this is an increase of 1 since 2011/12.[201] The 13 entries consist of a mix of Scheduled Monuments, Conservation Areas and Listed Buildings.[202]

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[196] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf
[197] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at:
https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf
[198] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf
[199] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf
[200] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at:
https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf

Table 8.1 Key sustainability issues for Maidstone and likely evolution without the Local Plan Review

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
There are many sites, features and areas of historical and cultural interest in the Borough, some of which are at risk and could be adversely affected by poorly located or designed development (SA Framework objective SA 15).	While a number of the heritage assets in the Borough, for example listed buildings and scheduled monuments, will be protected by statutory designations, without the Local Plan Review it is possible that these, and undesignated assets, will be adversely affected by inappropriate development. The Local Plan Review provides an opportunity to protect these assets (including their setting) from inappropriate development, as well as enhancing the historic environment and improving accessibility and interpretation of distinctive features of local heritage. Policy SP18 of the adopted Local Plan sets out to ensure that the characteristics, distinctiveness, diversity and quality of heritage assets will be protected and, where possible, enhanced.

[201] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports
[202] Historic England (2017) South East Register, Heritage at Risk [online] Available at: https://historicengland.org.uk/images-books/publications/har-2017-registers/se-har-register2017/

Figure 8.1: Historic Environment

Maidstone Borough Council SA

Legend:
- Maidstone Borough
- Neighbouring Local Authority Boundary

Listed Buidling
- Grade I (red triangle)
- Grade II* (yellow triangle)
- Grade II (blue triangle)

- Registered Parks and Gardens
- Scheduled Monument
- Conservation Area
- Areas of Archaeological Potential

Source: Historic England, MBC

Map Scale @ A4: 1:150,000

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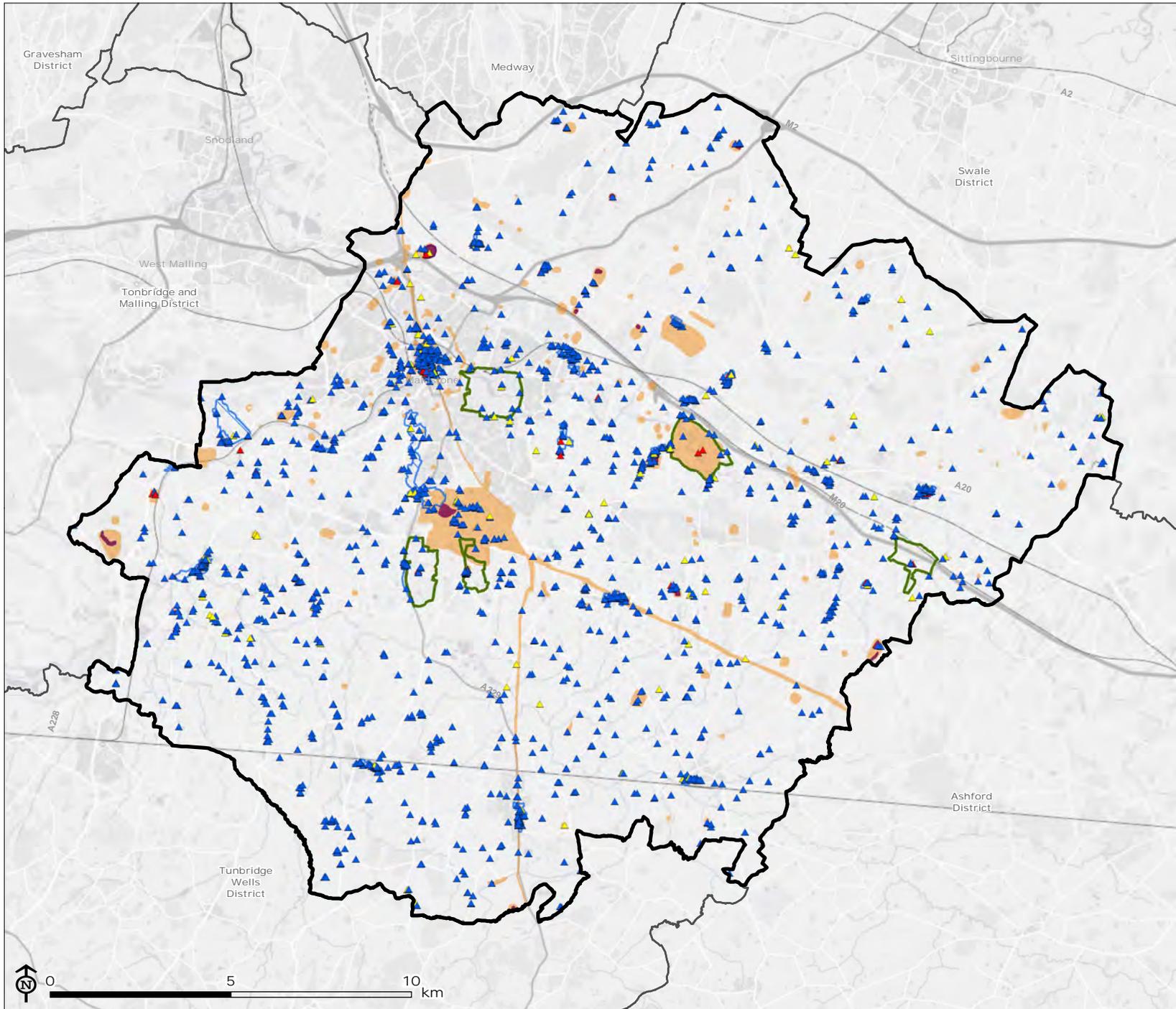
9   Landscape

Policy Context

International

9.1   **European Landscape Convention** (2002): Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

9.2   **National Planning Policy Framework (NPPF)**[203]: Planning principles include:

- Recognising the intrinsic beauty and character of the countryside.

- Protecting and enhancing valued landscapes. Development should be sympathetic to local character and history, including the surrounding built environment and landscape setting.

- Conserve and enhance landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty.

9.3   **A Green Future: Our 25 Year Plan to Improve the Environment**[204]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.

- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

Sub-national

9.4   **Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019**[205]: Sets out measures to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, maintained and strengthened well into the future. The Kent Downs AONB Unit is in the process of updating the management plan for late 2019.

9.5   **Kent and Medway Growth and Infrastructure Framework (GIF) update 2018**[206]: Provides a view of emerging development and infrastructure requirements to support growth across Kent and Medway. The document highlights the valuable role Green Infrastructure (including woodland in the Borough and the Kent Downs and High Weald Areas of Outstanding Natural Beauty as well as other parks and gardens) plays in assisting to deliver a wide range of benefits including recreation, biodiversity, health, climate change mitigation and adaptation and water quality.

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[203] Department for Communities and Local Government (2018) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

[204] HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

[205] Kent Downs AONB Unit (2014) Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019 [online] Available at: http://www.kentdowns.org.uk/uploads/documents/1__The__Kent__Downs__AONB.pdf

[206] Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework [online] available at: http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

9.6   **Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**[207]: The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the MBLP and to outline how and when these will be delivered.

9.7   **Green and Blue Infrastructure Strategy**[208]: Sets out a vision for the Borough's green and blue infrastructure for the next 20 years. The vision is for greener, healthier, attractive towns and villages sustainably connected to the rich tapestry of distinctive landscapes, wildlife habitats and waterways – valued, enjoyed and cared for by local people. The strategy sets out seven key themes, including:

- Promoting a distinctive townscape and landscape.

- Providing opportunities for sport, recreation, quiet enjoyment and health.

9.8   **Maidstone Green and Blue Infrastructure Strategy: Action Plan**[209]**:** This plan builds on the adopted Green and Blue Infrastructure Strategy from 2016 (mentioned above). The plan aims to deliver multiple projects centred on the same themes set out in the Green and Blue Infrastructure Strategy.

9.9   **Medway Valley Strategic Landscape Enhancement Plan (2015)**[210]: Contains the Vision for the Strategic Landscape Enhancement Plan (SLEP), '*The SLEP will use landscape as the common thread to tie together cross-disciplinary aspirations and aims. It will act to cement, by knitting together disparate plans (e.g. Green Infrastructure Strategies, Local Plans etc.) which exist for an area, by generating clear and practical measures which can be realised...*'

Current Baseline

9.10   Maidstone Borough is largely rural and contains a network of waterways with five main rivers. Maidstone town forms the primary urban area, however there are nine broad green corridors located across the urban area linking urban Maidstone with the surrounding countryside.[211]

9.11   Maidstone lies within five national character areas. In the very north of the Borough, the landscape falls within the North Kent Plain. To the north of Maidstone and the M20, the landscape falls within the North Downs. The urban area of Maidstone sits within the Wealden Greensand, and to the south the landscape falls within the Low Weald. To the very south, the landscape falls within the High Weald. Characteristics of each national character area are outlined below[212]:

- North Kent Plain – is an open, low and gently undulating landscape characterised by high quality, fertile and loamy soils. The land use is therefore dominated by agricultural land uses although habitats include woodland, grassland, marshes and wetlands.

- The North Downs – is a land of chalk soils, with a warm and dry climate that has been fashioned by its land use to produce an area of outstanding nature conservation interest. Chalk grassland is the most distinctive habitats, along with scrub and woodland.

- Wealden Greensand – to the south, it comprises mostly lowland heath. Many ancient woodlands have survived throughout the Natural Area, though often fragmented and on steeper slopes. The area also includes several river valleys, which support a series of habitats with drainage ditches, marshy grassland, reedbeds and wet woodlands.

[207] Maidstone Borough Council (2016), Maidstone Borough Local Plan Infrastructure Delivery Plan [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0016/121129/SUB-011-Infrastructure-Delivery-Plan-May-2016.pdf

[208] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf

[209] Maidstone Borough Council (2017) Maidstone Green and Blur Infrastructure Strategy: Action Plan. [online] Available at: http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODIzMiUyRkFwcGVuZGl4JTIwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjIwMTcucGRmJmFsbD0x

[210] Kent County Council and Fiona Fyfe Associates Limited (March 2015) Medway Valley Strategic Landscape Enhancement Plan [online] Available at: http://healthsustainabilityplanning.co.uk/wp-content/uploads/2015/06/MVSLEP-Complete-FINAL-Low-Res-27.03.151.pdf

[211] Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at: https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf

[212] Maidstone Borough Council and Jacobs (2013) Maidstone Landscape Character Assessment [online] Available at: http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf

- Low Weald – comprises a small scale and intimate landscape enclosed by an intricate mix of small woodlands and a patchwork of hedgerow enclosed fields. Ancient woodland and pasture, the historic network of hedgerows and shaws, unimproved grassland, grazing marsh, rivers, streams and ponds provide a rich habitat network.

- High Weald – is a well wooded landscape that rises above the Low Weald and is deeply incised in places to give a complex pattern of ridges and steep stream valleys. Habitats are provided by woodland and shaws, gill woodlands and streams, hedgerows, heathlands, exposed sand rock faces, parklands and ponds.

9.12 The Landscape Assessment of Kent split these five national character areas into subdivisions. Maidstone Borough falls wholly or partly within 28 of those subdivided landscape character areas.[213]

9.13 The landscape types have been further divided into 58 smaller 'Borough wide' landscape character areas, which are unique and individual geographical areas. These 58 'Borough wide' landscape character areas are split into seven different landscape types, which are stated below:

- Dry Valleys and Downs.

- Chalk Scarp.

- Gault Clay Vale.

- Greensand Orchards and Mixed Farmlands.

- Greensand Ridge.

- Low Weald.

- Valleys.[214]

9.14 Maidstone Borough also contains five Landscapes of Local Value which are designated in the current Local Plan: Greensand Ridge; Len Valley; Loose Valley; Medway Valley; and the Low Weald. Medway Valley, Len Valley and Loose Valley all surround parts of the urban area of Maidstone.[215]

9.15 27% of the Borough forms part of the Kent Downs Area of Outstanding Natural Beauty (AONB), which forms the eastern end of a great arc of designated landscape stretching from the East Hampshire and Surrey Hills AONBs.[216] The AONB roughly follows the South East's outcrop of chalk and greensand, the two ridges running parallel with each other to the coast. The chalk ridge, with its characteristic dip slope and dry valleys, has great wildlife importance in its unimproved chalk grassland, scrub communities and broadleaved woodlands. The well-wooded greensand ridge supports heathlands and acidic woodlands.

9.16 Maidstone has started the process of applying to change one of the Landscapes of Local Value, the 'Greensand Ridge,' to an AONB.[217]

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[213] Maidstone Borough Council and Jacobs (2013) Maidstone Landscape Character Assessment [online] Available at: http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf

[214] Maidstone Borough Council and Jacobs (2013) Maidstone Landscape Character Assessment [online] Available at: http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf

[215] Maidstone Borough Landscapes of Local Value (October 2015) [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0007/99547/Landscapes-of-Local-Value-October-2015.pdf

[216] http://www.landscapesforlife.org.uk/about-aonbs/visit-aonbs/kent-downs-aonb/

[217] Strategic Planning, Sustainability and Transportation Committee (2018), Review of National Parks and Areas of Outstanding Natural Beauty – Response [online] Available at: https://meetings.maidstone.gov.uk/documents/s63716/Review%20of%20National%20Parks%20and%20Areas%20of%20Outstanding%20Natural%20Beauty-%20Response.pdf

Table 9.1 Key sustainability issues for Maidstone and likely evolution without the Local Plan Review

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
The Borough contains a number of nationally distinct landscape character areas that could be harmed by inappropriate development. The Kent Downs AONB is of national importance for its landscape value, but is also heavily used as a recreational resource. The setting of the AONB (looking both out of the AONB and towards the AONB) can also be affected by inappropriate development (SA Framework objective SA 16).	The Borough's local and national character areas would be left without protection in the absence of the Local Plan Review and could be harmed by inappropriate development. The Local Plan Review offers a further opportunity to ensure that the variation in landscape character is taken into account in the design and siting of development and opportunities for the protection and enhancement of the landscape are maximised. Parts of the Borough are also within the Kent Downs AONB and its setting, and therefore the Local Plan can help to ensure that development does not compromise this protected landscape. Policy SP17 of the adopted Local Plan ensures that development in the countryside does not harm the character and appearance of an area, as well as provides particular protection for the Landscapes of Local Value.

Figure 9.1: Landscape
Designations

Maidstone Borough

Neighbouring Local Authority
Boundary

Kent Downs AONB

Landscape of Local Value

National Landscape Character
Area

High Weald

Low Weald

North Downs

North Kent Plain

Wealden Greensand

Source: Natural England, MBC

Map Scale @ A4:   1:150,000

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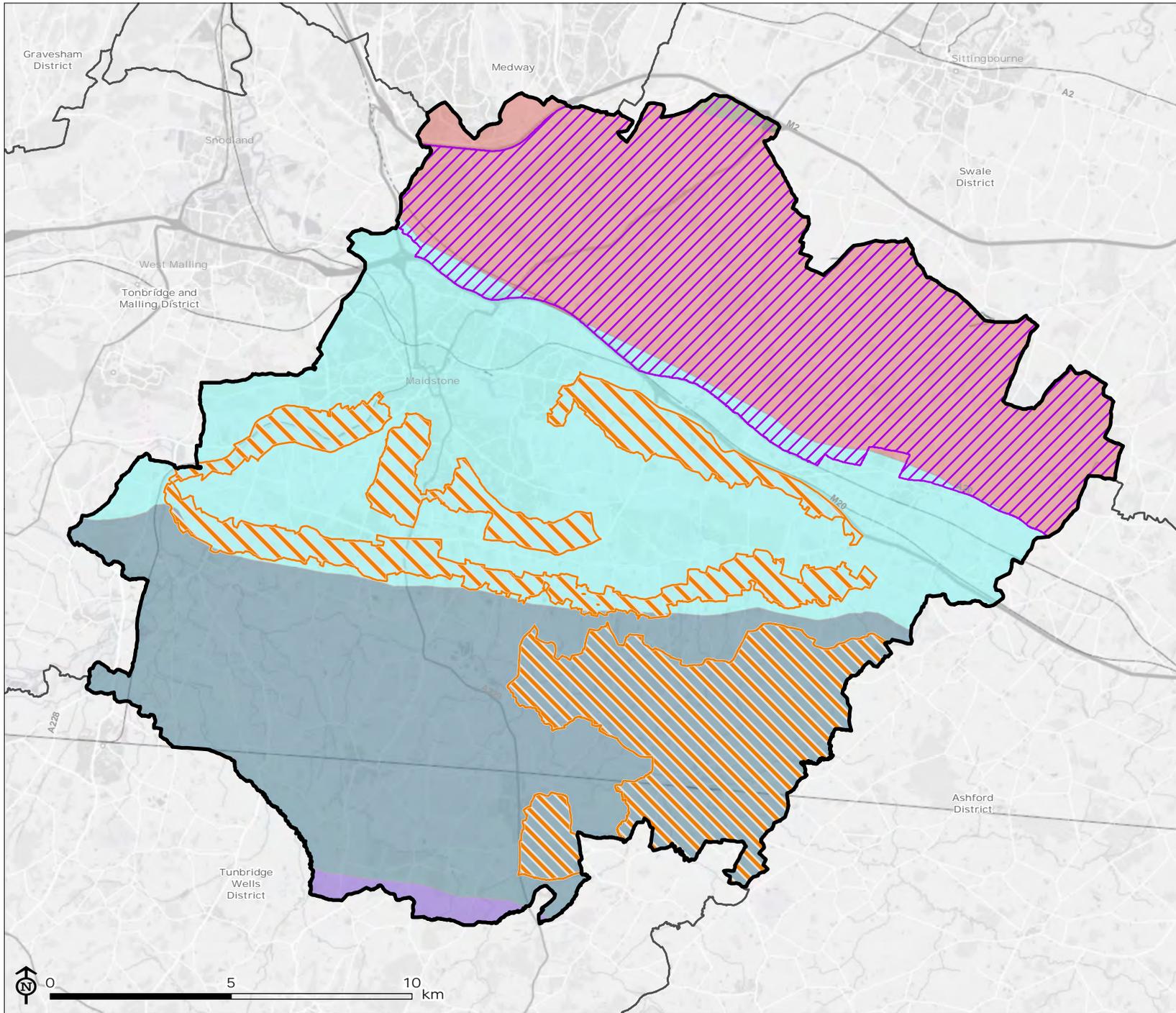
10 The SA Framework

The SA Framework

10.1   The development of a set of SA objectives (known as the SA Framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

10.2   The proposed SA Framework for the Local Plan is presented in **Table 10.1**, and has been developed from the analysis of international, national and local policy objectives, the baseline information, and the sustainability issues identified for the Borough.

10.3   The SA Framework is supported by a set of draft site assessment criteria which will be used to establish the potential effects generated by development in site options and allocations identified for consideration by the Borough Council. The performance of sites against the site assessment criteria will be used, alongside other technical assessment, to inform site selection and the subsequent SA of the Council's preferred spatial strategy and individual site allocations. More detail on the site assessment criteria is provided in **paragraphs 10.13** to **10.21**.

10.4   The SA objectives and appraisal questions (which provide a guide to the factors that should be considered when carrying out assessments) set out in the SA Framework and the site assessment criteria are subject to change following feedback collated during consultation on this SA Scoping Report with the three statutory consultation bodies (Environment Agency, Historic England and Natural England) under Regulation 12(5) of the SEA Regulations.

Table 10.1 SA Framework for the Maidstone Local Plan Review

SA Objective	Appraisal questions: Does/Will the Local Plan Review…	Relevant SEA Topics
SA 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home.	Provide for local housing need? Deliver the range of types, tenures and affordable homes the Borough needs over the Plan Period? Provide for the housing needs of an ageing population?	Population, Human Health and Material Assets
SA 2: To ensure ready access to essential services and facilities for all residents.	Provide for sufficient local services and facilities to support new and growing communities (e.g. schools, employment training and lifetime learning facilities, health facilities, sport and recreation, and services in local centres)? Provide housing within proximity to existing services and facilities that are accessible for all, if not to be provided on site?	Population, Human Health and Material Assets
SA 3: To strengthen community cohesion.	Facilitate the integration of new neighbourhoods with existing neighbourhoods? Promote developments that benefit and are used by existing and new residents in the Borough, particularly for the Borough's most deprived areas? Help to support high levels of pedestrian activity/ outdoor interaction, where people mix? Help to reduce levels of crime, anti-social behaviour and the fear of crime? Increase the number of community facilities that can be used for community gatherings e.g. cultural activities, trainings etc.?	Population and Human Health
SA 4: To improve the population's health and wellbeing and reduce health inequalities.	Promote health and wellbeing by maintaining, connecting and creating multifunctional open spaces, green infrastructure, and recreation and sports facilities? Protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with air and noise pollution, vibration and odour? Promote healthy lifestyles by encouraging and facilitating walking and cycling? Safeguard human health and well-being by promoting climate change resilience through sustainable siting, design, landscaping and infrastructure? Allocate additional sites for open space in relation to population growth? Create vibrant, multifunctional countryside in and around towns?	Population, Human Health and Climatic Factors
SA 5: To facilitate a sustainable and growing economy.	Provide an adequate supply of land and infrastructure to meet the Borough's forecast employment needs?	Population, Human Health and Material Assets

SA Objective	Appraisal questions: Does/Will the Local Plan Review…	Relevant SEA Topics
	Allow for sufficient flexibility to respond to uncertainties and changing economic circumstances?	
	Support opportunities for the expansion and diversification of business and inward investment?	
	Provide for new and improved education and training facilities leading to a work ready population of school and college leavers?	
SA 6: To support vibrant and viable Maidstone town centre.	Maintain and enhance the economic vitality and vibrancy of Maidstone town centre?	Population, Human Health and Material Assets
	Facilitate diverse and flexible town centre uses?	
	Ensure high quality design and pedestrian and cyclist friendly public realm?	
	Encourage a mixture of residential, commercial, retail, leisure and community uses?	
	Encourage safe and attractive evening activities?	
SA 7: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion.	Promote the delivery of integrated, compact communities made-up of a complementary mix of land uses?	Air, Climatic Factors, Population and Human Health
	Support the maintenance and expansion of public transport networks including areas with sufficient demand for the introduction of new public transport?	
	Help to address road congestion in and around Maidstone town centre and its causes?	
	Enhance connectivity of the sustainable transport network and provide new cycling and walking infrastructure to enable modal choice?	
SA 8: To conserve the Borough's mineral resources.	Avoid the unnecessary or unjustified sterilisation of mineral resources?	Material Assets
SA 9: To conserve the Borough's soils and make efficient and effective use of land.	Promote and support the development of previously developed land, and under-utilised land and buildings?	Soil and Human Health
	Take an appropriate approach to remediating contaminated land?	
	Minimise development on the Borough's best and most versatile agricultural land?	
	Encourage integrated, compact communities?	
SA 10: To maintain and improve the quality of the Borough's waters and achieve sustainable water resources management.	Minimise inappropriate development in Source Protection Zones?	Water
	Ensure there is sufficient waste water treatment capacity to accommodate the new development?	
	Avoid water pollution due to contaminated runoff from development?	
	Support efficient use of water in new development?	

SA Objective	Appraisal questions: Does/Will the Local Plan Review…	Relevant SEA Topics
SA 11: To reduce air pollution ensuring lasting improvements in air quality.	Minimise increases in traffic in Air Quality Management Areas? Contain measures which will help to reduce congestion? Facilitate the take up of low / zero emission vehicles? Enable a choice of more sustainable modes?	Air and Human Health
SA 12: To avoid and mitigate flood risk.	Minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change? Minimise flood risk and promote the use of SuDS and flood resilient design?	Water, Material Assets, Climatic Factors and Human Health
SA 13: To minimise the Borough's contribution to climate change.	Promote energy efficient design? Encourage the provision of renewable energy infrastructure where possible? Minimise greenhouse gas emissions from transport?	Climatic Factors
SA 14: To conserve, connect and enhance the Borough's wildlife, habitats and species.	Conserve designated and undesignated ecological assets, taking into account the impacts of climate change? Help to conserve, connect and enhance ecological networks, taking into account the impacts of climate change? Provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?	Biodiversity, Flora and Fauna and Human Health
SA 15: To conserve and/or enhance the Borough's historic environment.	Conserve and enhance the Borough's designated and non-designated heritage assets, including their setting and the wider historic environment? Outline opportunities for improvements to the conservation, management and enhancement of the Borough's heritage assets, particularly heritage at risk? Promote access to, as well as enjoyment and understanding of, the local historic environment for the Borough's residents and visitors?	Cultural Heritage, Architectural and Archaeological Heritage and Human Health
SA 16: To conserve and enhance the character and distinctiveness of the Borough's settlements and landscape.	Protect the Borough's sensitive and special landscapes, including the Kent Downs AONB? Safeguard the character and distinctiveness of the Borough's settlements?	Landscape and Cultural Heritage

Use of the SA Framework

10.5   The SA will be undertaken in close collaboration with the Maidstone Borough Council officers responsible for drafting the Local Plan Review in order to fully integrate the SA process with the production of the Local Plan Review.

10.6   The findings of the SA will be presented as a colour coded symbol showing a score for the option against each of the SA objectives along with a concise justification for the score given, where appropriate. It may be possible to group the appraisal of strategic and development management policies by theme.

10.7   The use of colour coding in the matrices will allow for likely significant effects (both positive and negative) to be easily identified, as shown in **Figure 10.1** below.

Figure 10.1 SA matrix guide

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

10.8   The dividing line between sustainability scores is often quite small. Where significant effects are distinguished from more minor effects this is because, using the appraisal questions and criteria and applying professional judgement, the effect of the option on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.

10.9   In determining the significance of the effects of the options for potential inclusion in the Local Plan Review it will be important to bear in mind the Local Plan's relationship with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

Reasonable alternatives

10.10   The SA must appraise not only the preferred options for inclusion in the Local Plan Review but 'reasonable alternatives' to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, or are outside the Plan area are unlikely to be reasonable.

10.11   The objectives, policies and site allocations to be considered for inclusion within the Local Plan Review are in the process of being identified and reviewed. The Council's reasons for selecting the alternatives to be included in the Local Plan Review will be reported at a later stage in the SA process.

Strategic Housing Land Availability Assessment

10.12 The Strategic Housing Land Availability Assessment (SHLAA) is an assessment by the Council of land availability, which identifies a future supply of land which is suitable, available and achievable for development uses over the plan period. Site options identified in the SHLAA will be assessed in the SA where these are considered reasonable alternatives. Whilst these are separate processes there may be opportunities to align the SHLAA methodology and SA methodology. In particular, it may be necessary to adjust the detailed criteria set out below in order to ensure that the SHLAA and SA processes are aligned, but the overall approach and principles underpinning this approach will remain the same. A SHLAA first phase of site assessments is scheduled to be completed by the end of September 2019.

SA site assessment criteria

10.13 The SA will assess the potential social, environmental and economic effects of the Local Plan Review and reasonable alternatives. SA criteria will be used to establish the potential effects generated by employment, residential, retail and Gypsy and Traveller development site options to be identified for consideration by the Council. The SA performance of sites will be used to inform site selection and SA of the Council's preferred spatial strategy and individual site options.

10.14 The draft site assessment criteria are organised under two broad categories:

- Criteria assessing the acceptability of access to the Borough's existing services and facilities.

- Criteria assessing the likelihood of harm to the Borough's environmental assets and constraints.

10.15 **Appendix 1** sets out the detailed assumptions used to judge the accessibility of access or likelihood of environmental harm for each housing and employment development option against each site assessment criterion[218]. Assessment criteria for assessing the effects of potential retail sites, mixed-use sites (including, if relevant, large-scale stand-alone new communities), and Gypsy and Traveller sites will be developed later in the SA process once the details of such proposals are known. The aim will be to use a similar approach and principles to ensure consistency in the SA process.

10.16 **Table A1.1** shows the 'as the crow flies' approach to the assumptions for access to services and facilities. **Table A1.2** shows the assumptions regarding distance associated with the risk of likelihood of harm to environmental assets.

10.17 The scores achieved by site options against the site assessment criteria indicate whether development in a specific location would be consistent with related sustainability objectives; they do not indicate the significance of the Local Plan Review's effects against each SA objective. For example, scores assigned to individual site options on the basis of intersection with areas of environmental constraint such as flood zones or areas of ecological value are independent of the proportion of the site intersecting with the constrained area; as such the assessment scores are designed to highlight potential adverse effects and flag these for closer examination. Such examination may reveal that only a small proportion of the site overlaps the constrained area so that it may be possible to avoid the potential effect identified by the SA by an appropriate site layout.

10.18 Where an individual site could give rise to significant effects in its own right, or in combination with other sites under consideration, these will be identified at an early stage in order to consider possible mitigation and to influence decisions by the Council on which sites to include as preferred sites. Once preferred sites are selected, discussion of the significance of the effects of the Local Plan Review as a whole is informed by analysis of the total area of sites falling within areas of environmental constraint. These findings on significance will be presented in the SA Report, along with a concise justification for the score given where appropriate.

10.19 It should be noted that there is not a one to one relationship between the site assessment criteria and the sustainability objectives; instead, one site assessment criterion may be relevant to the Local Plan Review's effects in relation to achievement of a number of sustainability objectives.

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[218] The assessment tests applied and information sources used have been adjusted to take account of local issues and evidence.

Table A1.3 shows the relationship between the site assessment criteria and the SA objectives defined in SA Framework.

10.20 The site assessment criteria provide a framework for assessing individual site options on a like for like basis, based on the existing spatial and environmental conditions within and in close proximity to each site and free from consideration as to what services, facilities, infrastructure and associated environmental mitigation and enhancement each site would provide. The consideration of residential and employment uses is therefore undertaken on a consistent basis. This ensures that all reasonable site options can be assessed at the same level of detail before site selection.

10.21 The application of the site assessment criteria also serves to highlight gaps in existing services, facilities and sustainable transport links. SA criteria offer a broader, integrated overview, and are not meant to replace or be substituted for the applicable individual factors for each use looked at in detail in key topic-based evidence.

11 Consultation and Next Steps

11.1   In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) are being sought in relation to the scope and level of detail to be included in the SA Report.

11.2   As outlined in the introduction, the consultees are in particular requested to consider:

- Whether the scope of the SA is appropriate as set out considering the role of the Maidstone Local Plan Review to help meet and manage Maidstone's needs.

- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.

- Whether the baseline information provided is robust and comprehensive, and provides a suitable baseline for the SA of the Maidstone Local Plan Review.

- Whether there are any additional SA issues relevant to the Local Plan Review that should be included.

- Whether the SA Framework is appropriate and includes a suitable set of SA objectives and site-based assumptions for assessing the effects of the options included within the Maidstone Local Plan Review and reasonable alternatives.

11.3   Responses from consultees will be reviewed and appropriate amendments made to the Scoping Report, including the baseline, policy context and SA Framework where necessary.

11.4   As the Local Plan Review is drafted, it will be subject to SA using the SA Framework presented in **Chapter 10**. At each stage where the Council consults on Local Plan options, policies and proposals, this will be accompanied by SA material for the public to take into account and comment upon. A full SA report (incorporating the later stages of the SA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Local Plan Review.

LUC

January 2019

Appendix 1 Site Assessment Criteria (Draft)

Table A1.1 Access to services and facilities – walking distance site assessment criteria

Site Assessment Criteria	Residential Sites				Employment Sites				Assessment Notes
	Very good	Good	Poor	Very poor	Very good	Good	Poor	Very poor	
Proximity to GP surgeries/ health centres and dentists	<= 400 m	401-800 m	801-1,200 m	>1,200 m	<= 400 m	401-800 m	801-1,200 m	>1,200 m	Excludes, opticians, pharmacies, hospitals and private healthcare facilities.
Proximity to primary or middle schools	<= 400 m	401-800 m	801-1,200 m	>1,200 m	N/A	N/A	N/A	N/A	Exclude private schools.
Proximity to secondary schools	<= 500 m	501-1,000 m	1,001-2,000 m	>2,000 m	N/A	N/A	N/A	N/A	Exclude private schools.
Proximity to further and higher education facilities	<= 500 m	501-1,000 m	1,001-2,000 m	>2,000 m	N/A	N/A	N/A	N/A	Includes Universities and Further Education Colleges.
Proximity to local centres	<= 200 m	201-400 m	401-800 m	>800 m	<= 200 m	201-400 m	401-800 m	>800 m	Service centres to be categorised as 'local' and 'town' by Maidstone Borough Council.
Proximity to town centres	<= 400 m	401-800 m	801-1,200 m	>1,200 m	<= 400 m	401-800 m	801-1,200 m	>1,200 m	

Site Assessment Criteria	Residential Sites				Employment Sites				Assessment Notes
Proximity to railway stations	<= 500 m	501-1,000 m	1,001-2,000 m	>2,000 m	<= 500 m	501-1,000 m	1,001-2000 m	>2,000 m	N/A
Proximity to bus stops	<= 200 m	201-400 m	401-800 m	>800 m	<= 200 m	201-400 m	401-800 m	>800 m	N/A
Proximity to cycle routes	<= 200 m	201-400 m	401-800 m	>800 m	<= 200 m	201-400 m	401-800 m	>800 m	N/A
Proximity to open spaces and sports centres	<= 400 m	401-800 m	801-1200 m	>1,200 m	<= 400 m	401-800 m	801-1,200 m	>1,200 m	N/A
Proximity to public rights of way (PRoW)	<= 200 m	201-400 m	401-800 m	>800 m	<= 200 m	201-400 m	401-800 m	>800 m	Greater weight will be given to PRoW within/near smaller settlements and more rural areas, where such routes are more likely to constitute a recreational resource.
Proximity to centres of employment	<= 500 m	501-1,000 m	1,001-2,000 m	>2,000 m	N/A	N/A	N/A	N/A	Includes business parks, town centres, and hospitals.

Access to services and facilities

Access to services and facilities will be assessed on the assumption that residents will travel on foot rather than by vehicle, reflecting national policy objectives to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to increase activity levels and to reduce vehicle emissions. Various pieces of research provide a variety of recommended guidance distances for walking. Those used in the SA are based on 'desired', 'acceptable' and preferred maximum' walking distances described in the publication 'Guidelines for Providing for Journeys on Foot' (Institution of Highways and Transport (IHT), 2000).

This suggests, for example, an acceptable walking distance of 800 m to most destinations, and 400 m to town centres. Professional judgement has been used to vary this standard distance in relation to certain services and facilities, for example, the standard distance of 800 m has been used for railway stations but a shorter distance of 400 m has been used for bus stops, reflecting the fact that individuals are likely to be prepared to walk greater distances to larger scale facilities.

Proximity to open spaces, sports centres and public rights of way

Sites within reasonable walking distance of areas of open space, sports centres and public rights of way should support residents in leading more active lifestyles. Walking distances used for open space and sport centres are based on IHT guidelines for 'other' destinations. Shorter distances have been used for proximity to PRoW than proximity to open space and sports centres to reflect the fact that people will be walking further once they reach the nearest PRoW access point.

Proximity to sustainable transport links

The proximity of development sites to sustainable transport links will affect the extent to which people are willing and able to make use of non-car based modes of transport for regular travel to places of employment, shops and so on, although the actual use of sustainable transport modes will depend on many factors.

It is assumed that people would generally be willing to travel further to access a railway station than a bus stop.

The proximity of site options to cycle routes is used as an indicator of how likely people are to cycle to or from a development site. While it is recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to do so will depend on a variety of factors that are independent of proximity such as the perceived safety of the road for cyclists and availability of cycle storage facilities at their destination, it is not appropriate to consider such factors at this strategic level of assessment.

Information about the frequency of public transport services is not taken into account in the SA as this is assumed to be too fluid to be a reliable basis of assessment and should also generally be capable of being increased in response to increased demand.

Proximity to employment opportunities

While the location of residential sites will not influence the number of employment opportunities, the proximity of housing to employment opportunities and public transport links can affect people's ability to access jobs.

Major employment opportunities are located throughout the plan area and neighbouring districts, not only in the areas allocated for employment, but also in the town centres, retail parks, hospitals, and in small scale premises around the towns as well as large scale businesses concentrated at the employment areas. Although there is no guarantee that people will find jobs at the employment areas closest to them, it is considered that provision of homes close to major sources of employment will support people in making shorter journeys to work.

Table A1.2 Risk of likelihood of harm to environmental assets site assessment criteria

Site Assessment Criteria	Residential Sites			Employment Sites			Assessment Notes
	Low	**Medium**	**High**	**Low**	**Medium**	**High**	
Proximity to heritage assets: allocations within existing settlements	All other sites	101-250 m	<=100 m	All other sites	101-250 m	<=100 m	Heritage assets include Scheduled Monuments, Listed Buildings Grades I, II* and II, Conservation Areas
Proximity to heritage assets: allocations outside of existing settlements	All other sites	501-1,000 m	<500 m	All other sites	501-1,000 m	<500 m	
Proximity to internationally designated wildlife sites[219]	All other sites	<= 6km of designated site boundary (all residential development) > 6km and <=10km of designated site boundary (large residential development only)	Intersects with designated site	N/A	N/A	Intersects with designated site	International and national wildlife and geological designations covered by the extent of the UK's Sites of Special Scientific Interest (SSSIs). See Appendix 3 of IRZ Guidance for further guidance: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf Note: with regard to
Proximity to wildlife sites: nationally	All other sites	Intersects with 'residential' or	Intersects with designated site	All other sites	Intersects with 'rural non-	Intersects with designated site	

[219] Thames Estuary and Marshes SPA, Thames Estuary and Marshes Ramsar site, Medway Estuary and Marshes SPA, Medway Estuary and Marshes Ramsar site, The Swale SPA, The Swale Ramsar site (known as the 'North Kent European Sites')

Site Assessment Criteria	Residential Sites			Employment Sites			Assessment Notes
designated wildlife sites - allocations within existing settlements		'all planning applications' IRZ			residential', 'air pollution' and 'water supply' or 'all planning applications' IRZ		internationally designated wildlife sites, the appraisal in the SA will also be informed by the findings of the Habitats Regulations Assessment of the Local Plan Review
Proximity to wildlife: nationally designated site - allocations outside existing settlements	All other sites	Intersects with 'rural residential' or 'all planning applications' IRZ	Intersects with designated site	All other sites	Intersects with 'rural non-residential', 'air pollution' and 'water supply' or 'all planning applications' IRZ	Intersects with designated site	
Proximity to locally designated wildlife sites and ancient woodland	All other sites	<=400 m from designated site boundary	Intersects with designated site	All other sites	<=400 m from designated site boundary	Intersects with designated site	Includes Local Nature reserves, Local Wildlife Sites and Ancient Woodland
Proximity to wildlife sites: Priority Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat	All other sites	Intersects with habitat	N/A	All other sites	Intersects with habitat	N/A	N/A
Proximity to designated landscapes: allocations within existing settlements	All other sites	Intersects with designated landscape	N/A	All other sites	Intersects with designated landscape	N/A	Proximity to Areas of Outstanding Natural Beauty and any local landscape designations
Proximity to	All other sites	<=5 km to	Intersects with	All other sites	<=5 km to	Intersects with	

Site Assessment Criteria	Residential Sites			Employment Sites			Assessment Notes
designated landscapes: allocations outside of existing settlements		designated landscape	designated landscape		designated landscape	designated landscape	
Intersection with Source Protection Zones (SPZs)	All other sites	Intersects with SPZ2 or 3	Intersects with SPZ1	All other sites	Intersects with SPZ2 or 3	Intersects with SPZ1	N/A
Intersection with flood risk areas	All other sites	Intersects with Flood Zone 2	Intersects with Flood Zone 3a or 3b	All other sites	Intersects with Flood Zone 2	Intersects with Flood Zone 3a or 3b	Note that Flood Zones relate only to river and tidal flooding.
Likely contribution to road traffic within area suffering from traffic-related air pollution	All other sites	N/A	Site is within or likely to generate commuter traffic through an AQMA	All other sites	N/A	Site is within or likely to generate commuter traffic through an AQMA	N/A
Proximity to sources of air pollution	All other sites	N/A	Site is within AQMA	All other sites	N/A	Site is within AQMA	N/A
Exposure to noise pollution from roads and railways	All other sites	Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB	N/A	N/A	N/A	Lnight road: https://data.gov.uk/dataset/road-noise-lnight-england-round-21 Lnight rail: https://data.gov.uk/dataset/93cf8119-386f-4044-9d3b-58e25771a16f/rail-noise-lnight-england-round-2 LAeq,16h road:

Site Assessment Criteria	Residential Sites			Employment Sites			Assessment Notes
							https://data.gov.uk/dataset/road-noise-laeq-16h-england-round-21 LAeq,16 rail: https://data.gov.uk/dataset/cb9923ad-f6b6-4492-b4d1-b1a24538f899/rail-noise-laeq-16h-england-round-2
Proximity to waste sites	All other sites	N/A	<=500 m to anaerobic digestion (AD) facility or <=250 m to waste management facility	All other sites	N/A	<=500 m to anaerobic digestion (AD) facility or <=250 m to waste management facility	Environment Agency should be able to provide a list of permitted waste sites if the local authority does not hold these.
Intersection with airport Public Safety Zones	All other sites	N/A	Intersects with an airport PSZ	All other sites	N/A	Intersects with airport PSZ	N/A
Intersection with mineral resources	All other sites	N/A	Intersects with Mineral Safeguarding Area that is not within the urban boundary/ village confines	All other sites	N/A	Intersects with Mineral Safeguarding Area that is not within the urban boundary/ village confines	N/A
Intersection with agricultural land	All other sites	Intersects with Grade 3	Intersects with Grade 1 or 2	All other sites	Intersects with Grade 3	Intersects with Grade 1 or 2	N/A

Proximity to heritage assets

The NPPF states that the 'significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

The proximity tests used in the SA of the Local Plan Review site allocations are intended to provide a basis for screening for the potential for adverse effects on heritage assets in the absence of a separately commissioned historic environment sensitivity study or similar. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.

Proximity to wildlife sites

Development sites that are close to wildlife sites may have the potential to adversely affect their features of interest, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure and so on. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as actual effects will depend on the particular sensitivities of the interest features of each wildlife site and appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Effects on internationally designated sites are assessed in detail via the Habitats Regulations Assessment (HRA) of the Local Plan Review, which will be reported in the SA. Effects on other wildlife sites will be considered in more detail through the development management process.

For the purposes of the SA and in the absence of separately commissioned evidence, Impact Risk Zones (IRZs) defined by Natural England are used to provide an initial assessment of the potential risks posed by development proposals to Sites of Special Scientific Interest (SSSIs). IRZs define zones around each biodiversity site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

A zone of influence of 400 m is assumed for all locally designated wildlife sites and ancient woodland, based on professional judgement.

Proximity to designated landscapes

In the absence of a separate study to establish the landscape sensitivity of the area within which the development site falls, assessment is based on proximity to designated landscapes - where development is within or close (i.e. within 2km) to designated landscapes, negative effects could result.

Intersection with Source Protection Zones

The effects of new development on water quality will depend on a variety of factors including whether there is capacity at the relevant wastewater treatment works and in the local sewer network to accommodate the new development; these factors are considered in the discussion of the effects of the plan as a whole rather than on a site by site basis.

Source Protection Zones (SPZs) are areas designated to protect groundwater sources used for public drinking water supply. They relate to the risk of contamination of the water source from various activities, this increasing, as the distance between the source of contamination and the groundwater abstraction point decreases:

- Zone 1 = Water borne contamination would take 50 days to travel from any point below the water table to the source (abstraction point); this zone has a minimum radius of 50 metres;

- Zone 2 = Water borne contamination would take 400 days to travel from any point below the water table to the source; this zone has a minimum radius of 250 or 500 metres, depending on the size of the abstraction;

- Zone 3 = Defined as the area around a source within which all groundwater recharge is presumed to be discharged at the source.

Intersection with flood risk areas

The effects of new development on exposure to flood risk will depend to some extent on its design, for example whether it incorporates SuDS, which is more appropriately assessed via SA of the development management policies. Where site options are located in areas of high flood risk, it could increase the number of people and assets at risk from flooding. National Planning Practice Guidance identifies which types of land uses are considered to be appropriate in Flood Zones 2, 3a and 3b with residential properties categorised as a 'more vulnerable use' that is suitable in Flood Zones 1 and 2 but would require an exception test in Flood Zone 3a, and is unsuitable in Flood Zone 3b.

Likely contribution to road traffic within areas suffering from traffic-related air pollution

Development sites that are within, or directly connected via road, to an Air Quality Management Areas (AQMA) could increase levels of air pollution in those areas as a result of increased vehicle traffic.

Exposure to noise pollution from roads and railways

The World Health Organization's Night Noise Guidelines for Europe (2009) set guideline values for health protection in terms of the metric set Lnight, outside which is the average annual noise level in the 8-hour period 2300-0700. The guidelines take account of the fact that the noise levels are measured outside but that the receptor (sleeping person) is inside and that most people to sleep with the window partly open. Adverse health effects begin to be observed when Lnight, outside is in the range 40-55 dB and when Lnight, outside is 55 dB or higher, adverse health effects occur frequently and there is a risk of cardiovascular disease. Since the lowest level of Lnight, outside reported in Defra's strategic noise maps is 50.0-54.9 dB the SA assumes a MEDIUM likelihood of harm for residential development in this noise zone and a HIGH likelihood of harm for residential development in 55.0 dB-59.9 and higher noise zones.

The World Health Organization's Guidelines for Community Noise (1999) set a guideline limit for average daytime noise in dwellings of 35 dB. Unlike the Night Noise Guidelines for Europe (2009) this limit is not based on the outdoor noise levels required to be monitored by Member States under the Environmental Noise Directive although, based on professional judgement, noise levels experienced indoors can be estimated to be, on average, 0 dB lower than outdoor noise levels so this guideline equates to an outdoor value of 45 dB. Serious annoyance in outdoor living areas occurs at outdoor noise levels of 55 dB. Defra's strategic noise maps show LAeq,16, the annual average outdoor noise levels for the 16-hour period 0700-2300, with the lowest reported noise band 55.0-59.9. The SA assumes a MEDIUM likelihood of harm for residential development in this noise zone and a HIGH likelihood of harm for residential development in 60.0 dB-64.9 and higher noise zones.

The World Health Organization's Night Noise Guidelines for Europe (2009) confirm that more vulnerable groups such as children, the chronically ill or the elderly are more susceptible to adverse effect from night noise. The SA therefore assumes that proposals for developments to serve such groups have a high likelihood of harm in locations where Lnight, outside is 50.0-54.9 dB or LAeq,16 is 55.0-59.9 dB. The SA does not consider exposure to noise pollution from roads and railways in relation to employment development as noise levels experienced by workers will be heavily influenced by the type of work carried to be out on the premises, whether hearing protection is worn by employees, and the design of the building (e.g. offices are more likely than dwellings to be air conditioned and acoustically insulated).

Proximity to waste sites

Correspondence with the Environment Agency in the course of other SA projects indicates that:

- New development within 500 m of an existing Anaerobic Digestion (AD) activity can result in people being exposed to odour and noise emissions. The severity of these impacts will depend on the size of the facility, the way it is operated and managed, the nature of the waste it takes and the prevailing weather conditions. The odour from an AD plant can be particularly offensive, even at low levels.

- New development within 250 m of a waste management facility could result in the community at the proposed development being exposed to odour, noise, dust and pest impacts. The severity of these impacts will depend on the size of the facility, the nature of the waste it takes and prevailing weather conditions.

Intersection with mineral resources

All new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of development sites. However, development within a Mineral Safeguarding Area may sterilise mineral resources. This could leave insufficient resources for future generations or mean that the minerals planning system loses the flexibility to extract resources at sites that would have a lower impact on the environment.

Agricultural land

The effects of new development on soils will depend on its location in relation to the areas of highest quality agricultural land in the Plan area, and whether the land has previously been developed. While prioritisation of brownfield land for development helps to make efficient use of land and soils, reliable and comprehensive data on the greenfield/brownfield status of land within the plan area is not always available, meaning that sites cannot be assessed on a consistent basis against this criterion. Potential loss of agricultural land is assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. The classification is based on the long term physical limitations of land for agricultural use; factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals.

Translating site assessment scores into SA objective effects

The site assessment criteria scores will be reorganised under the agreed SA Framework using **Table A1.3** below, i.e. the scores for site assessment criteria with a 'yes' against a particular SA objective will be combined to give an overall score for each site by SA objective.

To sum the site assessment scores by SA objective, the 'colour' scores will be translated into numerical scores as set out below:

- Accessibility criteria scores (desirability of walking distance):

  - Very good = 3

  - Good = 2

  - Poor = 1

  - Very poor = 0

- Environmental criteria scores (risk of likelihood of harm):

  - Low = -1

  - Medium = -2

  - High = -3

Where an individual site could give rise to significant effects in its own right, or in combination with other sites under consideration, these will be identified at an early stage in order to consider possible mitigation and to influence decisions by the Council on which sites to include as preferred sites. Once preferred sites are selected, discussion of the significance of the effects of the Local

Plan Review as a whole will be informed by the above analysis. These findings on significance will be presented in the SA Report, along with a concise justification for the score given where appropriate.

Table A1.3 Relationship between site assessment criteria and SA objectives

Site Assessment Criteria	Relevant to residential sites?	Relevant to employment sites?	SA1 – Housing	SA2–Access to services and facilities	SA3 – Community cohesion	SA4– Equality, health and wellbeing	SA5 – Economy	SA6 – Vibrant town centre	SA7 - Sustainable travel	SA8 – Minerals	SA9 – Soils and land use	SA10 – Water	SA11 – Air quality	SA12– Flood risk	SA13– Climate change mitigation	SA14 – Biodiversity	SA 15 – Historic environment	SA16 – Landscape
Proximity to GP surgeries/ health centres	Yes	Yes	No	**Yes**	**Yes**	**Yes**	No	No	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to primary or middle schools	Yes	No	No	**Yes**	**Yes**	**Yes**	No	No	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to secondary schools	Yes	No	No	**Yes**	**Yes**	**Yes**	No	No	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to local centres	Yes	Yes	No	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to Maidstone town centre	Yes	Yes	No	**Yes**	No	**Yes**	No	**Yes**	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to railway	Yes	Yes	No	**Yes**	No	**Yes**	No	**Yes**	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to bus stops	Yes	Yes	No	**Yes**	No	**Yes**	No	**Yes**	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to cycle paths	Yes	Yes	No	**Yes**	No	**Yes**	No	**Yes**	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to open spaces and sports	Yes	Yes	No	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**	No	No	No	**Yes**	No	**Yes**	No	No	No

Site Assessment Criteria	Relevant to residential sites?	Relevant to employment sites?	SA1 – Housing	SA2–Access to services and facilities	SA3 – Community cohesion	SA4– Equality, health and wellbeing	SA5 – Economy	SA6 – Vibrant town centre	SA7 - Sustainable travel	SA8 – Minerals	SA9 – Soils and land use	SA10 – Water	SA11 – Air quality	SA12– Flood risk	SA13– Climate change mitigation	SA14 – Biodiversity	SA 15 – Historic environment	SA16 – Landscape
centres																		
Proximity to public rights of way (PRoW)	Yes	Yes	No	**Yes**	No	**Yes**	No	**Yes**	**Yes**	No	No	No	No	No	**Yes**	No	No	No
Proximity to centres of employment	Yes	No	No	**Yes**	No	**Yes**	Yes	Yes	Yes	No	No	No	**Yes**	No	**Yes**	No	No	No
Proximity to heritage assets: allocations within existing settlements	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	No	**Yes**	No
Proximity to heritage assets: allocations outside of existing settlements	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	No	**Yes**	No
Proximity to wildlife sites: internationally or nationally designated wildlife sites - allocations within existing settlements	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	No	**Yes**	No	No
Proximity to wildlife sites: internationally or nationally designated site -	No	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	**Yes**	No	No

Site Assessment Criteria	Relevant to residential sites?	Relevant to employment sites?	SA1 – Housing	SA2–Access to services and facilities	SA3 – Community cohesion	SA4– Equality, health and wellbeing	SA5 – Economy	SA6 – Vibrant town centre	SA7 - Sustainable travel	SA8 – Minerals	SA9 – Soils and land use	SA10 – Water	SA11 – Air quality	SA12– Flood risk	SA13– Climate change mitigation	SA14 – Biodiversity	SA 15 – Historic environment	SA16 – Landscape
allocations outside existing settlements																		
Proximity to wildlife sites: locally designated wildlife sites and ancient woodland	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	**Yes**	No	No
Proximity to wildlife sites: Priority Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	**Yes**	No	No
Proximity to designated landscapes	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	**Yes**
Intersection with Source Protection Zones (SPZs)	Yes	Yes	No	No	No	No	No	No	No	No	No	**Yes**	No	No	No	No	No	No
Intersection with flood risk areas	Yes	Yes	**Yes**	No	No	**Yes**	**Yes**	No	No	No	No	No	No	**Yes**	No	No	No	No
Likely contribution to road traffic within areas suffering from	Yes	Yes	No	No	No	**Yes**	No	**Yes**	**Yes**	**Yes**	No	No	**Yes**	No	No	No	No	No

Site Assessment Criteria	Relevant to residential sites?	Relevant to employment sites?	SA1 – Housing	SA2–Access to services and facilities	SA3 – Community cohesion	SA4– Equality, health and wellbeing	SA5 – Economy	SA6 – Vibrant town centre	SA7 - Sustainable travel	SA8 – Minerals	SA9 – Soils and land use	SA10 – Water	SA11 – Air quality	SA12– Flood risk	SA13– Climate change mitigation	SA14 – Biodiversity	SA 15 – Historic environment	SA16 – Landscape
traffic-related air pollution																		
Proximity to sources of air pollution	Yes	Yes	No	No	No	**Yes**	No	No	No	No	No	No	**Yes**	No	No	No	No	No
Proximity to sources of traffic noise	Yes	No	No	No	No	**Yes**	No	No	No	No	No	No	No	No	No	No	No	No
Proximity to waste sites	Yes	Yes	No	No	No	**Yes**	No	No	No	No	No	No	No	No	No	No	No	No
Intersection with mineral resources	Yes	Yes	No	No	No	No	No	No	No	**Yes**	No	No	No	No	No	No	No	No
Intersection with agricultural land	Yes	Yes	No	No	No	No	No	No	No	No	**Yes**	No	No	No	No	No	No	**Yes**