

**Maidstone Borough Council**

**Interim Sustainability  
Appraisal of Maidstone  
Local Plan Review  
Regulation 18b  
Consultation**

**Final report**

Prepared by LUC

November 2020



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# Chapter 1

## Introduction

**Sustainability Appraisal (SA) shows how well a plan performs against environmental, social and economic objectives - this chapter provides an introduction to the SA**

**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 report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. SA iteratively informs the plan-making process by helping to refine them, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

### Context for the Maidstone Local Plan Review

**1.3** The borough of Maidstone covers approximately 40,000 hectares and is situated in the heart of Kent. Maidstone is the County Town of Kent and approximately 75% of its 171,800 population live in the urban area. The Maidstone urban area, located in the north west of the borough, has a strong commercial and retail town centre, with Maidstone comprising one of the largest retail centres in the south east. A substantial rural hinterland surrounds the urban area, part of which enjoys designation due to its high landscape and environmental quality. The borough encompasses a small section of the metropolitan green belt (1.3%), and 27% of the borough forms part of the Kent Downs Area of Outstanding Natural Beauty (AONB).

**1.4** The borough is strategically located between the Channel Tunnel and London with direct connections to both via the M20 and M2 motorways. Three central railway stations in the town connect to London, Ashford, Tonbridge and to the Medway Towns. Maidstone Borough has a close interaction with the Medway Towns that provide a part of the borough's workforce. The town centre acts as the focus for retail

development throughout the borough and has an important role to play in the visitor economy with the tourist information centre located at Maidstone Museum.

**1.5** The rural service centres of Harrietsham and Lenham lie on the Ashford International - Maidstone East - London Victoria line; and Headcorn, Marden and Staplehurst lie on the Ashford International - Tonbridge - London Charing Cross and London Cannon Street lines.

**1.6** The larger village of Yalding lies on the Medway Valley Line, Paddock Wood - Maidstone West - Maidstone Barracks - Strood. The Channel Tunnel link known as High Speed 1 (HS1) runs through the borough, providing fast links into London (a service links to HS1 from Maidstone West station, via Strood to Ebbsfleet). A number of main highway routes cross the borough including the A20, A229, A249, A274 and A26.

**1.7** The borough is relatively prosperous with a considerable employment base and a lower than average unemployment rate compared to Kent. However, the borough has a relatively low wage economy that has led to out-commuting for higher paid work.

**1.8** The local housing market crosses one adjacent borough boundary into Tonbridge and Malling, with relationships identified with the Ashford, Medway, Tunbridge Wells, and London housing markets. All of these markets are influenced by their proximity to London, resulting in relatively high house prices.

**1.9** There are parts of the borough that would benefit from renewal, primarily including Maidstone town centre and there are pockets of deprivation that exist, particularly in the urban area. The rural service centres and larger villages provide services to the rural hinterland and some larger villages also play a vital part in the rural economy. There are a number of significant centres of economic activity in and around the rural settlements, and smaller commercial premises are dotted throughout the borough.

**1.10** Agriculture remains an important industry to the borough including the traditional production of soft fruits and associated haulage and storage facilities.

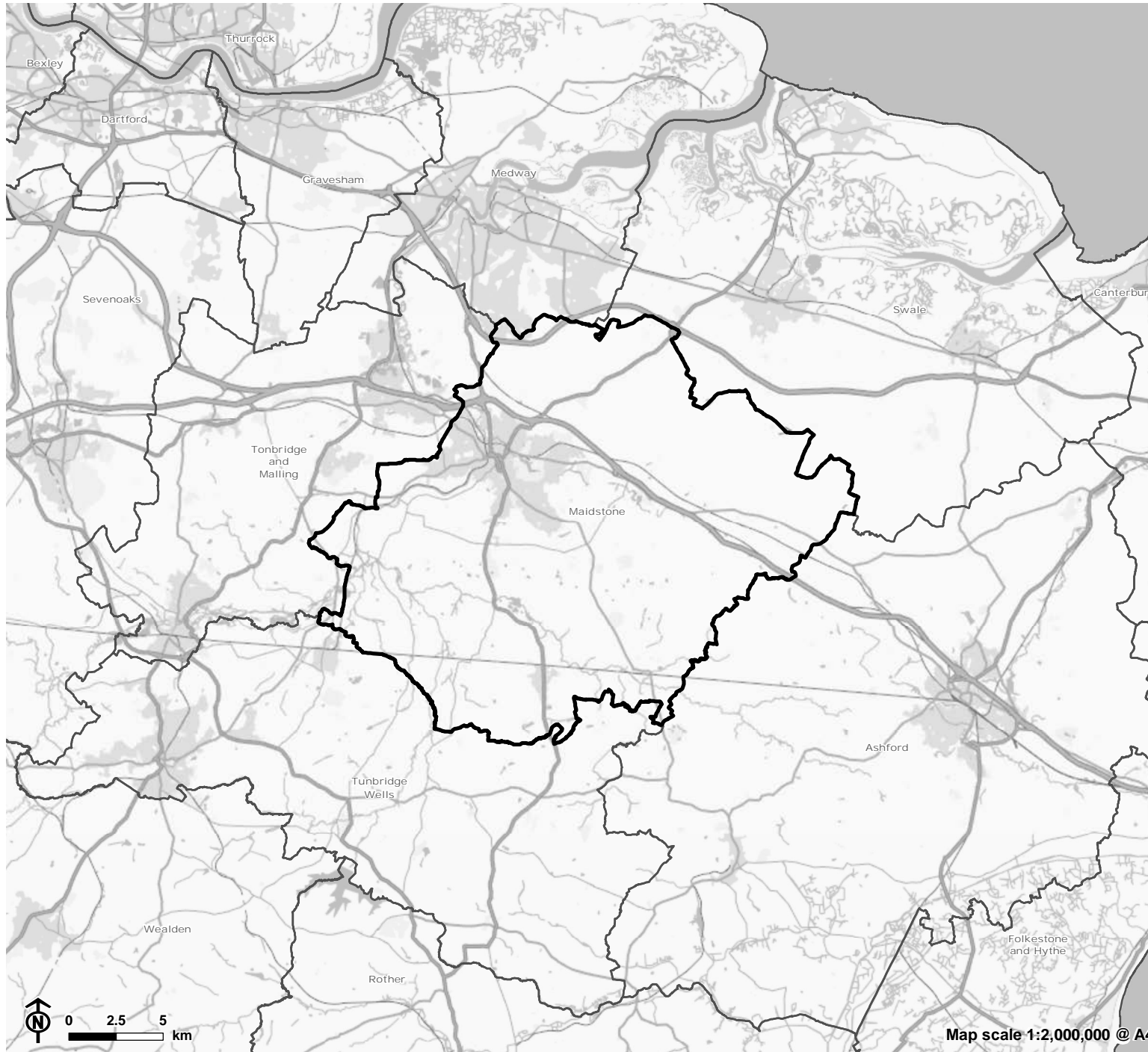
**1.11** The borough is fortunate to benefit from a number of built and natural assets including 41 conservation areas, over 2,000 listed buildings, 26 scheduled ancient monuments and 15 registered parks and gardens important for their special historic interest. Seven percent of the borough is covered by areas of ancient woodland, there are 63 local wildlife sites, 34 verges of nature conservation interest, 11 sites of special scientific interest, three local nature reserves and a European designated special area of conservation. The River Medway flows through the borough and the town centre and, together with its tributaries, is one of the borough's prime assets.

Protection of the borough's distinct urban and rural heritage remains an important issue for the council.

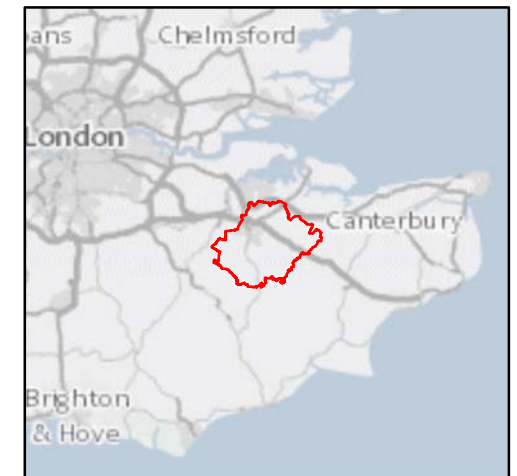
**1.12** The Council is making provision for new housing and employment growth, together with associated infrastructure, whilst at the same time emphasising that growth is constrained by Maidstone's high quality environment, the extent of the floodplain, and the limitations of the existing transport systems and infrastructure. There is also likely to be increased pressure to compete with nearby Ebbsfleet Garden City, the Kent Thames Gateway and Ashford to attract inward investment. The challenge for the Maidstone Borough Local Plan and this LPR is to manage the potential impacts of future growth to ensure that development takes place in a sustainable manner that supports the local economy whilst safeguarding the valuable natural and built assets of the borough.

**1.13** The location and extent of Maidstone Borough, the plan area, is shown in **Figure 1.1**.

**Figure 1.1: Maidstone District & Surrounding Local Authorities**



- Maidstone Borough
- Neighbouring Local Authority Boundary



## The Local Plan Review

**1.14** Maidstone Borough Council adopted its current Local Plan on 25 October 2017, which sets out the planning strategy for the Borough up to 2031.

**1.15** The independent Planning Inspector who examined the adopted Local Plan decided that an early review of the adopted plan would be needed. Policy LPR1 of the adopted Local Plan sets out a requirement to undertake a review of the Local Plan and includes a list of specific matters which an early review of the plan needs to consider. Additionally, the government subsequently introduced a five-year review period for local plans.

**1.16** The Local Plan Review is now being undertaken to ensure that the Local Plan remains up to date and can meet future needs for development. This includes ensuring that it is in line with the latest national planning policy requirements, including by extending the plan period to 2037, and changes in planning law.

**1.17** One of the matters that is now set by the government is the amount of housing need that the Council must plan to provide for in this review. This figure is 1,214 units per annum from 2022, a rise from 883 units per annum planned for in the adopted Local Plan 2017. The housing quantum has been objectively calculated using the Standard Method as set out in the Planning Practice Guidance, with minor adjustment through the Strategic Housing Market Assessment (SHMA).

**1.18** From an employment perspective, the Local Plan Review is being undertaken in quite unprecedented times, with the impacts of an ongoing world-wide pandemic and the United Kingdom's withdrawal from the European Union as yet unknown. For this reason, the approach proposed in the Local plan seeks to maintain the widest and most flexible employment land offer possible as a mechanism to ensure that Maidstone can compete effectively for both investment and reinvestment.

**1.19** The Local Plan Review recognises the important role of Maidstone town centre. Being the County Town of Kent, it is the most sustainable location in the borough. The role of the Town Centre going forward will become increasingly important both locally and sub-regionally as a focus for inward investment and growth and, for this reason, will be the subject of a Development Plan Document prepared alongside the Local Plan Review.

**1.20** The sites that are currently proposed as allocations within this Regulation 18 preferred approaches Local Plan Review document have been taken from analyses including information contained within a Strategic Land Availability Assessment. Matters such as site allocations, boundaries, yields and infrastructure requirements could change following

further evidence gathering, including relevant discussions with developers/landowners, infrastructure and service providers, key stakeholders and statutory undertakers, as appropriate.

**1.21** Key alternatives summarised within the Local Plan Review relate back to the alternatives tested and published in the 02/11/2020 Sustainability Appraisal Options for Spatial Strategy, Site Allocations and Garden Settlements document that is being published alongside this SA Report.

### Local Plan Review timetable

**1.22** The review has 6 main stages to it as set out in **Figure 1.2**. Currently the council is at stage 3.

Figure 1.2: Local Plan Review timetable



**1.23** A proportionate evidence base is being gathered for the preparation of this Local Plan Review.

**1.24** A Local Plan Review Scoping Themes & Issues document was produced and published for a 10 week consultation period between July and September 2019. A particular purpose of the consultation was to gather early feedback on the matters and issues which the LPR may need to tackle.

**1.25** The Local Plan Review is now at stage 3 and will undergo Regulation 18 consultation on the Preferred Approaches plan document. This sets out the preferred approaches to key policy areas and, where appropriate, reasonable alternatives. There is no statutory timeframe for consultation under Regulation 18. The council complies with the requirements set out in its Statement of Community Involvement.

1.26 The remaining stages are described in the 'Next steps' section in .

## Sustainability Appraisal and Strategic Environmental Assessment

1.27 Under the amended Planning and Compulsory Purchase Act 2004<sup>1</sup>, 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 (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations<sup>2</sup>, which remain in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the Local Plan Review to be subject to SA and SEA throughout its preparation.

1.28 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<sup>3</sup>), 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 Borough Council. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.29 The SA process comprises a number of stages.

**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 and the SA Report.

**Stage E:** Monitoring the significant effects of implementing the Local Plan.

## Meeting the requirements of the SEA Regulations

1.30 **Table 1.1** below signposts the relevant sections of the SA Report that are considered to meet the SEA Regulations requirements.

1.31 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 data gaps exist, these are highlighted in the 'Difficulties encountered' section in **Chapter 2**. 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. Relevant baseline information will be updated during the SA process as and when data are published.

## Structure of the SA Report

1.32 This chapter has introduced the SA process for the Maidstone Local Plan Review. The remainder of the report is structured into the following sections:

- **Chapter 2: Methodology** describes the approach taken to the SA of the Local Plan Review.
- **Chapter 3: Sustainability context for development in Maidstone Borough** describes the relationship between the Local Plan Review and other relevant plans, policies and programmes, in addition to the social, economic and environmental characteristics of the Borough through the identification of key sustainability issues.
- **Chapter 4: SA findings for spatial vision and objectives** summarises the SA findings for the spatial vision and objectives and how well they perform in relation to the SA objectives
- **Chapter 5: SA findings for the Borough spatial strategy** summarises the SA findings for the spatial strategy options and how well they perform against one another in relation to the SA objectives.
- **Chapter 6: SA findings for spatial strategic policies and detailed site allocation policies** summarises the SA findings for the reasonable alternative residential and employment site options that have been considered for allocation in the Local Plan Review.

<sup>1</sup> The Planning and Compulsory Purchase Act 2004 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018.

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental

Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).

<sup>3</sup> Ministry of Housing, Communities and Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>



- **Chapter 7: SA findings for thematic strategic policies and non-strategic policies** summarises the SA findings for the policies in the Local Plan Review.
- **Chapter 8: Cumulative effects** considers the cumulative effects of the Local Plan Review as a whole, and with other plans and programmes.
- **Chapter 9: Other reporting requirements** outlines the findings of the separate Habitats Regulations Assessment (HRA) of the Local Plan Review, outlines the Council's reasons for choosing the plan, and describes the approach that should be taken to monitoring the likely significant effects of the Local Plan Review and proposes monitoring indicators.
- **Chapter 10: Next steps** describes the next steps to be undertaken.

**1.33** The main body of the report is supported by a number of appendices as follows:

- **Appendix A** presents the consultation comments received in relation to the January 2019 SA Scoping Report and the responses to these.
- **Appendix B** presents the review of relevant plans, policies and programmes, in addition to the updated baseline information for the Borough.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations' Requirements	Where covered in this SA Report
Environmental Report	
<p>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:</p> <ul style="list-style-type: none"> <li>■ implementing the plan or programme; and</li> <li>■ reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.</li> </ul> <p>(Regulation 12(1) and (2) and Schedule 2).</p>	<p>This SA Report and the accompanying SA of Options Report<sup>4</sup> constitute the 'environmental report' produced to accompany consultation on the Regulation 18 Preferred Approaches Local Plan Review document.</p>
<p>An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>	<p><b>Chapter 3 and Appendix B</b></p>
<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	
<p>The environmental characteristics of areas likely to be significantly affected.</p>	
<p>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.</p>	
<p>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.</p>	
<p>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:</p> <ol style="list-style-type: none"> <li>a. biodiversity;</li> <li>b. population;</li> <li>c. human health;</li> <li>d. fauna;</li> <li>e. flora;</li> <li>f. soil;</li> <li>g. water;</li> <li>h. air;</li> <li>i. climatic factors;</li> <li>j. material assets;</li> <li>k. cultural heritage, including architectural and archaeological heritage;</li> <li>l. landscape; and</li> </ol>	<p><b>Chapter 4 to Chapter 8</b> and the accompanying SA of Options Report<sup>5</sup>.</p>

<sup>4</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

<sup>5</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

SEA Regulations' Requirements	Where covered in this SA Report
m. the interrelationship between the issues referred to in sub-paragraphs (a) to (l).	
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.	<b>Chapter 4 to Chapter 8.</b>
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.	<b>Chapter 2, Chapter 9, and the accompanying SA of Options Report<sup>6</sup>.</b>
A description of the measures envisaged concerning monitoring in accordance with regulation 17.	<b>Chapter 8.</b>
A non-technical summary of the information provided under paragraphs 1 to 9.	Requirement will be met at the next (Reg 19) stage.
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> <li>■ current knowledge and methods of assessment;</li> <li>■ the contents and level of detail in the plan or programme;</li> <li>■ the stage of the plan or programme in the decision-making process; and</li> <li>■ the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</li> </ul> <p>(Regulation 12 (3))</p>	Addressed throughout this SA Report.
<b>Consultation</b>	
<p>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.</p> <p>(Regulation 12(5))</p>	Consultation on the SA Scoping Report was undertaken between July and September 2020.
<p>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.</p> <p>As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>■ send a copy of those documents to each consultation body;</li> <li>■ 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");</li> <li>■ 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.</li> </ul> <p>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.</p> <p>(Regulation 13 (1), (2), and (3))</p>	Consultation is being undertaken in relation to the Local Plan Review in December 2020. The consultation document is accompanied by the 'environmental report'.

<sup>6</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

SEA Regulations' Requirements	Where covered in this SA Report
<p>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 reasonably practicable after forming that opinion:</p> <ul style="list-style-type: none"> <li>■ notify the Secretary of State of its opinion and of the reasons for it; and</li> <li>■ supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</li> </ul> <p>(Regulation 14 (1))</p>	<p>Unlikely to be relevant to the Local Plan Review, as there will be no effects beyond the UK.</p>
<p>Taking the environmental report and results of the consultation into account in decision-making (relevant extracts of Regulation 16)</p>	
<p>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:</p> <ul style="list-style-type: none"> <li>■ 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.</li> </ul> <p>(Regulation 16(1))</p>	<p>To be addressed after the Local Plan Review is adopted.</p>
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <ul style="list-style-type: none"> <li>■ 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 State,</li> <li>■ that the plan or programme has been adopted, and a statement containing the following particulars:</li> <li>■ how environmental considerations have been integrated into the plan or programme;</li> <li>■ how the environmental report has been taken into account;</li> <li>■ 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;</li> <li>■ how the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>■ the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>■ the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</li> </ul>	<p>To be addressed after the Local Plan Review is adopted.</p>
<p>Monitoring</p>	
<p>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.</p> <p>(Regulation 17(1))</p>	<p>To be addressed after the Local Plan Review is adopted.</p>

## Chapter 2

### Methodology

**SA should be carried out objectively and consistently and inform plan preparation from the start - this chapter explains how this has been achieved for the SA for the Maidstone Local Plan Review**

**2.1** In addition to complying with legal requirements, the approach taken to the SA of the Maidstone Local Plan Review is based on current best practice and the guidance on SA/SEA set out in the national Planning Practice Guidance. This involves carrying out SA as an integral part of the plan-making process.

**2.2 Figure 2.1** sets out the main stages of the plan-making process and shows how these correspond to the SA process. This is followed by a description of the approach that has been taken to the SA of the Maidstone Local Plan Review and provides information on the subsequent stages of the process.

Figure 2.1: Corresponding stages in plan-making and SA



## Stage A: Scoping

**2.3** The SA process began with the production of an SA Scoping Report for the Local Plan Review. The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the Plan area as well as the sustainability policy context and key sustainability issues.

**2.4** The Scoping Report prepared by LUC in January 2019 presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Local Plan Review were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
- Baseline information was collected on environmental, social and economic issues in Maidstone Borough. This baseline information provides the basis for predicting and monitoring the likely effects of options for policies and site allocations and helps to identify alternative ways of dealing with any adverse effects.
- Key sustainability issues for Maidstone Borough were identified and their likely evolution without the implementation of the Local Plan Review were considered.
- A sustainability appraisal framework was presented, setting out the SA objectives against which options and subsequently policies would be appraised. Further information on this 'SA framework' is provided in the 'Appraisal methodology' section below.

**2.5** Public and stakeholder participation is an important part of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping Report for the Local Plan Review was published for consultation between February and March 2019 with the three statutory consultees (Historic England, Natural England and the Environment Agency), a number of other stakeholders identified by the Council and members of the public.

**2.6** Appendix A lists the comments that were received during the consultation on the SA Scoping Report and describes how each one has been addressed during the preparation of this SA Report. In light of the comments received, a number of amendments were made to the review of plans, policies and programmes, the baseline information, the supporting questions in the AS framework, and the proposed monitoring indicators. The updated and amended versions of these are presented in this document.

**2.7** The review of plans, policies and programmes and the baseline information are summarised in **Chapter 3**. The full, updated review of plans, policies and programmes and the baseline information are included in **Appendix B**.

**2.8** Table 2.2 presents the SA Framework for the Maidstone Local Plan Review, which includes 16 SA objectives. The table also shows the amended appraisal questions and which SEA topics are relevant to each SA objective.

## Stage B: Developing and refining options and assessing effects

**2.9** Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA help to identify where there may be 'reasonable alternatives' to the options being considered for a plan.

**2.10** Regulation 12 (2) of the SEA Regulations requires that:

*"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*

- (a) *implementing the plan or programme; and*
- (b) *reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."*

**2.11** Any alternatives considered for the plan need to be 'reasonable'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.

**2.12** The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for the plan.

**2.13** This section provides an overview of how the appraisal of options has been undertaken and how this will feed into the development of the Maidstone Local Plan Review.

### Identification and appraisal of options

**2.14** The consideration of reasonable alternatives has been a focus throughout the SA process.

**2.15** The iterative process followed to identify reasonable alternatives is detailed in the accompanying SA of Options

Report<sup>7</sup> and summarised in the 'Reasons for choosing the plan' section of **Chapter 9** of this SA report. Reasonable alternatives were identified and appraised in relation to the spatial strategy, garden settlement allocations, and other site allocations. The results of the appraisal are also set out in the SA of Options report.

**2.16** In addition, alternative policy approaches were identified by the Council for some of the thematic policy areas set out in the Local Plan Review. Where these were judged to be reasonable alternatives, they are appraised in this SA report alongside the preferred policy approaches.

### Stage C: Preparing the Sustainability Appraisal Report

**2.17** The 'environmental report' at the Reg 18 Preferred Approaches stage comprises this SA Report and the accompanying SA of Options Report<sup>8</sup>. Together, these documents describes the process that has been undertaken to date in carrying out the SA of the Maidstone Local Plan Review. They contain appraisals of reasonable alternatives, as noted under 'Stage B' above, as well appraisals of the preferred policies in the Local Plan Review.

**2.18** The focus of the appraisal has been the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

**2.19** The 'environmental report' is intended to meet all the reporting requirements of the SEA Regulations, as already set out in **Table 1.1**.

### Stage D: Consultation on the Local Plan Review and this SA Report

**2.20** Maidstone Borough Council is inviting comments on the Local Plan Review (Reg 18 Preferred Approaches) and the 'environmental report'. These documents are being published on the Council's website for consultation from 1 December to 22 December 2020.

**2.21 Appendix A** presents the consultation comments received on the 2019 SA Scoping Report. An explanation is given on how the consultation comments have been addressed during the course of the SA.

### Stage E: Monitoring and implementation of the Local Plan Review

**2.22 Chapter 9** sets out suggested monitoring measures for potential negative effects that could arise as a result of the Local Plan Review.

### Appraisal methodology

#### SA framework

**2.23** The development of a set of sustainability objectives (known as the 'SA framework, as set out in **Table 2.2**) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared. These SA objectives define the long-term aspirations of the borough with regard to social, economic and environmental issues that the plan could affect. The objectives were originally defined from the analysis of relevant international, national and local policy objectives, baseline information, and key sustainability issues facing the plan area during the scoping stage of the SA.

**2.24** During the SA, the performance of the plan policies and site allocations are appraised in terms of their likely effects on the baseline, in relation to achievement of each of these SA objectives. Each SA objective is supported by a set of appraisal questions that are intended to help guide judgements on whether a particular element of the plan is likely to help the achievement of the objective in question. The appraisal questions are included for guidance only and are not intended to be definitive or exhaustive.

**2.25** The relationship between the SA objectives and the 'SEA topics', which are the specific topics that SEA is required to cover in line with per Schedule 2 of the SEA Regulations, is shown in the final column of **Table 2.2**. It can be seen that a number of the SA Objectives cut across SEA Topics, showing how interrelated many of these are.

#### Site assessment criteria and assumptions

**2.26** SA inevitably relies on an element of subjective judgement. However, in order to provide additional consistency and transparency in the appraisal of the site options, a clear set of decision-making criteria and assumptions for determining significance of the effects were developed for each of the SA Objectives in the SA Framework. These assumptions set out clear parameters within which certain SA scores would be given, based on factors such as the distance of site options from sensitive

<sup>7</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

<sup>8</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements



environmental features such as designated biodiversity sites or from key services and facilities such as service centres and public transport links. The criteria, many of which were applied through the analysis of spatial data using a Geographical Information System (GIS), are presented in the SA of Options Report<sup>9</sup>. The performance of the sites against the site assessment criteria provided the site options appraisals set out in that report. This quantitative approach also formed the starting point for the more qualitative appraisals of the preferred site allocation policies set out in this SA report.

### Significance scoring

**2.27** The dividing line between sustainability scores is often quite small. Significant effects have been distinguished from more minor effects using:

- the SA framework appraisal questions;
- the site assessment criteria; and
- professional judgement, where necessary.

**2.28** The effect of an option on an SA Objective was considered to be significant where it was of such magnitude that it would have a noticeable and measurable effect compared with other factors that may influence the achievement of that SA Objective.

**2.29** The detailed site appraisals identify the performance of the sites against a large number of individual criteria, of which there can be up to six for a single SA objective. However, in order to synthesise the scores against detailed appraisal criteria into single 'significance' scores for each SA objective, an additional step was introduced across all site option appraisals. The approach is set out in the final column of the site appraisal criteria table in Appendix A of the SA of Options Report<sup>10</sup> for residential and then for employment sites.

**2.30** For each SA objective, one of two approaches were generally adopted. The first approach was to assign numerical scores for each criterion as follows:

- A major positive effect was given +3
- A minor positive effect was given +1
- A negligible effect was given 0
- A minor negative effect was given -1
- A major negative effect was given -3

**2.31** The scores for the individual criteria were then totalled and averaged. A significance score was then assigned based on this average as follows:

- If the average score was  $\geq +2$  a significant positive effect was identified (++)
- If the average score was  $>0$  to  $<2$  a minor positive effect was identified (+)
- If the average score was 0 a negligible effect was identified (0)
- If the average score was  $<0$  to  $>-2$  a minor negative effect was identified (-)
- If the average score was  $\leq -2$  a significant negative effect was identified (--)

**2.32** The second approach for some SA objectives, primarily ones relating to the environment, was to consider each criterion individually, and to define significance scores based on the relevant weight that was appropriate to each criterion, as this was considered to be more robust than averaging scores.

**2.33** In this way, a single significance score was developed for each SA Objective for each residential or employment site, which allowed for consistent, objective and easier comparison of performance of different sites and also made it easier to take account of the GIS-based appraisal findings for site options when carrying out the more qualitative appraisal of corresponding site allocation policies.

### Key to SA scoring symbols

**2.34** The findings of the SA are presented as colour coded symbols showing a score for each policy or site option in relation to each SA objectives, accompanied by a concise justification for the score given, where appropriate.

**2.35** The colour coding is shown in **Table 2.1** below.

Table 2.1: Key to SA scoring symbols

++	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

<sup>9</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

<sup>10</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

0	Negligible effect likely
?	Likely effect uncertain
N/A	Not applicable or relevant

## Difficulties encountered

**2.36** It is a requirement of the SEA Regulations that when describing how the assessment was undertaken, this includes any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. Such difficulties are described here.

**2.37** The high-level nature of the spatial strategy options appraised by the SA meant that at times it was difficult to come to firm conclusions on the likely effects of the options in relation to each SA Objective.

**2.38** There was a need to ensure that a large number of site options could be appraised consistently. This was achieved by the use of site appraisal criteria and assumptions relating to each SA Objective, as described above.

**2.39** The site appraisal criteria and assumptions are presented in Appendix A of the SA of Options Report<sup>11</sup> and include a range of distance thresholds. These are based on the suggested acceptable walking distances presented in relevant guidance<sup>12</sup>. However, some distance thresholds were refined using professional judgment to reflect the fact that people are likely to be willing to walk longer distances to access higher order services (for example a secondary school rather than a primary school). It cannot be known which route people will take and this is likely to vary depending on the starting point of each individual's journey, especially where development site options are large. Therefore, for consistency and to avoid spurious accuracy, these distance thresholds were applied using straight line measurements from the boundary of a site option to the infrastructure/facility in question. GIS-based scores generated by application of the distance thresholds were moderated to take into account any significant barriers to movement such as railway lines, rivers/canals or dual carriageways.

**2.40** When considering accessibility of sites to social infrastructure such as GP surgeries or schools in relation to SA objective 2: Services & Facilities, it was not known whether individual facilities have the capacity to accept new residents. Additionally, when considering proximity of sites to schools, only state schools were considered. This is because these schools are open to all and it is expected the majority of

school age residents will attend state schools. Also, local catchments may not apply to independent schools, for which pupils will often travel further.

**2.41** When considering proximity to public rights of way or cycle paths in relation to SA objective 4: Health and SA objective 7: Sustainable Travel, no data were available for the local cycle path network therefore analysis only considered the national cycle network.

**2.42** When considering potential loss of the best and most versatile agricultural land in relation to SA objective 9: Soils, data to subdivide the agricultural land into grades 3a and 3b were not available, therefore these grades were considered together.

**2.43** When considering the potential for the Local Plan Review to affect air quality (SA objective 11) no modelling of the likely effects on air quality of traffic growth expected as a result of the development provided by the plan was available. Appraisal was therefore qualitative and subject to significant uncertainty.

**2.44** When considering the likely effect of the Local Plan Review in relation to SA objective 14: Biodiversity, it was considered disproportionate to consider the designated features of individual, locally designated biodiversity sites that may be affected. Instead, professional judgement<sup>13</sup> was used to define precautionary distance thresholds within which development may have an adverse affect. Potential effects on SSSIs and European sites were able to draw on the IRZs defined by Natural England for this purpose. Also in relation to SA objective 14, no digital data were available to confirm the location of any Regional Important/Local Geological Sites so these were excluded from the appraisal.

**2.45** In relation to SA objective 15: Historic environment, no heritage impact assessment was available to provide evidence on the likely effects of different spatial distributions of growth or the sensitivity to development of different parts of the Borough. Instead, it was necessary to use distance of development sites from historic assets as a basis for screening for the potential for adverse effects on heritage assets. Distances used were based on professional judgement with longer screening distances are used for sites options outside of existing settlements to reflect typically longer sightlines in rural rather than urban areas. As such, the findings were subject to a high degree of uncertainty. It is understood that the Council is currently commissioning a heritage impact assessment and that this will be available to inform the SA and plan-making at the next stage.

<sup>11</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

<sup>12</sup> The Institution of Highways and Transportation (2000) Guidelines for Providing for Journeys on Foot

<sup>13</sup> LUC is a market-leader in SA/SEA and HRA and has been involved in well over 100 SAs/SEAs of local plans, with no legal challenges to date. Our Planning and Ecology teams have carried out over 40 HRAs of numerous plans, many of them in conjunction with our SA/SEA work.

**2.46** In relation to SA objective 16: Landscape, likely effects of development were determined by reference to the Council's 2015 landscape capacity study. However a small number of landscape character areas were scoped out of this study and for development in these locations, reliance had to be placed on the earlier 2013 study.

**2.47** In a small number of cases, GIS-based scores shown for sites in the SA of Options Report<sup>14</sup> do not match those cited in appraisals of related preferred site allocation in this SA report. This was because of changes in site boundaries or corrections to the spatial analysis model in the few weeks between the appraisal of site options and that of the preferred sites. The correct and up to date position is reflected in the appraisals of preferred site allocation policies in this SA report.

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<sup>14</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

Table 2.2: SA framework for the Maidstone Local Plan Review

SA objective	Appraisal questions: Dows/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.	<p>Provide for local housing need?</p> <p>Deliver the range of types, tenures and affordable homes the borough needs over the Plan Period?</p> <p>Provide for the housing needs of an ageing population?</p> <p>Provide attractive places to live via multifunctional green infrastructure?</p>	Population, Human Health and Material Assets
SA 2: To ensure ready access to essential services and facilities for all residents.	<p>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, accessible green space / multifunctional green infrastructure, services in local centres)?</p> <p>Provide housing within proximity to existing services and facilities that are accessible for all, if not to be provided on site?</p>	Population, Human Health and Material Assets
SA 3: To strengthen community cohesion.	<p>Facilitate the integration of new neighbourhoods with existing neighbourhoods?</p> <p>Promote developments that benefit and are used by existing and new residents in the borough, particularly for the borough's most deprived areas?</p> <p>Help to support high levels of pedestrian activity/ outdoor interaction, where people mix?</p> <p>Help to reduce levels of crime, anti-social behaviour and the fear of crime?</p> <p>Increase the number of community facilities that can be used for community gatherings e.g. cultural activities, trainings etc.?</p>	Population and Human Health
SA 4: To improve the population's health and wellbeing and reduce health inequalities.	<p>Promote health and wellbeing by maintaining, connecting, enhancing and creating multifunctional open spaces, green infrastructure, and recreation and sports facilities and improving people's access to nature?</p> <p>Protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with air and noise pollution, vibration and odour?</p> <p>Promote healthy lifestyles by encouraging and facilitating walking and cycling?</p> <p>Safeguard human health and well-being by promoting climate change resilience through sustainable siting, design, landscaping and infrastructure?</p> <p>Allocate additional sites for open space in relation to population growth?</p>	Population, Human Health and Climatic Factors

SA objective	Appraisal questions: Dows/Will the Local Plan Review...	Relevant SEA topics
	Create vibrant, multifunctional countryside in and around towns?	
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? 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?	Population, Human Health and Material Assets
SA 6: To support vibrant and viable Maidstone town centre.	Maintain and enhance the economic vitality and vibrancy of Maidstone town centre? 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? Provide green infrastructure to provide multiple benefits for health and wellbeing, climate change adaptation, recreation and public amenity (e.g. shade and air quality)?	Population, Human Health and Material Assets
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? 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?	Air, Climatic Factors, Population and Human Health
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? Take an appropriate approach to remediating contaminated land? Minimise development on the borough's best and most versatile agricultural land?	Soil and Human Health

SA objective	Appraisal questions: Dows/Will the Local Plan Review...	Relevant SEA topics
	Encourage integrated, compact communities?	
SA 10: To maintain and improve the quality of the borough's waters and achieve sustainable water resources management.	<p>Minimise inappropriate development in Source Protection Zones?</p> <p>Ensure there is sufficient waste water treatment capacity to accommodate the new development?</p> <p>Avoid water pollution due to contaminated runoff from development?</p> <p>Support efficient use of water in new development?</p>	Water
SA 11: To reduce air pollution ensuring lasting improvements in air quality.	<p>Minimise increases in traffic in Air Quality Management Areas?</p> <p>Contain measures which will help to reduce congestion?</p> <p>Facilitate the take up of low / zero emission vehicles?</p> <p>Enable a choice of more sustainable modes?</p>	Air and Human Health
SA 12: To avoid and mitigate flood risk.	<p>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?</p> <p>Minimise flood risk and promote the use of SuDS, flood resilient design and natural flood management measures?</p>	Water, Material Assets, Climatic Factors and Human Health
SA 13: To minimise the borough's contribution to climate change.	<p>Promote energy efficient design?</p> <p>Encourage the provision of renewable energy infrastructure where possible?</p> <p>Minimise greenhouse gas emissions from transport?</p>	Climatic Factors
SA 14: To conserve, connect and enhance the borough's wildlife, habitats and species.	<p>Help to deliver biodiversity net gain?</p> <p>Conserve and enhance designated and undesignated ecological assets, taking into account the impacts of climate change?</p> <p>Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?"</p> <p>Help to conserve, connect and enhance ecological networks, taking into account the impacts of climate change?</p> <p>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?</p>	Biodiversity, Flora and Fauna and Human Health

SA objective	Appraisal questions: Dows/Will the Local Plan Review...	Relevant SEA topics
	Ensure that the biodiversity value of brownfield sites is identified, protected and enhanced?	
SA 15: To conserve and/or enhance the borough's historic environment.	<p>Conserve and enhance the borough's designated and non-designated heritage assets, including their setting and the wider historic environment?</p> <p>Outline opportunities for improvements to the conservation, management and enhancement of the borough's heritage assets, particularly heritage at risk?</p> <p>Promote access to, as well as enjoyment and understanding of, the local historic environment for the borough's residents and visitors?</p>	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.	<p>Protect the borough's sensitive and special landscapes, including the Kent Downs AONB?</p> <p>Safeguard the character and distinctiveness of the borough's settlements?</p>	Landscape and Cultural Heritage

## Chapter 3

# Sustainability context for development in Maidstone Borough

This chapter summarises the policy context for the preparation of the Local Plan Review and the key sustainability issues facing Maidstone Borough

### Review of plans, policies and programmes

**3.1** The Local Plan Review is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It must be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and the historic environment. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and local level.

**3.2** During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the Local Plan Review. The key points are summarised below and the full, updated review can be found in **Appendix B**.

**3.3** Schedule 2 of the SEA Regulations requires the SA to provide:

(1) *“An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.”*

...and...

(5) 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.



**3.4** It is therefore necessary to identify the relationships between the Local Plan Review and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.

#### Key international plans, policies and programmes

**3.5** 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 plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

**3.6** There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy.

**3.7** The UK left the EU in January 2020, although it is still subject to most EU legislation until the end of the transition period. Following the end of the transition period, most EU law will continue to apply as a result of provisions in the European Union (Withdrawal) Act 2018 (EUWA) and the 'EU Exit' amendments to domestic legislation.

#### Key national plans, policies and programmes

**3.8** Arguably, the most significant national policy context for the Local Plan Review is the National Planning Policy Framework (NPPF), which was first published in 2012. The Local Plan Review must be consistent with the requirements of the NPPF, which was updated and revised in July 2018, with further amendments in 2019. The NPPF sets out information about the purposes of local plan-making, stating that:

*“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

**3.9** 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 sufficient provision for:

- 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, green infrastructure, and planning measures to address climate change mitigation and adaptation.

**3.10** In addition, Local 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.

#### Neighbouring Local Plans

**3.11** Throughout the preparation of the Local Plan Review and the SA process, consideration will be given to the local plans being prepared by the authorities around Maidstone Borough. The development proposed in those authorities could give rise to in-combination effects with the effects of the Local Plan Review, and the effects of the various plans may travel across local authority boundaries. There are five authorities that border Maidstone Borough:

- Swale Borough Council
- Ashford Borough Council
- Tunbridge Wells Borough Council

- Sevenoaks District Council
- Medway Council

**3.12** In addition, Kent County Council has responsibility for water and minerals planning in the area, as well as preparing Local Transport Plans. Medway Council is responsible for its own waste and minerals planning.

### Neighbourhood Plans

**3.13** Neighbourhood Plans are prepared at the local level by a parish council, town council or neighbourhood forum. Once adopted, they form part of the formal Development Plan of the area in which they are located.

**3.14** At the time of writing, there were four 'made' (adopted) Neighbourhood Plans within Maidstone Borough. They are as follows:

- North Loose Neighbourhood Plan 2015 – 2031
- Loose Neighbourhood Plan 2018 – 2031
- Marden Neighbourhood Plan 2017 – 2031
- Staplehurst Neighbourhood Plan 2016 – 2031

**3.15** In addition, an independent examiner considered that the Lenham Neighbourhood Plan should be moved to referendum. The referendum is planned for May 2021.

### Baseline information

**3.16** Schedule 2 of the SEA Regulations requires the 'environmental report' to include a description of:

(3) "*The environmental characteristics of areas likely to be significantly affected.*"

**3.17** Given that SA embraces social and economic matters, as well as the environment, the scope of information to be collected is wide ranging. This 'baseline information' provides the context for assessing the sustainability of proposals in the Maidstone Local Plan Review and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.

**3.18** The SEA Regulations lists specific topics (the SEA Topics) that need to be considered. These are biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

**3.19** As an integrated SA and SEA is being carried out, baseline information relating to other sustainability topics has also been included; for example, information about housing, education, transport, energy, waste and economic growth. This information was originally presented in the January 2019 SA Scoping Report and an updated version has been included in **Appendix B**.

**3.20** To set out the context for the SA, a portrait of the borough is provided in the box below.

## A portrait of the borough of Maidstone

The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area. Maidstone Borough occupies a central location within the County of Kent. The River Medway flows through the western part of the borough including through Maidstone itself. Maidstone's population in mid-2018 was estimated as 169,980 persons compared to 167,730 in 2017, an estimated rise of 1.3%. The two largest age groups in 2018 were 45-49 and 50-54 and they made up 14% of the total population.

Wholesale and retail trade (including the repair of motor vehicles) makes up the largest industry in the borough with 16.4% of the working population employed in this industry. The next largest industries are human health and social work activities 15.1% and administrative and support service activities with 12.3%. 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%.

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.

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.

The Borough is rich in environmental assets, including the Kent Downs Area of Outstanding Natural Beauty (AONB) which forms the eastern end of an arc of designated landscape stretching from the East Hampshire and Surrey Hills AONBs. The Borough is also known for its historic interest, with 41 Conservation Areas, 26 Scheduled Monuments, 2,023 Listed Buildings and 5 Registered Parks and Gardens as well as important historic landscapes.

Similarly, there is considerable wildlife interest, including the internationally import North Downs Woodlands Special Area of Conservation (SAC) and nine Sites of Special Scientific Interest (SSSI). The Borough also contains a large number of locally designated wildlife sites, including four Local Nature Reserves (LNR) and 59 Local Wildlife Sites (LWS) and four Biodiversity Opportunity Areas.

Water resources are under stress and there is a risk of harm to water quality from demands from development placed on waste water treatment plants. Both of these issues could get worse as a result of climate change. 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.

## Key sustainability issues

3.21 Schedule 2 of the SEA Regulations requires the 'environmental report' to describe:

(2) *"The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.*

...and...

(4) *Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive."*

3.22 Given the wider scope of SA, the 'current state of the environment' and the 'environmental problems' are broadened out to include social and economic issues and are described as 'sustainability issues' in this SA Report.

3.23 A set of key sustainability issues for Maidstone Borough was identified during the Scoping stage of the SA and was

presented in the SA Scoping Report. **Table 3.1** describes the likely evolution of each key sustainability issue if the Local Plan Review were not to be adopted.

**3.24** The information in **Table 3.1** shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Maidstone Borough would be more likely to continue without the implementation of the Local Plan Review. In addition, it is likely that policy changes and updates to housing need calculations will mean that the housing provision in the current local plan no longer reflect local housing needs. This could result in development outside of the current local plans for the borough and/or a lack of suitable and sustainable development. In most cases, the emerging Local Plan Review offers opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan that reflects the requirements of the NPPF.

### Brexit

**3.25** The UK left the European Union on 31 January 2020. A transition period is now in place until 31 December 2020. During this period, the UK complies with all EU rules and laws, and virtually nothing has changed for businesses or for the public.

**3.26** However, when the transition period has ended, the relationship with the UK and the EU will depend upon any agreement that has been reached between the two parties. At this point in time, no such agreement has been reached.

**3.27** The full social, environmental and economic impacts of Brexit (whether positive, negative or negligible), will therefore not be known until the end of the transition period and, even then, they may take many years to materialise. Therefore, the impacts of Brexit have not been factored into this SA.

### COVID-19

**3.28** On 11 March 2020, the World Health Organisation announced that they had declared the coronavirus known as COVID-19 as a global pandemic.

**3.29** The global pandemic has caused immense global disruption and suffering. The UK has been one of the worst affected countries, both in terms of people's health and well-being, and economically.

**3.30** The effects of the pandemic in the medium to long-term, and particularly over the full extent of the Local Plan Review period, are unknown. Much depends upon the evolution of the virus, and society's ability to discover effective vaccines or treatments.

**3.31** In the short-term, the impacts have been profound and possibly unprecedented for at least a century. Apart from the impacts on death rates and people's health (particularly older

members of the community, those with pre-existing conditions, and certain sectors of the population), the indirect impacts on sectors of the economy have been massive.

**3.32** From a planning perspective, the pandemic has brought to light the importance of healthy living environments, access to nature and outdoor space, the ability to exercise, and the impact of noise and pollution. There has been a significant impact on city and town centres (including 'the high street'), as people have switched to online shopping and restrictions have been placed on restaurants, bars and other social activities. Many more people are now working from home, and much fewer people are using public transport.

**3.33** Whether these trends continue, or whether they have simply speeded up trends that were already happening, is difficult to predict. However, it has provided planners with renewed food for thought and increased emphasis on the role of town centres and the high street, the use of the car and alternative modes of transport, the need to provide for both informal and formal recreation, and the design of healthy places in which to live and work.

**Table 3.1: Key sustainability issues for Maidstone Borough and likely evolution without the Local Plan Review**

Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
Population, health and wellbeing	
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.
Levels of obesity in the borough are just below 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.
There has been a general increase in all reported crimes both within Maidstone and Kent between 2017/18 and 2018/19 (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

Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
	reduce crime by incorporating good design principles that should address the functioning of an area.
<b>Economy</b>	
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.
<b>Transport connections and travel habits</b>	
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 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.
<b>Air, land and water quality</b>	
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 <sub>2</sub> and PM <sub>10</sub> , 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

Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
	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 other benefits of the best and most versatile agricultural land.' <sup>15</sup>
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.' <sup>16</sup>
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 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.

<sup>15</sup> MHCLG (2018), National Planning Policy Framework pg. 49 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

<sup>16</sup> MHCLG (2018), National Planning Policy Framework pg. 35 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
<b>Climate change adaptation and mitigation</b>	
<p>Extreme weather events (e.g. intense rainfall, prolonged high temperatures) are likely to become more common and more intense. (SA Framework objective SA 13).</p>	<p>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.</p>
<p>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).</p>	<p>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.</p>
<p>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).</p>	<p>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.</p>
<b>Biodiversity</b>	
<p>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)</p>	<p>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.</p>
<b>Historic environment</b>	
<p>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).</p>	<p>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.</p>
<b>Landscape</b>	



Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
<p>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).</p>	<p>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.</p>

## Chapter 4

# SA findings for spatial vision and objectives

This section presents the appraisal of the spatial vision and objectives for the Local Plan Review

### Spatial vision and objectives

4.1 The spatial vision is as follows:

*By 2037: Embracing growth which provides improved infrastructure, economic opportunity, services, spaces, and homes for our communities, while protecting our heritage, natural and cultural assets, and addressing the challenges of climate change.*

4.2 The spatial vision is supported by eleven spatial objectives:

1. To provide for a balance of new homes and related retail and employment opportunities in the borough across the Local Plan Review across the plan period and across the borough;
2. Maintenance of the distinct character and identify of villages and the urban area;
3. Protection of the built and natural heritage, including the Kent Downs AONB and its setting, the setting of the High Weald AONB and areas of local landscape value;
4. Provision of strategic and local infrastructure to support new development and growth including a sustainable Integrated Transport Strategy, adequate water supply, sustainable waste management, energy infrastructure, and social infrastructure such as health, schools and other educational facilities;
5. Improve the quality of air within the Air Quality Management Area (AQMA);
6. Renewal of Maidstone Urban Area with particular focus on Maidstone Town Centre and areas of social and environmental deprivation;
7. Redressing the low wage economy by expanding the employment skills base to target employment opportunities;

8. Meeting housing needs by delivering affordable housing, local needs housing, accommodation for the elderly, accommodation to meet Gypsy and Traveller needs, and accommodation to meet rural housing needs;
9. Protection and promotion of the multi-functional nature of the borough's open spaces, rivers and other watercourses;
10. Ensuring that all new development is built to a high standard of sustainable design and construction;
11. Ensuring that applications for development adequately seek to reduce impacts on and mitigate against climate change, the issues of flooding and water supply, and the need for dependable infrastructure for the removal of sewage and waste water.

**4.3 Table 4.1** below summarises the sustainability effects for the above spatial vision and objectives in relation to the SA objectives, and the findings are described below the table.

Table 4.1: SA findings for Spatial Vision and Objectives

	Vision	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11
SA1: Housing	+?	+	+	0	0	0	+	0	++	0	0	0
SA2: Services & Facilities	+?	+	+	0	+	0	++	0	+	0	0	0
SA3: Community	+?	0	0	0	0	0	+	0	0	0	0	0
SA4: Health	+?	0	0	0	0	0	+	0	+	0	0	0
SA5: Economy	+?	++	++	+	+	0	++	++	0	0	0	0
SA6: Town Centre	0	++	0	0	0	0	++	+	0	0	0	0
SA7: Sustainable Travel	+?	0	+?	0	++	0	0	0	0	0	0	0
SA8: Minerals	0	0	0	0	0	0	0	0	0	0	0	0
SA9: Soils	0	0	+/-	0	0	0	0	0	0	0	0	0
SA10: Water	+?	0	+?	0	+	0	0	0	0	+	0	++
SA11: Air Quality	+?	0	+?	0	+	++	0	0	0	0	0	0
SA12: Flooding	+?	0	+?	0	+	0	0	0	0	+	0	++
SA13: Climate Change	+?	0	+?	0	+	0	0	0	0	0	+	++
SA14: Biodiversity	+?	0	0	0	0	0	+	0	0	++	+	+
SA15: Historic Environment	+?	0	0	+	0	0	0	0	0	0	+	0
SA16: Landscape	0	0	++	++	0	0	0	0	++	+	+	0

## Explanation of SA findings for spatial vision and objectives

### Spatial vision

**4.4** The spatial vision for Maidstone Borough sets out a general ambition for development to take place in a sustainable way, embracing a mix of social, economic and environmental aspirations. This will enable the borough to be an attractive place to live, work and invest.

**4.5** If the spatial vision is achieved, it can be expected to lead to minor positive effects against the following SA objectives:

- SA objective 1: Housing, because the spatial vision embraces growth which provides homes for the communities present in Maidstone Borough.
- SA objective 2: Services & Facilities, because the provision of services is specifically referenced in the spatial vision.
- SA objective 3: Community, because the provision of services, which includes community facilities and spaces, will help strengthen the community.
- SA objective 4: Health, because if other aspects of the spatial vision are achieved, such as the delivery of homes and services, which includes primary healthcare facilities, in addition to sustainable and more active transport links, this will provide the foundations for people's health and wellbeing.
- SA objective 5: Economy, because the spatial vision embraces growth which provides for economic opportunity.
- SA objective 7: Sustainable Travel, because the spatial vision seeks to improve infrastructure. It is assumed that this includes sustainable transport modes, particularly walking and cycling routes, as well as public transport links.
- SA objective 10: Water, because as mentioned above, the spatial vision seeks to improve infrastructure provision. It is likely this includes waste water treatment works.
- SA objective 11: Air Quality, because if other aspects of the spatial vision are achieved, such as the delivery of sustainable travel infrastructure, this will help minimise air pollution.
- SA objective 12: Flooding, because the spatial vision seeks to improve infrastructure. It is assumed that this includes flood mitigation schemes.

- SA objective 13: Climate Change, because the spatial vision specifically seeks to address the challenges of climate change.
- SA objective 14: Biodiversity, because the spatial vision encourages growth but seeks to protect the natural environment.
- SA objective 15: Historic Environment, because the spatial vision encourages growth but seeks to protect heritage and cultural assets.

**4.6** Because they are not specifically mentioned, the spatial vision's contribution to the achievement of the following objectives is likely to be negligible: SA objective 6: Town Centre, SA objective 8: Minerals, SA objective 9: Soils, SA objective 12: Flooding and SA objective 16: Landscape.

**4.7** The spatial vision is unlikely to have any adverse effects in relation to the SA objectives.

**4.8** All of the effects of the spatial vision are subject to some uncertainty since their achievement will depend on the details of the Local Plan Review policies and site allocations which are designed to implement it.

### Spatial objectives

#### Spatial objective 1

**4.9** Spatial objective 1 seeks to provide a balance of uses in Maidstone Borough, but particularly within the Maidstone urban area with a particular focus on the renewal of Maidstone Town Centre. The spatial objective discusses developing skilled employment opportunities within the borough alongside developing learning opportunities. It also makes reference to the significant employment locations at the former Syngenta Works and Woodcut Farm. Therefore, significant positive effects are expected in relation to SA objective 6: Town Centre and SA objective 5: Economy.

**4.10** Minor positive effects are expected in relation to SA objective 1: Housing and SA objective 2: Services & Facilities because this spatial objective seeks to provide a balance of new homes, in addition to retail opportunities. Therefore, in addition to providing housing, retail services will also be provided. The spatial objective also gives consideration to the range of services and role of the rural service centres, the five larger villages of Boughton Monchelsea, Coxheath, Eythorne Street (Hollingbourne), Sutton Valence and Yalding, in addition to smaller villages and hamlets where appropriate.

#### Spatial objective 2

**4.11** Spatial objective 2 seeks to maintain the distinct character and identity of villages and the urban area. Likewise, the supporting text to this spatial objective requires development to be of high quality design that responds to the

local character of areas. This is expected to help minimise any adverse effects development might have on the landscape. Therefore, a significant positive effect is expected in relation to SA objective 16: Landscape.

**4.12** The spatial objective refers to the regeneration of employment sites, including the expansion of existing employment sites. Therefore, a significant positive effect is expected in relation to SA objective 5: Economy. A mixed minor positive and minor negative effect is expected in relation to SA objective 9: Soils because regenerating existing employment sites is an efficient use of previously developed land. However, supporting the expansion of employment sites is likely to result in the development of greenfield land and the possible loss of best and most versatile agricultural land.

**4.13** A minor positive effect is expected in relation to SA objective 2: Services & Facilities because this spatial objective seeks to strengthen the role of rural service centres and larger villages through the retention of existing services.

**4.14** A minor positive effect is expected in relation to SA objective 1: Housing because this spatial objective supports the delivery of a mix of housing tenures and is therefore likely to meet the housing needs of different residents.

**4.15** Spatial objective 2 refers to strengthening the role of rural service centres and larger villages through the addition of new infrastructure. It is unclear what infrastructure this refers to, but it could include sustainable transport links, such as walking and cycling routes, in addition to public transport links, all of which would help minimise air pollution. Therefore, minor positive but uncertain effects are expected in relation to SA objective 7: Sustainable Travel and SA objective 11: Air Quality. Other types of infrastructure that may also help strengthen these areas include water resources management, flood mitigation schemes and renewable energy schemes. Therefore, minor positive but uncertain effects are also expected in relation to SA objective 10: Water, SA objective 12: Flooding and SA objective 13: Climate Change.

### **Spatial objective 3**

**4.16** Spatial objective 3 supports the protection of built and natural heritage, specifically the Kent Downs AONB and the High Weald AONB, in addition to areas of local landscape value. Therefore, a significant positive effect is expected in relation to SA objective 16: Landscape.

**4.17** A minor positive effect is expected in relation to SA objective 15: Historic Environment because the spatial objective also requires development to have regard to heritage designations.

**4.18** A minor positive effect is expected in relation to SA objective 5: Economy because reference is made to diversifying the rural economy.

### **Spatial objective 4**

**4.19** Spatial objective 4 supports the provision of infrastructure, with specific reference made to transport, water supply, waste management, energy infrastructure and social infrastructure, such as health, schools and other educational facilities. Further detail is provided in relation to transport, specifically promoting journeys made by public transport, walking and cycling. Therefore, a significant positive effect is expected in relation to SA objective 7: Sustainable Travel and a minor positive effect is expected in relation to SA objective 11: Air Quality. Minor positive effects are also expected in relation to SA objective 10: Water, SA objective 12: Flooding, SA objective 13: Climate Change and SA objective 2: Services & Facilities.

**4.20** A minor positive effect is expected in relation to SA objective 5: Economy because the delivery of the transport network will help support a prosperous economy.

### **Spatial objective 5**

**4.21** Spatial objective 5 seeks to improve air quality within the Air Quality Management Area. Therefore, a significant positive effect is expected in relation to SA objective 11: Air Quality.

### **Spatial objective 6**

**4.22** Spatial objective 6 focuses on the renewal of the Maidstone urban area, with a particular focus on Maidstone Town Centre and areas of deprivation. The spatial objective seeks to improve the offer of Maidstone Town Centre, specifically its office, retail, residential, leisure, cultural and tourism functions. Reference is also made to the revitalisation and regeneration of key commercial and residential sites in Maidstone's urban areas, that experience deprivation. These measures will improve the employment opportunities available in the town centre, at the same time as increasing footfall, whilst also providing much needed housing. Therefore, significant positive effects are expected in relation to SA objective 5: Economy, SA objective 6: Town Centre, SA objective 2: Services & Facilities and SA objective 1: Housing.

**4.23** Spatial objective 6 specifically states that there will be a focus on the provision of appropriate social infrastructure in the town centre. Additionally, the measures proposed by this spatial objective will support the creation of a distinctive, accessible, safe and high quality environment for the community. Therefore, minor positive effects are also expected in relation to SA objective 3: Community and SA objective 4: Health.

**4.24** The spatial objective supports a range of development but also seeks to enhance the natural environment in Maidstone Town Centre, including the riverside. This is likely to result in a minor positive effect in relation to SA objective 14: Biodiversity.

### **Spatial objective 7**

**4.25** Spatial objective 7 seeks to expand the employment skills base across Maidstone Borough and in Maidstone Town Centre, and to provide related employment opportunities. Therefore, a significant positive effect is expected in relation to SA objective 5: Economy, whilst a minor positive effect is expected in relation to SA objective 6: Town Centre.

### **Spatial objective 8**

**4.26** Spatial objective 8 seeks to meet housing needs by delivering affordable housing, housing for the elderly and pitches for Gypsy, Travellers and Travelling Showpeople. Therefore, a significant positive effect is expected in relation to SA objective 1: Housing and SA objective 4: Health.

**4.27** A significant positive effect is also expected in relation to SA objective 16: Landscape because this spatial objective supports new housing that is of a design, scale, character and location appropriate to the settlement.

**4.28** The spatial objective also makes reference to the retention of existing services and facilities. Therefore, a minor positive effect is expected in relation to SA objective 2: Services & Facilities.

### **Spatial objective 9**

**4.29** Spatial objective 9 seeks to protect and promote the multi-functional nature of the borough's open spaces, rivers and other watercourses. It specifically makes reference to green and blue infrastructure and linking areas of environmental value. Therefore, a significant positive effect is expected in relation to SA14: Biodiversity.

**4.30** A minor positive effect is expected in relation to SA objective 10: Water and SA objective 12: Flooding because the provision of green infrastructure can help mitigate against climate change by managing surface water and sewer flooding by reducing runoff and providing water storage and retention areas.

**4.31** A minor positive effect is also expected in relation to SA objective 16: Landscape because protecting open spaces is likely to enhance the local landscape.

### **Spatial objective 10**

**4.32** Spatial objective 10 promotes high quality design in new development, whilst also taking into consideration its impact on climate change and how this can be mitigated. It also expects new development to implement sustainable construction standards. Therefore, a minor positive effect is expected in relation to SA objective 13: Climate Change.

**4.33** The spatial objective specifically states that development must make a positive contribution to an area, particularly its built and natural heritage, whilst also protecting and enhancing biodiversity. Therefore, minor positive effects are also

expected in relation to SA objective 14: Biodiversity, SA objective 15: Historic Environment and SA objective 16: Landscape.

### **Spatial objective 11**

**4.34** Spatial objective 11 supports development that reduces its impact on and mitigates against climate change, by addressing issues of flooding and water supply. There is also an ambition to for the borough to become carbon neutral by 2030. Therefore, significant positive effects are expected in relation to SA objective 13: Climate Change, SA objective 12: Flooding and SA objective 10: Water.

**4.35** A minor positive effect is expected in relation to SA objective 14: Biodiversity because this spatial objective supports development that gives high regard to the protection and enhancement of biodiversity.

**4.36** It is noted that none of the spatial objectives explicitly address SA objective 8: Minerals.

## Chapter 5

# SA findings for the Borough spatial strategy

This chapter presents the appraisal findings for the spatial strategy

### Spatial strategy

#### Reasonable alternatives tested

**5.1** The Council's development of the spatial strategy followed an iterative process with the findings at each stage communicated to Council officers to inform further options development.

**5.2** The Council identified a set of three initial spatial strategy options that were based on a fixed quantum of growth that would meet identified local, and that were deliberately distinctive to highlight the sustainability differences the elements of a spatial strategy that were considered reasonable. The three initial spatial strategy options subject to SA were:

- **Option RA1: Local Plan Review Continued** – no garden settlements, new residential and economic development allocations located according to the existing settlement hierarchy – Maidstone, Rural Service Centres, Larger Villages and some potentially suitable sites in the Countryside.
- **Option RA1a: No Maidstone** - four garden settlements included, with residual new residential and economic development allocations to be located according to the existing settlement hierarchy – Rural Service Centres and Larger Villages, excluding Maidstone and Countryside sites.
- **Option RA2a: Maidstone + 4 Garden Settlements** - majority of new residential and economic development allocations to be located at Maidstone, including development at edges, as well as four garden settlements; and residual growth allocated to Rural Service Centres and Larger Villages.

**5.3** The Council then defined a set of refined spatial strategy options, having regard to the results of the initial appraisal. These options were based on the allocation of amounts of development to different areas based on site availability. A key assumption made at this stage was the decision that due to



the risk profile of garden settlements, that the Local Plan Review should only include two such projects. After completion of the Garden Settlements Deliverability Assessment, there were three proposals that could be considered as deliverable within the Plan period: North of Marden, Lidsing, and Heathlands. As such the testing of refined alternatives consisted of three key variables:

- Higher or lower development in Maidstone
- Zero, one, or two garden settlements
- Higher or lower in rural service centres/ larger villages/ smaller villages & hamlets/ the countryside

**5.4** The refined spatial strategy options subject to SA are summarised in **Table 5.1**.

**5.5** The process followed for identifying the spatial strategy options to be subject to SA and the results of the SA are described in detail in the separate SA of Options report that has been published alongside this SA document<sup>17</sup>.

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<sup>17</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

Table 5.1: Rationale for refined spatial strategy options

	Scenario 1 - Local Plan 2017 continued	Scenario 2 - Two garden settlements approaches			Scenario 3 - One garden settlement approaches		
Location		a	b	c	a	b	c
Maidstone (Urban)	V. High	Low	Low	Low	High	High	High
Rest of Borough (Rural)	V. High	Low	Low	Low	High	High	High
Garden Settlements	0	Heathlands + North of Marden	Heathlands + Lidsing	North of Marden + Lidsing	Lidsing	Heathlands	North of Marden

### Policy SS1: Maidstone Borough Spatial Strategy

**5.6** This policy sets out the minimum required amount of development for different uses over the Local Plan Review period and the strategy for the distribution of this development between the following categories of potential development location:

- Maidstone urban area
- Garden settlements and strategic development locations
- Rural service centres
- Larger villages
- Other locations

**5.7** These locations form a hierarchy with the strategy seeking to direct focus development at the most sustainable towns and village locations in the borough where employment, key services and facilities together with a range of transport choices are available or accessible. Due to the quantum of need, new growth locations have been identified in the form of garden settlements and strategic development locations. The policy also sets out the spatial strategy in relation to employment sites and infrastructure provision.

**5.8** The likely effects of the policies in relation to each sustainability objective are shown in **Table 5.2**, in accordance with the scoring scheme set out in **Chapter 2**.

Table 5.2: SA findings for policy SS1: Maidstone Borough Spatial Strategy

SA objective	SS1: Spatial Strategy
SA1: Housing	++
SA2: Services & Facilities	++
SA3: Community	++/--?
SA4: Health	++/--
SA5: Economy	++
SA6: Town Centre	++
SA7: Sustainable Travel	++?/-?
SA8: Minerals	--
SA9: Soils	--
SA10: Water	-
SA11: Air Quality	-?

SA objective	SS1: Spatial Strategy
SA12: Flooding	--
SA13: Climate Change	--/+
SA14: Biodiversity	--
SA15: Historic Environment	--?
SA16: Landscape	--?

### Explanation of SA findings for policy SS1: Maidstone Borough Spatial Strategy

**SA Objective 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home**

**5.9** The housing quantum of 18,210 dwelling between 2022-2037 identified in policy SS1 has been objectively calculated using the Standard Method as set out in the Planning Practice Guidance, with minor adjustment through the SHMA. It takes account of demographic trends and income to house price affordability ratios to determine an appropriate housing amount for the borough. The Local Plan Review intends to deliver the full quantum of the total objectively assessed housing need, as such significant positive effects are anticipated in relation to this SA objective.

#### Mitigation

**5.10** No negative effects identified therefore no mitigation required.

**SA Objective 2: To ensure ready access to essential services and facilities for all residents**

**5.11** Policy SS1 sets out the principles for the distribution of development across the borough, setting out that Maidstone urban area will be the main focus for development in the borough, that new garden settlements at Lidsing and Heathlands will be developed and that the rural service centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst will be the secondary focus for development. Other settlements will be the focus of either limited housing and employment development consistent with their scale and role, or to help ensure local services are supported.

**5.12** In general, locating development nearer to services and facilities makes access to these services and facilities generally more feasible, as it reduces the need to travel, and reliance on private transport, which is not available to everyone. Shorter distances can generally facilitate active travel and public transport modes, the use of which is intrinsically more sustainable than use of the private vehicles.

**5.13** The Borough of Maidstone covers 40,000 hectares and approximately 75% of its population lives in the urban area of Maidstone town<sup>18</sup>. As the County town and the dominant settlement in the borough, Maidstone town offers the greatest range and number of services and facilities compared to elsewhere in the borough. For example, outside of Maidstone, Lenham is the only rural service centre or larger village that has a secondary school. Maidstone town also provides a focus for employment in the borough, as demonstrated by the fact that average commuting distances travelled by the borough's residents generally increase with distance from Maidstone town<sup>19</sup>. In accordance with policy SS1, employment development is also to be focussed to Maidstone town, further increasing the wide range of employment options. As such the policy ambition that Maidstone town remains the primary focus for development will result in more homes (and their residents) being closer to a large range of services and facilities (more so than would be the case if the homes were provided elsewhere), which is likely to result in greater access to services and facilities.

**5.14** The five Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst all provide a good range of services which serve both the village and the surrounding hinterland. All provide a nursery and primary school; a range of shops (including a post office); a doctor's surgery; at least one place of worship, public house, restaurant and community hall as well as open space provision<sup>20</sup>. Residents of new homes here will more readily be able to access services and facilities than they would if located elsewhere in the borough (with the exception of Maidstone town).

**5.15** The provision of development within two new garden settlements seeks to ensure that homes and businesses within them have access to services. Once completed it is envisaged that residents will have access to a range of services and facilities. There is a risk that the delivery phasing may result in some occupants being unable to readily access services and facilities in the short to medium term, for example if housing and employment is occupied ahead of shops and schools opening.

**5.16** The policy ambition to limit development outside the aforementioned areas will reduce the amount of new development whose occupants will need to travel further to access goods and services, although it is important to note that occupants of new development at the five Larger Villages of Boughton Monchelsea, Coxheath, Eyhorne Street (Hollingbourne), Sutton Valence and Yalding will be within a

relatively close distance of sufficient services and facilities to meet day-to-day needs.

**5.17** As a result of the above, significant positive effects are anticipated in relation to this SA objective.

#### Mitigation

**5.18** Ensuring social, health, green and transport infrastructure are delivered at the same time as housing would ensure that new development can develop a sense of community and that existing services and facilities elsewhere do not feel additional pressure in the short term.

#### SA Objective 3: To strengthen community cohesion

**5.19** Community cohesion is influenced by factors such as its ability to deliver development that provides sufficient jobs, services and facilities to meet the needs of the population, integrates well with existing neighbourhoods, that meets the needs of specific groups, that will benefit both new residents and existing ones, that is designed to provide spaces for informal interaction, and that is designed to reduce crime and the fear of crime. It has many links with other SA objectives. Policy SS1 focusses the majority of development to the area of Maidstone Borough which currently has the greatest amount of services and facilities and largest existing community. This part of Maidstone Borough has the greatest capacity to absorb new development and it is considered likely that the focussing of development here will result in increased employment opportunities, and increased opportunity for greater mixing of different population groups and those with different skills and experiences. This is considered likely to result in a high level of community cohesion.

**5.20** Policy SS1 seeks to develop new communities at the garden settlements of Lidsing and Heathlands. Garden settlements can be designed from the outset to achieve community cohesion although in practice, a true sense of community cohesion can take a long time to achieve, especially when such developments are only partly completed.

**5.21** There is also the potential for residents of existing communities near large scale garden settlements to be affected in negative ways, for example experiencing increased congestion and pollution and less capacity at existing infrastructure and services. However, there is also the potential for such communities to positively benefit from new services and facilities and the infrastructure provided as part of garden settlements. Such effects are more likely to be experienced as a result of the Heathlands garden settlement as it is close to comparatively smaller existing communities such as Lenham and Lenham Heath and is likely to change

<sup>18</sup> Local Plan Review Document

<sup>19</sup> 2011 Census travel to work data

<sup>20</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

the local context considerably. For Lidsing, such effects are less likely because most of the nearby residents are already living in the larger, urban Medway Towns conurbation, rather than, for example, a discrete rural settlement which is more likely to be dominated by such a scale of development. It is recognised that Bredhurst village is close to the site (within 100m of the boundary) but the segregating effect of the M2 is likely to reduce such effects.

**5.22** As such mixed significant positive and significant negative effects (prior to mitigation) are anticipated in relation to this SA objective. The negative effects are uncertain as individuals are likely to have different views about new development, which may be either positive, negative or mixed.

### Mitigation

**5.23** In order to reduce the potential for negative effects, development management policies and site-specific requirements should seek to ensure community involvement occurs throughout the process of planning new allocations including the garden settlements and to ensure the community brought into these places are able to influence their local environment, such as through setting up an appropriate local governance structure or community trust.

**5.24** Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that new development can develop a sense of community and that existing services and facilities elsewhere do not feel additional pressure in the short term.

**5.25** Ensuring that existing communities also receive sufficient development, investment and support for their services and facilities is also important for cohesion, rather than focussing all the attention on the new communities.

### SA Objective 4: To improve the population's health and wellbeing and reduce health inequalities

**5.26** Health and wellbeing are affected by a number of matters, including lifestyles, life chances and personal wealth and opportunity. In addition, environmental pollution such as air quality or noise also has the potential to affect health and wellbeing.

**5.27** Maidstone Borough (69.2%) has a higher percentage of adults who consider themselves physically active than nationally (66.3%) but is just below the Kent average (69.8%)<sup>21</sup>. However, with regard to health inequalities, 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. 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<sup>22</sup>.

**5.28** Maidstone contains 425 hectares of greenspace, 30 large parks, 80 Neighbourhood greenspaces, 68 play areas, 700 allotment plots across 12 sites and 4 Green Flag parks. Overall, there is more publicly accessible, managed open space within the urban wards compared to the rural wards of the borough<sup>23</sup>.

**5.29** Policy SS1 focusses development to Maidstone town above all other locations. As set out above, this urban area includes the most publicly accessible and managed open space and therefore focussing development to Maidstone town will provide new occupants with greater opportunity to access these.

**5.30** The Maidstone town area also contains the most deprived neighbourhoods in the borough. The policy seeks to achieve renewal of the town centre, which is likely to provide opportunities to address existing deficiencies more so than focussing development elsewhere. It is also possible that new services and facilities such as walking, cycling and public transport improvements and new open space associated with development may help to improve the potential for existing residents to participate in more active lifestyles, which are generally associated with improved health and wellbeing.

**5.31** Having said this, it is important to take into account known environmental pollution issues. Maidstone has a designated air quality management area (AQMA) closely linked to strategic roads in the settlement. The spatial strategy set out in policy SS1 will likely increase the potential for more people to be present within (and potentially exacerbate existing conditions within) the AQMA, leading to negative health effects. There are four waste sites within and near to Maidstone town including Allington Wiped Film Evaporator Plant at 20 Industrial Estate (mostly outside Maidstone Borough but immediately to the northwest of the town), at Bircholt Road, Tovil household waste recycling centre, and at Heronden Road. It is possible that localised odour pollution associated with these sites may affect local communities. In addition, some areas within Maidstone town are affected by high noise levels from roads and railways and focussing development at this urban centre will increase the potential for new occupants to be affected by noise.

<sup>21</sup> Public Health England (2020) Maidstone Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000110.html?area-name=maidstone>

<sup>22</sup> Ibid

<sup>23</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf)

**5.32** The rural service centres and indeed the settlements listed below these in the settlement hierarchy are anticipated to benefit from the infrastructure, services and facilities which are likely to be delivered alongside new development under the spatial strategy. Effects in relation to environmental pollution are likely to be less significant than at Maidstone or garden settlements.

**5.33** For the garden settlements, the policy sets out that these will be developed in accordance with garden community principles<sup>24</sup>, which include delivery of integrated and accessible transport systems with active and public travel modes prioritised, and for new green infrastructure and biodiversity net gain. Should these principles be achieved then positive effects are anticipated.

**5.34** Having said this, it is important to take into account known environmental pollution issues. In relation to the Lidsing garden settlement, this is severely affected by high noise levels, due to its proximity to the M2. At Heathlands, there is a wastewater treatment works within the site and an inert landfill site within the site at Shepherds Farm Quarry which may result in issues relating to odour. It also experiences high noise levels due to its proximity to the M20 and A20. It is possible that the effects of high noise and / or odour may result in a lower quality of life and at worst, compound health conditions.

**5.35** Mixed effects are therefore anticipated in relation to this SA objective including the significant positive effects identified in relation to the provision of new green infrastructure and enhanced opportunities for active lifestyles, and significant negative effects (prior to mitigation) in relation to the potential air quality, noise and odour effects.

### Mitigation

**5.36** It is recommended that the areas of deprivation, and specifically health deprivation, are mapped out within the borough. In addition, understanding why those areas are deprived and aiming to provide specifically what is lacking in those areas is crucial. Providing additional green space and active travel routes alongside the rest of the development would also improve health and wellbeing.

**5.37** Policy wording for site allocations should ensure the delivery of the garden communities principles and these should also form part of the Local Plan Review's monitoring framework.

**5.38** In order to mitigate potential negative effects from air quality, noise and odour, the development management or site allocation policies should seek to specifically address these

issues. In this regard, it should be noted that air, noise and odour pollution generally reduce very quickly with increasing distance from the source. It may be possible to avoid effects by appropriate site layouts or using suitable screening (e.g. acoustic barriers and planting). It may also be possible to use trees and shrubs as a natural barrier to air pollution.

**5.39** The inclusion of community facilities designed to accommodate activities related to healthcare and healthy lifestyles (for example new parent groups or exercise classes), would help to facilitate healthy lifestyles, and should be included in Local Plan Review policies related to site allocation or development management.

### SA Objective 5: To facilitate a sustainable and growing economy

**5.40** The Council has prepared an employment need assessment<sup>25</sup> which identifies that the minimum floorspace required to forecasted need is 105,550 square metres between 2022-2037. Policy SS1 sets out that this amount of provision will be provided. This level of employment is anticipated to aid in the development of a stronger economy in the borough resulting in significant positive effects.

**5.41** The council has undertaken an assessment of expected population growth, combined with analysis of national and local retail trends and Experian forecasts. This identifies an objectively assessed projected retail floorspace requirement of 10,838 square metres by 2032. In accordance with the NPPF, sufficient land to meet retail need for ten years should be identified in local plans. Policy SS1 sets out that the required quantum of retail and leisure floorspace will be provided. This is likely to result in significant positive effects in relation to this SA objective.

**5.42** In terms of spatial distribution, policy SS1 sets out that Maidstone town will be the main focus for development (specifically including retail and office development) and that urban renewal will be prioritised in the centre. Maidstone is currently the main urban area within the borough and well connected to other areas outside it. Employment opportunities provided here are considered likely to be accessible to and benefit other communities in the borough.

**5.43** In addition, policy SS1 sets out that employment development will take place outside Maidstone town, specifically it provides for a prestigious business park at Junction 8 of the M20 that is well connected to the motorway network, redevelopment of the former Syngenta Works site near Yalding, significant provision at the garden settlements, and suitably scaled employment at the rural service centres. It

<sup>24</sup> <https://www.tcpa.org.uk/garden-city-principles>

<sup>25</sup> <https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/pr-evidence/Maidstone-Economic-Development-Needs-Study-Stage-Two.pdf>

is considered that this distribution of economic development is likely to increase employment opportunities throughout the borough, leading to a stronger economy.

**5.44** Significant positive effects are therefore anticipated in relation to this SA objective.

#### Mitigation

**5.45** A diversity of economic development could be encouraged through suitable policies in the Local Plan Review.

**5.46** An attractive planning and financial regime to attract early investment in economic uses at the garden settlements will help to ensure a suitably phased delivery of housing and economic development in these locations.

#### SA Objective 6: To support vibrant and viable Maidstone town centre

**5.47** Maidstone town centre is home to the predominant concentration of shops, jobs, services and facilities in the borough. No other settlements in the borough have such an offer. Town centres are experiencing increased strain from out-of-centre and out-of-town competition, as well as on-line alternatives. These issues are also now being exacerbated by COVID-19.<sup>26</sup> Therefore, retaining the vitality and viability of Maidstone town centre is an important sustainability objective for the borough.

**5.48** Policy SS1 includes provisions which result in increased development in the Maidstone urban area, and specifically that this will be the focus of development during the plan period, and that it will remain the primary retail and office location. The increase in population in this area is likely to increase potential expenditure in the centre as well as an increased labour force and increased skills supply.

**5.49** Policy SS1 also prioritises renewal in the town, which will help to enhance the vibrancy of Maidstone town.

**5.50** As the primary settlement in the borough it is likely that occupants of development elsewhere in the borough will also utilise facilities and services in Maidstone town, thereby also increasing the likely expenditure and labour supply. As such all development in the borough is likely to have a positive effect in relation to this SA objective. Such effects could be magnified by ensuring good transport links to Maidstone town centre exist from within the town and outside it. The focus should be on public transport and cycling links to avoid

increased private motorised traffic levels in the urban area, which could reduce the vibrancy and attractiveness of the town.

**5.51** In light of the above, significant positive effects are anticipated in relation to this SA objective.

#### Mitigation

None identified.

#### SA Objective 7: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion

**5.52** Maidstone 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, as well as to/from the M2 & M25. The constrained nature of the town centre has contributed to peak period congestion and the designation of the wider urban area as an AQMA. 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 London 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<sup>27</sup>. 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. The Network Rail Kent Area Route Study also highlights capacity issues with 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<sup>28</sup>.

**5.53** Policy SS1 sets out that Maidstone urban area will be the main focus for development. As Maidstone town is the largest urban area which offers the greatest range of employment, services and facilities, this approach is considered likely to result in a significant proportion of the occupants of new development being able to access these services and facilities without the need to travel large distances. This is likely to facilitate the use of more sustainable modes of travel (compared to the car) which is likely to result in significant positive effects. These will, however, depend on provision of a

<sup>26</sup> Centre for Cities (2020) High Streets [online] Available at: <https://www.centreforcities.org/high-streets/>

<sup>27</sup> 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](http://www.kent.gov.uk/data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>28</sup> 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>

high quality public transport and active travel network featuring frequent, affordable and reliable bus services and safe, attractive and direct active travel routes.

**5.54** Policy SS1 also directs a significant amount of development to locations outside Maidstone town. Occupants of these areas will almost certainly need to access Maidstone town centre from time to time due to the higher order of facilities and services it provides, however this is reduced by the policy provisions to locate development outside Maidstone town in locations that have sufficient facilities and services to meet day to day needs, including garden settlements and rural service centres.

**5.55** This said, policy SS1 also allocates some development to locations which may increase the likelihood of travel by private motorised vehicles, including the employment allocation at Junction 8 of the M20. Development of the Leeds-Langley corridor to support new highways links will, by its nature, increase the attractiveness of road transport. The Lidsing garden settlement is likely to be very easily accessible to the M2 and this may lead to more use of private motorised vehicles than would be the case if it were not so readily accessible. Similarly, although to a lesser extent, Heathlands Garden community is likely to be readily accessible to the motorway network and this may also result in an increase in the use of motorised transport.

**5.56** The provision for small scale opportunities to support the rural economy within the policy may help to reduce the distance that those living in the rural area need to travel to access employment.

**5.57** In accordance with the above, the strategy of policy SS1 to focus development to Maidstone town, and to service centres which generally cater for day to day needs is likely to result in significant positive effects. However the potential for some development locations to result in increased travel by private motorised vehicle such as the Junction 8 employment site are considered likely to result in minor negative effects (prior to mitigation). Uncertainty is recorded against the findings in relation this SA objective because these are based on the potential for sustainable travel which may potentially be delivered due to the various existing context and proposed infrastructure in relation to transport.

#### Mitigation

**5.58** Local plan policies and development allocation policies should stipulate requirements for development forms that reduce distance between homes, employment and key destinations to facilitate walking and cycling and also require

that walking and cycling provision is of high quality, is attractive and direct in order to facilitate use of sustainable modes and reduce use of private motorised vehicles.

**5.59** Provision of school transport infrastructure and travel plans to help facilitate use of sustainable travel for pupils will help to reduce motorised transport associated with school, and the potential for localised congestion.

**5.60** High internet data speeds accessible to new development and existing areas will help to reduce the need to travel, and the local plan should seek to support this ambition.

#### SA Objective 8: To conserve the borough's mineral resources

**5.61** Around half of the borough is covered by Mineral Safeguarding Areas (MSAs) designated in the Kent Minerals & Waste Local Plan. The minerals include limestone, sandstone, river terrace deposits, silica sand and sub-alluvial river terrace deposits<sup>29</sup>.

**5.62** Although policy SS1 focuses the majority of development on Maidstone town, there are some development areas set out in policy SS1 which will conflict with Mineral Safeguarding Areas.

**5.63** Regarding the Heathlands garden settlement allocation, prior to consideration of mitigation, development is likely to result in conflicts with mineral-related activities, as set out in more detail in the appraisal of policy SP4(a): Heathlands Garden Settlement.

**5.64** Other locations including the edge of Maidstone town sites are likely to result in the loss of areas identified as Mineral Safeguarding Areas, which may result in sterilisation of mineral resources.

**5.65** In accordance with the above, significant negative effects (prior to mitigation) are anticipated in relation to this SA objective.

#### Mitigation

**5.66** The potential negative effects in relation to mineral resources could be avoided by ensuring that where allocation of sites overlaying mineral resources occurs, those resources are recovered prior to construction, where economically viable.

**5.67** Recommendations in relation to Heathlands are set out in the appraisal of policy SP4(a): Heathlands Garden Settlement.

<sup>29</sup> Kent County Council (2015) Kent Minerals and Waste Local Plan 2013-2030: Maidstone Borough Council – Mineral Safeguarding Areas [online] Available at: [https://www.kent.gov.uk/about-the-](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)

[council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1](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)



### SA Objective 9: To conserve the borough's soils and make efficient and effective use of land

**5.68** 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. 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 where they meet the Greensand to the south. 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<sup>30</sup>.

**5.69** Policy SS1 sets out that Maidstone urban area will be the focus of development and as such, much of this development is anticipated to occur on brownfield land. This approach will conserve soils on greenfield land and make efficient use of land, by not requiring more space to be developed (brownfield development is no net difference in this regard, as it has already been 'used' for development).

**5.70** However much of the development provided for within policy SS1 would be located on greenfield sites, including the new garden settlements at Lidsing and Heathlands. Each of these garden settlement locations lies within mostly Grade 3 agricultural land, It is uncertain whether the Grade 3 agricultural land is 3a or 3b, as such, there is the potential for new development to harm the borough's best and most versatile soils.

**5.71** The development dispersed across urban extensions to Maidstone town and at rural service centres and larger villages are also likely to affect areas of high quality agricultural land.

**5.72** In accordance with the above significant negative effects are anticipated in relation to this SA objective.

#### Mitigation

**5.73** It will be difficult to avoid most of the potential negative effects identified by the SA at garden settlements and other greenfield site allocations but effects could potentially be mitigated by considering whether boundaries of site options could be redrawn or masterplanned and used so as to avoid loss of the best and most versatile agricultural land. For example, the southern part of Heathlands is proposed for

open space and it may be possible to provide some community based food production or grazing in this area.

### SA Objective 10: To maintain and improve the quality of the borough's waters and achieve sustainable water resources management

**5.74** Kent is one of the driest regions in England and Wales<sup>31</sup>. Water use in the borough is high by both national and international standards, and some water bodies in Maidstone are failing to meet the Water Framework Directive objective of 'good status'<sup>32</sup>. These issues are likely to be exacerbated by additional housing and economic growth, coupled with climate change. Pressures, including the projected increase in population, related to the provision of water supply and wastewater treatment are key contributors to the current and projected future status of water bodies in Kent. Development could adversely affect surface water quality due to additional increased urban runoff, discharges of wastewater (for example because there is insufficient treatment capacity at the local WwTWs) or pollution events. Nutrient enrichment issues in the receiving waters is primarily a biodiversity rather than drinking water quality issue and are therefore dealt with under SA objective 14: Biodiversity.

**5.75** Development could affect water quality in drinking water resources during construction or occupation. 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 increases as the distance between the source of contamination and the groundwater abstraction point decreases. Drinking Water Safeguard Zones are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. The significant majority of the borough, including Maidstone town, is within a surface water drinking water safeguarding zone, and the provisions of policy SS1 direct the significant majority of development to locations which intersect this. In addition, the entirety of the Lidsing garden settlement falls within SPZ 3 (but is not within any other water protection or safeguarding areas) and approximately two fifths of the Heathlands site is within SPZ 3, the remainder being outside any other water protection or safeguarding areas.

**5.76** In accordance with the above, minor negative effects are anticipated in relation to this SA objective, prior to mitigation.

<sup>30</sup> 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](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf)

<sup>31</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>32</sup> AECOM (2017) Kent Water for Sustainable Growth Study

### Mitigation

**5.77** The incorporation of policies and design codes that include water efficiency measures will be necessary if the negative effects of development on water resources are to be addressed. Also, the introduction of a water use awareness campaign could educate the public on how best to reduce their water use. Investment in wastewater treatment works may be required to accommodate additional demand from development, depending on the capacity of the wastewater treatment works serving the proposed development location. In some instances, there may be technical limits to whether upgrades to treatment capacity or processes can achieve an acceptable quality of treated discharges.

### SA Objective 11: To reduce air pollution ensuring lasting improvements in air quality

**5.78** . Maidstone town 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 Council designated the wider urban area as an AQMA in 2008 due to elevated concentrations of Nitrogen Dioxide (NO<sub>2</sub>) 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<sub>2</sub> levels at some key locations near major roads and junctions remain above the EU Limit Value with no discernible downward trend<sup>33</sup>.

**5.79** Policy SS1 directs a significant amount of development to the Maidstone urban area, which may result in increases in motorised transport in this area and particularly the AQMAs. In addition, as discussed in relation to SA7: Sustainable travel, it is likely that development at Junction 8, the Leeds-Langley Corridor, Lidsing garden settlement and to an extent, Heathlands garden settlement may also result in increased motorised vehicles driving through the AQMAs in Maidstone town. The development dispersed to the strategic development locations may also result in increased travel through the AQMAs in Maidstone town.

**5.80** While the garden settlements have the potential to be developed in a manner which prioritises and facilitates active travel, the likelihood of no or very limited movement by motorised vehicle is highly unlikely.

**5.81** Minor yet uncertain negative effects are anticipated in relation to this SA objective prior to mitigation. These are

uncertain as how and where people choose to travel, and by what method is affected by a number of factors which may affect the severity of any effects in relation to air quality.

### Mitigation

**5.82** Ensure that through design codes that each development will have to incorporate green infrastructure and that in areas of existing or potential poor air quality this is designed to help improve air quality. In addition, incentivise the creation of active travel options such as bike lanes and pedestrian walkways through design of development, integrated with existing networks, supported by contributions from developers through S106 agreements.

### SA Objective 12: To avoid and mitigate flood risk

**5.83** Fluvial flood risk within Maidstone is concentrated in the southern and south-western part of the borough, as well as in Maidstone town centre. The primary source of fluvial flood risk in the catchment is the River Medway<sup>34</sup>. The main source of surface water flood risk is 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<sup>35</sup>. The risk of flooding is likely to be intensified due to climate change.

**5.84** Policy SS1 directs a significant amount of development to Maidstone town centre and the Rural Service Centres in the south of the borough, including Marden, Staplehurst, and Headcorn. These locations each contain areas identified as being in an area of fluvial flood risk (Flood Zones 2 or 3), which may result in development being located in these locations.

**5.85** Although the proposed garden settlements of Lidsing and Heathlands do not include a significant area identified as being at surface water flood risk, a substantial part of the Heathlands location has relatively high groundwater flood risk. It is possible that development here could lead to effects in relation to this such as increased flood risk on site or in surrounding areas.

**5.86** In addition, the creation of more impermeable surfaces may create additional flood risk, although the likelihood and potential severity of this will be affected by the design of new development.

<sup>33</sup> 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](http://www.kent.gov.uk/data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>34</sup> 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](http://www.maidstone.gov.uk/data/assets/pdf_file/0015/132810/CC-005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf)

<sup>35</sup> Ibid

**5.87** In accordance with the above, significant negative effects are anticipated in relation to this SA objective prior to mitigation.

#### **Mitigation**

**5.88** The potential negative effects would be most effectively avoided by sensitive masterplanning and mitigation to avoid development in areas of sites at greatest risk of flooding and to mitigate for any increases in flood risk elsewhere. The incorporation of green spaces and SuDS into the design of new developments could also help to mitigate flood risk.

#### **SA Objective 13: To minimise the borough's contribution to climate change**

**5.89** The UK is a signatory to the international 2015 Paris Agreement, committing the country to a long-term goal of keeping the increase in global average temperature to well below 2°C above pre-industrial levels, through domestic mitigation measures. The UK's Climate Change Act 2008 (as amended in 2019) commits to reduce national emissions by at least 100% of 1990 levels by 2050. In April 2019, Maidstone Borough Council declared a Climate Emergency. In order to make its contribution towards addressing these issues, the borough will need to reduce its carbon emissions significantly over the plan period.

**5.90** All development built to typical, present day construction and energy efficiency standards will result in increased emissions of greenhouse gases, as a result of both the construction and operation of the buildings. As such, the amounts of development set out in SS1 will lead to an increase in greenhouse gas emissions.

**5.91** In addition, the spatial distribution of development will also result in effects in relation to this SA objective, influenced most by emissions relating to transport and travel. Policy SS1 specifically directs the focus of development to Maidstone urban area which, as reported in comments above in relation to SA objective 7: Sustainable travel, may result in a comparatively reduced need to travel and facilitate the use of active modes of travel and public transport, which will in turn reduce the potential for greenhouse gas emissions. In addition, the focus of development to other service centres, including garden settlements and rural service centres should similarly (although to a lesser extent) facilitate the use of more sustainable modes of travel on a day to day basis.

**5.92** In summary of the above, policy SS1 is likely to result in significant negative effects (prior to mitigation) in relation to this SA objective due to the increased greenhouse gas emissions. However, the allocation of development to locations which generally will facilitate the use of sustainable modes of travel (thereby reducing the likely potential of

greenhouse gas emissions) is considered likely to result in minor positive effects.

#### **Mitigation**

**5.93** Local Plan policies and design codes for strategic development should that require low carbon construction, energy efficient building design and provision of decentralised, low carbon energy generation (e.g. district heating networks and micro-renewables). In addition, improvements to active transport infrastructure, public transport, electric vehicle infrastructure and introduction of car sharing programs could reduce the borough's greenhouse gas emissions.

#### **SA Objective 14: To conserve, connect and enhance the borough's wildlife, habitats and species**

**5.94** The Borough contains and is close to a wide variety of both designated and non-designated natural habitats and biodiversity including a Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSIs), Local Wildlife Sites (LWSs), Local Nature Reserves (LNRs), priority habitats and ancient woodland. In addition, many Biodiversity Opportunity Areas have been identified within the borough, indicating where enhancement could be most beneficial. Apart from designated sites, it is important that functional ecological habitats and networks are safeguarded and improved in order to support biodiversity in the borough generally, and its connections outside the borough but also to help support the designated sites and features.

**5.95** All development has the potential to negatively affect biodiversity through direct loss of habitat, severance, pollution and increased disturbance. As such the total quantum of development provided for by policy SS1 is likely to lead to some negative effects.

**5.96** Having said this, the distribution of development will also influence the likelihood and potential severity of effects in relation to this SA objective. The focus of development to Maidstone urban area as directed by policy SS1 may affect local wildlife sites here through, for example, increased disturbance. However, the focus of development on the urban area is likely to lead to fewer implications in relation to international designations.

**5.97** As addressed in more detail in the separate Habitats Regulations Assessment (HRA) of the Local Plan Review, there is a potential for any development that drains to the Upper Stour catchment (in the north-east of the borough) or is served by a wastewater treatment works (WwTW) in this catchment (for example Lenham WwTW) to have a significant adverse effect on the downstream European designations of Stodmarsh SAC, SPA and Ramsar site. In line with Natural

England advice<sup>36</sup>, any such development must demonstrate no additional adverse effects to these European sites by achieving nutrient neutrality. Since the spatial strategy includes development at Heathlands garden settlement and at the rural service centre of Lenham, prior to consideration of mitigation there is a potential for significant adverse effects in relation to SA objective 14: Biodiversity.

**5.98** The delivery of development at the garden settlements of Lidsing and Heathlands also has the potential to impact local wildlife sites and ancient woodland, areas of which are within the proposed site boundaries of these.

**5.99** Development in the Rural Service Centres of Marden and Headcorn may result in impacts in relation to national designations including Marden Meadows and the River Beult, as impact risk zones associated with these designations extend over these settlements.

**5.100** In summary of the above, significant negative effects are considered possible prior to consideration of mitigation, for example in relation to potential implications for wildlife designations, including on the Stodmarsh European designations.

#### Mitigation

**5.101** In line with NPPF requirements, Local Plan Review policy should be put in place to ensure biodiversity net gain is achieved on each development site or losses are offset elsewhere within the borough where this is not feasible. Where development would be within an established zone of influence of a designated biodiversity sites, policy should require contribution to any established mitigation scheme.

**5.102** In relation to the nutrient enrichment issue in the Upper Stour catchment described above, it should be possible on large development sites to achieve nutrient neutrality in line with the Natural England guidance; Local Plan Review site allocation and development management policies should require this. Smaller developments may be unable to provide on-site mitigation to achieve nutrient neutrality due to lack of space and/or financial viability considerations. Potential solutions may include a tariff charged on such smaller developments, this being used to fund strategic, off-site mitigation measures. At the time of writing, there were no approved, strategic off-site mitigation measures to which smaller developments could contribute, creating some doubt about the deliverability of smaller developments in the Upper Stour catchment in the short term, although adverse effects on biodiversity should still be avoided by a Local Plan Review development management policy requirement to demonstrate

nutrient neutrality plus project-level HRA under the Habitats Regulations.

**SA Objective 15: To conserve and/or enhance the borough's historic environment**

**5.103** There are 41 Conservation Areas within the borough. 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. Each of these Conservation Areas contain a mixture of Listed Buildings. The Borough also contains 5 sites included on the Register of Historic Parks and Gardens<sup>37</sup>.

**5.104** Policy SS1 sets out that Maidstone town will remain the focus of development. Maidstone town includes numerous heritage designations including listed buildings, conservation areas, scheduled monuments and areas of archaeological potential and Mote Park registered Park and Garden.

**5.105** Although to a lesser extent, designations are also found in the rural service centres and garden settlement sites.

**5.106** It is possible that the focus of development to Maidstone town, the rural service centres and garden settlements will result in either direct or setting impacts on these designations. As such significant negative effects are anticipated in relation to this SA objective, prior to consideration of mitigation. However, uncertainty around these effects exists as such effects are influenced by the form and design of new development.

#### Mitigation

**5.107** Avoidance of development that results in harm to the significance of heritage assets, including their setting, would provide the best mitigation. However, design codes with heritage assets and local character at the forefront could also be implemented.

**SA Objective 16: To conserve and enhance the character and distinctiveness of the borough's settlements and landscape**

**5.108** Just over a quarter of the borough lies within the Kent Downs Area of Outstanding Natural Beauty (AONB). In addition, many parts of the rest of the borough are designated as Landscapes of Local Value. The sensitivity of these designations and the wider landscape to development are set

<sup>36</sup> Natural England, (2020), Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites - For Local Planning Authorities

<sup>37</sup> 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/EN-V-018-Heritage-Topic-Paper-September-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0019/131725/EN-V-018-Heritage-Topic-Paper-September-2016.pdf)

out in the Council's landscape capacity study.<sup>38</sup> This identifies that a substantial proportion of the borough has high landscape sensitivity, with the greatest concentrations of land in these categories in the south and west of the borough. Significant parts of the north and east of the borough are of moderate landscape sensitivity. The main areas of low landscape sensitivity, all of which are relatively small, are located around Sandling (north-west of Maidstone urban area), between Boughton Monchelsea and Warmlake (south-east of Maidstone urban area) and between Sandway and Lenham Heath (in the east of the borough).

**5.109** Policy SS1 focusses development primarily to existing settlements. Development within existing settlements would have a lower risk of adversely affecting the landscape, although this would depend on the scale and massing of development, and effects from edge of settlement development on greenfield land may affect landscape character and distinctiveness.

**5.110** The proposed garden settlements will result in the introduction of large urban developments at Lidsing and Heathlands. Lidsing lies on the edge of the AONB and is mainly within an area of moderate landscape sensitivity. The Heathlands location lies within areas of both high and low landscape sensitivity. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value or the Kent Downs AONB. As a result of the development distribution set out in policy SS1, it is likely that development would adversely affect the landscape as each potential development location lies within areas of very high to moderate landscape sensitivity. As such, significant negative effects (prior to mitigation) are expected.

### **Mitigation**

**5.111** Local plan policies to ensure development site layouts and development design that seek to reduce adverse effects on the landscape would help to reduce effects.

### **Recommendations**

Measures to limit the potential for negative effects and strengthen the positive effects identified for this policy are recommended in the mitigation sections of the appraisals in relation to each SA objective.

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<sup>38</sup> Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

## Chapter 6

### SA findings for spatial strategic policies and detailed site allocation policies

This section presents the appraisals of the Maidstone Town Centre 2050 Vision, the spatial strategic policies and the corresponding site allocation policies

#### Maidstone Town Centre 2050 Vision

6.1 The Maidstone Town Centre 2050 Vision is set out below.

6.2 Table 6.1 below summarises the sustainability effects for the vision in relation to the SA objectives, and the findings are described below the table.

*Securing the future role of Maidstone as the County Town of Kent and as a focus for investment in a wide range of employment, retail and leisure facilities. By 2050 a renewed Maidstone town centre will be a distinctive, safe and high quality place that has:*

- *Retained its best environmental features, including the riverside and the enhanced public realm, facilitating a more active and multi-functional set of urban spaces;*
- *Provided a variety of well-integrated attractions for all ages including new shopping, businesses, leisure, tourism, and cultural facilities; and*
- *Improved access for all.*

*Key components in realising this vision are:*

- *Enhancing the diversity of the retail offer, supporting a continued balance between independent and multiple retailers;*
- *Creating a highly sustainable location resilient to future climate change;*
- *Establishing the town centre as an attractive hub for business building on the town centre's assets and environment to maximise its sphere of influence and access to labour;*

- *Creating a stronger mix and balance of uses within the centre to support long term viability including where appropriate residential development;*
- *Delivery of new high quality community, health and education infrastructure;*
- *Adding higher value jobs, new approaches to sustainable working and sustainable living patterns;*
- *Sequencing the delivery of development such that improvements to jobs and infrastructure are provided alongside new housing;*
- *Ensuring the centre's green and blue infrastructure, and public realm is enhanced to attract new investment;*
- *Developing the visitor economy and creating an attractive and healthy living and working environment;*
- *Providing a pattern of both accessibility and service provision/activity which encourages all of the borough and beyond to identify with the Town Centre, and*
- *Tackling congestion and air quality issues through improvements in provision for vehicles, pedestrians and cyclists, including public transport.*

Table 6.1: SA findings for Maidstone Town Centre 2050 Vision

	Maidstone Town Centre 2050 Vision
SA1: Housing	+
SA2: Services & Facilities	++
SA3: Community	++
SA4: Health	++
SA5: Economy	++
SA6: Town Centre	++
SA7: Sustainable Travel	++/-
SA8: Minerals	0
SA9: Soils	0
SA10: Water	+
SA11: Air Quality	++/-
SA12: Flooding	+
SA13: Climate Change	++/-
SA14: Biodiversity	+
SA15: Historic Environment	0
SA16: Landscape	0

**6.3** If the Maidstone Town Centre 2050 Vision is achieved, it can be expected to lead to significant positive effects in relation to the following SA objectives:

- SA objective 2: Services & Facilities, because the main focus of the vision is to provide a range of employment, retail and leisure facilities within the town centre, in addition to attractions for all ages, including tourism and cultural facilities. High quality community, health and education infrastructure will also be delivered.
- SA objective 3: Community, because a key component of the vision is delivering new high quality community, infrastructure. Additionally, the vision seeks makes provision for an enhanced public realm, which will facilitate a more active and multi-functional set of urban spaces. This has the potential to support high levels of

pedestrian activity, which may generate interaction between residents.

- SA objective 4: Health, because a key component of the vision is delivering new high quality health infrastructure. Additionally, the vision seeks to create a healthy living and working environment, although the details of this are not specified.
- SA objective 5: Economy, because the vision seeks to establish the town centre as an attractive hub for business, building on the town centre's assets and environment to maximise its sphere of influence and access to labour. The vision also seeks to develop the visitor economy so as to create an attractive and healthy living and working environment, which is likely to bring more people to the area.
- SA objective 6: Town Centre, because the vision is solely focused on Maidstone Town Centre and its future development, setting out a number of measures that will secure its future role as the County Town of Kent.
- SA objective 7: Sustainable Travel, because the vision seeks to improve access for all through improvements for pedestrians and cyclists, and users of public transport. However, this effect is mixed with a minor negative effect because the vision also makes reference to improvements in provision for vehicles, which may make the private car a more attractive mode of transport.
- SA objective 11: Air Quality, because as mentioned above, the vision seeks to improve access for all through improvements for pedestrians and cyclists, and users of public transport. This is likely to help minimise air pollution. However, this effect is mixed with a minor negative effect because the vision also makes reference to improvements in provision for vehicles, which may make the private car a more attractive mode of transport, with adverse effects on air quality.
- SA objective 13: Climate Change, because as mentioned above, the vision seeks to improve access for all through improvements for pedestrians and cyclists, and users of public transport. This is likely to help minimise greenhouse gas emissions associated with the private car. However, this effect is mixed with a minor negative effect because the vision also makes reference to improvements in provision for vehicles, which may make the private car a more attractive mode of transport, generating an increase in greenhouse gas emissions.

**6.4** The Maidstone Town Centre Vision is expected to lead to minor positive effects in relation to the following SA objectives:

- SA objective 1: Housing, because the vision seeks to create a stronger mix and balance of uses within

Maidstone Town Centre to support long term viability, including, where appropriate, residential development.

- SA objective 10: Water, because the vision seeks to ensure that Maidstone Town Centre's green and blue infrastructure is enhanced. Green infrastructure will help mitigate against climate change by managing surface water flooding by reducing runoff and providing water storage and retention areas, which will prevent water contamination.
- SA objective 12: Flooding, because as mentioned above, the vision seeks to ensure that Maidstone Town Centre's green and blue infrastructure is enhanced. Green infrastructure will help mitigate against climate change by managing surface water flooding and sewer flooding by reducing runoff and providing water storage and retention areas.
- SA objective 14: Biodiversity, because the vision seeks to ensure that Maidstone Town Centre's green and blue infrastructure is enhanced, which is likely to increase the biodiversity present.

Because they are not mentioned, the vision's contribution to the achievement of the following objectives is likely to be negligible: SA objective 8: Minerals, SA objective 9: Soils, SA objective 15: Historic Environment and SA objective 16: Landscape.



## Maidstone Town Centre

### Reasonable alternatives tested

**6.5** The Council's site identification and selection process is detailed in its Strategic Land Availability Assessment (SLAA). This formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA. Broadly speaking, sites were only discounted as reasonable alternatives for the SA if the SLAA determined that constraints would prevent any development on the site or if they were promoted a use for which there was no identified need.

**6.6** The site identification and selection process, the lists of reasonable alternative site options that were subject to SA, and the approach to and results of the SA of site options are set out in the separate SA of Options report that has been published alongside this SA document .

### Policy SP1: Maidstone Town Centre and site allocation policies for this location

**6.7** This section presents the appraisals of the following Local Plan Review policies:

- SP1: Maidstone Town Centre
- LPRSA009: Right Kard
- LPRSA053: 12-14 Week Street
- LPRSA144: Medway/ High St
- LPRSA145: Len House
- LPRSA146: Maidstone East
- LPRSA147: Gala Bingo & Granada House
- LPRSA148: Maidstone Riverside
- LPRSA149: Maidstone West
- LPRSA150: Mill Street Car Park
- LPRSA151: Mote Road

**6.8** Policy SP1: Maidstone Town Centre sets out the strategic priorities for the continued renewal of Maidstone Town Centre, criteria to be met by town centre development, and the total amounts of housing, commercial, and retail development to be provided by the Local Plan Review.

**6.9** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in the town centre, and the detailed criteria to be met before development will be permitted.

**6.10** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.2** following the scoring scheme set out in **Chapter 2**.

Table 6.2: SA findings for policy SP1: Maidstone Town Centre and site allocation policies for this location

SA objective	SP1: Maidstone Town Centre	LPRSA009: Right Kard	LPRSA053: 12-14 Week Street	LPRSA144: Medway/ High St	LPRSA145: Len House	LPRSA146: Maidstone East	LPRSA147: Gala Bingo & Granada House	LPRSA148: Maidstone Riverside	LPRSA149: Maidstone West	LPRSA150: Mill Street Car Park	LPRSA151: Mote Road
SA1: Housing	+	0	0	0	0	0	0	0	0	0	0
SA2: Services & Facilities	0	+	+	+	+	+	+	+	+	+	+
SA3: Community	0	+	+	+	+	+	+	+	+	+	+?
SA4: Health	+	+	+	+	0	+?	+?	+?	+?	+?	+?
SA5: Economy	+	+	+	+	+	+	+	+	+	+	+
SA6: Town Centre	++	++	++	++	++	++	++	++	++	++	0?
SA7: Sustainable Travel	+?	++	++	++	++	++	+	++	++	++	+
SA8: Minerals	0	0	0	0	0	0	0	-	-	0	0
SA9: Soils	0	0	0	0	0	0	0	0	0	0	0
SA10: Water	0	-	-	-	-	-	-	-	-	-	-
SA11: Air Quality	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SA12: Flooding	0	0	0	-	--	-	--	-	--	-	0
SA13: Climate Change	+	++	+	+	+	++	+	++	++	+	+
SA14: Biodiversity	0	-	-	-	-	-	-	-	-	-	-
SA15: Historic Environment	+	--?	--?	-?	-?	-?	-?	--?	--?	-?	-?
SA16: Landscape	+	0	0	0	0	0	0	-?	0	0	0

### Explanation of SA findings for policy SP1: Maidstone Town Centre and site allocation policies for this location

**6.11** In relation to SA objective 1: Housing, minor positive effects are expected from the strategic policy SP1: Maidstone Town Centre. While the effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole, the policy does require that development in the town centre demonstrates a quality of design that responds positively to the townscape and identifies opportunities for residential development. Negligible effects are expected from site 310 itself, because the site-specific policy makes no mention of the type or quality of housing to be delivered on the site.

**6.12** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP1: Maidstone Town Centre. The GIS-based site options work identified minor positive effects for all site-specific allocations in the town centre. While the majority of sites have good access to employment and other services (catering for residents of residential uses and employees of employment uses) within the town centre, as well as reasonable access to primary schools, this is offset by the poor access some have to secondary schools in particular - which are generally located around the edge of the town centre. These SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.13** In relation to SA objective 3: Community, negligible effects are expected from the strategic policy SP1: Maidstone Town Centre. All of the site-specific allocation policies contain provisions requiring consideration of the amenity of neighbours (and, in the case of site 9, the amenity of a neighbouring pub) or provisions which require the development to interact with its surroundings through measures such as active frontages. This results in minor positive scores for all sites in relation to this SA objective.

**6.14** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP1: Maidstone Town Centre, given the requirement for development to contribute to a high quality public realm and pedestrian environment, and the requirement to retain the riverside as an environmental features, contributing to the GBI network that supports health and wellbeing. The initial GIS-based scores identified negligible or minor negative effects for the majority of site-specific allocation policies in relation to residential use and mainly minor positive effects in relation to employment use. While there are no odour concerns from nearby waste sites, and the sites generally have adequate access to open space, the majority of sites (other than 9 and 53) lie within the air quality management area (AQMA), and the majority are also subject to high noise exposure. Nevertheless, several of the site-specific policies require provisions including noise

surveys, air quality measures and additional open space provision, which in several cases have reduced the effects initially identified. Taking into account these requirements within allocation policies, scores in relation to SA objective 4: Health now range from negligible to minor positive. In cases of uncertain effects, this reflects uncertainty over how successfully the required assessments and surveys will be implemented within the scheme in question.

**6.15** In relation to SA objective 5: Economy, minor positive effects have been identified for the strategic policy SP1: Maidstone Town Centre, given the requirements for a focus on a renewed retail environment, the introduction of new workspaces and measures to increase local employment levels. All the site options in the town centre have the potential to deliver employment opportunities through the provision of varied employment floor space, and therefore have the potential for positive effects in relation to SA objective 5: Economy.

**6.16** Significant positive effects have been identified in relation to SA objective 6: Town Centre for both strategic policy SP1: Maidstone Town Centre and almost all site allocations within the town centre. This is because there is a clearly stated priority within policy SP1 to create a strong service offering that increases footfall, with positive effects on vibrancy and viability in the town centre, delivered through an Action Plan. The mixed uses envisaged in the site allocation policies also contribute to this goal. Only in the case of site 151 (Mote Road) has a negligible effect been identified, due to the fact that no 'Class A' (shops, including some services such as professional services) are allocated at the site. However there is some uncertainty over this effect given the changes to the Use Classes order in September 2020, which merged Use Classes A and B and provide for more flexibility over ultimate uses.

**6.17** In relation to SA objective 7: Sustainable Travel, minor positive effects are expected from the strategic policy SP1: Maidstone Town Centre, given requirements to achieve improved accessibility to and through the town centre through the Integrated Transport Strategy and Infrastructure Delivery Plan. There is uncertainty over these effects given that it is not yet clear how ambitious these measures will be. In general, significant positive effects have been identified for site-specific policies in the town centre, given the strong access to public transport and low average commuting distances. However, only minor positive effects have been identified for sites 147 and site 151, largely because they are more distant from rail services and cycle routes.

**6.18** Negligible effects have been identified in relation to SA objective 8: Minerals for policy SP1: Maidstone Town Centre. Negligible effects have been identified in relation to this SA objective for all site-specific policies other than sites 148 and

149, both of which lie in a minerals safeguarding area (MSA). Given that both sites lie entirely within these constraints, it is not considered possible to mitigate this effect.

**6.19** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP1: Maidstone Town Centre and for all site allocation policies, given that all sites considered are brownfield sites and none necessitate the loss of valuable agricultural land.

**6.20** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP1: Maidstone Town Centre. Minor negative effects have been identified for all allocated sites in the town centre, given that all lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.21** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP1: Maidstone Town Centre. The GIS-based site options work identified significant negative effects for 6 of the 10 sites, given significant risk from fluvial and surface water flooding in the town centre. In some cases, where these flood risk zones account for a large part of the site in question (including sites 145, 147 and 149), these significant negative effects remain. However at a number of sites, provisions within the site-specific policies (including sites 144 and 146), these effects have been reduced to minor negative in relation to this SA objective.

**6.22** In relation to SA objective 13: Climate Change, minor positive effects have been identified for the strategic policy SP1: Maidstone Town Centre, which allocated residential sites within the town centre, helping to reduce the number of trips and as such lower the potential for emissions compared to out-of-town sites. The GIS-based site options work identified a combination of significant and minor positive effects in relation to this SA objective for sites in the town centre, which generally reflected variation in access to key services and public transport access e.g. to Maidstone's rail stations.

**6.23** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic SP1: Maidstone Town Centre. The GIS-based site options work identified minor negative effects for all sites allocated within the town centre in relation to this SA objective, given that all intersect with the 'air pollution' impact risk zone (IRZ) for nearby SSSIs. While several of the site-specific policies require a Phase 1 habitat survey to be carried out on site, this will not address the particular issue identified here, and as such the SA scores remain unaffected by the policy wording.

**6.24** In relation to SA objective 15: Historic Environment, minor positive effects have been identified for the strategic policy SP1: Maidstone Town Centre, given the requirement for development here to respond positively to the townscape, including ensuring the conservation and enhancement of the town centre's historic fabric. The GIS-based site options work identified significant negative effects with uncertainty in relation to this SA objective for all sites allocated within the town centre, given the potential impact of development on the cluster of listed buildings, conservation area, scheduled monument and area of archaeological interest in the town centre. However, in several cases (sites 53, 145 and 157), provisions within the site-specific policies require any new development to respect or enhance heritage assets and respond to the relevant listed context, which reduces the effect to minor negative with uncertainty.

**6.25** In relation to SA objective 16: Landscape, minor positive effects have been identified for the strategic policy SP1: Maidstone Town Centre given that, for sites adjacent to the rivers Len and Medway, development is required to respond positively to the rivers' setting, taking account of views from the river valley sides. For all site-specific policies other than site 148, the GIS-based site options work identified negligible effects in relation to this SA objective, as they lie outside the designated Landscape Character Areas (LCAs). Site 148, however, lies within the Medway Valley Allington LCA, which has been assessed as highly sensitive. Nevertheless, only a small part of the site intersects with this LCA, reducing the residual impact to minor negative with uncertainty. See below for recommendations.

### Mitigation

**6.26** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Greater emphasis on measures to reduce the impact of floods – such as SuDS features integrated into new development, would help to mitigate the residual flood risk identified at many developments within the town centre. This is particularly relevant for the site-specific policies for sites 148 and 149.
- Provision of additional secondary educational infrastructure would help to support a mixed residential community in the town centre and provide stronger access to the full range of key services.
- A landscape and visual impact assessment at site 148 (Maidstone Riverside) would help to address the potential negative impacts on local landscape character in the north of the site.

- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.

## Maidstone Urban Area

### Reasonable alternatives tested

**6.27** The Council's site identification and selection process is detailed in its Strategic Land Availability Assessment (SLAA). This formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA. Broadly speaking, sites were only discounted as reasonable alternatives for the SA if the SLAA determined that constraints would prevent any development on the site or if they were promoted a use for which there was no identified need.

**6.28** The site identification and selection process, the lists of reasonable alternative site options that were subject to SA, and the approach to and results of the SA of site options are set out in the separate SA of Options report that has been published alongside this SA document.

### Policy SP2: Maidstone Urban Area and site allocation policies for this location

**6.29** This section presents the appraisals of the following Local Plan Review policies:

- SP2: Maidstone Urban Area
- LPRSA152: Former Royal British Legion Social Club
- LPRSA298: Dorothy Lucy Centre
- LPRSA303: EIS Oxford Rd
- LPRSA362: Maidstone Police HQ, Sutton Rd
- LPRSA156: Danebury, College Road
- LPRSA366: Springfield Tower, Royal Engineers Road

**6.30** Policy SP2: Maidstone Urban Area identifies the urban area outside of the town centre as a sustainable location that will be a key focus for new development and sets criteria to be met by development in the urban area. It also confirms the total amount of residential development to be provided on new site allocations within the urban area and sets out the infrastructure requirements to support development in the urban area. Policy SP2 confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA. Policy SP2 also lists the existing employment sites that are designated as Economic Development Areas by Policy SP11(a) to maintain employment opportunities in the urban area. The sustainability effects of this designation are separately presented under the SA of Policy SP11(a) and not repeated here.

**6.31** The detailed site allocation policies set out the amounts and types of development to be provided on each site

allocation in the urban area, and the detailed criteria to be met before development will be permitted.

**6.32** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.3** following the scoring scheme set out in **Chapter 2**.

Table 6.3: SA findings for policy SP2: Maidstone Urban Area and site allocation policies for this location

SA objective	SP2: Maidstone Urban Area	LPRSA152: Former Royal British Legion Social Club	LPRSA298: Dorothy Lucy Centre	RdLPRSA156: Danebury, College Road	LPRSA362: Maidstone Police HQ, Sutton Rd	LPRSA303: EIS Oxford Rd	LPRSA366: Springfield Tower, Royal Engineers Road
SA1: Housing	0	0	0	0	0	0	0
SA2: Services & Facilities	+	0	-	+	-	-	+
SA3: Community	+	+	+	+	+	0	+
SA4: Health	+	0	+	+	+	+	+
SA5: Economy	+	--	0	0	--	--	0
SA6: Town Centre	0	+	+	+	+	+	+
SA7: Sustainable Travel	0	-	-	+	-	-	++
SA8: Minerals	0	0	-	0	-	0	0
SA9: Soils	0	0	0	0	0	0	0
SA10: Water	0	-	-	-	-	-	-
SA11: Air Quality	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SA12: Flooding	0	0	--	0	--	--	--
SA13: Climate Change	0	-	0	+	-	-	+
SA14: Biodiversity	+	-?	-?	0	0	0	0
SA15: Historic Environment	0	0?	--?	0?	--?	0?	-?
SA16: Landscape	0	-	0	0	--	0	0

### Explanation of SA findings for policy SP2: Maidstone Urban Area and site allocation policies for this location

**6.33** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP2: Maidstone Urban Area, as the effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are also expected for all site-specific allocation policies in relation to this SA objective, because the policies make no mention of the type or quality of housing to be delivered on the site.

**6.34** In relation to SA objective 2: Services & Facilities, minor positive effects are expected from the strategic policy SP2: Maidstone Urban Area, given the requirements for expanded educational and health infrastructure. The GIS-based site options work identified a mixture of minor positive effects, negligible effects and minor negative effects for all site-specific allocation policies, which varies depending to the amenities available in the local area. In general, access from these sites to secondary schools and retail centres is poor, while access to employment is better, and access to GP surgeries varies. These SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.35** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP2: Maidstone Urban Area. This is because the policy seeks to maintain the network of district and local centres, as well as retaining the town's green spaces and supports development that improves the social, environmental and employment wellbeing of those living in identified areas of deprivation. For most site-specific allocation policies, minor positive effects are identified in relation to this SA objective, where the policies require development to take account of the amenity of neighbours or to provide community infrastructure. In the case of site 303, there is an existing community use on site, however policy requires for this use to be retained unless a suitable alternative location is identified, resulting in residual negligible effects for this site.

**6.36** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP2: Maidstone Urban Area, given the requirement to retain green spaces and the amenity value of these areas, as well as support for the wellbeing of those living in areas of deprivation. The initial GIS-based scores generally identified minor positive effects for the majority of site-specific allocation policies. These sites tend not to raise concerns over significant noise pollution, odour or air quality and have some access to open space and public rights of way. However in the case of site 152, negative effects were reduced to negligible effects given the requirement for provision of open space within the site-specific allocation policy. In the case of site 366, the requirement for

noise and air quality surveys are noted but do not affect the overall SA scores for the site.

**6.37** In relation to SA objective 5: Economy, minor positive effects have been identified for the strategic policy SP2: Maidstone Urban Area, given the requirement to retain well located business areas and to maintain the network of district and local centres. A mixture of effects were identified for the site-specific allocation policies in relation to this SA objective – residential development at sites 152, 303 and 362 would result in the loss of existing employment space, and as such significant negative effects have been identified. However in other cases, negligible effects were identified in relation to this SA objective, and are unaffected by the site-specific allocation policies.

**6.38** Negligible effects have been identified in relation to SA objective 6: Town Centre for both strategic policy SP2: Maidstone Urban Area. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.39** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP2: Maidstone Urban Area. In general, minor negative effects have been identified for site-specific policies in relation to this SA objective. While access to bus stops is generally strong, access to cycling routes and rail station is weaker. The exception in relation to this SA objective is site 366, where strong access to cycle routes and some access to Maidstone East rail station result in significant positive effects identified in relation to this SA objective. A minor positive effect was also identified for site 156, which has some access to Maidstone West rail station and so performs slightly better on this SA objective.

**6.40** Negligible effects have been identified in relation to SA objective 8: Minerals for policy SP2: Maidstone Urban Area. Negligible effects have been identified in relation to this SA objective for all site-specific policies other than sites 298 and 362, which intersect partially with minerals safeguarding areas (MSAs).

**6.41** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP2: Maidstone Urban Area and for all site allocation policies, given that all sites considered are brownfield sites and none necessitate the loss of valuable agricultural land.

**6.42** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP2: Maidstone Urban Area. Minor negative effects have been identified for all allocated sites in the town centre, given that all lie within a drinking water safeguarding zone (surface water). Given that



almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.43** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP2: Maidstone Urban Area. The GIS-based site options work identified significant negative effects for sites 298, 303, 362 and 366 in relation to this SA objective, and negligible effects for all other sites. In instances of negative effects, there are some areas at risk of surface water flooding, which are not altered by the site-specific allocation policies, and as such significant negative effects are identified in all cases. However in several cases, only a minority of the site is affected and there is therefore scope for mitigation.

**6.44** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP2: Maidstone Urban Area. The GIS-based site options work identified a combination of minor negative and minor positive effects in relation to this SA objective for sites allocated here, which generally reflected variation in access to key services and public transport access in the different locations.

**6.45** In relation to SA objective 14: Biodiversity, minor positive effects have been identified for the strategic SP2: Maidstone Urban Area, given the requirement to ensure that development positive contributes to the biodiversity value of green spaces. The GIS-based site options work identified minor negative effects for sites 152 and 298 and negligible effects for sites in relation to this SA objective. In both cases, the risk to biodiversity comes from nearby ancient woodland, and both site-specific allocation policies require a Phase 1 Habitat survey to be carried out. Given that this may help to reduce impact on nearby biodiversity assets if, for example, it leads to buffering of or increased connectivity with off-site habitats, it contributes uncertainty to the previously identified minor negative effect in both cases.

**6.46** In relation to SA objective 15: Historic Environment, minor positive effects have been identified for the strategic policy SP2: Maidstone Urban Area. The GIS-based site options work identified negligible effects with uncertainty in relation to this SA objective for half of the sites. However in the case of sites 298, 362 and 366, significant negative effects with uncertainty were identified, largely given their proximity to listed buildings and the potential impact on its setting. The site-specific policy for site 366 requires development to respect the setting of a nearby listed building, reducing the effect to minor negative with uncertainty.

**6.47** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP2: Maidstone Urban Area. For most site-specific allocation policies, negligible effects were identified as these locations

do not fall within sensitive landscape character areas. However site 152 lies on the threshold of the Farleigh Greensand Fruit Belt landscape character area (LCA), which is judged to be highly sensitive, and part of site 362 overlaps with the same LCA. However given that there is only a very limited intersection with this LCA in the case of site 152, only minor negative effects are identified for site 152 in relation to this SA objective. The SA scores for site 362 remain the same, however given only partial overlap, there is scope for mitigation.

### Mitigation

**6.48** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- In the case of sites 298 and 362, those parts of the sites with lie in a mineral safeguarding area (MSA) can be avoided, or minerals can be extracted prior to development.
- In order to minimise the risk of surface water flooding at sites 298, 303, 362 and 366, SuDS features should be integrated into proposed development schemes, and development should avoid those limited areas where flood risk has been identified.
- In the case of site 298, an assessment should be carried out of the impact of development on the setting of the nearby listed building and used to inform site design.
- In the case of site 362, development should be directed towards those parts of the site with lower identified landscape sensitivity.

## Edge of Maidstone

### Reasonable alternatives tested

**6.49** The Council's site identification and selection process is detailed in its Strategic Land Availability Assessment (SLAA). This formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA. Broadly speaking, sites were only discounted as reasonable alternatives for the SA if the SLAA determined that constraints would prevent any development on the site or if they were promoted a use for which there was no identified need.

**6.50** The site identification and selection process, the lists of reasonable alternative site options that were subject to SA, and the approach to and results of the SA of site options are set out in the separate SA of Options report that has been published alongside this SA document.

### Policy SP3: Development at the Edge of Maidstone and site allocation policies for this location

**6.51** This section presents the appraisals of the following Local Plan Review policies:

- SP3 Development at the edge of Maidstone
- LPRSA246 - Land Rear of Appletree House, Maidstone
- LPRSA266 - Land at Ware Street, Maidstone
- LPRSA196 - Land at Willow Farm, the Countryside
- LPRSA216 - Rochester Meadow, the Countryside
- LPRSA010 - Bydews Place, South West of Maidstone Urban Extension
- PRSA265 - Land at Abbey Farm, South West of Maidstone Urban Extension
- PRSA235 – Land at Boughton Lane, South of Maidstone Urban Extension
- LPRSA270 - Land South West of Police HQ, South of Maidstone
- LPRSA172 - Land at Sutton Road, South East of Maidstone

**6.52** Policy SP3: Development at the Edge of Maidstone identifies the urban fringe of Maidstone as a deliverable location for new housing growth and sets criteria to be met by development on the urban edge. It also confirms the total amount of residential development to be provided on new site allocations within the urban area and sets out the infrastructure requirements to support development in the urban area. Policy SP3 confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the

absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA. Policy SP2 also lists the existing employment sites that are designated as Economic Development Areas by Policy SP11(a) to maintain employment opportunities in the urban area. The sustainability effects of this designation are separately presented under the SA of Policy SP11(a) and not repeated here.

**6.53** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in the urban area, and the detailed criteria to be met before development will be permitted.

**6.54** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.4**, following the scoring scheme set out in **Chapter 2**.

Table 6.4: SA findings for policy SP3: Development at the Edge of Maidstone and site allocation policies for this location

SA objective	SP3 Development at the edge of Maidstone	LPRSA246 - Land Rear of Appletree House, Maidstone	LPRSA266 - Land at Ware Street, Maidstone	LPRSA196 - Land at Willow Farm, the Countryside	LPRSA216 - Rochester Meadow, the Countryside	LPRSA010 - Bydews Place, South West of Maidstone Urban Extension	PRSA265 - Land at Abbey Farm, South West of Maidstone Urban Extension	LPRSA235 – Land at Boughton Lane, South of Maidstone Urban Extension	LPRSA270 - Land South West of Police HQ, South of Maidstone	LPRSA172 - Land at Sutton Road, South East of Maidstone
SA1: Housing	0	0	0	0	0	0	0	0	0	0
SA2: Services & Facilities	+	-	-	--	--	-	-	-	-	-
SA3: Community	+	+	+	+	+	+	+	+	+	+
SA4: Health	+	+	+	+	+	+	+	+	+	+
SA5: Economy	0	0	0	0	0	0	0	0	0	0
SA6: Town Centre	0	+	+	+	+	+	+	+	+	+
SA7: Sustainable Travel	0	+	+	+	+	-	-	-	-	-
SA8: Minerals	0	-	-	0	0	-	-	-	-	-
SA9: Soils	0	--	--	--	--	--	--	--	--	--
SA10: Water	0	-	-	-	-	-	-	-	-	-
SA11: Air Quality	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SA12: Flooding	0	--	--	--	-	0	--	0	--	0
SA13: Climate Change	0	-	-	-	-	-	-	-	-	-
SA14: Biodiversity	0	0	0	0	0	-	-	0	-	-
SA15: Historic Environment	0	--?	--?	--?	--?	-?	-?	--?	--?	-?
SA16: Landscape	0	-	-	0	0	--	--	-	--	--

### Explanation of SA findings for policy SP3: Development at the Edge of Maidstone and site allocation policies for this location

**6.55** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP3: Development at the Edge of Maidstone, as the effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are also expected for all site-specific allocation policies in relation to this SA objective, because the policies make no mention of the type or quality of housing to be delivered on the site.

**6.56** In relation to SA objective 2: Services & Facilities, minor positive effects are expected from the strategic policy SP3: Development at the Edge of Maidstone, given the requirements for new primary schools and local shopping facilities to serve new development. The GIS-based site options work identified a mixture of minor negative and significant negative effects in relation to this SA objective for the site-specific allocation policies. While these sites are scattered across different parts of the urban edge of Maidstone, in general access to secondary schools and retail centres was found to be poor and there were mixed results regarding access to GP surgeries, primary schools and employment. In the case of adjacent sites 196 and 216, where significant negative effects were identified, provisions in the site-specific policies to improve connectivity to the town centre are noted but do not affect overall SA scores.

**6.57** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP3: Development at the Edge of Maidstone, given the requirements within the policy for provision of new community centres to serve development. For all site-specific allocation policies, minor positive effects are identified in relation to this SA objective, given that all require development to take account of the amenity of neighbours in some form. In particular, the policy for site 246 requires measures to prevent overlooking of other dwellings and for natural screening on site boundaries.

**6.58** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP3: Development at the Edge of Maidstone, given the requirement for improvements to health infrastructure and for publicly accessible open space. The initial GIS-based scores generally identified a range of SA scores in relation to this SA objective for site-specific allocation policies, given varying access to open space and the varying impact of air and noise pollution on these sites. However all sites have strong access to the public rights of way (PROW) network. In particular, adjacent sites 196 and 216 are significantly affected by the impact of

the nearby road infrastructure, both in terms of air pollution and noise exposure. However in both cases, the site-specific policy requires that development should mitigate in line with the Low Emissions Strategy, resulting in overall minor positive impacts in relation to this SA objective, given strong access to open space and public rights of way (PROW). In the case of the policy for site 265, the requirements for improved provision of open space and measures to minimise the impact of the adjacent former landfill site changes the identified minor negative effect to a minor positive effect.

**6.59** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone and for all site-specific allocation policies, given that none of the allocations would lead to the loss of an existing employment site.

**6.60** Negligible effects have been identified in relation to SA objective 6: Town Centre for both strategic policy SP3: Development at the Edge of Maidstone. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.61** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP3: Development at the Edge of Maidstone. Effects ranging from minor negative to minor positive were identified by the initial, GIS-based appraisals of the allocated sites in relation to this SA objective, reflecting the varied locations of the sites. In general, access to rail stations was poor, than for sites 246 and 266, which have some access to Bearsted rail station. Access to bus services is better, however access to existing cycle routes is poor across all sites other than 196 and 216. In the case of site 246, the requirements for the provision of a new bus route improved the identified effects to minor positive, however requirements for public transport improvements at sites 235, 265 and 270 are noted but do not affect the overall SA scores, given residual poor access to rail services and cycle routes.

**6.62** Negligible effects have been identified in relation to SA objective 8: Minerals for policy SP3: Development at the Edge of Maidstone. Minor negative effects have been identified in relation to this SA objective for the majority of the site-specific policies, which intersect with a minerals safeguarding area (MSA). The exceptions are adjacent sites 196 and 216, which do intersect with MSAs.

**6.63** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone. Significant negative effects have been identified for most site-specific allocation policies in relation to this SA objective, given that all except site 10 would lead to

the loss of greenfield land and most are on high quality agricultural land. Site 10 is identified as a mixed greenfield and brownfield site but the majority of the site intersects with Grade 2-classified agricultural land, contributing to the significant negative effects identified. These SA scores are unaffected by site-specific policies.

**6.64** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone. Minor negative effects have been identified for all allocated sites, given that all lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.65** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone. The GIS-based site options work identified a range of SA scores for the site-specific allocation policies in relation to this SA objective, from significant negative to negligible. In general, the major risk identified within these sites comes from surface water flooding, with some instances of groundwater flooding risk in addition. These SA scores were unaffected by site-specific policies.

**6.66** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone. The GIS-based site options work identified minor negative effects in relation to this SA objective for all sites allocated here, which generally reflected poor/mixed access to some key services and public transport across the different locations.

**6.67** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone. The GIS-based site options work identified a range of SA scores for the site-specific allocation policies in relation to this SA objective, from significant negative to negligible. Where negative effects were identified, this related to either the presence of Priority Habitat on-site, or proximity to areas of ancient woodland. In a number of cases (site 246, 266, 172, 10 and 270), Phase 1 habitat surveys and other measures required by site-specific policies (including respecting ancient woodland) were judged to reduce the significance of the previously identified negative effects.

**6.68** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone. The GIS-based site options work identified significant negative effects with uncertainty in relation to this SA objective for all sites other than site 172, which is more distant from nearby heritage

assets. However at site 265, the provisions within the site-specific policy to respect and enhance listed buildings at Abbey Gate reduce this negative effect to minor negative, as does wording in site-specific policies 10 and 265, where listed buildings are stated to constrain part of the site. Nevertheless, the uncertainty over these effects remains, given that it is unclear without further investigation how successfully the impact on these assets can be mitigated.

**6.69** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP3: Development at the Edge of Maidstone. For five of the site-specific allocation policies, significant negative effects were identified by the GIS-based site options work in relation to this SA objective, for those sites lying within landscape character areas (LCAs) judged as being highly sensitive. However adjacent sites 196 and 216 do not lie in these more sensitive areas. In some cases, these effects have been reduced to minor negative, where policies include requirements for screening and limiting the effects on adjacent open countryside – this is the case for sites 246, 266 and 235.

### Mitigation

**6.70** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Given the poor access to cycle routes in relation to SA objective 7: Sustainable Travel, site-specific policies should be required to provide appropriate cycle links to routes on the existing National Cycle Network, where appropriate.
- Ensure that any significant mineral resources within this site are recovered prior to construction, where economically viable.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- SuDS features should be integrated into the design of those sites where negative effects have been identified in relation to SA objective 12: Flooding, given that the major risk in these cases stems from surface water flooding.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for these locations to conserve and enhance the historic environment.

- Landscape and visual impact assessments should be required for those sites where residual significant negative effects remain in relation to SA objective 16: Landscape. Recommendations for screening of development from adjacent open countryside would also help to mitigate risk.

## Garden Settlements

### Reasonable alternatives tested

**6.71** The Council indicated, when carrying out the Call for Sites in March 2019, that it was interested in pursuing garden communities as a method of accommodating future housing need in the Local Plan Review. Through the Call for Sites, a number of garden settlement-scale developments were submitted. The Council commissioned an independent assessment of the suitability and deliverability of each of these and three potentially deliverable garden settlements were identified as follows:

- North of Marden
- North of M2/Lidsing
- Heathlands

**6.72** These three sites were therefore considered to be reasonable alternative garden settlement options for the purposes of the SA as they were considered to have sufficient potential to be achievable in principle.

**6.73** The process followed for identifying the garden settlement options to be subject to SA and the results of the SA of those options are described in detail in the separate SA of Options report that has been published alongside this SA document<sup>39</sup>.

### Policy SP4: Garden Settlements and site allocation Policies SP4(a) and SP4(b)

**6.74** This section reports the findings of the SA of the Local Plan Review policies which include specific provisions in relation to the new garden settlements which are proposed at Lidsing and Heathlands as follows:

- Policy SP4: Garden settlements;
- Policy SP4(a): Heathlands Garden Settlement; and
- Policy SP4(b): Lidsing Garden Settlement.

**6.75** assessment findings for each of these policies, which are summarised in **Table 6.5** below, in accordance with the scoring scheme set out in **Chapter 2**. However, these policies are interrelated. Policy SP4 provides the overarching principles which apply to both garden settlements while policies SP4(a) and SP4(b) provide more detailed provisions in respect of the specific garden settlements to which they relate. Due to this strong inter-relationship of the policies, this section considers the likely effects to arise from policy SP4

and the effects of the detailed provisions in policies SP4(a) and SP4(b) in comparison to this.

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<sup>39</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

Table 6.5: SA findings for policy SP4: Garden Settlements and site allocation Policies SP4(a) and SP4(b)

SA Objective	Policy SP4: Garden settlements;	Policy SP4(a): Heathlands Garden Settlement	Policy SP4(b): Lidsing Garden Settlement
SA1: Housing	++	++	++
SA2: Services & Facilities	+++?	+++?	+++?
SA3: Community	+	--?/+?	+?/-?
SA4: Health	+	++/--	++/--
SA5: Economy	++	++	++
SA6: Town Centre	+	+	+
SA7: Sustainable Travel	+	+?	-?
SA8: Minerals	0	--	0
SA9: Soils	--	--	--
SA10: Water	--	--	--
SA11: Air Quality	-	-	-
SA12: Flooding	0	-	0
SA13: Climate Change	-	-	-
SA14: Biodiversity	+?	+?	+?
SA15: Historic Environment	0	--	--
SA16: Landscape	-	-	-



**Explanation of SA findings for policy SP4: Garden Settlements and site allocation Policies SP4(a) and SP4(b)****SA Objective 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home**

**6.76** The provision of Garden communities as set out in policies SP4, 4(a) and 4(b) will result in a significant number of new homes being constructed over the plan period. This will help to provide additional opportunities for home ownership within the borough. Provision 1F of policy SP4 sets out that new buildings will be designed with a strong focus on energy efficiency, reduced carbon emissions and climate change mitigation. Provision 1D of the same policy sets out that generous amounts of green space will be provided and provision 1E sets out that an integrated transport system which emphasises active modes of travel. Provision 2 sets out a requirement that development within garden settlements is master planned and subject to a design code. These provisions will help to ensure that the new homes constructed within the garden settlements are sustainably constructed and well designed, resulting in significant positive effects in relation to this SA objective.

Policy SP4(a) includes the main provision that development within the Heathlands garden settlement complies with policy SP4, thereby all effects anticipated in relation to SP4 will apply to SP4(a). In addition, policy SP4(a) sets out a requirement for 40% of homes to be affordable and for homes to be of a mix of types and tenures, including generational living. This will help some members of the community to access housing who would otherwise be unable to do so and will also help to ensure that the housing better suits residents. Significant positive effects are anticipated in relation to this SA objective.

**6.77** Policy SP4(b) again includes the provision that development within Lidsing garden settlement complies with policy SP4, thereby all effects anticipated in relation to policy SP4 will apply to SP4(b). Similar to policy SP4(a) it requires 40% affordable housing, and a mix of types and tenures, including generational living. Significant positive effects are anticipated in relation to this SA objective.

**Mitigation**

**6.78** The positive effects could be further enhanced by requiring a tenure and housing mix that is appropriate in accordance with the housing evidence that the council has produced, specifically the strategic housing market assessment.

**6.79** Specific reference to design standards such as Lifetime Homes would help to ensure that the homes provided under these policies will be well designed and be suited to occupants of different circumstances and abilities.

**SA Objective 2: To ensure ready access to essential services and facilities for all residents**

**6.80** Policy SP4 sets out that garden settlements will be required to deliver appropriate local retail and services, taking account of local levels of service provision. As a principle for development, this is likely to help ensure that occupants of the new garden settlements have access to essential services and facilities. Coupled with the provisions which require all mitigation to be costed and phased alongside new homes and jobs, significant positive effects are anticipated in relation to this SA objective. However, the delivery of these will be dependent on a range of factors including viability and service provider policies and strategies and as such, these effects are considered to be uncertain.

**6.81** Policy SP4(a) sets out that Heathlands garden community would be developed with a new rail station on the Ashford-Maidstone railway line and that this new station will be the design-focus of the district centre. At distance of greater than 1.2km from the proposed station, local centres will be provided. This proposed network of district and local centres will help to ensure that residents are able to access services and facilities readily by a range of modes. The distances involved are likely to help facilitate the use of active travel modes, which reduces dependency on private vehicle ownership (thereby increasing the scope for those without this to access the services and facilities). In addition to the district and local centres, a new primary school is required by policy SP4(a) as well as sufficient open space to exceed the council's usual standards. These policy provisions will help to ensure people have access to services and facilities within the garden settlement and this is likely to provide for most day to day needs, subject to the final provision of these being determined. In addition, a significant amount of employment (1 job to 1 home) is required by the policy, which is likely to help the resident population gain employment within their local area. However, it is understood that secondary school-aged pupils from Heathlands will be able to attend Lenham Secondary School, which is over 1km from the nearest boundary of the site, and no specific transport policy to address this is included in the policy. This may result in dependence on the private car to access secondary education. In addition to this, it is possible that some necessary services and facilities will not be provided within the garden settlement due to a lack of specificity in the policy. Further to the day to day needs of residents, due to the scale of the garden settlement it will always be the case that occupants will need to access higher order services and facilities in other settlements, particularly Maidstone town. It is similarly the case that, despite the high target for employment provision within the garden settlement, some people will need to access employment opportunities off site, to meet their specific skills and career ambitions. The proposed rail station

will help to ensure that occupants of Heathlands can access the higher order services and facilities and additional employment opportunities in other settlements whilst reducing dependence on the private car. The requirement for new road junctions is also set out within the policy, which will support those with access to a private vehicle and buses to access services, facilities and employment opportunities in Maidstone town and other settlements near Heathlands. The effects of the policy in relation to this SA objective are anticipated to be significant positive with uncertainty. The uncertainty stems from the lack of clarity over which services and facilities will be provided within the garden settlement.

**6.82** Policy SP4(b) sets out that a new local centre will be provided within Lidsing garden settlement on the alignment of a bus route linking to wider destinations. However the location / alignment of this within the development is not set out in the policy so it is unclear whether this will facilitate access to services and facilities within it from all areas of the development. It is also unclear what specific services and facilities will be provided here. The policy sets out that new primary school and open space will be provided within the settlement, which when combined with the local centre is likely to enable occupants of Lidsing to access day to day services and facilities, subject to the final provision of these being determined. The policy is unclear in relation to secondary aged pupils, and until the strategy in relation to these is defined, it cannot be determined that secondary aged pupils will be able to readily access education. In addition, a significant amount of employment (1 job to 1 home) is required by the policy which is likely to help the resident population gain employment within their local area. This will also facilitate residents of surrounding areas to access employment opportunities here. Due to the scale of Lidsing garden settlement, it will be the case that residents and other occupants will need to visit other settlements to access higher order facilities and services. Some occupants will also need to travel away from the site to find employment opportunities which align with their skills and career ambitions. The provisions of the policy include a new orbital bus route which links to the Medway urban area, and strategic walking / cycling links along the Capstone Valley. These will help to ensure residents are able to access services, facilities and employment opportunities in the Medway urban area using active modes of travel and public transport, thereby reducing dependency on private vehicles. The proposed highway improvement at M2 junction 4 will also facilitate those with a private vehicle to access facilities, services and employment in other settlements, again whilst reducing dependence on private vehicles. In accordance with the above, the effects of the policy in relation to this SA objective are anticipated to be significant positive with uncertainty. The uncertainty stems from the lack of clarity over which services and facilities will be provided within the garden settlement.

### Mitigation

**6.83** In order to reduce uncertainty identified in relation to the anticipated effects, more prescriptive detail about the facilities and services to be provided within each garden settlement should be included in the policies.

**6.84** For both garden settlements, greater clarity about the secondary education provision should be provided to set out where pupils will be educated and how they will be able to access this. At Heathlands, there is potential for walking and cycling connections to Lenham to be improved but this does not feature within policy SP4 or SP4(a). If included, this would provide greater opportunity for pupils to walk to cycle to Lenham secondary school.

**6.85** The location of the local centre within Lidsing should be clarified in order to understand how this will affect accessibility to services and facilities.

### SA Objective 3: To strengthen community cohesion

**6.86** Garden settlements are, by their nature, intended to be new self-sustaining settlements which offer employment, facilities and services for the community they create. It is considered that both garden settlements will therefore result in minor positive effects in relation to this SA objective because the nature of the settlements will facilitate the creation of new communities. However, there is also a risk that the development of a large scale development will result in concerns from local communities in relation to construction impacts, increased traffic and increased demand for local services that may not have sufficient capacity to accommodate this.

**6.87** Policy SP4 requires evidence of community engagement with and identification of future roles for the community. It also includes provisions to provide for local food growing, which if undertaken through community growing schemes may help to form a sense of community. However it does not specifically require a specific standard of community engagement. As such, minor positive effects are anticipated as a result of policy SP4 in relation to this SA objective.

**6.88** Policy SP4(a) sets out that infrastructure and mitigation will be required in phase with development. The provision of services and facilities may benefit existing communities around the site, which may lead to some positive community views about the new settlement. However, there is significant potential for surrounding communities to view the development negatively. Heathlands, as proposed, would comprise a large development relative to the existing settlements of Lenham Heath and Lenham and would therefore be likely to change the identity of these. The Stantec Deliverability and Viability Assessment identifies that there are likely to be significant new vehicle trips as a result of this site, at least 1,600 new trips in the AM peak. Heathlands is likely to

result in greater pressure on services in Lenham, particularly GP facilities and secondary school provision and this may result in some community friction, leading to a loss of community cohesion. As such mixed minor positive and significant negative effects are identified from policy SP4(a) in relation to this SA objective. All effects are uncertain as different members of the community may perceive this garden settlement differently.

**6.89** Policy SP4(b) sets out that infrastructure and mitigation will be required in phase with development. The provision of services and facilities may benefit existing communities around the site, which may lead to some positive community views about the new settlement. However, the Lidsing garden settlement is likely to result in increased traffic as a result of both the development itself, and the proposed new arm to Junction 4 of the M2 (which is an element of the transport package associated with this settlement option). This has particular implications for roads within Gillingham due to the redistribution of traffic and increased use of roads here to access the new junction arm. This may cause friction with the existing communities, but on the other hand the enhanced access to the M2 may be seen as a positive change. The potential for erosion of identity of the existing, adjacent communities is less than for Heathlands because most of the nearby residents are already living in the larger, urban Medway urban area, rather than, for example, a discrete rural settlement which is more likely to be dominated by such a scale of development. As such, these effects are not considered to be significant. It is recognised that Bredhurst village is close to the site (within 100m of the boundary) but the segregating effect of the M2 is likely to reduce such effects. In accordance with the above, mixed minor positive and minor negative effects are identified from policy SP4(b) in relation to this SA objective. All effects are uncertain as different members of the community may perceive this garden settlement differently.

### Mitigation

**6.90** Performance of the Local Plan Review in relation to this SA objective relates to factors such as its ability to deliver development that integrates well with existing neighbourhoods, that meets the needs of specific groups, that will benefit both new residents and existing ones, that is designed to provide spaces for informal interaction, and that is designed to reduce crime and the fear of crime. In order to reduce the potential for negative effects, policies 4, 4(a) and 4(b) should seek to ensure community involvement occurs throughout the process of planning garden settlements and to ensure the community created within the settlements are able to influence their local environment, such as through setting up an appropriate local governance structure or community trust at an early phase of the development. It is considered that the policies would result in more positive effects if they

were more prescriptive in relation to the level and quality of public engagement that is expected. Similarly if they were also more prescriptive in relation to a focus on developing strong sense of community within the garden settlements.

**6.91** The policies would benefit from specific requirements that any deficits in the capacity of local infrastructure that would be created or exacerbated by new demand from the garden settlements should be appropriately addressed.

### SA Objective 4: To improve the population's health and wellbeing and reduce health inequalities

**6.92** Health and wellbeing are affected by a number of matters, including lifestyles, life chances and personal wealth and opportunity. In addition, environmental pollution such as air quality or noise also has the potential to affect health and wellbeing. The effects of climate change have the potential to worsen health and wellbeing, through, for example, hotter or colder temperatures being reached and more severe weather events.

**6.93** Policy SP4 includes provisions that the garden settlements will include area of open space and give residents the best opportunities to follow healthy lifestyles, including allowing activity to be built into their daily lives. Provision of such infrastructure and design of the settlements to achieve this is considered likely to result in beneficial effects through increasing potential for healthy and active lifestyles and reducing urban heat island effects. However, policy SP4 does not include any provisions relating to climate change adaptation – for example promoting climate change resilience through sustainable siting, design, landscaping and infrastructure. As such it is possible that some beneficial effects of the policy provisions could be missed, or eroded over time. Minor positive effects are therefore anticipated in relation to this SA objective.

**6.94** In relation to policy SP4(a), at Heathlands, there is a wastewater treatment works within the site and an inert landfill site within the site at Shepherds Farm Quarry which may result in issues relating to odour. It also experiences high noise levels due to its proximity to the M20 and A20. It is possible that the effects of high noise and / or odour may result in a lower quality of life and at worst, compound health conditions. Policy SP4(a) does not include any specific mitigation for effects which may arise as a result of this. In addition, although the policy includes a provision (6b) which sets out 'climate change', it is unclear whether this specifically includes designing and constructing the garden settlement in a manner which promotes resilience to the effects of climate change. As such, adverse effects may arise in relation to health and wellbeing. Policy SP4(a) also re-iterates the significant provision of open space and cycling and walking links. In conclusion, policy SP4(a) is considered likely to give

rise to mixed significant positive and significant negative effects in relation to this SA objective – the positive effects from enabling and facilitating active lifestyles and the negative effects from potential environmental pollution issues and unmitigated implications of climate change.

**6.95** A significant proportion of the Lidsing site is adversely affected by road noise from the M2, which may result in a lower quality of life and at worst, compound health conditions. Policy SP4(b) does not include any specific mitigation for effects which may arise as a result of this. Furthermore, similar to policy SP4(a), SP4(b) includes a provision which sets out 'climate change'. It is unclear whether this specifically includes designing and constructing the garden settlement in a manner which promotes resilience to the effects of climate change. As such, adverse effects may arise in relation to health and wellbeing. Similar to policy SP4(a), this policy also re-iterates the significant provision of open space and cycling and walking links. In conclusion, policy SP4(b) is considered likely to give rise to mixed significant positive and significant negative effects in relation to this SA objective for the same reasons described in relation to policy SP4(a).

#### Mitigation

**6.96** In order to mitigate potential negative effects from air quality, noise and odour, the policies should seek to specifically address these issues. In this regard, it should be noted that air, noise and odour pollution generally reduce very quickly with increasing distance from the source. It may be possible to avoid effects by appropriate site layouts or using suitable screening (e.g. acoustic barriers and planting). It may also be possible to use trees and shrubs as a natural barrier to air pollution.

**6.97** As set out in the discussion above, the effects of climate change have the potential to adversely affect human health and wellbeing. It is recommended that the garden settlement policies include provisions setting out that the settlements will be designed and constructed in a manner which promotes resilience to the effects of climate change, through, for example, appropriate siting, design, landscaping and infrastructure.

**6.98** Access to health care and community support is crucial in helping with the diagnosis and treatment of mental and physical health matters. Policy provisions relating to the development of a healthcare strategy for each garden settlement, including how residents will be able to access healthcare and community support, would help to further enhance positive effects in relation to this SA objective.

#### SA Objective 5: To facilitate a sustainable and growing economy

**6.99** Policy SP4 sets a benchmark target of 1 new job for each new home delivered, with jobs across a range of types. Should this be achieved, significant positive effects are anticipated from policy SP4 in relation to this SA objective.

**6.100** Policy SP4(a) re-iterates the requirement of 1 job to 1 home and identifies the distribution of economic development within the settlement. The policy also sets out that key infrastructure will be provided, which will facilitate connectivity to other settlements including a new rail station, enhanced bus routes and two new road junctions onto the A20 and a potential connection to the M20. The provision of jobs will lead to a direct benefit to the economy through providing increased space for business to grow, and the transport infrastructure will facilitate the movement of the labour force to the most appropriate job locations. As such, significant positive effects are anticipated in relation to this SA objective.

**6.101** Policy SP4(b) sets out that job delivery at Lidsing should seek to exceed the ratio of 1 job to 1 home, and as such it is anticipated that at least 2,000 jobs will be provided at this garden settlement, resulting in direct economic benefits through providing increased space for business to grow. In addition the policy includes the provision of walking and cycling links connecting to the Medway Urban Area, a new orbital bus route linking to Lordswood and Hempstead, and a link to M2 Junction 4. These transport connections will facilitate the movement of the labour force to the most appropriate job locations. As such, significant positive effects are anticipated in relation to this SA objective.

#### Mitigation

**6.102** None identified.

#### SA Objective 6: To support vibrant and viable Maidstone town centre

**6.103** The garden communities that are to be provided for under policy SP4 would result in an increase in population within Maidstone Borough. Given the key role of Maidstone town in providing the greatest number and range of services, facilities and employment in the borough and the distances of the garden settlements from Maidstone town centre (Heathlands approximately 10 miles; Lidsing approximately 5 miles), it is likely that residents of both Heathlands and Lidsing will visit Maidstone town to access these. As such, the development of the garden communities as prescribed under policy SP4 is likely to result in increased vibrancy in Maidstone and minor positive effects are anticipated.

**6.104** Policy SP4(a) sets out that Heathlands will be linked to Maidstone by a new railway station. In addition, two new junctions onto the A20 and a potential new junction on the

M20 facilitate access between Heathlands and Maidstone. This is likely to result in travel of residents of Heathlands to Maidstone for employment or social / leisure activities, resulting in increased people in Maidstone town, which subsequently will increase expenditure and vibrancy. As such, minor positive effects are anticipated from policy SP4(a) in relation to this SA objective.

**6.105** Policy SP4(b) provides further detail in relation to Lidsing. Lidsing is likely to relate more closely to the Medway Urban Area which surrounds it to the west, north and east, however as set out above, it is approximately 5 miles between Lidsing and Maidstone town centre, which is likely to result in some Lidsing residents being able to readily access Maidstone town. The improvements to junction 4 of the M2 set out in the policy will further enhance access between the two settlements. Similar to the discussion in relation to policy SP4(a) above, the development of Lidsing is likely to result in increased people in Maidstone town, which subsequently will increase expenditure and vibrancy. As such, minor positive effects are anticipated from policy SP4(a) in relation to this SA objective.

#### Mitigation

**6.106** None identified.

#### SA Objective 7: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion

**6.107** The effects of site allocations in relation to SA objective 7: Sustainable travel will partly depend on reducing the need to travel by ensuring that the garden settlements provide essential services and facilities and employment as part of their overall development package. These factors have been appraised under SA objective 2: Services and facilities. In addition, access to open space has been appraised under SA objective 4: Health. These factors are not repeated here. Instead, the appraisal for SA objective 7 considers the effects of development in relation to facilitating sustainable travel and reducing dependency on private vehicles.

**6.108** It is important to note that all development is likely, in accordance with typical travel patterns, to result in some increased use of private vehicles and corresponding increased traffic levels and potentially congestion. However, this demand for private vehicle travel can vary according to development location, design and availability of alternative transport options. Policy SP4 sets out that the garden settlements will be required to provide integrated and accessible transport choices, with a particular emphasis on active modes, public transport and low emission technologies, and superfast broadband. Superfast broadband, in particular, will help to reduce the need to travel and a focus on active modes and public transport are anticipated to reduce the demand for the

private car. As such, whilst it is recognised that the garden settlements will give rise to increased traffic and in some locations, localised congestion, the policy provisions to limit this are clear. Minor positive effects are therefore anticipated from policy SP4 in relation to this SA objective.

**6.109** Policy SP4(a) places several requirements on the Heathlands garden settlement that will help to reduce dependency upon, and use of, private vehicles. These include:

- A new railway station at the district centre, with optimisation of density to facilitate access to this and the district centre;
- Provision of additional local centres;
- New and improved bus routes;
- Cycling and walking links within the settlement.

**6.110** These design and infrastructure provisions, in particular the railway station, should help to ensure that dependency upon and use of private vehicles is limited. However it should be recognised that the policy also provides for two new road junctions on the A20 and for a potential connection to the M20. These will most likely encourage the use of private vehicles, resulting in increased traffic and potentially localised congestion. Recognising that this is the case, the inclusion of a new rail station is considered to offer a significant opportunity to reduce private vehicle based transport. As such uncertain minor positive effects are anticipated in relation to this SA objective as a result of policy SP4(a). The uncertainty arises because the manner by which people will travel will be influenced by the timing of the provision of new infrastructure, its location, design and final routing, public awareness, journey time and cost of parking at the destination. Further transport modelling assessment may identify evidence which justifies a change to this assessment.

**6.111** Policy SP4(b) includes several requirements of the Lidsing garden settlement that will help to reduce dependency upon, and use of, private vehicles. These include:

- Optimisation of density around areas which can best facilitate access to services;
- An orbital bus route linking Lordswood & Hempstead, as well as the Medway town centres;
- New walking and cycling links within the site and to the Medway urban area through the capstone valley.

**6.112** These design and infrastructure provisions should help to ensure that dependency upon and use of private vehicles is limited. However the policy also sets out the requirement for a new link to junction 4 of the M2, which is likely to facilitate the use of private vehicles and as a result lead to increased traffic levels and, in some places, localised congestion. As such uncertain minor negative effects are anticipated in relation to

this SA objective as a result of policy SP4(b). The uncertainty arises because the manner by which people will travel will be informed the timing of the provision of new infrastructure, its location, design and final routing, public awareness, journey time and cost of parking at the destination. This appraisal is subject to change as further transport modelling assessment may identify evidence which justifies a change to this assessment.

### Mitigation

**6.113** Phasing and delivery of the garden settlements' design and transport infrastructure will be key in helping to establish patterns of sustainable travel when these new settlements are being developed. Policies SP4(a) and SP4(b) would both benefit from being more specific about the construction phasing of the settlement and phasing of the transport infrastructure proposed, in order to ensure that the infrastructure is provided at an early stage in the delivery of each garden settlement and that occupants of the garden settlements are able to access it.

**6.114** A policy requirement for the creation of settlement specific travel plans / transport strategies for each settlement to demonstrate the anticipated use of sustainable modes of travel and how this will be maximised and who will be responsible for achieving it would provide further benefits in relation to this SA objective, by, for example, setting a clear expectation that the potential to use active and more sustainable travel modes will be assessed and managed during the planning, construction and operational phases of the garden settlements.

### SA Objective 8: To conserve the borough's mineral resources

**6.115** Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either sterilise future mineral extraction or delay delivery of housing until extraction is complete and land has been remediated (note that only one Mineral Consultation Area is defined in Kent and it is not in Maidstone Borough). Allocating development close to active mineral extraction sites could result in negative effects on amenity due to noise, vibration, dust, and road traffic associated with extraction.

**6.116** Policy SP4 does not contain any provisions relating to mineral resources. A such policy SP4 has been as having negligible effects in relation to this SA objective. The effects of sub-policies SP4(a) and SP4(b) are discussed below.

**6.117** The reasoned justification for policy SP4(a) sets out that there is uncertainty around the delivery of the western part of the Heathlands garden settlement, in part due to the existing mineral allocations. Shepherds Farm Quarry is an active

mineral extraction site located in the north-eastern corner of the site area. The Burleigh Farm extraction site is adjacent to (but not within) the eastern boundary of the Heathlands site and a safeguarding area for this site extends east of this. In addition, approximately three quarters of the Heathlands site is designated as a Mineral Safeguarding Area, for numerous resources including Limestone, Sandstone, Silica Sand (construction sands) and Sub Alluvial River Terrace. The development of this garden settlement is likely to result in conflicts in relation to development and mineral-related activities however policy SP4(a) does not address these. As such significant negative effects are anticipated from SP4(a) in relation to this SA objective.

**6.118** The Lidsing site does not intersect with any Mineral Safeguarding Area or Safeguarded Mineral Site and therefore negligible effects are anticipated from policy SP4(b) in relation to this SA objective.

### Mitigation

**6.119** Policy SP4(a) should address the potential conflict with mineral resources in order to provide clarity over this matter. The large scale of the site Heathlands and associated build out times and ability to phase the development may offer the opportunity to extract safeguarded minerals. A revised policy SP4(a) should set out a clear framework for the relationship between development and existing / planned mineral extraction activities in order to avoid conflicts (such as nuisance), should the mineral extraction and development occur simultaneously.

### SA Objective 9: To conserve the borough's soils and make efficient and effective use of land

**6.120** Potential loss of higher quality agricultural land to development was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. Both garden settlement allocations are on land classified as grade 3 (or better) agricultural land:

- At Heathlands, a grade 2 area covers a band along the southern part of the site, approximately a quarter of the site in total (the remainder is grade 3);
- Lidsing sits entirely within grade 3 agricultural land.

**6.121** Policies SP4, SP4(a) and SP4(b) do not include provisions that would seek to protect or preserve the borough's soils, resulting in the potential loss of high quality soils.

**6.122** In addition, both garden communities are identified as greenfield or mixed greenfield and brownfield sites by MBC officers. The development of both settlements would therefore result in the loss of greenfield land.

**6.123** As such, significant negative effects are anticipated in relation to this SA objective for policies SP4, SP4(a) and SP4(b).

#### Mitigation

**6.124** Given the scale and location of the garden settlements, it would be difficult to avoid all of the potential negative effects but effects could potentially be mitigated by considering whether boundaries of the garden settlements could be redrawn or masterplanned and used so as to avoid loss of the best and most versatile agricultural land. For example, the southern part of Heathlands is proposed for open space and it may be possible to provide some community based food production or grazing in this area.

#### SA Objective 10: To maintain and improve the quality of the borough's waters and achieve sustainable water resources management

**6.125** Kent is one of the driest regions in England and Wales<sup>40</sup>. Water use in the borough is high by both national and international standards, and some water bodies in Maidstone are failing to meet the Water Framework Directive objective of 'good status'<sup>41</sup>. These issues are likely to be exacerbated by additional housing and economic growth, coupled with climate change. Pressures, including the projected increase in population, related to the provision of water supply and wastewater treatment are key contributors to the current and projected future status of water bodies in Kent. None of the provisions within policies SP4, SP4(a) or SP4(b) refer to water efficiency and therefore it is considered possible that the development of the garden settlements will result in increased water use, resulting adverse impacts on water availability.

**6.126** The garden settlements could adversely affect surface water quality due to additional increased urban runoff, discharges of wastewater (for example because there is insufficient treatment capacity at the local WwTWs) or pollution events. The potential for nutrient enrichment of the receiving waters is primarily a biodiversity rather than drinking water quality issue and is therefore dealt with under SA objective 14: Biodiversity.

**6.127** Development of the garden settlements could affect water quality in drinking water resources during construction or occupation. 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 increases as the distance between the source of contamination and the

groundwater abstraction point decreases. Drinking Water Safeguard Zones are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. Both garden settlement boundaries intersect drinking water safeguarding zones, specifically:

- Approximately two fifths of the Heathlands site is within SPZ 3, the remainder being outside any other water protection or safeguarding areas.
- The entirety of the Lidsing option falls within SPZ 3 but is not within any other water protection or safeguarding areas.

**6.128** Neither of policies SP4, SP4(a) or SP4(b) include provisions in relation to safeguarding water quality.

**6.129** In accordance with the above, given the lack of protection for water resources or water quality, each of policies SP4, SP4(a) and SP4(b) are assessed as potentially giving rise to significant negative effects in relation to this SA objective.

#### Mitigation

**6.130** The Council should work with the Environment Agency and water companies to understand the particular water resource protection objectives for which these zones have been designated and to ensure that Local Plan Review policies for the garden settlements allocated within the source protection zones place appropriate requirements on development to avoid contributing to drinking water protection objectives.

**6.131** Local Plan Review policies should include requirements for new development to utilise water efficient design and fixtures.

**6.132** Local Plan Review policies should set out requirements in relation to sustainable drainage systems to ensure water is not contaminated and that development allocated within the Local Plan Review document does not limit the potential for water supply in the future.

#### SA Objective 11: To reduce air pollution ensuring lasting improvements in air quality

**6.133** This SA considers the potential for development to worsen air quality in those areas which are identified as having poor air quality at present, which are identified as air quality management areas (AQMAS).

<sup>40</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at:

[http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>41</sup> AECOM (2017) Kent Water for Sustainable Growth Study

**6.134** None of policies SP4, SP4(a), or SP4(b) include specific provisions in relation to air quality. As such, this SA considers the implications of the garden settlements as they would be developed in accordance with these policies.

**6.135** Policy SP4 has been assessed as a combination of the likely effects of both the Heathlands and Lidsing garden settlements, as it provides for the development of both. As discussed below, minor negative effects are anticipated in relation to individual policies SP4(a) and SP4(b), and as such, a minor negative effects is also identified against policy SP4.

**6.136** The Heathlands garden settlement does not intersect any AQMA. However as discussed in relation to SA objective 6: Town Centre, it is likely that residents of Heathlands will access Maidstone town centre, and it is likely that some of these trips will be made by a petrol/diesel vehicle. As such, it is anticipated that there will be some increases in the pollutants for which the AQMA is declared as a result of the Heathlands development. In addition to exacerbating existing areas of poor air quality in Maidstone urban area, there is also the potential for air quality issues to arise within the new garden settlement itself, due to use of petrol/diesel vehicles for journeys within the settlements and off-site to access employment, secondary education, and other higher order services. The policy includes provisions which will potentially reduce the use of petrol / diesel fuelled road vehicles though provisions including a settlement form and infrastructure to promote active travel, high ratio of jobs to homes and new public transport infrastructure including a new rail station. These elements reduce the potential for air quality impacts to arise. As such, minor negative effects are therefore anticipated in relation to this SA objective as a result of policy SP4(a).

**6.137** The Lidsing garden settlement is approximately 5 miles from Maidstone Town centre and as set out in the discussion in relation to SA objective 6: Town Centre, it is likely that some residents of Lidsing will access Maidstone town centre. It is also likely that residents of Lidsing will visit the Medway urban area, a network of roads within which have been identified within the Central Medway AQMA. It is likely that some trips to both of these areas would be made by petrol/diesel vehicle. This is likely to result in increases in the pollutants for which the AQMAs are declared. As noted for Heathlands, there is also the potential for air quality issues to arise within the new garden settlement itself, due to use of petrol/diesel vehicles. As also noted for Heathlands, the policy includes provisions which will help to limit the use of motorised road vehicles including a settlement form and infrastructure to promote active travel, high ratio of jobs to homes and new public transport infrastructure. These elements reduce the potential for air quality impacts to arise. As such, minor negative effects are therefore anticipated in relation to this SA objective as a result of policy SP4(b).

### Mitigation

**6.138** In order to help prevent on-site air quality effects from petrol/diesel vehicle use, it is recommended that policies SP4(a) and SP4(b) are amended to incorporate a requirement for green infrastructure alongside roads to help mitigate air quality issues through, for example, absorption of pollutants.

### SA Objective 12: To avoid and mitigate flood risk

**6.139** Residential development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. The Government's Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of Flood Zone 1 and 2 but would require an exception test in flood zone 3a and is unsuitable in flood zone 3b. Surface water flooding occurs when intense rainfall overwhelms drainage systems. Groundwater flood risk can occur via permeable superficial deposits (PSD) (these generally occur in the flood plain, and can be mistaken for fluvial flooding), via high spring flows, and via high bedrock groundwater levels.

**6.140** Policy SP4 does not refer to flood risk, as this is dealt with in subsequent policies SP4(a) and SP4(b). As such, policy SP4 has been appraised as having negligible effects in relation to this SA objective.

**6.141** Small areas within the boundary of Heathlands garden settlement are within flood zone 3 and/or subject to a 1 in 30 year surface water flood risk. In approximately one third of the site, running east-west through the centre, groundwater levels are identified as being near the surface or within 0.5m of it. As such adverse effects in relation to this SA objective are considered possible. Policy SP4a4(a) sets out that a flood risk assessment will be required. However, it is understood that engineering solutions to mitigate groundwater flooding are limited and it is unclear from the allocation policy whether the area of the site identified as being at a higher level of groundwater flood risk would be developed, therefore it is considered that the potential for some adverse effects in relation to this SA objective remain despite the requirement for a flood risk assessment. In addition the policy does not feature any specific provision concerning climate change adaptation. It is possible that climate change may bring more extreme weather events, which may exacerbate flood risk issues. In accordance with the above, minor negative effects are anticipated in relation to this SA objective.

**6.142** effects in relation to this SA objective are judged to be minor negative but with uncertainty relating to how these might be mitigated.

**6.143** Small areas of the Lidsing option are identified as having a 1 in 30 year surface water flood risk. Groundwater levels are anticipated to be at least 5m below ground level.



Policy SP4(b) sets out that a flood risk assessment will be required. Although the policy does not refer to climate change adaptation, the current low level of flood risk on the site is likely to reduce the potential for issues in relation to this. In line with the requirement for a flood risk assessment and the minimal flood risk, it is considered likely that the flood risk matters can be appropriately mitigated and effects in relation to this SA objective will be negligible.

### Mitigation

**6.144** Provide more information within the Heathlands site allocation policy and supporting text on the sources of flood risk to which the site is thought exposed and the types of mitigation that will be expected, should these be confirmed through a flood risk assessment .

**6.145** Provide clarification of the role and scope of the flood risk assessments, in particular requiring consideration of climate change effects as part of this process.

### SA Objective 13: To minimise the borough's contribution to climate change

**6.146** The UK is a signatory to the international 2015 Paris Agreement, committing the country to a long-term goal of keeping the increase in global average temperature to well below 2°C above pre-industrial levels, through domestic mitigation measures. The UK's Climate Change Act 2008 (as amended in 2019) commits to reduce national emissions by at least 100% of 1990 levels by 2050. In April 2019, Maidstone Borough Council declared a Climate Emergency. In order to make its contribution towards addressing these issues, the borough will need to reduce its carbon emissions significantly over the plan period.

**6.147** The starting point for the appraisal in relation to SA objective 13 is that all development built to typical, present day construction and energy efficiency standards will result in increased emissions of greenhouse gases, as a result of both the construction and operation of the buildings. As such, the finding against this appraisal will almost always be negative, however this is assessed against the likelihood that the policy provisions will reduce emissions from their maximum potential. Note that some effects of the policies in relation to climate change adaptation/resilience are addressed under SA objective 4: Health and Wellbeing.

**6.148** Policy SP4 includes the specific provision that buildings and places will be designed with a strong emphasis focus on energy efficiency and reduced carbon emissions. This clear provision is considered likely to result in the garden settlements significantly reducing their potential greenhouse gas emissions.

**6.149** In addition to this, policy SP4 includes a number of provisions which will reduce carbon emissions as a result of

reducing the need to travel using greenhouse gas emitting vehicles (which includes electric vehicles if charged from non-carbon neutral electricity generation). These provisions include:

- Allowing residents to follow healthy lifestyles, including allowing activity to be built into their daily lives
- Enabling local food production, thereby reducing the need to travel and demand for goods from outside the settlement;
- Generous amounts of green space, trees and hedgerows, designed to provide attractive walking and cycling links;
- Providing integrated and active transport choices, focussing on active travel, public transport and low emissions technologies;
- Superfast broadband;
- Appropriate local retail and services
- A good local employment offer with a target of 1 job to 1 home.

**6.150** The reduced need to travel and focus on modes of travel that release less greenhouse gas emissions than motor cars which will arise as a result of these policy provisions will reduce the potential effect of the garden settlements in relation to climate change. As such, minor negative effects are anticipated in relation to this SA objective.

**6.151** Policy SP4(a) expands on the provisions of policy SP4 and includes further provisions that will help to reduce potential greenhouse gas emissions from the Heathlands garden settlement. These include a new rail station which will be at the district centre, new bus routes and cycling and walking links and primary school provision. However the policy also includes provisions for new road junctions which although necessary to provide access, will in some part facilitate travel by road which is, (based on current travel habits) predominantly private vehicle based. The potential new link to the M20 is considered to be the potentially most significant of these as this will provide a direct link to a fast, direct and attractive road route, facilitating use of the private car. Overall, and taking account of the provisions of policy SP4 which provide the context for this policy, minor negative effects are anticipated in relation to this SA objective as a result of policy SP4(a).

**6.152** Policy SP4(b) expands on the provision of policy SP4 and includes further provisions that will help to reduce potential greenhouse gas emissions from the Lidsing garden settlement. These include a new primary school, new bus routes and cycling and walking links within the settlement and to the Medway urban area to the north. However the policy

also provides for a new link to M2 junction 4, which will help to facilitate travel by road which is, (based on current travel habits) predominantly private vehicle based. This is likely to result in greenhouse gas emissions more so than not providing this junction link. Overall, and taking account of the provisions of policy SP4 which provide the context for this policy, minor negative effects are anticipated in relation to this SA objective as a result of policy SP4(a).

### Mitigation

**6.153** The policies could be more specific about the way in which climate change mitigation measures will be determined and the likely success of these. For example, requiring appropriate technical modelling of a range of solutions and selecting those likely to have the greatest and most cost effective benefits.

### SA Objective 14: To conserve, connect and enhance the borough's wildlife, habitats and species

**6.154** . Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity of those sites, for example through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

**6.155** There are several local wildlife sites within the Heathlands boundary, including Bull Heath Pit, Pasture and Ponds at Lenham Forstal and Parts of Lenham Heath & Chilston Park. There are also areas of ancient woodland within the boundary at New Pond Shore, Round Wood, Tainter Field Shaw and Wheatgratten Wood. Areas of various types of priority habitat also exist within the site.

**6.156** The Lidsing site does not intersect with any international, national or local designations. However there is an area of ancient woodland within it and several areas of ancient woodland adjacent to the site. In addition, there is a small area of Deciduous Woodland priority habitat within the north-east margin. The site is also within Impact Risk Zones for certain industrial processes which may cause air pollution – due to the sensitivity of the Purple Hill SSSI, just over 1km to the east. The northern margin of the site is also within an Impact Risk Zone for rural residential development associated with the Medway Estuary and Marshes SSSI.

**6.157** Policy SP4 includes provisions that each garden settlement will include generous amounts of green space with the purpose of achieving biodiversity net gain. This clear

policy provision is considered likely to result in a benefit for biodiversity, resulting in minor positive effects. Having said this, until further assessment and design is undertaken and ecological mitigation designed, the potential effects in relation to this SA objective is uncertain.

Policy SP4(a) re-iterates and clarifies the biodiversity net gain requirements, citing that a biodiversity net gain of 20% must be achieved. However the policy does not include any specific provisions to mitigate potential adverse effects on the designations and sensitive habitats / species within and near to the garden settlement boundary. In addition, the Heathlands garden settlement has the potential to have a significant adverse effect on the downstream European designations of Stodmarsh SAC, SPA and Ramsar site, as it drains into the Upper Stour catchment (in the north-east of the borough) and is served by Lenham wastewater treatment works (WwTW), which is within this catchment. However policy SP4(a) includes specific provision to address this through the provision of a new country park/wetland area to filter phosphates and nitrates in line with Natural England guidance, which requires nutrient neutrality.

**6.158** Due to the provisions for 20% biodiversity net gain and the new country park to achieve nutrient neutrality, minor positive effects are anticipated from policy SP4(a) in relation to this SA objective. Having said this, until further assessment and design is undertaken and ecological mitigation designed, the potential effects in relation to this SA objective is uncertain.

**6.159** Policy SP4(b) re-iterates and clarifies the biodiversity net gain requirements, citing that a biodiversity net gain of 20% must be achieved. However the policy does not include any specific provisions to the designations and sensitive habitats / species within and near to the garden settlement boundary. Due to the provisions for 20% biodiversity net gain, minor positive effects are anticipated from policy SP4(b) in relation to this SA objective. Having said this, until further assessment and design is undertaken and ecological mitigation designed, the potential effects in relation to this SA objective is uncertain.

### Mitigation

**6.160** Further positive effects could be achieved if the policies were to set out a level of protection for the important habitats and species which are already present within and near to the boundaries of the proposed garden settlements.

### SA Objective 15: To conserve and/or enhance the borough's historic environment

**6.161** 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 arising from the proposed garden settlements 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.

**6.162** The proximity-based appraisal used in this SA is intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of separate evidence in the form of a historic environment sensitivity study or similar they are subject to a high degree of uncertainty. Based on professional judgement, this SA considers the potential implications of the policies in relation to heritage assets which intersect the proposed garden settlements or are 1km of their boundary.

**6.163** Policy SP4 does not specifically refer to heritage matters, as this is dealt with in subsequent policies SP4(a) and SP4(b). As such, policy SP4 was appraised as having negligible effects in relation to this SA objective.

**6.164** At Heathlands, there are 12 listed buildings within the site, all of which are Grade II listed apart from Royton Manor, which is Grade II\*. In addition, the Chilston Park Registered Park and Garden lies adjacent to the southwestern boundary of this option. There are no designated heritage assets within the site option at Lidsing but there are 10 grade II listed buildings approximately 200m to the east of the site at Bredhurst and Kelmsley Street. In addition, there is an archaeological priority area associated with Bredhurst Church.

**6.165** Both Policies SP4(a) and SP4(b) include provisions that require the Heathlands and Lidsing garden settlements to be masterplanned in a manner that interfaces with existing buildings which will be retained. It is assumed this would extend to listed buildings. However the policy wording does not specifically identify that these buildings or any other heritage assets will be treated sensitively or that the design of the garden settlements should seek to limit adverse effects on the heritage assets and their settings.

**6.166** As such, both policies SP4(a) and SP4(b) are considered to have the potential to result in significant negative effects in relation to this SA objective.

**6.167** Both policies SP4(a) and SP4(b) contain a provision to ensure that archaeological survey is undertaken. The negative

effects identified above are not considered likely to occur in relation to archaeology as a result of this specific policy protection.

#### Mitigation

**6.168** Avoidance of development that results in harm to the significance of heritage assets, including their setting, would provide the best mitigation. However, design codes with heritage assets and local character at the forefront could also be required by policies SP4(a) and SP4(b).

#### SA Objective 16: To conserve and enhance the character and distinctiveness of the borough's settlements and landscape

**6.169** Just over a quarter of Maidstone Borough lies within the Kent Downs Area of Outstanding Natural Beauty (AONB). Both garden settlements lie near to the AONB and Lidsing is adjacent to it, separated only by the width of the M2. In addition, many parts of the rest of the borough are designated as Landscapes of Local Value. The sensitivity of these designations and the wider landscape to development are set out in the Council's landscape capacity study<sup>42</sup>. This has been used to inform the appraisal in relation to this SA objective.

**6.170** The delivery of new, large scale urban settlements in close proximity to the Kent Downs AONB, as would be the case if either garden settlements were built, would be likely to have adverse effects on the AONB through impacts to its setting alone. Furthermore, the council's landscape capacity study assesses the landscape through identification of more detailed character and sensitivity areas and identifies their sensitivity to change.

**6.171** The Heathlands site falls into three different landscape character areas:

- East Lenham Vale in the northern part of the site, which is of high sensitivity;
- Lenham Heath Farmlands, which is of low sensitivity; and
- Chilston Parklands is of high sensitivity.

**6.172** Overall, the site is considered to have high sensitivity to change.

**6.173** The Lidsing option almost entirely falls into the Bredhurst and Stockbury Downs character area, which has moderate sensitivity to change. The reasoned justification to the allocation policy sets out that in order to provide the additional link to M2 junction 4 (which is a key infrastructure element of Lidsing garden settlement), an area of the AONB

<sup>42</sup> Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

would be required. Although the reasoned justification text also sets out that significant enhancements to the AONB would be provided, it is considered that harm will still arise from this, albeit this may be considered 'acceptable' in planning terms.

**6.174** Policy SP4 requires the garden settlements to respond to the local character in the heart of Kent and provide a masterplan that seeks to integrate development into its surroundings. Although these are not direct references to protecting or minimising harm to sensitive landscapes, these provisions are considered likely to reduce some of the adverse effects from development of large new urban settlements in areas which form the setting of the Kent Downs AONB. As such, minor negative effects are anticipated as a result of the provisions of policy SP4.

**6.175** As set out above, Heathlands is considered to lie in an area that has high landscape sensitivity. Policy SP4(a) requires a landscape study to inform the design parameters of the masterplan including views into / from the AONB to be undertaken. This, combined with the requirements in policy SP4 is considered likely to reduce the potential for adverse landscape effects, although these are still expected to occur. Minor negative effects are therefore anticipated in relation to this SA objective from policy SP4(a).

**6.176** For Lidsing, the site is considered to be in a location that is moderate sensitivity but due to the proposed road link which travels into the AONB, is considered to have potential for significant adverse effects. Policy SP4(b) includes a provision that a landscape study should be undertaken to inform the design parameters of the masterplan including views into / from the AONB and that the settlements shape in terms of its relationship with the AONB will also form part of the masterplanning / design parameters. As a result of this and the significant mitigation proposed in relation to the new link to M2 junction 4, minor negative effects are anticipated as a result of policy SP4(b) in relation to this SA objective.

#### Mitigation

**6.177** Further assessment in relation to landscape sensitivity should be undertaken with key findings and mitigation included within Local Plan Review policy.

## (Potential) Strategic Development Locations

### Reasonable alternatives tested

**6.178** Policy SP5(a) was included in the Local Plan Review to maintain flexibility and policies SP5(b) and SP5(c) simply carry

over policies from the adopted Local Plan. As such, no reasonable alternatives existed to the SP5 suite of policies.

## Policy SP5: (Potential) Strategic Development Locations and site allocation policies SP5(a) to SP5(c)

**6.179** Policy SP5 is an overarching policy which sets out the precedent for the development of three 'broad locations' of development. These include 1,300 units at Invicta Barracks; 1,000 units at Lenham and an area to safeguard the potential to deliver a new Leeds-Langley relief road. The specific provisions relating to these development areas are set out in policies SP5(a): Development in the Leeds-Langley Corridor; SP5(b): Invicta Barracks Strategic Development Location; and SP5(c): Lenham Broad Location For Housing Growth. The approach to the appraisal of these policies is discussed below.

### Policy SP5 Potential Strategic Development Locations

**6.180** Because this policy is an overarching policy that sets out the principle of development in the three aforementioned broad locations but contains no other provisions, the SA considers the potential environmental effects arising from the sub policies (SP5(a), Sp5(b) and SP5(c)) and does not separately appraise policy SP5. The approach to the appraisal of the sub policies is set out below.

#### Policy SP5(a): Development in the Leeds-Langley Corridor

**6.181** Policy SP5(a) is appraised below and the SA scores are set out in **Table 6.6**.

#### Policy SP5(b): Invicta Barracks Strategic Development Location

**6.182** The identification of the Invicta Barracks as a strategic development site includes the same policy provisions as those of policy 'H2(2): Invicta Park Barracks, Maidstone broad location for housing growth' of the extant local plan<sup>43</sup>. Since policy SP5(b) retains an existing policy in an extant local plan that has already been subject to SA and been adopted, it is not considered necessary to re-appraise this policy.

#### Policy SP5(c): Lenham Broad Location For Housing Growth

**6.183** The identification of the Lenham Broad Location For Housing Growth essentially provides for the retention of existing local plan policy, specifically policy 'H2(3): Lenham broad location for housing growth'. It is therefore not

<sup>43</sup> [https://maidstone.gov.uk/\\_data/assets/pdf\\_file/0005/171149/Local-Plan-v2-November-2017.pdf](https://maidstone.gov.uk/_data/assets/pdf_file/0005/171149/Local-Plan-v2-November-2017.pdf)

considered necessary to re-appraise this policy for the same reasons as set out for policy SP5(b).

Table 6.6: SA findings for policy SP5a Development in the Leeds-Langley Corridor.

SA objective	SP5(a): Development in the Leeds-Langley Corridor
SA1: Housing	?
SA2: Services & Facilities	?
SA3: Community	?
SA4: Health	?
SA5: Economy	?
SA6: Town Centre	?
SA7: Sustainable Travel	?
SA8: Minerals	?
SA9: Soils	?
SA10: Water	?
SA11: Air Quality	?
SA12: Flooding	?
SA13: Climate Change	?
SA14: Biodiversity	?
SA15: Historic Environment	?
SA16: Landscape	?

#### Explanation of SA findings for policy SP5: (Potential) Strategic Development Locations and site allocation policies SP5(a) to SP5(c)

**6.184** For the reasons set out above, only policy SP5(a) has been appraised. Policy SP5(a): Development in the Leeds-Langley Corridor does not propose any development but rather safeguards land for a potential future link road, the

provision of which has not yet been confirmed. If and when a link road is proposed by the highways authority (Kent County Council), the plan or project would be subject to its own environmental assessment under the SEA and/or EIA Regulations, as appropriate. The only effect of the policy is that it may preclude or require the re-design of development proposals for other uses that might otherwise be permitted in the defined corridor but the nature, scale or type of any such development are not known at this time. As such the effects of the policy are judged to be uncertain in relation to the SA objectives.

## Rural Service Centres

### Reasonable alternatives tested

**6.185** The Council's site identification and selection process is detailed in its Strategic Land Availability Assessment (SLAA). This formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA. Broadly speaking, sites were only discounted as reasonable alternatives for the SA if the SLAA determined that constraints would prevent any development on the site or if they were promoted a use for which there was no identified need.

**6.186** The site identification and selection process, the lists of reasonable alternative site options that were subject to SA, and the approach to and results of the SA of site options are set out in the separate SA of Options report that has been published alongside this SA document.

### Policy SP6: Rural Service Centres

**6.187** This section presents the appraisals of Policy SP6: Rural Service Centres, which are considered the most sustainable settlements in Maidstone's settlement hierarchy outside of Maidstone town centre and urban area. This is part of an approach which seeks to direct development towards those rural settlements that can best act as service centres for their local population and surrounding rural communities.

**6.188** Policy SP6 sets out the criteria to be met by development in Rural Service Centres, and the total amounts of housing and employment development to be provided by the Local Plan Review.

**6.189** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in the town centre, and the detailed criteria to be met before development will be permitted.

**6.190** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.7**, following the scoring scheme set out in **Chapter 2**.

Table 6.7: SA findings for policy SP6: Rural Service Centres

SA objective	SP6: Rural Service Centres
SA1: Housing	0
SA2: Services & Facilities	+
SA3: Community	+
SA4: Health	+

SA objective	SP6: Rural Service Centres
SA5: Economy	+
SA6: Town Centre	0
SA7: Sustainable Travel	0
SA8: Minerals	0
SA9: Soils	0
SA10: Water	0
SA11: Air Quality	N/A
SA12: Flooding	0
SA13: Climate Change	0
SA14: Biodiversity	0
SA15: Historic Environment	0
SA16: Landscape	0

### Explanation of SA findings for policy SP6: Rural Service Centres

**6.191** Minor positive effects have been identified for Policy SP6: Rural Service Centres in relation to SA objectives 2 to 5, largely because the policy seeks to retain and improve existing employment sites and encourage new employment opportunities (contributing to SA objective 5: Economy) and resists the loss of local shops, community facilities and green spaces while supporting new ones (contributing to SA objectives 2, 3 and 4).

**6.192** Negligible effects have been identified in relation to all other SA objectives for this policy.

### Mitigation

**6.193** Measures to limit the potential for negative effects and strengthen the positive effects identified for this policy are recommended as follows:

- None identified.

## Harrietsham

### Policy SP6(a): Harrietsham and site allocation policies for this location

**6.194** This section presents the appraisals of the following Local Plan Review policies:

- SP6(a): Harrietsham
- LPRSA071: Land adjacent Keilen Manor, Marley Rd, Harrietsham
- LPRSA101: Land south of A20, Harrietsham

**6.195** Policy SP6(a): Harrietsham sets criteria to be met by development in this Rural Service Centre. It also confirms the total amount of residential development to be provided on new site allocations within Harrietsham and sets out the infrastructure requirements to support development in the urban area. Policy SP6(a) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.196** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in Harrietsham, and the detailed criteria to be met before development will be permitted.

**6.197** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.8**, following the scoring scheme set out in **Chapter 2**.



Table 6.8: SA findings for policy SP6(a): Harrietsham and site allocation policies for this location

SA objective	SP6(a): Harrietsham	LPRSA071: Land adjacent Keilen Manor, Matley Rd, Harrietsham	LPRSA101: Land south of A20, Harrietsham
SA1: Housing	0	+	+
SA2: Services & Facilities	+	-	-
SA3: Community	+	+	+
SA4: Health	+	+	-
SA5: Economy	0	0	0
SA6: Town Centre	0	+	+
SA7: Sustainable Travel	0	+	+
SA8: Minerals	0	0	0
SA9: Soils	0	--	--
SA10: Water	0	-	-
SA11: Air Quality	N/A	N/A	N/A
SA12: Flooding	0	0	-
SA13: Climate Change	0	-	-
SA14: Biodiversity	0	-	-
SA15: Historic Environment	0	--?	--?
SA16: Landscape	0	-	-

### Explanation of SA findings for policy SP6(a): Harrietsham and site allocation policies for this location

**6.198** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP6(a): Harrietsham, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Minor positive effects are expected from both the site allocation policies because of the requirement in each of them for development to be of a high standard of design.

**6.199** In relation to SA objective 2: Services & Facilities, minor positive effects are expected from the strategic policy SP6(a): Harrietsham. This is because it will help to ensure adequate capacity in health infrastructure, primary school places, and primary healthcare facilities to serve the additional residents, as well as providing general support for maintaining or enhancing local shops and community services. For the sites allocated within Harrietsham, the GIS-based site options work identified a minor negative effect in relation to SA objective 2: Services & Facilities given that, while primary schools and GP surgeries are available locally, Harrietsham lies distant from the nearest secondary school, retail centre (in Lenham) and average commuting distances are relatively high from this area. These SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.200** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP6(a): Harrietsham because of its requirement to resist loss of existing community facilities and green spaces and support new ones to meet local needs. Minor positive effects are expected from both the site allocation policies because of the requirement in each of them for design of the site to ensure neighbouring residents' amenity is protected.

**6.201** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP6(a): Harrietsham due to the provision of health infrastructure and open space. For the sites allocated within Harrietsham, the GIS-based site options work identified a minor positive effect for site 071 and a minor negative effect for site 101 in relation to SA objective 4: Health. This reflected the potentially major negative effects of road noise from the M20 and the major positive effects of the sites' proximity to open space. Site 071 also benefitted from its proximity to the public rights of way network. The requirement for the provision of open space provision in the suite of policies helps to reinforce the previously identified positive effects but the overall SA scores for the sites are unaffected by the provisions of the site-specific allocation policies.

**6.202** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP6(a):

Harrietsham and for both site allocation policies. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy SP6(a) is separately assessed under policy SP11(a) and the site allocation policies would not lead to loss of existing employment sites or provide new employment space.

**6.203** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy SP6(a): Harrietsham. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.204** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP6(a): Harrietsham. For both the sites allocated within Harrietsham, the GIS-based site options work identified minor positive effects in relation to SA objective 7: Sustainable Travel. This reflected the positive effects of nearby bus services, offset by the negative effects of lack of proximity to rail services or cycle paths. These previously identified positive effects are reinforced by the requirements for the provision of a cycle route, bus stops and increased bus service regularity within the site-specific policies but the overall SA scores for the sites are unaffected.

**6.205** Negligible effects have been identified in relation to SA objective 8: Minerals, given the absence of mineral safeguarding areas or safeguarded mineral sites in the vicinity.

**6.206** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP6(a): Harrietsham. For both of the site allocation policies, significant negative effects have been identified in relation to SA objective 9: Soils, given that the development of either site would result in the loss of greenfield land and of Grade 2 agricultural land. Mitigation of this effect is unlikely to be possible, given that the entirety of both sites lie within Grade 2 classified land.

**6.207** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP6(a): Harrietsham. Minor negative effects have been identified for both site allocation policies in relation to SA objective 10: Water, given that both sites lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.208** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP6(a):

Harrietsham. The GIS-based site options work identified a significant negative effect for site LPRSA101, given that part of the site contains land with a 1 in 30 year risk of surface water flooding. However, the allocation policy's requirement for mitigation through SuDS reduces this to a minor negative effect. A negligible effect was identified for site LPRSA071, which lies outside relevant flood risk zones.

**6.209** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP6(a): Harrietsham. The GIS-based site options work identified minor negative effects for SA objective 13: Climate Change, principally because of relatively poor accessibility to some key services and employment (as discussed under SA objective 2: Services & Facilities) and consequent travel-related carbon emissions. Site-specific policies do not alter this conclusion.

**6.210** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP6(a): Harrietsham. The GIS-based site options work identified significant negative effects for both site allocations in relation to SA objective 14: Biodiversity. This was because the sites are within 250m of locally designated wildlife sites or ancient woodland and contain areas of priority habitat. However, the requirements set out in site-specific policies for Phase 1 habitat surveys to inform appropriate on and/or off-site mitigation and for the retention of existing trees are judged to reduce these to minor negative effects.

**6.211** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP6(a): Harrietsham. The GIS-based site options work identified significant negative effects with uncertainty for both sites in relation to SA objective 15: Historic Environment, given the proximity to nearby heritage assets, including listed buildings and an area of archaeological potential alongside Marley Road. It is possible that the requirement within site-specific policies for vernacular materials may provide some mitigation but in the absence of evidence on the nature of potential effects of these allocations on the historic environment, none is recognised at this stage of the SA.

**6.212** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP6(a): Harrietsham. The GIS-based site options work identified significant negative effects for both sites in relation to SA objective 16: Landscape. A large part of Harrietsham, including both identified sites, lies in the Harrietsham to Lenham Vale Landscape Character Area (LCA), which has been assessed as highly sensitive. However the requirements within site-specific policies for landscape and visual impact appraisals at both sites, as well as measures such as hedgerow retention and careful landscaping, are judged to reduce the effects to minor negative.

## Mitigation

**6.213** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Consider the need for development design and site layout to protect future occupiers from road noise associated with the M20.
- Consider the potential to connect site LPRSA101 to the local footpath and cycle path networks.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.

## Headcorn

### Policy SP6(b): Headcorn and site allocation policies for this location

**6.214** This section presents the appraisals of the following Local Plan Review policies:

- SP6(b): Headcorn
- LPRSA310 – Mote Road Headcorn

**6.215** SP6(b): Headcorn identifies Headcorn as a deliverable location for new housing growth and sets criteria to be met by development in this Rural Service Centre. It also confirms the total amount of residential development to be provided on new site allocations within the urban area and sets out the infrastructure requirements to support development in the urban area. Policy SP6(b) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.216** The detailed site allocation policy sets out the amounts and types of development to be provided on the site allocation in Headcorn, and the detailed criteria to be met before development will be permitted.

**6.217** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.9**, following the scoring scheme set out in **Chapter 2**.

*Table 6.9: SA findings for policy SP6(b): Headcorn and site allocation policies for this location*

SA objective	SP6(b): Headcorn	LPRSA310 – Mote Road Headcorn
SA1: Housing	0	0
SA2: Services & Facilities	0	-
SA3: Community	+	+
SA4: Health	+	+
SA5: Economy	0	0
SA6: Town Centre	0	+
SA7: Sustainable Travel	0	+
SA8: Minerals	0	-
SA9: Soils	0	--

SA objective	SP6(b): Headcorn	LPRSA310 – Mote Road Headcorn
SA10: Water	0	-
SA11: Air Quality	N/A	N/A
SA12: Flooding	0	-
SA13: Climate Change	0	-
SA14: Biodiversity	0	-
SA15: Historic Environment	0	--?
SA16: Landscape	0	-

**6.218** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP6(b): Headcorn, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are expected from site 310 itself, because the site-specific policy makes no mention of the type or quality of housing to be delivered on the site.

**6.219** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP6(b): Headcorn. While the policy does note that two existing sites are designated as Economic Development areas in order to maintain employment opportunities in the locality, this improvement on the 'access to employment' criteria would not change the overall rating on access to a range of services from a minor negative. Further, the effect of these Economic Development Areas will be assessed separately under policy SP11a. For site LPRSA310, the GIS-based site options identified a minor negative effect in relation to SA objective 2: Services & Facilities given that, while a primary school and retail centre are available locally, Headcorn lies distant from the nearest secondary school,

**6.220** For site LPRSA310, the GIS-based site options work identified a minor negative effect in relation to SA objective 2: Services & Facilities given that, while primary schools and GP surgeries are available locally, this site lies over 800m from the local GP surgery and distant from the nearest secondary school, and average commuting distances are high from this area. As such, these SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.221** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP6(b): Headcorn, because of its requirement to resist loss of existing community facilities and green spaces and support new ones

to meet local needs. Minor positive effects are expected from the allocation policy for site LPRSA310 because of the requirement for design of the site to ensure neighbouring residents' amenity is protected.

**6.222** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP6(b): Headcorn due to the provision of health infrastructure and open space. For site 310, the GIS-based site options work identified a minor positive effect for site 310 in relation to SA objective 4: Health, reflecting the site's proximity to open space and the public rights of way network. The requirement for the provision of open space provision in the suite of policies helps to reinforce the previously identified positive effects but the overall SA scores for the site is unaffected by the provisions of the site-specific allocation policy.

**6.223** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP6(b): Headcorn and for site 310. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy SP6(b) is separately assessed under policy SP11(a). In the case of the site allocation policy, development here would not lead to loss of existing employment sites or provide new employment space.

**6.224** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy SP6(b): Headcorn. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.225** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP6(B): Headcorn. For site 310, the GIS-based site options work identified minor positive effects in relation to SA objective 7: Sustainable Travel. This reflected the positive effects of proximity to bus services and the train station within Headcorn, offset by the negative effects of lack of proximity to cycle paths. The site-specific policy requires any development to address the lack of a pavement along Mote Road, and the related weakness in non-car permeability, although no specific requirements are outlined. While this will help to support walking, the overall SA scores for the site is unaffected.

**6.226** In relation to SA objective 8: Minerals, negligible effects have been identified for the strategic policy SP6(b): Headcorn. For site 310, the GIS-based site options work identified minor negative effects in relation to SA objective 8: Minerals, because the northern half of the site lies in a Mineral Safeguarding Area (MSA). This score is unaffected by the site-specific policy.

**6.227** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP6(b): Headcorn. For site 310, significant negative effects have been identified in relation to SA objective 9: Soils, given that the development of the site would result in the loss of greenfield land and of Grade 3 agricultural land. Given that all of the agricultural land within the site boundary is grade 3 and that loss of greenfield land on this site is inevitable, this significant negative effect is impossible to mitigate and the score is unaffected by the site-specific policy.

**6.228** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP6(b): Headcorn. Minor negative effects have been identified for site 310 in relation to SA objective 10: Water, given that the site lies within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.229** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP6(b): Headcorn. The GIS-based site options work identified a significant negative effect for site 310, given that part of the site contains land within Flood Zone 3, including access to the site. The site-specific policy requires acceptable flood safety measures bring agreed with the EA, which reduces this effect to a minor negative effect, given that the risk applies to only a limited area of the site and mitigation is required within the policy wording.

**6.230** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP6(b): Headcorn. The GIS-based site options work identified minor negative effects for site 310 in relation to SA objective 13: Climate Change, principally because of relatively poor accessibility to some key services and employment (as discussed under SA objective 2: Services & Facilities) and consequent travel-related carbon emissions. The site-specific policy does not alter this conclusion.

**6.231** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP6(b): Headcorn. The GIS-based site options work identified minor negative effects for site 310 in relation to SA objective 14: Biodiversity. This was because the site lies within the relevant impact risk zone (IRZ) for nearby SSSIs. Provisions within the site-specific policies do not affect this score.

**6.232** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP6(b): Headcorn. The GIS-based site options work identified a significant negative effect with uncertainty for site 310 in relation to SA objective 15: Historic Environment, given the

proximity to nearby heritage assets, including listed buildings and an area of archaeological potential along Moat Road. Nothing within the site-specific allocation policy reduces this effect or uncertainty.

**6.233** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP6(b): Headcorn. The GIS-based site options work identified a significant negative effect for site 310 in relation to SA objective 16: Landscape. The entirety of Headcorn, including this site, lies in the Headcorn Pasturelands Landscape Character Area (LCA), which has been assessed as highly sensitive. Given that the site-specific policy requires landscaping which reflects the setting adjacent to open countryside and that this site is adjacent to the existing built up area, these effects are reduced to minor negative.

### Mitigation

**6.234** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Convenient pedestrian access to be provided to the site from Moat Road, allowing journeys by foot to be the default for all locally based key services, particularly the retail centre and local primary school on Kings Road.
- Ensure that any significant mineral resources within this site are recovered prior to construction, where economically viable.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.
- Provision of appropriate habitats and land uses within the 'multi-functional amenity space' which would support nearby designated biodiversity assets.
- Align requirements of this suite of policies in relation to design, layout and landscape with the guidelines and mitigation suggested for this LCA by the Council's Landscape Capacity Study, for example requiring new development to respect the local vernacular in scale, density and materials.

## Lenham

### Policy SP6(c): Lenham and site allocation policies for this location

**6.235** This section presents the appraisals of the following Local Plan Review policies:

- SP6(c): Lenham
- LPRSA260 – Ashford Road Lenham
- LPRSA285 – Land at Dickley Courte Lenham

**6.236** Policy SP6(c): Lenham identifies Lenham as a deliverable location for new housing growth and sets criteria to be met by development in this Rural Service Centre. It also confirms the total amount of residential and commercial development to be provided on new site allocations within the urban area and sets out the infrastructure requirements to support development in the urban area. Policy SP6(b) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.237** The detailed site allocation policies set out the amounts and types of development to be provided on the site allocations in Lenham, and the detailed criteria to be met before development will be permitted.

The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.10**, following the scoring scheme set out in **Chapter 2**.

Table 6.10: SA findings for policy SP6(c): Lenham and site allocation policies for this location

SA objective	SP6(c): Lenham	LPRSA260 – Ashford Road Lenham	LPRSA285 – Land at Dickley Courte Lenham
SA2: Services & Facilities	0	-	--
SA4: Health	0	+	+
SA5: Economy	0	+	+
SA6: Town Centre	0	0	0
SA7: Sustainable Travel	0	0	+
SA8: Minerals	0	0	0
SA9: Soils	0	--	++

SA objective	SP6(c): Lenham	LPRSA260 – Ashford Road Lenham	LPRSA285 – Land at Dickley Courte Lenham
SA10: Water	0	0	-
SA11: Air Quality	N/A	N/A	N/A
SA12: Flooding	0	-	0
SA13: Climate Change	0	-	-
SA14: Biodiversity	0	0	-
SA15: Historic Environment	0	--?	-?
SA16: Landscape	0	-?	--

### Explanation of SA findings for policy SP6(c): Lenham and site allocation policies for this location

**6.238** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP6(c): Lenham. This is because none of the requirements within it will provide for additional key services for workers at the employment sites. For the two sites allocated at Lenham, the GIS-based site options work identified a minor negative effect for site 260 and a significant negative effect for site 285 in relation to SA objective 2: Services & Facilities. Both sites are located a significant distance from Maidstone town centre, however site 285 also lies a significant distance from the GP surgery and retail centre within Lenham. These SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.239** In relation to SA objective 4: Health, negligible effects are expected from the strategic policy SP6(c): Lenham, although it is noted that the loss of existing green spaces will be resisted. For the sites allocated at Lenham, the GIS-based site options work identified a minor positive effect for both sites. In the case of site 260, this reflected the negative effects of its location adjacent to a waste site offset by the benefits of its close proximity to both open space and the public rights of way network. While nearby waste sites are not a concern for site 285, its score reflects its location slightly more distant from nearby areas of open space. While site-specific policies require landscaping schemes within the sites, this does not amount to the provision of open space and as such these policies do not affect the SA scores.

**6.240** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP6(c): Lenham.

As site allocations with the potential to deliver employment opportunities, the two sites allocated at Lenham have the potential for positive effects in relation to SA objective 5: Economy.

**6.241** Negligible effects have been identified in relation to SA objective 6: Town Centre for both strategic policy SP6(c): Lenham and all site allocations within Lenham, because these sites are not in Maidstone town centre.

**6.242** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP6(c): Lenham. For the sites allocated at Lenham, the GIS-based site options work identified minor negative effects for site 260 and minor positive effects for site 285 in relation to SA objective 7: Sustainable Travel. This reflects that, while there is a rail station in Lenham, site 260 lies 1,000-2,000m from the station while site 285 is 500-1,000m from the station. Site 285 is also closer to a bus stop than site 260. Both sites are 400-800m from a cycle path. Recognising that the site-specific policy for site 260 requires the provision of additional bus services or a shuttle service to the rail station, the effect score is modified from minor negative to negligible for this site.

**6.243** Negligible effects have been identified in relation to SA objective 8: Minerals, given the absence of mineral safeguarding areas which overlap with site boundaries, or safeguarded mineral sites in the vicinity.

**6.244** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP6(c): Lenham. For both of the allocated sites, the GIS-based appraisal of site options identified significant negative effects in relation to SA objective 9: Soils, as digital data indicate that both overlay Grade 2 agricultural land; in addition site 260 is greenfield. However, given that site 285 is brownfield, the score for that site allocation policy has been amended to significant positive. Mitigation of the significant negative effect for site is unlikely to be possible, given that all of it is within Grade 2 classified land.

**6.245** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP6(c): Lenham. Minor negative effects have been identified for site 285 in relation to SA objective 10: Water, given that it lies within a drinking water safeguarding zone (surface water), however negligible effects have been identified for site 260, which does not. Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites. Recommendations on alternative mitigation are provided at the end of this section.

**6.246** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP6(c): Lenham. The GIS-based site options work identified a negligible effect for site 260 in relation to this SA objective, given that it lies outside the relevant identified flood risk areas.

However a minor negative effect has been identified for site 285, where there is some identified risk of groundwater flooding within the site. The site-specific allocation policies have no effect on these SA scores, and mitigating groundwater flooding risk can be more challenging than other forms of flood risk, as many traditional methods of flood protection may not be effective.

**6.247** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP6(c): Lenham. The GIS-based site options work identified minor negative effects for both sites in Lenham in relation to SA objective 13: Climate Change, principally because of relatively poor accessibility to some key services and public transport links (as discussed under SA objective 2: Services & Facilities) and the consequent travel-related carbon emissions.

**6.248** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP6(c): Lenham and for site 260. The GIS-based site options work identified minor negative effects for site 285 in relation to this SA objective, which lies on a relevant impact risk zone (IRZ) for nearby designated sites.

**6.249** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP6(c): Lenham. The GIS-based site options work identified significant negative effects with uncertainty for site 260 in relation to SA objective 15: Historic Environment, given the proximity to nearby heritage assets, including listed buildings and an area of archaeological potential in the centre of Lenham. However site 285 lies more distant from these assets and as such a minor negative effect with uncertainty was identified. The requirement within the site-specific policy for site 260 for high standards of design and vernacular materials may provide some mitigation, but in the absence of evidence on the nature of potential effects of this allocation on the historic environment, none is recognised at this stage of the SA.

**6.250** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP6(c): Lenham. The GIS-based site options work identified significant negative effects for both sites in relation to SA objective 16: Landscape, given that both lie within the Harrietsham to Lenham Vale Landscape Character Area (LCA), which has been assessed as highly sensitive. This remains the case for site 285, however the requirements within the site-specific policy for site 260 for an appropriate landscape framework for the site to protect the setting of the Kent Downs AONB reduces this impact to minor negative with uncertainty.



## Mitigation

**6.251** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Provision of appropriate habitats and land uses within site 285 which would support nearby designated biodiversity assets.
- Provide mitigation for potential dust, noise and odour impacts at site 260.
- Strengthen requirements within the site-specific allocation policy for site 285 for providing a landscape framework which limits impact on the sensitive landscape setting.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment, particularly in the case of site 260.

## Marden

### Policy SP6(d): Marden and site allocation policies for this location

**6.252** This section presents the appraisals of the following Local Plan Review policies:

- SP6(d): Marden
- LPRSA295 – Land north of Copper Lane, Marden
- Policy LPRSA314 - Land east of Albion Rd, Marden

**6.253** Policy SP6(d): Marden sets criteria to be met by development in this Rural Service Centre. It also confirms the total amount of residential development to be provided on new site allocations within Marden and sets out the infrastructure requirements to support development in the urban area. Policy SP6(d) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.254** The detailed site allocation policies set out the amount and type of development to be provided on each site allocation in Marden, and the detailed criteria to be met before development will be permitted.

**6.255** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.11**, following the scoring scheme set out in **Chapter 2**.

Table 6.11: SA findings for policy SP6(d): Marden and site allocation policies for this location

SA objective	SP6(d) - Marden	LPRSA295 – Land north of Copper Lane, Marden	Policy LPRSA314 - Land east of Albion Rd, Marden
SA1: Housing	0	0	0
SA2: Services & Facilities	0	-	-
SA3: Community	+	+	+
SA4: Health	+	+	+
SA5: Economy	0	0	0
SA6: Town Centre	0	+	+
SA7: Sustainable Travel	0	+	+

SA objective	SP6(d) - Marden	LPRSA295 – Land north of Copper Lane, Marden	Policy LPRSA314 - Land east of Albion Rd, Marden
SA8: Minerals	0	-	-
SA9: Soils	0	--	--
SA10: Water	0	-	--
SA11: Air Quality	N/A	N/A	N/A
SA12: Flooding	0	-	--
SA13: Climate Change	0	-	-
SA14: Biodiversity	0	-	0
SA15: Historic Environment	0	--?	--?
SA16: Landscape		--	-

### Explanation of SA findings for policy SP6(d): Marden and site allocation policies for this location

**6.256** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP6(d): Marden, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are expected from both sites, because the site-specific policies make no mention of the type or quality of housing to be delivered on the site.

**6.257** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP6(d): Marden. For both sites, the GIS-based site options identified minor negative effects in relation to SA objective 2: Services & Facilities given that, while a GP surgery and Marden's retail centre are available within a reasonable distance, the site lies more than 800m from the nearest primary school, distant from the nearest secondary school and average commuting distances from this location are high. These SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.258** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP6(d): Marden, because of its requirement to resist loss of existing community facilities and green spaces and support new ones to meet local needs. Minor positive effects are expected from both site-specific allocation policies because of the requirement to

integrate with surrounding development and for landscaping to soften views from surrounding areas.

**6.259** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP6(d): Marden due to the provision of health infrastructure and open space. For the sites, the GIS-based site options work identified a minor positive effect for site 295 in relation to SA objective 4: Health, reflecting the site's proximity to open space and the public rights of way network, as well as the absence of significant pollution sources. A negligible effect was identified for site 314, given the lack of access to publicly accessible open space. However provisions in the site-specific allocation policy for the latter to provide open space increase this effect to minor positive.

**6.260** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP6(d): Marden and for both. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy SP6(b) is separately assessed under policy SP11(a). In the case of the site allocation policies, development here would not lead to loss of existing employment sites or provide new employment space.

**6.261** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy SP6(d): Marden. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.262** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP6(d): Marden, the requirements for railway station enhancements and measures to improve sustainable transport infrastructure being too generic or covered in more detail by the site specific allocation policies. For both sites, the GIS-based site options work identified minor positive effects in relation to SA objective 7: Sustainable Travel. This reflected the positive effects of proximity to bus services and relatively good proximity to the train station in Marden, offset by the negative effects of lack of proximity to cycle paths. The site-specific policies require improvements to local bus services, however the overall SA score for this objective are unaffected by these requirements.

**6.263** In relation to SA objective 8: Minerals, negligible effects have been identified for the strategic policy SP6(d): Marden. For both sites, the GIS-based site options work identified minor negative effects in relation to SA objective 8: Minerals, because at least part of each site lies in a Mineral Safeguarding Area (MSA). These scores are unaffected by the site-specific policies.

**6.264** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP6(d): Marden. For both sites, significant negative effects have been identified in relation to SA objective 9: Soils, given that the development of either would result in the loss of greenfield land and of Grade 3 agricultural land. Given that loss of greenfield land on these sites is inevitable, this effect is impossible to mitigate and the score is unaffected by the site-specific policies.

**6.265** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP6(d): Marden. Minor negative effects have been identified for both sites in relation to SA objective 10: Water because the sites lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.266** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP6(d): Marden. The GIS-based site options work identified a significant negative effect for both sites, given that limited of both sites contain land identified as being at risk of flooding from surface water (1 in 30 years). The site-specific policy for site 295 requires that the south part of the site around the existing ponds be kept free of development, reducing this effect to minor negative, given that the risk applies to only a limited area of the site.

**6.267** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP6(d): Marden. The GIS-based site options work identified minor negative effects for both sites in relation to SA objective 13: Climate Change, principally because of relatively poor accessibility to some key services and long average commuting distances (as discussed under SA objective 2: Services & Facilities above), resulting in the likelihood of travel-related carbon emissions.

**6.268** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP6(d): Marden. The GIS-based site options work previously identified minor negative effects for site 295 in relation to SA objective 14: Biodiversity. This was because the site lies within relevant impact risk zones (IRZs) for nearby Marden Meadows SSSI. Although the site-specific allocation policy requires a Phase 1 habitats survey to be carried out, it is uncertain whether this would address the potential pressures on the nearby SSSI for which the IRZ is defined, therefore the residual SA score is judged to remain minor negative. Negligible effects were identified for site 314, which lies outside the relevant risk zones.

**6.269** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP6(d): Marden. The GIS-based site options work identified a significant negative effect with uncertainty for both sites in relation to SA objective 15: Historic Environment, given the proximity to nearby heritage assets, including a cluster of listed buildings in the Marden Conservation Area. Nothing within the site-specific allocation policy reduces this effect or uncertainty.

**6.270** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP6(d): Marden. The GIS-based site options work identified significant negative effects for both sites in relation to SA objective 16: Landscape. The entirety of Marden, including these sites, lies in the Staplehurst Low Weald Landscape Character Area (LCA), which has been assessed as highly sensitive. The site-specific policy for site 295 requires structural landscaping to soften the impact of development on the wider landscape, reducing this effect to minor negative with uncertainty, given the generic nature of the requirements in the policy for limiting impact on landscape. The SA score for site 314 is unaffected by the site-specific allocation policies.

### Mitigation

**6.271** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.
- Greater clarify over the requirement for flood resilience on site, including SuDS features, given risk of surface flooding both within the sites and in the wider area. This might be incorporated into existing water bodies on-site, and should also provide additional habitat to mitigate impacts of development on local biodiversity.
- Provision of a pedestrian-friendly route and cycle path linking the sites with the enhanced Marden railway station and other key destinations, to reduce car dependence.
- Ensure that any significant mineral resources within this site are recovered prior to construction, where economically viable, or that the site layout avoid development of the area within the Minerals Safeguarding Area (MSA) to the north.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.

## Staplehurst

### Policy SP6(e): Staplehurst and site allocation policies for this location

**6.272** This section presents the appraisals of the following Local Plan Review policies:

- SP6(e): Staplehurst
- LPRSA066 – Land east of Lodge R, Staplehurst
- LPRSA114 – Land at Home Farm, Staplehurst

**6.273** Policy SP6(e): Staplehurst sets criteria to be met by development in this Rural Service Centre. It also confirms the total amount of residential development to be provided on new site allocations within Staplehurst and sets out the infrastructure requirements to support development in the urban area. Policy SP6(e) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.274** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in Staplehurst, and the detailed criteria to be met before development will be permitted.

**6.275** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.12** following the scoring scheme set out in **Chapter 2**.

*Table 6.12: SA findings for policy SP6(e): Staplehurst and site allocation policies for this location*

SA objective	SP6(e) - Staplehurst	LPRSA066 – Land east of Lodge R, Staplehurst	LPRSA114 – Land at Home Farm, Staplehurst
SA1: Housing	0	0	0
SA2: Services & Facilities	0	--	--
SA3: Community	+	+	+
SA4: Health	+	+	+
SA5: Economy	0	0	--
SA6: Town Centre	0	+	+
SA7: Sustainable Travel	0	+	+
SA8: Minerals	0	0	0

SA objective	SP6(e) - Staplehurst	LPRSA066 – Land east of Lodge R, Staplehurst	LPRSA114 – Land at Home Farm, Staplehurst
SA9: Soils	0	--	-
SA10: Water	0	-	-
SA11: Air Quality	N/A	N/A	N/A
SA12: Flooding	0	--	--
SA13: Climate Change	0	-	-
SA14: Biodiversity	0	-	0
SA15: Historic Environment	0	0?	--?
SA16: Landscape	0	--	-

### Explanation of SA findings for policy SP6(e): Staplehurst and site allocation policies for this location

**6.276** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP6(e): Staplehurst, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are expected from both the site allocation policies because there are no requirements specific within them for the nature and design of housing to be delivered.

**6.277** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP6(e): Staplehurst. While the policy seeks to ensure adequate capacity in health infrastructure to serve the additional residents and provides general support for maintaining or enhancing local shops and community services, this would not bring any of these key services into greater proximity with the allocated sites. For both sites allocated within Staplehurst, the GIS-based site options work identified significant negative effects in relation to SA objective 2: Services & Facilities. While site 114 has slightly better access to Staplehurst's retail centre, there is no secondary school within Staplehurst and average commuting distances from this area are high. Both sites are located over 800m from both the village's GP surgery and the local primary school. These SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.278** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP6(e): Staplehurst because of its requirement to resist loss of

existing community facilities and green spaces and support new ones to meet local needs. Minor positive effects are expected from both the site allocation policies because of the requirement in each of them for design of the site to ensure neighbouring residents' amenity is protected.

**6.279** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP6(e): Staplehurst due to the improvements required to health infrastructure, including improvements to the Staplehurst Medical Centre. For the sites allocated within Staplehurst, the GIS-based site options work identified minor positive effects for both sites in relation to SA objective 4: Health. Health concerns centre around the impact of noise pollution from the railway line on site 66, and the impact of odour from the waste site to the north of site 114. However, neither site lies in an AQMA and both have strong access to existing open space and the public rights of way (PROW) network. The requirement for the provision of open space provision and enhancement of public rights of way in the suite of policies help to reinforce the previously identified minor positive effects but the overall SA scores for the sites are unaffected by the provisions of the site-specific allocation policies.

**6.280** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP6(e): Staplehurst and for allocated site 66. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy SP6(a) is separately assessed under policy SP11(a). However, the allocation of site 114 for residential development would necessitate the loss of an existing employment site, resulting in significant negative effects. This effect is not possible to mitigate, and as such the previous SA scores are unaffected by site-specific policies.

**6.281** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy SP6(e): Staplehurst. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.282** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP6(e): Staplehurst. For allocated sites within Staplehurst, minor positive effects were identified for this SA objective for site 66, but minor negative effects were identified for site 114. While both sites are relatively well located for access to Staplehurst railway station (particularly site 66), both also lie distant from nearby cycle routes. The different scores for the two sites reflects the lack of proximity to bus services for site 114, however the site-specific policy for 114 requires a new bus route and stop within 400m, which results in the adjustment of the score for this site to minor positive.

**6.283** Negligible effects have been identified in relation to SA objective 8: Minerals, given the mineral safeguarding areas (MSAs) within Staplehurst do not intersect with either of these sites.

**6.284** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP6(e): Staplehurst. Both sites lie within Grade 3 classified agricultural land, however given that site 114 is located on a former brownfield site, only minor negative effects have been identified in relation to SA objective 9: Soils. However site 66 is also a greenfield site and, as such, significant negative effects were identified. These SA scores are unaffected by the site-specific allocation policies.

**6.285** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP6(e): Staplehurst. Minor negative effects have been identified for both site allocation policies in relation to SA objective 10: Water, given that both sites lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.286** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP6(e): Staplehurst. The GIS-based site options work identified significant negative effects for both sites allocated with Staplehurst in relation to this SA objective. Both sites contain land with a 1 in 30 year risk of surface water flooding, and in the case of site 66, a very limited part of the north of the site lies within Flood Zone 2. The site-specific policy for site 66 requires development to avoid any development within Flood Zone 2 however, given the limited extent of the intersection and the lack of mitigation within this group of policies for surface water flood risk, this does not affect the previously identified negative scores.

**6.287** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP6(e): Staplehurst. The GIS-based site options work identified minor negative effects for both sites in relation to this SA objective 13, principally because of relatively poor accessibility to some key services and employment (as described above under SA objective 2: Services & Facilities), which is considered likely to result in travel-related carbon emissions.

**6.288** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP6(e): Staplehurst. The GIS-based site options work identified minor negative effects for site 114 and significant negative effects for site 66 in relation to SA objective 14: Biodiversity. This is

because both sites within 250m of the boundary of either a locally designated site (Ponds and Pasture, Wanshurst Green Local Wildlife Site) or areas of ancient woodland (along Sweetlands Lane). In addition, site 66 contains areas of Priority Habitat. However the site-specific policies for both sites require a phase 1 habitat survey, which may result in on and/or off-site mitigation, which reduces the residual effect in both cases.

**6.289** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP6(e): Staplehurst. The GIS-based site options work identified significant negative effects with uncertainty for site 114 in relation to this SA objective, given the site's proximity to nearby heritage assets including the area of archaeological interest and listed buildings along Station Road and elsewhere. Negligible effects with uncertainty were identified in the case of site 66, which is more distant from these assets. These SA scores remain unaffected by the site-specific allocation policies.

**6.290** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP6(e): Staplehurst. The GIS-based site options work identified significant negative effects for both sites in relation to SA objective 16: Landscape. This is because the entirety of Staplehurst, including both identified sites, lies in the Staplehurst Low Weald Landscape Character Area (LCA), which has been assessed as highly sensitive. While the requirement within the site-specific policy for a landscape and visual impact appraisals at site 114 is judged to reduce the effect to minor negative, there is no such requirement for site 66 and the previously identified SA score is unaffected.

### Mitigation

**6.291** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Given that the nearest secondary school is some distance away in another village, the sustainability of these sites would be improved if there were enhanced bus services provided to the nearest secondary school.
- Noise pollution from the rail line affecting site 66 could be mitigated by using an appropriate site layout to avoid the worst affected areas, and by using trees and shrubs as a natural barrier to noise pollution.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any

appropriate requirements on development to aid achievement of drinking water protection objectives.

- The requirement for multi-functional SuDS features within both sites in Staplehurst would help to mitigate the identified risk from surface water flooding, as well as simultaneously providing benefits for local biodiversity (SA objective 14: Biodiversity).
- Given the identified high sensitive landscape in which both sites lies, an LVIA should also be a site-specific requirement for site 66.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.

## Larger Villages

### Reasonable alternatives tested

**6.292** The Council's site identification and selection process is detailed in its Strategic Land Availability Assessment (SLAA). This formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA. Broadly speaking, sites were only discounted as reasonable alternatives for the SA if the SLAA determined that constraints would prevent any development on the site or if they were promoted a use for which there was no identified need.

**6.293** The site identification and selection process, the lists of reasonable alternative site options that were subject to SA, and the approach to and results of the SA of site options are set out in the separate SA of Options report that has been published alongside this SA document<sup>44</sup>.

### Policy SP7: Larger Villages

**6.294** This section presents the appraisals of Policy SP7: Larger Villages, which identifies five villages that can be designated as larger villages:

- Boughton Monchelsea;
- Coxheath;
- Eyhorne Street (Hollinbourne);
- Sutton Valence; and
- Yalding.

**6.295** Policy SP7: Larger Villages considers all five settlements as sustainable locations for limited new housing development, providing that it is of a scale and in keeping with their role, character and size.

**6.296** It sets out the criteria to be met by development in larger villages, and the total amounts of housing, commercial, and retail development to be provided by the Local Plan Review.

**6.297** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in the larger villages, and the detailed criteria to be met before development will be permitted.

**6.298** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.13**, following the scoring scheme set out in **Chapter 2**.

Table 6.13: SA findings for policy SP7: Larger Villages

SA objective	SP7: Larger Villages
SA1: Housing	0
SA2: Services & Facilities	+
SA3: Community	+
SA4: Health	+
SA5: Economy	0
SA6: Town Centre	0
SA7: Sustainable Travel	0
SA8: Minerals	0
SA9: Soils	0
SA10: Water	0
SA11: Air Quality	N/A
SA12: Flooding	0
SA13: Climate Change	0
SA14: Biodiversity	0
SA15: Historic Environment	0
SA16: Landscape	0

### Explanation of SA findings for policy SP7: Larger Villages

**6.299** Minor positive effects have been identified for Policy SP6: Rural Service Centres in relation to SA objectives 2 to 4, largely because the policy seeks to resist the loss of local shops, community facilities and green spaces while supporting new ones.

**6.300** Negligible effects have been identified in relation to all other SA objectives for this policy.

### Mitigation

**6.301** Measures to limit the potential for negative effects and strengthen the positive effects identified for this policy are recommended as follows:

- None identified.

<sup>44</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements



## Boughton Monchelsea

### Policy SP7(a): Boughton Monchelsea and site allocation policies for this location

**6.302** This section presents the appraisals of the following Local Plan Review policies:

- Policy SP7(a): Boughton Monchelsea
- LPRSA122: The Orchard, Land Adjacent to White Cottage, Boughton Monchelsea
- LPRSA360: Campfield Farm, Boughton Monchelsea

**6.303** Policy SP7(a): Boughton Monchelsea sets out the strategic priorities for development in the village, criteria to be met by development, and the total amounts of housing, to be provided by the Local Plan Review. Policy SP7(a) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.304** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in Boughton Monchelsea, and the detailed criteria to be met before development will be permitted.

**6.305** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.14**, following the scoring scheme set out in **Chapter 2**.

Table 6.14: SA findings for policy SP7(a): Boughton Monchelsea and site allocation policies for this location

SA objective	SP7(a): Boughton Monchelsea	LPRSA122 – The Orchard, Land Adjacent to White Cottage, Boughton Monchelsea	LPRSA360 – Campfield Farm, Boughton Monchelsea
SA1: Housing	0	+	+
SA2: Services & Facilities	+	-	-
SA3: Community	+	+	0
SA4: Health	+	+	+
SA5: Economy	0	--	0
SA6: Town Centre	0	+	+

SA objective	SP7(a): Boughton Monchelsea	LPRSA122 – The Orchard, Land Adjacent to White Cottage, Boughton Monchelsea	LPRSA360 – Campfield Farm, Boughton Monchelsea
SA7: Sustainable Travel	0	-	-
SA8: Minerals	0	-	0
SA9: Soils	0	--	--
SA10: Water	0	-	-
SA11: Air Quality	N/A	N/A	N/A
SA12: Flooding	0	0	0
SA13: Climate Change	0	-	-
SA14: Biodiversity	0	0	0
SA15: Historic Environment	0	-?	--?
SA16: Landscape	0	-?	-?

### Explanation of SA findings for policy SP7(a): Boughton Monchelsea and site allocation policies for this location

**6.306** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP7(a): Boughton Monchelsea, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Minor positive effects are expected from both the site allocation policies due to requirements within them for development proposals to be of a high standard of design.

**6.307** In relation to SA objective 2: Services & Facilities, minor positive effects are expected from the strategic policy SP7(a): Boughton Monchelsea, given the support it provides for new retail development in the village. For both sites allocated within Boughton Monchelsea the GIS-based site options work identified minor negative effects in relation to SA objective 2: Services & Facilities. While average commuting distances from this area are relatively low and there is some access to primary and secondary education in the local area, there is no reasonable access to railway services or to local retail centres from either of these sites. These SA scores are unaffected by the provisions of the site-specific allocation policies.

**6.308** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP7(a): Boughton Monchelsea because of its requirement to resist loss of existing community facilities and green spaces and support new ones to meet local needs. Minor positive effects are expected from site 122 in relation to this SA objective, given the requirement in the site-specific policy for development to protect the amenity of neighbours. Negligible effects are identified in the case of site 360.

**6.309** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP7(a): Boughton Monchelsea due to the support for new open spaces to meet local needs.

**6.310** For the sites allocated within Boughton Monchelsea the GIS-based site options work identified minor positive effects for both sites in relation to SA objective 4: Health. This is because there are no significant concerns over air quality, noise exposure or odour, and there is strong access to existing open space and the public rights of way (PROW) network. Despite the requirement for provision of additional open space, these SA scores are not affected by the site-specific policies.

**6.311** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea and for allocated site 360. However the allocation of site 122 for residential development would necessitate the loss of an existing employment site, resulting in significant negative effects. This effect is not possible to mitigate, and as such the previous SA scores are unaffected by site-specific policies.

**6.312** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy SP7(a): Boughton Monchelsea. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.313** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP7(a): Boughton Monchelsea. For allocated sites within Boughton Monchelsea, minor negative effects were identified for this SA objective in both cases. For both sites, there is good access to bus stops, but no access to either rail services or cycle routes. These SA scores are unaffected by the site-specific policies.

**6.314** Negligible effects have been identified in relation to SA objective 8: Minerals and for site 360, given the mineral safeguarding areas (MSAs) within Boughton Monchelsea do not intersect with this site. However, part of site 122 does

intersect with an MSA, and as such minor negative effects were identified in relation to this SA objective.

**6.315** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea. However significant negative effects were identified in relation to this SA objective for both allocated sites, given that both sites necessitate the loss of a greenfield sites and lie within Grade 2 classified agricultural land. These SA scores are unaffected by the site-specific allocation policies.

**6.316** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea. Minor negative effects have been identified for both site allocation policies in relation to SA objective 10: Water, given that both sites lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.317** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea and for both allocated sites, given that both sites lie outside the relevant flood risk zones.

**6.318** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea. The GIS-based site options work identified minor negative effects for both sites in relation to this SA objective 13, principally because of relatively poor accessibility to some key services and employment, which is considered likely to result in travel-related carbon emissions.

**6.319** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea and for both allocated sites, given that neither site contains areas of Priority Habitat or is considered likely to impact nearby designated assets. While the requirement for Phase 1 habitat surveys is noted, this does not affect the overall SA scores for these sites.

**6.320** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea. The GIS-based site options work identified significant negative effects with uncertainty for both sites in relation to this SA objective, given the proximity of both to the cluster of archaeological and heritage assets in the village. In the case of site 122, the requirements within the site-specific policy to design the development to reflect the setting of the adjoining Conservation Area, and to protect and enhance the setting of listed buildings, reduce this effect to minor negative with uncertainty. In the case of site 360, there is a requirement in the site-specific policy for an

archaeological pre-determination assessment, however the impact of the development on the nearby Conservation Area is not addressed, and as such effects remain significant negative with uncertainty.

**6.321** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP7(a): Boughton Monchelsea. The GIS-based site options work identified significant negative effects for both sites in relation to SA objective 16: Landscape. This is because both sites lie in the Farleigh Greensand Fruit Belt Landscape Character Area (LCA), which has been assessed as highly sensitive. The site-specific allocation policies for both sites require the layout and lighting design to minimise impact on the landscape and, in the case of site e360, a landscape and visual impact assessment (LVIA). As a result, the expected effects for both sites are reduce to minor negative with uncertainty. The residual uncertainty reflects uncertainty over how successfully these landscape impacts can be mitigated.

### Mitigation

**6.322** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Ensure that any significant mineral resources within site 122 are recovered prior to construction, where economically viable, or that the site layout avoid development of the area within the Minerals Safeguarding Area (MSA).
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment, particularly in the case of site 360 in order to limit any impact on nearby Conservation Area.

## Coxheath

### Policy SP7(b): Coxheath and site allocation policies for this location

**6.323** This section presents the appraisals of the following Local Plan Review policies:

- Policy SP7(b): Coxheath
- LPRSA005 - Land Adjacent to Dingley Dell, the Countryside
- LPRSA084 - Land off Heath Road, Coxheath
- LPRSA202 - Land at Forstal Lane, Coxheath
- LRSA257 - Land at Junction of Heath Road/ Dean Street, the Countryside

**6.324** Policy SP7(b): Coxheath sets out the strategic priorities for development in the village, criteria to be met by development, and the total amounts of housing, to be provided by the Local Plan Review. Policy SP7(b) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.325** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in Coxheath, and the detailed criteria to be met before development will be permitted.

**6.326** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.15**, following the scoring scheme set out in **Chapter 2**.

Table 6.15: SA findings for policy SP7(b): Coxheath and site allocation policies for this location

SA objective	SP7(b) - Coxheath	LPRSA005 - Land Adjacent to Dingley Dell, the Countryside	LPRSA084 - Land off Heath Road, Coxheath	LPRSA202 - Land at Forstal Lane, Coxheath	LRS257 - Land at Junction of Heath Road/ Dean Street, the Countryside
SA1: Housing	0	+	+	+	+
SA2: Services & Facilities	0	-	-	-	-
SA3: Community	+	0	+	+	0
SA4: Health	+	+	+	+	+
SA5: Economy	0	--	0	0	0
SA6: Town Centre	0	+	+	+	+
SA7: Sustainable Travel	0	-	-	-	-
SA8: Minerals	0	-	-	-	-
SA9: Soils	0	--	--	--	--
SA10: Water	0	-	-	-	-
SA11: Air Quality	N/A	N/A	N/A	N/A	N/A
SA12: Flooding	0	0	0	0	0
SA13: Climate Change	0	-	-	-	-
SA14: Biodiversity	0	0	-	-	-
SA15: Historic Environment	0	--?	--?	0?	--?
SA16: Landscape	0	-	-	-?	-

### Explanation of SA findings for policy SP7(b): Coxheath and site allocation policies for this location

**6.327** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP7(b): Coxheath, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Minor positive effects are expected from all site allocation policies because they require development proposals to be of a high standard of design incorporating the use of vernacular materials.

**6.328** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP7(b): Coxheath. While the policy seeks to ensure adequate capacity in health infrastructure to serve the additional residents and provides general support for maintaining or enhancing local shops and community services, this would not bring any of these key services into greater proximity with the allocated sites. For all sites allocated within Staplehurst, the GIS-based site options work identified minor negative effects in relation to SA objective 2: Services & Facilities. This reflects poor accessibility for all sites to the local or town centres and secondary schools. Sites 5, 84 and 257 are also relatively distance from GP surgeries and primary schools, however site 202 performs better in this regard. All sites are, however, relatively accessible to employment sites. None of the four site-specific policies require provision of additional key services, and as such these SA scores remain unaffected.

**6.329** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP7(b): Coxheath because of its requirement to resist loss of existing community facilities and green spaces and support new ones to meet local needs. Minor positive effects are expected from sites 84 and 202, given the requirements within site-specific allocation policies to protect the amenity of neighbouring residents through the design of development. In all other cases, negligible effects are expected.

**6.330** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy SP7(b): Coxheath due to the improvements required to health infrastructure, including improvements to Orchard and Stockett Lane surgeries. For the sites allocated within Coxheath, the GIS-based site options work identified minor positive effects for all sites in relation to SA objective 4: Health. This reflects the fact that all sites lie within 300m of existing publicly accessible open space and most are free of concerns regarding air, noise and odour pollution. The only site to present concerns over dust, noise and odour from waste facilities is site 202, given the proximity of the waste site off Stockett Lane. However site 202 has strong access to the public rights of way (PROW) network, which balances this negative. While some of the site-specific policies require

provision of pedestrian and cycle routes, these are assessed under SA objective 7: Sustainable Travel. All site-specific policies also require provision of open space, however given existing access to open space, this would not alter the previously identified minor positive overall SA scores.

**6.331** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP7(b): Coxheath and for all allocated sites other than site 5, which would require the conversion of an existing employment site and therefore scores significant negative. This effect is not possible to mitigate, and as such the previous SA scores are unaffected by site-specific policies.

**6.332** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy SP7(b): Coxheath. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.333** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP7(b): Coxheath. For all allocated sites within Coxheath, minor positive effects were identified for this SA objective. This reflects the fact that there is no rail station in Coxheath and no access to the National Cycle Network, however access to bus services is relatively strong for all sites. All site-specific allocation policies require improvements for improved bus service provision, however this does not affect the overall SA scores. Neither does the requirement for site 202 for the provision of a cycle and pedestrian path along its boundaries, because without wider improvements to the cycle network in Coxheath, this improvement is unlikely to significantly improve opportunities for sustainable travel for future residents.

**6.334** In relation to SA objective 8: Minerals, negligible effects are expected from the strategic policy SP7(b): Coxheath. Minor negative effects have been identified for all sites allocated in Coxheath in relation to this SA objective, given that all lie within a Minerals Safeguarding Area (MSA).

**6.335** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP7(b): Coxheath. All sites allocated at Coxheath lie within Grade 2 classified agricultural land, and as such significant negative effects are identified in relation to this SA objective. These SA scores are unaffected by the site-specific allocation policies.

**6.336** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP7(b): Coxheath. Minor negative effects have been identified for all site allocation policies in relation to SA objective 10: Water because all of them lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is

within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.337** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP7(b): Coxheath and for all site-specific allocation policies. This is because all sites lie outside the relevant flood risk zones.

**6.338** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP7(b): Coxheath. The GIS-based site options work identified minor negative effects for all sites in relation to this SA objective 13, principally because of relatively poor accessibility to some key services and employment (as described above in relation to SA objective 2: Services & Facilities), which is considered likely to result in travel-related carbon emissions.

**6.339** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP7(b): Coxheath. The GIS-based site options work identified minor negative effects for all site allocations in relation to SA objective 14: Biodiversity. This is because site 202 lies relatively close to the ancient woodland at Hamlet's Wood, and the remainder of the sites lie close to both the ancient woodland at Amsbury Wood and the Quarry Wood local wildlife site (LWS). However the site-specific policies require Phase 1 habitat surveys at all sites, as well as tree surveys in some cases. As a result, the residual effects in relation to SA objective 14 are reduced to negligible in all cases.

**6.340** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP7(b): Coxheath. The GIS-based site options work identified significant negative effects with uncertainty for all sites other than 202 in relation to this SA objective, given their proximity to nearby heritage assets including the area of archaeological interest and listed buildings. In the case of site 202, the identified effects are negligible with uncertainty, given the edge-of-settlement location. These SA scores remain unaffected by the site-specific allocation policies, despite some noted requirements for the use of vernacular materials.

**6.341** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP7(b): Coxheath. The GIS-based site options work identified minor negative effects for those sites to the east of the existing settlement – 5, 84, and 257, given that they lie in the Coxheath Plateau LCA, which is assessed as moderately sensitive. However site 202, to the north of Coxheath, lies in the highly sensitive Farleigh Greensand Fruit Belt LCA, and as such significant negative effects with uncertainty were previously identified. However the site-specific allocation policy for 202 requires a landscape and visual impact assessment to be undertaken and lower density requirement

on the peripheries of the site, which reduces this effect to minor negative with uncertainty, given uncertainty over how comprehensively landscape impact can be mitigated.

### Mitigation

- Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:
- More ambitious improvements to create a well-connected network of local cycle routes in Coxheath under strategic policy SP7(b): Coxheath might improve the effects in relation to SA objective 7: Sustainable Transport, beyond limited site-specific improvements.
- Ensure that any significant mineral resources within this site are recovered prior to construction, where economically viable, or that the site layout avoid development of the area within the Minerals Safeguarding Area (MSA) to the north.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.

## Eyhorne Street (Hollingbourne)

### Policy SP7(c): Eyhorne Street (Hollingbourne) and site allocation policies for this location

**6.342** This section presents the appraisals of the following Local Plan Review policies:

- Policy SP7(c): Eyhorne Street (Hollingbourne)
- LPRSA204 - Land south east of Eyhorne Street, Eyehorne St (Hollingbourne)

**6.343** Policy SP7(c): Eyhorne Street (Hollingbourne) sets out the strategic priorities for development in the village, criteria to be met by development, and the total amounts of housing, to be provided by the Local Plan Review. Policy SP7(c) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.344** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in Eyhorne Street (Hollingbourne), and the detailed criteria to be met before development will be permitted.

**6.345** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.16**, following the scoring scheme set out in **Chapter 2**.

Table 6.16: SA findings for policy SP7(c): Eyhorne Street (Hollingbourne) and site allocation policies for this location

SA objective	SP7(c) - Eyhorne Street (Hollingbourne)	LPRSA204 - Land south east of Eyhorne Street, Eyehorne St (Hollingbourne)
SA1: Housing	0	+
SA2: Services & Facilities	0	--
SA3: Community	+	+
SA4: Health	0	+
SA5: Economy	0	0
SA6: Town Centre	0	+
SA7: Sustainable Travel	0	+
SA8: Minerals	0	0

SA objective	SP7(c) - Eyhorne Street (Hollingbourne)	LPRSA204 - Land south east of Eyhorne Street, Eyehorne St (Hollingbourne)
SA9: Soils	0	--
SA10: Water	0	-
SA11: Air Quality	N/A	N/A
SA12: Flooding	0	0
SA13: Climate Change	0	-
SA14: Biodiversity	0	+
SA15: Historic Environment	0	-?
SA16: Landscape	0	-?

### Explanation of SA findings for policy SP7(c): Eyhorne Street (Hollingbourne) and site allocation policies for this location

**6.346** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP7(c): Eyhorne Street (Hollingbourne), noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Minor positive effects are expected from the site allocation policy for 204 because of requirements for development proposals to be of a high standard of design.

**6.347** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP7(c): Eyhorne Street (Hollingbourne) In the case of site 204, the GIS-based site options work identified a significant negative effect in relation to this SA objective. This is because the site lies distant from all relevant key services other than the nearby primary school. This SA score is unaffected by the provisions of the site-specific allocation policy.

**6.348** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP7(c): Eyhorne Street (Hollingbourne) because of its requirement to resist loss of existing community facilities and green spaces and support new ones to meet local needs. A minor positive effect is expected from the site allocation policy for 204 because of the requirement for design of the site to ensure neighbouring residents' amenity is protected.

**6.349** In relation to SA objective 4: Health, negligible effects are expected from the strategic policy SP7(c): Eyhorne Street



(Hollingbourne). For site 204, the GIS-based site options work identified minor positive effects in relation to this SA objective. While the site has strong access to publicly accessible open space and the public rights of way (PROW) network, the positive effect is moderated by the impact of noise pollution from the nearby M20. This SA score is unaffected by the provisions of the site-specific allocation policy.

**6.350** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne) and for allocated site 204. Given that residential development here would not necessitate the loss of an existing employment site or provide new employment space.

**6.351** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy SP7(c): Eyhorne Street (Hollingbourne). However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.352** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP7(c): Eyhorne Street (Hollingbourne). In the case of site 204, a minor positive effect was previously identified in relation to this SA objective, largely due to the site's proximity to Hollingbourne rail station and to nearby bus stops, and despite the absence of accessible parts of the National Cycle Network. This SA score is unaffected by the provisions of the site-specific allocation policy.

**6.353** Negligible effects have been identified in relation to SA objective 8: Minerals and for site 204, given that the site proposed for development does not intersect with mineral safeguarding areas (MSAs) and is not close to a safeguarded mineral site.

**6.354** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne). A significant negative effect was identified for site 204, given that the site is greenfield. The site also lies in Grade 3 classified agricultural land. The score is unaffected by the site-specific policy for 204.

**6.355** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne). A minor negative effect has been identified for site 204 in relation to this SA objective, given that the site lies within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.356** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne). The GIS-based site options work also identified a negligible effect for site 204 given that the site does not intersect with any of the relevant flood risk areas.

**6.357** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne). The GIS-based site options work identified minor negative effects for site 204 in relation to this SA objective, principally because of relatively poor accessibility to many key services and employment sites (as described above in relation to SA objective 2: Services & Facilities), which is considered likely to result in travel-related carbon emissions.

**6.358** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne). The GIS-based site options work also identified negligible effects for site 204 in relation to this SA objective, given that it does not lie in close proximity to the relevant designated sites or protected assets. In recognition of the fact that the site-specific policy requires a Phase 1 habitat survey and provision of ecological mitigation/enhancement areas at the site to ensure appropriate habitat connectivity, the previously identified SA score was revised to minor positive.

**6.359** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne). The GIS-based site options work identified significant negative effects with uncertainty for site 204 in relation to this SA objective, given the site's proximity to nearby heritage assets, including the Hoes Conservation Area and associated listed buildings. However, given that further sites have already been allocated for residential development to the north of site 204, impacts on relevant heritage assets are reduced, and as such the residual effect is minor negative with uncertainty.

**6.360** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP7(c): Eyhorne Street (Hollingbourne). The GIS-based site options work identified significant negative effects for site 204 in relation to SA objective 16: Landscape. This is because the site lies in the Eyhorne Vale Landscape Character Area (LCA), which has been assessed as highly sensitive. However the requirement within the site-specific policy for a landscape and visual impact appraisals at the site, and an appropriate landscape framework to protect the setting of the nearby AONB, is judged to reduce these effects to minor negative with uncertainty. The uncertainty relates to how successful mitigation can be in reducing landscape impact at this site.

### Mitigation

- Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:
- Buffers for noise pollution from the M20.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.

## Sutton Valence

### Policy SP7(d): Sutton Valence and site allocation policies for this location

**6.361** This section presents the appraisals of the following Local Plan Review policies:

- Policy SP7(d): Sutton Valence
- LPRSA204 - Land south east of Eyhorne Street, Eyehorne St (Hollingbourne)
- LPRSA021 - Land adjacent 4 Southways, Sutton Valence
- LPRSA078 - Haven Farm, Sutton Valence
- LPRSA335 - Fir Tree and Norton Lea (South), Sutton Valence

**6.362** Policy SP7(c): Eyhorne Street (Hollingbourne) sets out the strategic priorities for development in the village, criteria to be met by development, and the total amounts of housing, to be provided by the Local Plan Review. Policy SP7(d) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.363** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in Eyhorne Street (Hollingbourne), and the detailed criteria to be met before development will be permitted.

**6.364** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.17**, following the scoring scheme set out in **Chapter 2**.

Table 6.17: SA findings for policy SP7(d): Sutton Valence and site allocation policies for this location

SA objective	SP7(d) Sutton Valence	LPRSA021 - Land adjacent 4 Southways, Sutton Valence	LPRSA078 - Haven Farm, Sutton Valence	LPRSA335 - Fir Tree and Norton Lea (South), Sutton Valence
SA1: Housing	0	0	0	0
SA2: Services & Facilities	0	-	-	-
SA3: Community	+	+	+	0
SA4: Health	+	+	+	+
SA5: Economy	0	0	0	0
SA6: Town Centre	0	+	+	+
SA7: Sustainable Travel	0	-	-	-
SA8: Minerals	0	-	-	-
SA9: Soils	0	--	--	--
SA10: Water	0	-	-	-
SA11: Air Quality	N/A	N/A	N/A	N/A
SA12: Flooding	0	0	0	0
SA13: Climate Change	0	-	-	-
SA14: Biodiversity	0	0	0	0
SA15: Historic Environment	0	--?	--?	-?
SA16: Landscape	0	--	0	--

### Explanation of SA findings for policy SP7(d): Sutton Valence and site allocation policies for this location

**6.365** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP7(d): Sutton Valence, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are expected in relation to this SA objective from all site allocation policies because there are no provisions related to the design or quality of housing to be provided.

**6.366** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP7(d): Sutton Valence. While the policy seeks to ensure adequate capacity in health infrastructure to serve the additional residents and provides general support for maintaining or enhancing local shops and community services, this would not bring any of these key services into greater proximity with the allocated sites. For all sites allocated within Sutton Valence the GIS-based site options work identified minor negative effects in relation to SA objective 2: Services & Facilities. This reflects poor accessibility for all sites to the local or town centres and secondary schools as well generally long commuting distances, despite relatively good access to local GP surgeries and primary schools. None of the site-specific policies require provision of additional key services, and as such these SA scores remain unaffected.

**6.367** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP7(d): Sutton Valence because of its requirement to resist loss of existing community facilities and green spaces and support new ones to meet local needs. Minor positive effects are expected from sites 21 and 78, given the requirements within site-specific allocation policies to protect the amenity of neighbouring residents through the design of development. In the case of 335, negligible effects are expected.

**6.368** In relation to SA objective 4: Health, negligible effects are expected from the strategic policy SP7(d): Sutton Valence. For the sites allocated within Sutton Valence, the GIS-based site options work identified minor positive effects for all sites in relation to SA objective 4: Health. This reflects the fact that only at site 78 are there concerns regarding noise exposure, and this is offset by strong access to open space and the public rights of way (PROW) network across all sites. These SA scores are unaffected by the site-specific policies.

**6.369** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP7(d): Sutton Valence and for all allocated sites, given that none would require the loss of an existing employment site.

**6.370** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic SP7(d): Sutton Valence. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.371** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP7(d): Sutton Valence. For all allocated sites within Sutton Valence, minor negative effects were identified for this SA objective. This reflects the fact that there is no rail station in Sutton Valence and no access to the National Cycle Network, however access to bus services is relatively strong for all sites. These SA scores are unaffected by the site-specific policies.

**6.372** In relation to SA objective 8: Minerals, negligible effects are expected from the strategic policy SP7(d): Sutton Valence. Minor negative effects have been identified for all sites allocated in Sutton Valence in relation to this SA objective, given that all lie within a Minerals Safeguarding Area (MSA).

**6.373** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP7(d): Sutton Valence. Significant negative effects have been identified in relation to this SA objective for all sites allocated in Sutton Valence, because sites 21 and 78 are greenfield sites, and site 335 lies entirely within Grade 2 classified agricultural land.

**6.374** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP7(d): Sutton Valence. Minor negative effects have been identified for all site allocation policies in relation to SA objective 10: Water, given that all sites lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.375** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP7(d): Sutton Valence and for all site-specific allocation policies. This is because all sites lie outside the relevant flood risk zones.

**6.376** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP7(d): Sutton Valence. The GIS-based site options work identified minor negative effects for all sites in relation to this SA objective 13, principally because of relatively poor accessibility to some key services and employment, which is considered likely to result in travel-related carbon emissions.

**6.377** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP7(d):

Sutton Valence. The GIS-based site options work also identified negligible effects for all sites other than site 78, where the presence of Priority Habitat (traditional orchard) within the site boundaries resulted in minor negative effects. However provisions within the site-specific policy for site 78 to carry out a Phase 1 habitat survey and provide mitigation for any impacts reduces the residual effect to negligible.

**6.378** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP7(d): Sutton Valence. The GIS-based site options work identified significant negative effects with uncertainty for all allocated sites in relation to this SA objective, given their proximity to the cluster of heritage assets and area of archaeological interest in Sutton Valence. However in the case of site 335, the requirement in the site-specific policy to retain and protect the setting of nearby listed buildings, and to take into account the Conservation Area, reduces this effect to minor negative with uncertainty. The remaining uncertainty reflects uncertainty over how successfully these impacts can be mitigated.

**6.379** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP7(d): Sutton Valence. The GIS-based site options work identified significant negative effects for sites 21 and 335, given that they lie at least partially in the Sutton Valence Greensand Ridge landscape character area (LCA), which is judged as being highly sensitive to development. Site 78 lies in a less sensitive landscape setting and as such negligible effects were identified in relation to this SA objective. These SA scores are unaffected by the site-specific policies.

### 6.380

#### Mitigation

**6.381** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Use vegetation or other measures within the layout of site 78 in order to buffer the effect of noise pollution at the site.
- Ensure that any significant mineral resources within this site are recovered prior to construction, where economically viable, or that the site layout avoid development of the area within the Minerals Safeguarding Area (MSA) to the north.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any

appropriate requirements on development to aid achievement of drinking water protection objectives.

- Carry out a landscape and visual impact assessment (LVIA) at sites 21 and 335 and use the results to inform site layout and design. In the case of site 335, it may be possible to direct development to the less sensitive areas of the site in landscape terms.

## Yalding

### Policy SP7(e): Yalding and site allocation policies for this location

**6.382** This section presents the appraisals of the following Local Plan Review policies:

- SP7(e): Yalding
- LPRSA248 - Land North of Kenward Road, Yalding

**6.383** Policy SP7(e): Yalding sets out the strategic priorities for development in the village, criteria to be met by development, and the total amounts of housing, to be provided by the Local Plan Review. Policy SP7(e) confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.384** The detailed site allocation policy sets out the amount and type of development to be provided on the site allocation in Yalding, and the detailed criteria to be met before development will be permitted.

**6.385** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.18**, following the scoring scheme set out in **Chapter 2**.

*Table 6.18: SA findings for policy SP7(e): Yalding and site allocation policies for this location*

SA objective	SP7(e) Yalding	LPRSA248 - Land North of Kenward Road, Yalding
SA1: Housing	0	0
SA2: Services & Facilities	0	-
SA3: Community	+	?
SA4: Health	+	+
SA5: Economy	0	0
SA6: Town Centre	0	+
SA7: Sustainable Travel	0	+
SA8: Minerals	0	-
SA9: Soils	0	--
SA10: Water	0	-

SA objective	SP7(e) Yalding	LPRSA248 - Land North of Kenward Road, Yalding
SA11: Air Quality	N/A	N/A
SA12: Flooding	0	-
SA13: Climate Change	0	0
SA14: Biodiversity	0	-?
SA15: Historic Environment	0	--?
SA16: Landscape	0	--

### Explanation of SA findings for policy SP7(e): Yalding and site allocation policies for this location

**6.386** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP7(e): Yalding, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are also expected from the site allocation policy for 248 because there are no requirements for standards or quality of design for housing delivered on the site.

**6.387** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP7(e): Yalding. In the case of site 248, the GIS-based site options work identified a minor negative effect in relation to this SA objective. This is because, while the site is distant from secondary schools and retail centres, it has strong access to the local GP surgery and primary schools, and average commuting distances from this area are relatively low. This SA score is unaffected by the provisions of the site-specific allocation policy.

**6.388** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP7(e): Yalding because of its requirement to resist loss of existing community facilities and green spaces and support new ones to meet local needs. A minor positive effect is expected from the site allocation policy for 248 because of the requirement for design of the site to ensure neighbouring residents' amenity is protected.

**6.389** In relation to SA objective 4: Health, negligible effects are expected from the strategic policy SP7(e): Yalding. For site 248, the GIS-based site options work identified minor positive effects in relation to this SA objective. The site has

strong access to publicly accessible open space and the public rights of way (PROW) network, and there are no identified issues with air, noise or other pollution. While the site-specific allocation policy requires the provision of at least 1.77 ha of open space, the overall SA score is unaffected by these requirements.

**6.390** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP7(e): Yalding and for allocated site 248, given that residential development here would not necessitate the loss of an existing employment site and no new employment space would be provided.

**6.391** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic SP7(e): Yalding. However, minor positive effects have been identified for all site-specific allocation policies in relation to this SA objective, as residents of these developments are likely to travel to access higher order services in Maidstone town centre.

**6.392** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP7(e): Yalding. In the case of site 248, a minor positive effect was previously identified in relation to this SA objective. This is because the site lies relatively close to Yalding rail station and has strong access to bus stops, which is tempered by the distance from the closest parts of the National Cycle Network. It is noted that the site-specific allocation policy for 248 requires enhanced bus service regularity, however this does not affect the overall SA score for the site.

**6.393** Negligible effects have been identified in relation to SA objective 8: Minerals. Minor negative effects have been identified for site 248 in relation to this SA objective, given that the southern tip of the site intersects with a mineral safeguarding areas (MSA).

**6.394** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy SP7(e): Yalding. A significant negative effect was identified for site 248, given that the land is a greenfield site. The site also lies in Grade 3 classified agricultural land, however the SA score itself is a result of the lands' greenfield status, and the score is unaffected by the site-specific allocation policy.

**6.395** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP7(e): Yalding. A minor negative effect has been identified for site 248 in relation to this SA objective, given that the site lies within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.396** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP7(e): Yalding. The GIS-based site options work identified a significant negative effect for site 204 as the southern part intersects with Flood Zone 3 and small parts of the site are subject to high levels of surface water flood risk. Given the requirement in the site allocation policy to direct development to the areas of lowest flood risk, the residual effect is assessed as minor negative.

**6.397** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP7(e): Yalding. The GIS-based site options work also identified negligible effects for site 248 in relation to this SA objective. This is because, while some types of service are not available locally, access to sustainable transport means is relatively strong and average commuting distances relatively low from this area. The score is unaffected by the site-specific allocation policy.

**6.398** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP7(e): Yalding. The GIS-based site options work identified significant negative effects for site 204 in relation to this SA objective. This reflects the site's intersection with relevant IRZs for the adjacent River Beult SSSI and its proximity to nearby local wildlife sites at St Peter & St Paul's Churchyard and Stoneham and the Lees. It is noted that the site-specific policy requires a Phase 1 habitat survey and provision of ecological mitigation/enhancement areas at the site to ensure appropriate habitat connectivity, which is judged to reduce the residual effect to minor negative, with uncertainty relating to effectiveness of mitigation.

**6.399** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP7(e): Yalding. The GIS-based site options work identified significant negative effects with uncertainty for site 248 in relation to this SA objective, given the site's proximity to nearby heritage assets, in particular the Yalding Conservation Areas and associated listed buildings and area of archaeological interest. This score is unaffected by the site-specific allocation policy.

**6.400** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP7(e): Yalding. The GIS-based site options work identified significant negative effects for site 248 in relation to this SA objective 16. This is because the site, lies in the Yalding Farmlands Landscape Character Area (LCA), which has been assessed as highly sensitive. This SA score is unaffected by provisions in the site-specific allocation policy.



## Mitigation

- Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:
- Avoid the MSA when building out the site - only a small part intersects with the MSA.
- A landscape and visual impact assessment (LVIA) should be required for site 248, given identified landscape sensitivities. It should be evidenced that the results of this assessments have informed decisions on site layout and design. .
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.

## Smaller Villages

### Reasonable alternatives tested

**6.401** No reasonable alternatives to this policy were identified by the Council.

### Policy SP8: Smaller Villages and site allocation policies for this location

**6.402** This section presents the appraisals of Policy SP8: Smaller Villages only, as there are no site-specific allocation policies.

**6.403** Policy SP8: Smaller Villages sets out the strategic priorities for the development of Maidstone's smaller villages, criteria to be met by development, and the total amounts of housing to be provided by the Local Plan Review.

**6.404** The likely effects of the policy in relation to each sustainability objective are shown in **Table 6.19**, following the scoring scheme set out in **Chapter 2**.

*Table 6.19: SA findings for policy SP8: Smaller Villages and site allocation policies for this location*

SA objective	SP8 – Smaller Villages
SA1: Housing	0
SA2: Services & Facilities	+/-?
SA3: Community	+
SA4: Health	+?
SA5: Economy	?
SA6: Town Centre	0
SA7: Sustainable Travel	-?
SA8: Minerals	?
SA9: Soils	-?
SA10: Water	-?
SA11: Air Quality	N/A
SA12: Flooding	?
SA13: Climate Change	-
SA14: Biodiversity	?

SA objective	SP8 – Smaller Villages
SA15: Historic Environment	?
SA16: Landscape	-?

### Explanation of SA findings for policy SP8: Smaller Villages and site allocation policies for this location

**6.405** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP8: Smaller Villages, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole.

**6.406** In relation to SA objective 2: Services & Facilities, mixed minor positive and minor negative effects are expected from the strategic policy SP8: Smaller Villages. The policy provides for limited development in smaller villages, where access to services (particularly higher-level services) is likely to be less strong, but where small-scale development can help to maintain the viability of services in smaller settlements. Under this policy, development will only be acceptable where it can be linked to the retention or expansion of specific infrastructure or service assets within the settlement, contributing to the potential positive effects.

**6.407** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy SP8: Smaller Village. The policy states that development will only be acceptable where it has community support, either through a Neighbourhood Plan or other Parish endorsement.

**6.408** In relation to SA objective 4: Health, minor positive effects with uncertainty are expected from the strategic policy SP8: Smaller Villages. In general terms, there are no air quality management areas (AQMA) in smaller villages and they are less likely to suffer from noise pollution. Many are also likely to have relatively good access to open space and the public rights of way (PROW) network. However these details will vary village by village, and as such this is an uncertain expected effect.

**6.409** In relation to SA objective 5: Economy, uncertain effects have been identified for the strategic policy SP8: Smaller Villages. This is because, without site locations specified, it is impossible to predict whether development under this policy will lead to the loss of existing employment sites.

**6.410** In relation to SA objective 7: Sustainable Travel, minor negative effects with uncertainty are expected from the

strategic policy SP8: Smaller Villages. It is considered unlikely that villages of this scale will have strong access to public transport linkages such as rail stations or regular bus services, however access is likely to vary for each village.

**6.411** Uncertain effects have been identified for strategic policy SP8: Smaller Villages in relation to SA objective 8: Minerals. While mineral safeguarding areas (MSAs) cover a considerable amount of the borough, without specified locations for development under this policy, it is impossible to predict whether these will intersect with the villages in question.

**6.412** In relation to SA objective 9: Soils, minor negative effects with uncertainty have been identified for the strategic policy SP8: Smaller Village. By their nature, these smaller villages are within a countryside setting and are likely to be greenfield sites and to intersect with agricultural land. However there is uncertainty over this effect, given that the development of brownfield sites is possible under this policy, and without specified locations, it is impossible to predict what classification of agricultural land would be lost as a result of development.

**6.413** In relation to SA objective 10: Water, minor negative effects with uncertainty have been identified for the strategic policy SP8: Smaller Villages. The vast majority of the borough lies within the relevant water resource protection zones, and as such it is likely that sites considered under this policy will also intersect with these zones. However there is uncertainty over this effect given that specific sites are not identified.

**6.414** In relation to SA objective 12: Flooding, uncertain effects have been identified for the strategic policy SP8: Smaller Villages. There are significant flood risks in certain parts of the borough, particularly in the south and west, however without specific locations for development it is impossible to predict whether this would affect new development under this policy.

**6.415** In relation to SA objective 13: Climate Change, minor negative effects have been identified for the strategic policy SP8: Smaller Villages. This is largely because commuting distances are generally likely to be longer from these more rural locations, as is car-based travel to access services.

**6.416** In relation to SA objective 14: Biodiversity, uncertain effects have been identified for the strategic policy SP8: Smaller Villages, given that sites have not been specified and as such it is impossible to predict the impact on designated assets and areas of Priority Habitat, which would have to be assessed on a site-by-site basis.

**6.417** Similarly, in relation to SA objective 15: Historic Environment, uncertain effects have been identified for the strategic policy SP8: Smaller Villages. Without specific

allocated sites, it is impossible to predict the impact on the relevant heritage assets, which would have to be assessed on a site-by-site basis.

**6.418** . In relation to SA objective 16: Landscape, minor negative effects with uncertainty have been identified for the strategic policy SP8: Smaller Villages. Development in these more rural locations present the possibility of significant negative effects, prior to any mitigation, on the borough's highly sensitive landscapes, which are widespread outside major settlements. However under the policy, development will only be acceptable where design takes account of landscape impact having regard to the setting of the settlement within the countryside, which reduces these expected negative effects to minor, however uncertainty remains.

### Mitigation

**6.419** None identified.

## The Countryside

### Reasonable alternatives tested

**6.420** The Council's site identification and selection process is detailed in its Strategic Land Availability Assessment (SLAA). This formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA. Broadly speaking, sites were only discounted as reasonable alternatives for the SA if the SLAA determined that constraints would prevent any development on the site or if they were promoted a use for which there was no identified need.

**6.421** The site identification and selection process, the lists of reasonable alternative site options that were subject to SA, and the approach to and results of the SA of site options are set out in the separate SA of Options report that has been published alongside this SA document.

### Policy SP9: Development in the Countryside and site allocation policies for this location

**6.422** This section presents the appraisals of the following Local Plan Review policies:

- Policy SP9: Development in the Countryside
- LPRSA001 - Land Adjacent to Brhemar Garage, the Countryside
- LPRSA329 - Land at Sapphire Kennels, the Countryside
- PRSA273 - Land between Maidstone Road and Whetsted Road, the countryside

**6.423** Policy SP9: Development in the Countryside sets out the strategic priorities development within rural areas of the borough, criteria to be met by any development, and the total amounts of housing to be provided by the Local Plan Review. Policy SP9 confirms that existing Local Plan sites are still allocated. Since these allocations will happen in the absence of the Local Plan Review they form part of the baseline rather than being appraised in this SA.

**6.424** The detailed site allocation policies set out the amounts and types of development to be provided on each site allocation in the town centre, and the detailed criteria to be met before development will be permitted.

**6.425** The likely effects of the policies in relation to each sustainability objective are shown in **Table 6.20**, following the scoring scheme set out in **Chapter 2**.

Table 6.20: SA findings for policy SP9: Development in the Countryside and site allocation policies for this location

SA objective	SP9: Development in the Countryside	LPRSA001 - Land Adjacent to Brhemar Garage, the Countryside	LPRSA329 - Land at Sapphire Kennels, the Countryside	LPRSA273 - Land between Maidstone Road and Wheatsted Road, the countryside
SA1: Housing	0	0	0	N/A
SA2: Services & Facilities	0	--	--	--
SA3: Community	0	0	0	N/A
SA4: Health	0	0	+	0
SA5: Economy	0	--	--	+
SA6: Town Centre	0	0	0	0
SA7: Sustainable Travel	0	-	-	0?
SA8: Minerals	0	0	0	0
SA9: Soils	+	-	-	--
SA10: Water	0	-	-	-
SA11: Air Quality	N/A	N/A	N/A	N/A
SA12: Flooding	0	0	0	--?
SA13: Climate Change	0	-	-	--?
SA14: Biodiversity	0	0	0	0
SA15: Historic Environment	0	--?	--?	--?
SA16: Landscape	+	-?	-?	-?

### Explanation of SA findings for policy SP9: Development in the Countryside and site allocation policies for this location

**6.426** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy SP9: Development in the Countryside, noting that effects of the amount of housing provided by the Local Plan are appraised elsewhere in this report, at the scale of the plan area as a whole. Negligible effects are also expected from both residential site allocation policies, because there are no stated requirements for standards or quality of design for housing delivered on the site. This Objective is not applicable to employment sites.

**6.427** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy SP9: Development in the Countryside. The GIS-based site options work identified significant negative effects in relation to this SA objective for both allocated residential sites. This is because, while site 1 has some degree of access to the GP surgery in Sutton Valence, otherwise both sites are distant from all relevant key services, and average commuting distances from this area are high. For site 273 (employment), significant negative effects were identified, given poor access to GP surgeries, town and local centres. These scores are unaffected by the site-specific allocation policies.

**6.428** In relation to SA objective 3: Community, negligible effects are expected from both the strategic policy SP9: Development in the Countryside and for both site allocations in the Countryside. This SA objective is not applicable to employment sites.

**6.429** In relation to SA objective 4: Health, negligible effects are expected from the strategic policy SP9: Development in the Countryside. The GIS-based site options work previously identified minor negative effects in relation to this SA objective for both allocated residential sites. In both cases, there are negative impacts on health as a result of noise from the adjacent A274 Headcorn Road but benefit from strong access to the public rights of way (PROW) network. In the case of site 1, the negative impact of dust, noise and odour from the waste site to the north west is balanced by some access to nearby publicly accessible open space in Sutton Valence. However both site-specific allocation policies require the provision of open space either on-site and off-site, which moderates these SA score to negligible for site 1 and minor positive for site 329.

**6.430** In the case of site 273 (employment), negligible effects were identified in relation to SA objective 4: Health, given that the positive effects of access to nearby open space were balanced by the negative effects of dust, noise and odour from the East Peckham Quarry to the north – this score is unaffected by the site-specific policy.

**6.431** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy SP9: Development in the Countryside. Significant negative effects were identified for both allocated residential sites, given that both would lead to the loss of existing employment sites. Site 273 is allocated for employment, and as such minor positive effects have been identified.

**6.432** Negligible effects were identified in relation to SA objective 6: Town Centre due to the distance of most countryside locations from Maidstone town centre.

**6.433** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy SP9: Development in the Countryside. For both allocated residential sites, minor negative effects were previously identified in relation to this SA objective. This is because, while the sites have strong access to local bus stops, there is no rail station nearby, nor are there cycle routes. It is noted that both site-specific policies require pavements and new crossing infrastructure, however this does not affect the overall SA scores for the sites. In the case of site 273 (employment), minor negative effects were also previously identified, given that there is a rail station in nearby Beltring, however bus and cycle access is weaker. However the site-specific allocation policy for 273 requires the submission of a travel plan and relevant contributions to public transport infrastructure, which reduces this effect to negligible with uncertainty. The uncertainty reflects the lack of detail on how the travel plan can be acted upon, and the nature of contributions made to public transport.

**6.434** Negligible effects have been identified in relation to SA objective 8: Minerals and for all allocated sites, given that none intersects with mineral safeguarding areas (MSAs) or is close to a safeguarded mineral site.

**6.435** In relation to SA objective 9: Soils, minor positive effects have been identified for the strategic policy SP9: Development in the Countryside, which supports the efficient use of the borough's agricultural land and soil resource. Minor negative effects were identified in relation to this SA objective for both allocated residential sites, given that both lie in Grade 3 classified agricultural land. Significant negative effects were identified for site 273, given that part of the site intersects with Grade 2 classified agricultural land. These SA scores are unaffected by the site-specific allocation policies.

**6.436** In relation to SA objective 10: Water, negligible effects have been identified for the strategic SP9: Development in the Countryside. Minor negative effects have been identified for all allocated sites in relation to this SA objective, given that all lie within a drinking water safeguarding zone (surface water). Given that almost all of the borough is within relevant water resource protection zones it is not feasible to avoid these

when allocating residential sites; recommendations on alternative mitigation are provided at the end of this section.

**6.437** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy SP9: Development in the Countryside and for both residential site allocation policies, given that both sites lie outside the relevant flood risk areas. However significant negative effects were identified in the case of site 273, the entirety of which lies in Flood Zone 3. It is noted that the development will have to be subject to a flood risk assessment and that the exceptions test may need to be met. This does not reduce the significant negative effect previously identified, however it does contribute uncertainty to the effect.

**6.438** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy SP9: Development in the Countryside. Minor negative effects have been identified for both residential sites in relation to this SA objective, reflecting deficiencies in access to local services, employment sites and sustainable transport options, judged as likely to result in increase carbon emissions. In the case of site 273, significant negative effects were identified, given the poor access to services and relatively poor access to sustainable transport. The requirement for the production of a travel plan and public transport contributions in the site-specific policy does not reduce this effect but does contribute uncertainty.

**6.439** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy SP9: Development in the Countryside and for both residential site-specific allocation policies. This is because neither site lies in close proximity to any of the relevant designated assets or areas of Priority Habitat. It is noted that the site-specific policies require Phase 1 habitat surveys to be carried out, however this has no impact on the previously identified SA scores. In the case of site 273, minor negative effects were identified because the site lies in an impact risk zone (IRZ) for a nearby SSSI but consideration of the types of development to which the intersecting IRZ relates suggests that the likely effect is actually negligible. The site-specific allocation policy does not affect this SA score.

**6.440** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy SP9: Development in the Countryside. The GIS-based site options work identified significant negative effects with uncertainty for all sites in relation to this SA objective, given the site's proximity to nearby listed buildings along Headcorn Road and elsewhere. These scores are unaffected by the site-specific allocation policies.

**6.441** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy SP9:

Development in the Countryside. The GIS-based site options work identified significant negative effects for both residential sites in relation to this SA objective. This is because the sites lie in the Headcorn Pasturelands Landscape Character Area (LCA), which has been assessed as highly sensitive. However the site-specific policy in both cases requires that future development should be reflective of, and minimise impact on, the designated landscape, which reduces the anticipated effect for both to minor negative with uncertainty, given ongoing uncertainty over how successfully landscape impact can ultimately be mitigated at the site level.

**6.442** In the case of site 273, significant negative effects were also identified in relation to SA objective 16: Landscape, given that the site lies in the Beltring Grasslands Landscape Character Area (LCA), which has been assessed as highly sensitive. Similarly, the site-specific policy requires mitigation in the form of a suitable landscape buffer on the boundaries of the site to protect the open setting, which reduces the anticipated effect for both to minor negative with uncertainty, given ongoing uncertainty over how successfully landscape impact can ultimately be mitigated at the site level.

### Mitigation

- Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:
- The site layout for both residential sites should integrate a vegetation buffer of some kind which mitigates the impact of noise from the adjacent A274. Residential development can also avoid the most noise-sensitive areas within site boundaries.
- Further detail may be required on the public transport contributions required in case of site 273 e.g. a shuttle bus or other link from Beltring rail station.
- Development within site 273 should be limited to only Grade 3 classified agricultural land, which accounts for the majority of site – avoiding development of Grade 2 classified land along its western edge.
- Work with the Environment Agency and water companies to understand the reasons for designation of the Drinking Water Safeguard Zone within which the allocated sites are located and ensure that the suite of Local Plan Review policies for this location places any appropriate requirements on development to aid achievement of drinking water protection objectives.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for this location to conserve and enhance the historic environment.

**6.443** It is noted that site 273 is coming forward as a result of the Paddock Wood urban extension in neighbouring Tunbridge Wells borough, the northern boundary of which abuts this site's southern boundary. Any mitigation for the allocation by the Local Plan Review should therefore form part of a comprehensive approach to the development as a whole.



## Chapter 7

### SA findings for thematic strategic policies and non-strategic policies

#### This chapter sets out the findings of the appraisal of the thematic strategic and non-strategic policies

**7.1** The commentary focuses on describing effects that are expected to be significant. A number of the policies are expected to have no effect on one or more SA objective as they are focused on a specific topic such as housing and therefore would not directly affect the achievement of some SA objectives. No commentary is provided in relation to these SA scores.

#### Housing

##### Reasonable alternatives tested

**7.2** Consideration was given to the potential to enact locally-specific tenure and mix targets in the preparation of the Local Plan Review. While there is value in incorporating neighbourhood-level needs data into policies SP10(a): Housing Mix and SP10(b): Affordable Housing, the granularity of data is not currently in the Council's evidence base to support it. Given that the Council do not have data that would support this approach and given the detailed approach described appears to be at odds with the strategic nature of both policies, this was judged not to be a reasonable alternative that requires appraisal.

**7.3** Policies HOU9: Custom & Self-Build Housing and HOU10: Build to Rent Proposals have three reasonable alternatives:

- 1.** No policy: No new policy is brought forward.
- 2.** Amalgamate with other policies: To bring forward the issue as part of another broader design policy or amend an existing policy to allow for this.
- 3.** Have a separate independent policy: To develop a separate preferred approach to deal with the issue independently of other design policies.

**7.4** With regard to the first of these three reasonable alternatives, having no new policy represents the baseline against which the Local Plan Review is being appraised and is therefore not a reasonable alternative for the purposes of this

SA. With regard to the remaining two reasonable alternatives, there is no indication of any alternative policy direction as described. As such, this represents an alternative approach to the presentation rather than the content of the policy and is therefore not a reasonable alternative for the purposes of this SA.

**7.5** No reasonable alternatives were identified by the Council for the remaining policies in this section.

### Strategic policies SP10(a): Housing Mix to SP10(c): Gypsy & Traveller Site Allocations and non-strategic policies housing policies HOU1 to HOU11

**7.6** This section presents the appraisals of the following policies:

- SP10(a): Housing Mix
- SP10(b): Affordable Housing
- SP10(c): Gypsy & Traveller Site Allocations
- HOU1: Development on Brownfield Land
- HOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the Built-up Area
- HOU3: Residential Premises Above Shops & Businesses
- HOU4: Residential Garden Land
- HOU5: Density of Residential Development
- HOU6: Affordable Local Housing Need on Rural Exception Sites
- HOU7: Specialist Residential Accommodation
- HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation
- HOU9: Custom & Self-Build Housing
- HOU10: Build to Rent Proposals
- HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside

**7.7** Policy SP10(a): Housing Mix seeks to achieve a balanced housing mix across Maidstone Borough, which reflects the needs of those currently living in the area and those in years to come. Policy SP10(b): Affordable Housing sets out the percentage affordable housing targets, including for different tenures, whilst policy SP10(c): Gypsy & Traveller Site Allocations sets out the accommodation needs for Gypsies, Travellers and Travelling Showpeople.

**7.8** Non-strategic policies HOU1: Development on Brownfield Land to HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside outline how Maidstone Council

will support housing growth across the borough, whilst also delivering the vision and objectives of the Local Plan Review. Policy HOU1: Development on Brownfield Land promotes the development of previously developed land and sets out in what circumstances development will be permitted. Policy HOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the Built-Up Area provides a set of criteria for when proposals for the extension, conversion or redevelopment of a residential property will be permitted. Policy HOU3: Residential Premises Above Shops and Business promotes residential accommodation on above ground floor level in Maidstone Town Centre, as well as district and local centres.

**7.9** Policy HOU4: Residential Garden Land promotes the development of domestic garden land to create residential dwellings, on land outside of smaller villages and the countryside, whilst policy HOU5: Density of Residential Development lists the minimum density requirements across Maidstone Borough. Policy HOU6: Affordable Local Housing Need on Rural Exception Sites sets out the circumstances in which affordable housing can be delivered on rural exception sites, whilst policy HOU7: Specialist Residential Accommodation sets out the circumstances for when permission for specialist residential accommodation for older, disabled and more vulnerable people, will be permitted. Policy HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation also sets out the circumstances for when permission for Gypsy, Traveller and Travelling Showpeople accommodation will be permitted.

**7.10** Policy HOU9: Custom & Self-Build Housing demonstrates the Council's support for self and custom build development, which will be provided as part of the overall housing need. Policy HOU10: Build to Rent Proposals encourages the development of rental accommodation, whilst policy HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside supports the replacement of dwellings in the countryside, in addition to their extension.

**7.11 Table 7.1** summarises the sustainability effects for all of the above policies in relation to the SA objectives, and the findings are described below the table.

Table 7.1: SA findings for strategic policies SP10(a): Housing Mix to SP10(c): Gypsy & Traveller Site Allocations and non-strategic housing policies HOU1 to HOU11

Policy	SP10(a): Housing Mix	SP10(b): Affordable Housing	SP10(c): Gypsy & Traveller Site Allocations	HOU1: Development on Brownfield Land	HOU2: Residential Extensions, Conversions, Annexes, and Permitted Development within the	HOU3: Residential Premises above Shops & Businesses	HOU4: Residential Garden Land	HOU5: Density of Residential Development	HOU6: Affordable Local Housing Need on Rural Exception Sites	HOU7: Specialist Residential Accommodation	HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation	HOU9: Custom & Self-Build Housing	HOU10: Build to Rent Proposals	HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside
SA1: Housing	++	++	++	+	+	++	+	+	++	++	++	+	++	+
SA2: Services & Facilities	0	0	0	+?	0	++	+?	++	++	0	+	+	++	0
SA3: Community	++	+	0	0	0	0	0	0	+	0	0	0	0	0
SA4: Health	+	0	0	0	+	+	+	+	+	+	+	+?	+?	+
SA5: Economy	+	+	0	0	0	+	+	+	+	0	0	0	+	+
SA6: Town Centre	0	0	0	+?	0	++	+?	++	0	0	0	0	++	0
SA7: Sustainable Travel	0	0	0	++	0	++	+?	++	++	0	0	++	++	0
SA8: Minerals	0	0	0	0	0	0	+?	0	-?	0	0	++	++	0
SA9: Soils	0	0	0	++	0	++	+/-	++	-?	0	0	0	0	0
SA10: Water	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SA11: Air Quality	0	0	0	++	0	++	+?	++	++	0	0	++	++	0

Chapter 7  
SA findings for thematic strategic policies and non-strategic policies

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Policy	SP10(a): Housing Mix	SP10(b): Affordable Housing	SP10(c): Gypsy & Traveller Site Allocations	HOU1: Development on Brownfield Land	HOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the	HOU3: Residential Premises above Shops & Businesses	HOU4: Residential Garden Land	HOU5: Density of Residential Development	HOU6: Affordable Local Housing Need on Rural Exception Sites	HOU7: Specialist Residential Accommodation	HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation	HOU9: Custom & Self-Build Housing	HOU10: Build to Rent Proposals	HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside
SA Objective														
SA12: Flooding	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SA13: Climate Change	0	0	0	++	0	++	+?	++	++	0	0	++	++	0
SA14: Biodiversity	0	0	0	+?	0	0	-	0	+?/-	0	+	0	0	0
SA15: Historic Environment	0	0	0	0	0	0	0	0	+?	0	0	0	0	0
SA16: Landscape	0	0	0	+	+	0	0	+	+	+	+	+	0	+

### Explanation of SA findings for strategic policies SP10(a): Housing Mix to SP10(c): Gypsy & Traveller Site Allocations and non-strategic policies housing policies HOU1 to HOU11

**7.12** All policies are expected to have positive effects in relation to SA objective 1: Housing because they make provision for new housing or permit housing development in certain circumstances. Over half of the policies are expected to have a significant positive effect for this objective because they make provision for a mix of housing, including affordable housing, housing of different tenures (including plots for custom and self-build) and specialist accommodation for older, disabled and more vulnerable people.

**7.13** Policies HOU3: Residential Premises above Shops & Businesses, HOU5: Density of Residential Development, HOU6: Affordable Local Housing Need on Rural Exception Sites and HOU10: Build to Rent Proposals are expected to have a significant positive effect in relation to SA objective 2: Services & Facilities because they promote residential development that is located within close proximity to essential services and facilities. Policy HOU5: Density of Residential Development sets out the minimum density requirements for residential development across Maidstone Borough, with the highest density of development promoted in Maidstone Town Centre, where most services and facilities tend to be located. Policy HOU10: Build to Rent Proposals also promotes residential accommodation in the town centre, whilst HOU3: Residential Premises above Shops & Business permits residential accommodation above shops and businesses. Policy HOU6: Affordable Local Housing Need on Rural Exception Sites requires preference to be given to development where a range of services, including community facilities, are available.

**7.14** Policies HOU1: Development on Brownfield Land, HOU4: Residential Garden Land, HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation and HOU9: Custom & Self-Build Housing are expected to have a minor positive effect in relation to SA objective 2: Services and Facilities. Policy HOU9: Custom & Self-Build Housing supports self and custom build development in suitable and sustainable locations, which is assumed to be locations within close proximity to services and facilities, or public transport links to settlements that contain these amenities. Policy HOU4: Residential Garden Land promotes the development of domestic garden land in areas outside of smaller villages and the countryside, whilst policy HOU1: Development on Brownfield Land promotes the development of brownfield land also in areas outside of smaller villages and the countryside. These areas are assumed to be larger, more urban areas, where more amenities are available. However, this is unknown. As such, the effects for SA objective 2 have been

recorded as uncertain. Policy HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation specifically states that permission for accommodation will be granted if it is located within walking or cycling distance of local services, including schools and healthcare facilities, or people can travel via public transport links to these services.

**7.15** Policy SP10(a): Housing Mix is expected to have a significant positive effect for SA objective 3: Community because it promotes the delivery of mixed communities across new housing developments and within existing housing areas in the borough. The policy encourages the delivery of a range of house sizes, types and tenures, in order to meet the needs of different groups of people within the population, including those from more deprived areas.

**7.16** Policies SP10(b): Affordable Housing and HOU6: Affordable Local Housing Need on Rural Exception Sites are expected to have a minor positive effect in relation to SA objective 3: Community because they promote affordable housing delivery. Therefore, people who would not normally be able to afford to buy a house, may be able to under this policy, particularly those from more deprived areas within the borough.

**7.17** All policies with the exception of SP10(b): Affordable Housing, SP10(c): Gypsy & Traveller Site Allocations and HOU1: Development on Brownfield Land, are expected to have a minor positive effect in relation to SA objective 4: Health. This is due to a number of reasons but mainly because these policies permit development within close proximity to town centres, where most services and facilities, including GP surgeries, are based. Therefore, a number of people would be located within close proximity to healthcare facilities if required.

**7.18** Proximity to amenities in general is also expected to encourage walking and cycling, at the same time as reducing reliance on the private car. This would reduce vehicular emissions and improve air quality, whilst also encouraging physical exercise, with beneficial effects on people's health. Additionally, a number of these policies require residential development to not have any adverse effect on residential amenity, such as loss of privacy, outlook or light, and any problems associated with noise and odour, which is expected to have beneficial effects on people's health and wellbeing. A number of these policies also make provision for specialist accommodation aimed at older, disabled and vulnerable people, helping deliver the care and support required.

**7.19** The majority of these policies are expected to have a minor positive effect in relation to SA objective 5: Economy because they make provision for, or permit, much needed housing (including affordable housing), which attracts people of working age to the area. This is likely to have beneficial effects on the economy. Additionally, the policies that support

residential development within the town centre and other similar areas, such as HOU5: Density of Residential Development and HOU10: Build to Rent Proposals, are expected to increase footfall in the town centre, with positive effects on the economy. Policies HOU6: Affordable Local Housing Need on Rural Exception Sites and HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside, on the other hand, support the rural economy by permitting development in more rural areas, outside the settlement of Maidstone.

**7.20** Policies HOU3: Residential Premises above Shops & Businesses, HOU5: Density of Residential Development and HOU10: Build to Rent Proposals, are expected to have a significant positive effect for SA objective 6: Town Centre because they each promote residential development within Maidstone Town Centre. Policy HOU10: Build to Rent Proposals specifically promotes rental accommodation, which is likely to make the town centre more attractive to young professionals who may be looking for a flat or other smaller property to rent, near their place of work, whilst also increasing footfall.

**7.21** Policies HOU1: Development on Brownfield Land and HOU4: Residential Garden Land are expected to have minor positive but uncertain effects in relation to SA objective 6: Town Centre because HOU4 promotes the development of domestic garden land in areas outside of smaller villages and the countryside, whilst HOU1 promotes the development of brownfield land also in areas outside of smaller villages and the countryside. These areas are assumed to be larger, more urban areas, such as Maidstone Town Centre, although this is unknown. Consequently, there is potential for both policies to increase footfall in the town centre, enhancing its vitality and vibrancy.

**7.22** Policy HOU6: Affordable Local Housing Need on Rural Exception Sites is expected to have a significant positive effect for SA objective 7: Sustainable Travel because it specifically states that the Council will grant permission for sites where a range of services are accessible by foot, cycle or public transport. Likewise, policy HOU1: Development on Brownfield Land supports residential development on brownfield sites in the countryside which are not residential gardens, provided the site is, or can reasonably be made, accessible by sustainable modes to Maidstone urban area, a rural service centre or larger village. Therefore, this policy is also expected to have a significant positive effect in relation to SA objective 7: Sustainable Travel. Policies HOU3: Residential Premises above Shops & Businesses, HOU5: Density of Residential Development, HOU9: Custom & Self-Build Housing and HOU10: Build to Rent Proposals are also expected to have a significant positive effect for SA objective 7: Sustainable Travel. The policies promote residential development that is within close proximity to a range of

services and facilities, particularly in Maidstone Town Centre. Therefore, people do not have to travel elsewhere and via the private car to reach these amenities. This has the potential to encourage more sustainable travel modes, such as walking and cycling.

**7.23** Policy HOU4: Residential Garden Land is expected to have a minor positive but uncertain effect in relation to SA objective 7: Sustainable Travel because it promotes the development of domestic gardens outside of smaller villages and the countryside, which is assumed to be larger settlements towards the top of the settlement hierarchy, where services and facilities are within closer proximity to one another, but this is unknown.

**7.24** Policy HOU4: Residential Garden Land is expected to have a minor negative effect in relation to SA objective 8: Minerals and a mixed minor positive and minor negative effect for SA objective 9: Soils because although it promotes the redevelopment of domestic gardens, and therefore does not make efficient use of previously developed land, it is likely the garden is underused and its redevelopment may be considered a more effective use of land. This is especially the case in an area that already contains dwellings and associated services and facilities. Additionally, it is likely that any minerals would have been previously extracted from the site. Alternatively, minerals sterilisation may have already taken place. Due to the fact this is unknown, the effect for SA objective 8: Minerals is recorded as uncertain.

**7.25** Policy HOU6: Affordable Local Housing Need on Rural Exception Sites is expected to have a minor negative but uncertain effect in relation to SA objective 8: Minerals because housing development in rural areas and on land that is previously undeveloped, may potentially result in minerals sterilisation, although this is unknown until specific proposals come forward. In addition, the mineral could be extracted prior to development taking place.

**7.26** Policies HOU1: Development on Brownfield Land, HOU3: Residential Premises above Shops & Businesses and HOU5: Density of Residential Development are expected to have a significant positive effect for SA objective 9: Soils. This is because policy HOU1: Development on Brownfield Land promotes the development of previously developed land that may be under-utilised. Policy HOU5: Density of Residential Development promotes an increase in the density of development, which may be achieved through adding extra storeys to existing buildings. Likewise, policy HOU3: Residential Premises above Shops & Businesses promotes residential premises on above ground floor levels, which may have been used previously for other uses.

**7.27** Policy HOU6: Affordable Local Housing Need on Rural Exception Sites is expected to have a minor negative but uncertain effect in relation to SA objective 9: Soils because

these rural exception sites may potentially result in the loss of some of the best and most versatile agricultural land, although this is unknown until specific proposals come forward.

**7.28** Policies HOU1: Development on Brownfield Land, HOU3: Residential Premises above Shops & Businesses, HOU5: Density of Residential Development, HOU6: Affordable Local Housing Need on Rural Exception Sites, HOU9: Custom & Self-Build Housing and HOU10: Build to Rent Proposals are expected to have a significant positive effect in relation to SA objective 11: Air Quality and SA objective 13: Climate Change for the reasons set out above, under SA objective 7: Sustainable Travel. Ensuring services are accessible by foot, cycle or public transport will reduce dependence on the private car, which will also reduce greenhouse gas emissions and improve air quality. Likewise, policy HOU4: Residential Garden Land is expected to have a minor positive but uncertain effect for these two objectives for the reasons set out above, under SA objective 7: Sustainable Travel. It is assumed this policy promotes development in larger settlements towards the top of the settlement hierarchy, and therefore reduces the need to travel via the private car, reducing associated vehicular emissions.

**7.29** Policies HOU1: Development on Brownfield Land and HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation are expected to have a minor positive effect in relation to SA objective 14: Biodiversity. Policy HOU1: Development on Brownfield Land is likely to reduce development on greenfield land and potentially prevent any loss in biodiversity. Furthermore, the policy states that residential development on brownfield sites in the countryside will be permitted provided the redevelopment results in a significant environmental improvement. The policy does not provide detail on what is considered a significant environmental improvement, and therefore uncertainty is added against the effect. Policy HOU8: Traveller and Travelling Showpeople Accommodation requires the ecological impact of development to be assessed and a scheme for any necessary mitigation and enhancement measures to be confirmed. This is expected to help reduce any adverse effect on biodiversity. The policy also requires additional planting to help mitigate any impacts of development, which may enhance biodiversity.

**7.30** Policy HOU6: Affordable Local Housing Need on Rural Exception Sites is expected to have a mixed minor positive and minor negative but uncertain effect in relation to SA objective 14: Biodiversity. This is because the policy is likely to result in development on greenfield land, which could potentially have an adverse effect on any biodiversity present within the area. However, the policy states that where ecological designations are affected by the proposed development, proposals must have regard to the designation and its purpose. This is expected to help protect any

ecological designations in the area. However, further detail is not provided on the way in which proposals must have regard to ecological designations, and therefore uncertainty is added against this effect.

**7.31** Policy HOU4: Residential Garden Land is expected to have a minor negative effect for SA objective 14: Biodiversity because it promotes residential development in gardens, which will cause the loss of these gardens and any associated biodiversity.

**7.32** Only one policy, HOU6: Affordable Local Housing Need on Rural Exception Sites, is expected to have an effect in relation to SA objective 15: Historic Environment. A minor positive effect is expected for this SA objective because the policy states that where heritage designations are affected by proposed development, regard must be given to the designation and its purpose. Again, the policy does not specify in what way regard must be given to the designation and its purpose, therefore the effect has been recorded as uncertain.

**7.33** Policies HOU1: Development on Brownfield Land, HOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the Built-up Area, HOU5: Density of Residential Development, HOU6: Affordable Local Housing Need on Rural Exception Sites, HOU7: Specialist Residential Accommodation, HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation, HOU9: Custom & Self-Build Housing and HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside are expected to have a minor positive effect in relation to SA objective 16: Landscape. This is mainly due to the fact these policies require consideration to be given to the effects of development on the landscape, with proposals reflecting the character and appearance of an area. Policy HOU9: Custom & Self-Build Housing is expected to have a minor positive effect because it promotes self and custom build development, which can introduce different design features to an area, generating interest and enhancing the overall character of an area.

## Recommendations

**7.34** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy HOU1: Development on Brownfield Land permits residential development on brownfield sites in the countryside, provided the redevelopment will result in a significant environmental improvement. Further detail could be added, specifying what is meant by a significant environmental improvement and how this can be achieved.
- Policies HOU4: Residential Garden Land and HOU6: Affordable Local Housing Need on Rural Exception Sites

could require any loss of biodiversity to be offset elsewhere, with reference made to biodiversity net gain. Alternatively, reference could be added to policy SP14(a): Natural Environment.

- It is recommended that policy HOU6: Affordable Local Housing Need on Rural Exception Sites does more in the way of protecting the landscape, biodiversity and geodiversity, and the historic environment. The policy could list a set of measures that would help protect and enhance the natural and built environment. Alternatively, reference could be added to policies SP14(a): Natural Environment, SP14(b): Historic Environment and ENV1: Development Affecting Heritage Assets.
- There could be a requirement in policy HOU6: Affordable Local Housing Need on Rural Exception Sites for any minerals to be extracted before development. The policy could also contain wording that prevents the development of best and most versatile agricultural land.
- A number of the policies would benefit from some additional wording on the historic environment, and how any adverse effects on historic assets will be mitigated.

## Economic development

### Reasonable alternatives tested

**7.35** As outlined in **Chapter 5**, the Council followed an iterative process in developing its spatial strategy with the SA findings at each stage communicated to Council officers to inform further options development. The spatial strategy options included both residential and economic development. The process followed for identifying the spatial strategy options to be subject to SA and the results of the SA are described in detail in the separate SA of Options report that has been published alongside this SA document<sup>45</sup>.

**7.36** The Council's site identification and selection process is detailed in its Strategic Land Availability Assessment (SLAA). This formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA. The site identification and selection process, the lists of reasonable alternative site options that were subject to SA, and the approach to and results of the SA of site options are also set out in the separate SA of Options report that has been published alongside this SA document<sup>46</sup>.

### Strategic policies SP11: Economic Development to SP11(c): Employment Allocations and non-strategic commercial development policies CD1 to CD9 and TRL1 to TLR2

**7.37** This section presents the appraisals of the following policies:

- SP11: Economic Development
- SP11(a): Retention of Employment Sites
- SP11(b): District and Local Centres
- SP11(c): Employment Allocations
- CD1: Town, District and Local Centres
- CD2: Primary and Secondary Frontages
- CD3: Leisure and Community Uses
- CD4: Accommodation for Rural Workers
- CD5: Live-Work Units
- CD6: New Agricultural Buildings and Structures
- CD7: Expansion of Existing Businesses in Rural Areas
- CD8: Farm Shops in the Countryside
- CD9: Equestrian Development
- TLR1: Mooring Facilities and Boat Yards
- TLR2: Holiday Lets, Caravan and Camp Sites

**7.38** Strategic policy SP11: Economic Development sets out how the Council will support and improve the economy across the borough, which includes retaining, intensifying, regenerating and expanding existing economic development premises. The policy also seeks to encourage highly-skilled people to work in the borough, whilst also improving the skills of the general population by supporting further and higher education provision. Policy SP11(a): Retention of Employment Sites lists the designated Economic Development Areas in the borough and seeks to prevent the change of use or redevelopment of these premises. Policy SP11(b): District and Local Centres lists the district and local centres in Maidstone Borough, and seeks to maintain and enhance the retail function and supporting community uses of these centres, in addition to making provision for a new local centre as part of the new residential scheme at Langley Park. Policy SP11(c): Employment Allocations lists seven employment site allocation policies, requiring development to be permitted provided the

<sup>45</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

<sup>46</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements



criteria for each site set out in the detailed site allocation policies are met.

**7.39** Non-strategic commercial development policy CD1 supports retail and main town centre leisure and culture uses in Maidstone Town Centre, whilst also requiring an impact assessment for proposals for these uses outside of Maidstone Town Centre. The policy also supports retail and supporting community uses in district and local centres, as well as preventing the loss of local shops and facilities elsewhere. Policy CD2: Primary and Secondary Frontages sets out what development will be permitted in Maidstone Town Centre to maintain the primary and secondary frontages, and the area's reputation as a shopping destination. Policy CD3: Leisure and Community Uses supports the development of leisure and community uses, particularly within defined town, district and local centres.

**7.40** Policy CD4: Accommodation for Rural Workers supports proposals for housing accommodation for a rural worker. Policy CD5: Live-Work Units supports new-build live-work units in the defined urban area, garden settlements, and settlement boundaries of the rural service centres and larger villages. For the conversion of rural buildings to employment generating uses, a set of criteria listed in the policy must be met. Policy CD6: New Agricultural Buildings and Structures permits development of new agricultural buildings or structures provided a set of criteria are met. Policy CD7: Expansion of Existing Businesses in Rural Areas grants planning permissions for rural businesses provided they meet the criteria listed. Policy CD8: Farm Shops in the Countryside supports proposals for the retail sales of fresh produce at the point of production (or originating from the farm holding). However, the proposal must not demonstrably damage the viability of district centres and village shops. Policy CD9: Equestrian Development sets out in what circumstances permission for equestrian development will be granted.

**7.41** Non-strategic policy TLR1: Mooring Facilities and Boat Yards supports proposals for ancillary riverbank development associated with small scale and short-term mooring facilities, provided the criteria set out in this policy are met. Policy TLS2: Holiday Lets, Caravan and Camp Sites supports proposals for holiday lets, caravans and/or holiday tents outside of settlement boundaries, provided the proposal would not result in an unacceptable loss in the amenity of the area, and the site would be unobtrusively located and well screened.

**7.42** Table 7.2 summarises the sustainability effects for all of the above policies in relation to the SA objectives, and the findings are described below the table.

Table 7.2: SA findings for strategic policies SP11: Economic Development to SP11(c): Employment Allocations and non-strategic commercial development policies CD1 to CD9 and TRL1 to TRL2

Policy  SA Objective	SP11: Economic Development	SP11(a): Retention of Employment Sites	SP11(b): District and Local Centres	SP11(c): Employment Allocations	CD1: Town, District and Local Centres	CD2: Primary and Secondary Frontages	CD3: Leisure and Community Uses	CD4: Accommodation for Rural Workers	CD5: Live- Work Units	CD6: New Agricultural Buildings and Structures	CD7: Expansion of Existing Businesses in Rural Areas	CD8: Farm Shops in the Country- side	CD9: Equestrian Development	TRL1: Mooring Facilities and Boat Yards	TRL2: Holiday Lets, Caravan and Camp Sites
SA1: Housing	0	0	0	0	0	0	0	+	0	0	0	0	0	+	+/-
SA2: Services & Facilities	+	0	++	0	++	++	++	0	+	0	0	+	0	0	0
SA3: Community	0	0	0	0	+	+	++	0	0	0	0	0	0	0	0
SA4: Health	0	0	+	0	+	0	+	0	+	+	+	0	0	0	+
SA5: Economy	++	++	++	0	++	++	+	+	+	+	++	+	+	0	+
SA6: Town Centre	++	0	0	0	++	++	+	0	0	0	0	0	0	0	0
SA7: Sustainable Travel	0	0	+	0	++	0	++	0	+	0	0	-	0	0	0
SA8: Minerals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SA9: Soils	++/-	+	0	0	0	0	0	0	0	0	0	0	0	0	0
SA10: Water	0	0	0	0	0	0	0	0	0	+	0	0	+	+	0

Chapter 7

SA findings for thematic strategic policies and non-strategic policies

Interim SA of Maidstone Local Plan Review  
November 2020

Policy  SA Objective	SP11: Economic Development	SP11(a): Retention of Employment Sites	SP11(b): District and Local Centres	SP11(c): Employment Allocations	CD1: Town, District and Local Centres	CD2: Primary and Secondary Frontages	CD3: Leisure and Community Uses	CD4: Accommodation for Rural Workers	CD5: Live- Work Units	CD6: New Agricultural Buildings and Structures	CD7: Expansion of Existing Businesses in Rural Areas	CD8: Farm Shops in the Country- side	CD9: Equestrian Development	TLR1: Mooring Facilities and Boat Yards	TLR2: Holiday Lets, Caravan and Camp Sites
SA11: Air Quality	0	0	+	0	++	0	++	0	+	0	0	-	0	0	0
SA12: Flooding	0	0	0	0	0	0	0	0	0	+	0	0	+	+	0
SA13: Climate Change	0	0	+	0	++	0	++	0	+	0	0	-	0	0	0
SA14: Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
SA15: Historic Environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SA16: Landscape	0	+	0	0	0	0	0	0	+	+	+	0	+	+	+

### Explanation of SA findings for strategic policies SP11: Economic Development to SP11(c): Employment Allocations and non-strategic commercial development policies CD1 to CD9 and TRL1 to TLR2

**7.43** Policies CD4: Accommodation for Rural Workers and TLR1: Mooring Facilities and Boat Yards are expected to have a minor positive effect in relation to SA objective 1: Housing because they both support proposals for residential accommodation, specifically caravans and boats, and any other forms of housing accommodation, some of which may be temporary. Therefore, both policies help provide for local housing need. Policy TLR2: Holiday Lets, Caravan and Camp Sites is expected to have a mixed minor positive and minor negative effect against this objective because it supports proposals for holiday lets, caravans and/or holiday tents. However, the policy requires a holiday occupancy condition to be attached to any permission, which would prevent use of any unit as a permanent dwelling. Therefore, this policy would not help meet local housing need, instead providing for visitors to the area.

**7.44** Policies SP11(b): District and Local Centres, CD1: Town, District and Local Centres, CD2: Primary and Secondary Frontages and CD3: Leisure and Community Uses are expected to have a significant positive effect in relation to SA objective 2: Services & Facilities. Policies SP11(b): District and Local Centres and CD1: Town, District and Local Centres support the retention and enhancement of the retail function of district and local centres, in addition to community uses. Policy SP11(b): District and Local Centres specifically makes provision for a new local centre as part of the new residential scheme at Langley Park. Policy CD1: Town, District and Local Centres also supports proposals for retail and main town centre leisure and culture uses in existing centres unless certain circumstances set out in the policy are met. The policy requires an impact assessment to be undertaken where a proposal is for a main town centre use outside of a defined centre, and also prevents the loss of local shops and facilities outside of local and district centres. Policy CD2: Primary and Secondary Frontages seeks to ensure that retail remains the predominant use in Maidstone Town Centre by permitting further retail development, in addition to professional or financial services, cafés, restaurants and drinking establishments, and community and leisure uses. Policy CD3: Leisure and Community Uses is also expected to have a significant positive effect because it supports proposals for leisure and community uses.

**7.45** Policies SP11: Economic Development, CD5: Live-Work Units and CD8: Farm Shops in the Countryside are expected to have a minor positive effect in relation to SA objective 2: Services & Facilities. Policy SP11: Economic Development seeks to enhance the vitality and viability of Maidstone Town

Centre, whilst also retaining the hierarchy of retail centres. Therefore, it is expected that any defined centres across Maidstone Borough will be protected and enhanced, specifically the services and facilities present within these areas. Policy CD5: Live-Work Units restricts the construction of new-build live-work units to the defined urban area, garden settlements and settlement boundaries of the rural service centres and larger villages, where more people are located. Therefore, people are more likely to be located within close proximity to the services offered by other residents at live-work units. Policy CD8: Farm Shops in the Countryside supports retail sales of fresh produce, providing residents with a range of goods that may not otherwise be accessible.

**7.46** Policy CD3: Leisure and Community Uses is expected to have a significant positive effect in relation to SA objective 3: Community because it supports proposals for community uses, whilst also requiring an 'active frontage' to be established, which helps reduce levels of crime. Policies CD1: Town, District and Local Centres and CD2: Primary and Secondary Frontages are expected to have a minor positive effect for SA objective 3: Community because they support community uses in town, district and local centres.

**7.47** Policies SP11(b): District and Local Centres, CD1: Town, District and Local Centres, CD3: Leisure and Community Uses, CD5: Live-Work Units, CD6: New Agricultural Buildings and Structures, CD7: Expansion of Existing Businesses in Rural Areas and TLR2: Holiday Lets, Caravan and Camp Sites are expected to have a minor positive effect in relation to SA objective 4: Health. Most of these policies encourage walking and cycling by locating services and facilities in close proximity to people. A number of the policies also give consideration to residential amenity by requiring any adverse effects of development on residential amenity to be minimised, particularly in rural areas. Some of these policies also support the development of leisure uses which are expected to increase people's levels of physical exercise.

**7.48** Given they cover economic development and employment, almost all of the policies are expected to have positive effects in relation to SA objective 5: Economy. Policies SP11: Economic Development, SP11(a): Retention of Employment Sites, SP11(b): District and Local Centres, CD1: Town, District and Local Centres, CD2: Primary and Secondary Frontages and CD7: Expansion of Existing Businesses in Rural Areas are expected to have a significant positive effect for this objective because they seek to support and improve the economy in Maidstone Borough. This is achieved through the retention, intensification, regeneration and expansion of existing economic development premises, in urban areas and rural areas, in addition to attracting more people to the borough. Policy SP11: Economic Development also seeks to improve skills in the workforce by supporting further and higher education provision, in addition to

supporting improvements in information and communications technology, to facilitate more flexible working practices. Policy CD2: Primary and Secondary Frontages focuses more specifically on Maidstone Town Centre and providing a mix of uses including retail, professional and financial services, cafés, restaurants and bars, and community and leisure facilities. Similarly, policies SP11(b): District and Local Centres and CD1: Town, District and Local Centres support the retail function and supporting community uses of town, district and local centres.

**7.49** The remaining policies, with the exception of SP11(c): Employment Allocations and TLR1: Mooring Facilities and Boat Yards, are expected to have a minor positive effect against SA objective 5: Economy because they support smaller, localised development that will have positive effects on the local economy, but which may not be as significant district-wide, compared to the policies in the previous paragraph. Policies CD4: Accommodation for Rural Workers, CD6: New Agricultural Buildings and Structures, CD8: Farm Shops in the Countryside and CD9: Equestrian Development are expected to have a minor positive effect for SA objective 5 because they support development in rural areas for existing and new businesses, in addition to accommodation for rural workers. Policy CD3: Leisure and Community Uses is expected to have a minor positive effect because it supports the development of leisure and community uses, which may generate local employment opportunities. Policy CD5: Live-Work Units is also expected to have a minor positive effect because it enables people to provide their services from home, generating money that will contribute towards the local economy. Policy TLR2: Holiday Lets, Caravan and Camp Sites is expected to have a minor positive effect against this objective because it supports the tourism industry through the provision of holiday lets, caravans and/or holiday tents.

**7.50** Policies SP11: Economic Development, CD1: Town, District and Local Centres and CD2: Primary and Secondary Frontages are expected to have a significant positive effect in relation to SA objective 6: Town Centre. This is because policy SP11: Economic Development seeks to enhance the vitality and viability of Maidstone Town Centre, whilst also maintaining the hierarchy of retail centres. The policy also supports economic development in the Maidstone urban area which may potentially bring in more people to the town. Likewise, policy CD1: Town, District and Local Centres supports proposals for retail and main town centre leisure and culture uses, whilst also preventing this type of development from taking place outside of Maidstone Town Centre unless certain criteria are met. Policy CD2: Primary and Secondary Frontages seeks to maintain the primary and secondary frontages in Maidstone Town Centre, so as to retain its reputation as a retail destination. Policy CD3: Leisure and Community Uses is expected to have a minor positive effect

for SA objective 6: Town Centre because it supports proposals for leisure and community uses, with a preference towards town, district and local centres.

**7.51** Policies CD1: Town, District and Local Centres and CD3: Leisure and Community Uses are expected to have a significant positive effect in relation to SA objective 7: Sustainable Travel because they promote development at defined centres, where residents are located within close proximity to the amenities they need. Therefore, people can easily access various services and facilities via walking and cycling, or public transport. Both policies specifically require proposals located at the edge of an existing centre or out of a centre, to ensure the provision of walking and cycling routes, as well as public transport links. Therefore, overall, both policies are expected to encourage use of sustainable travel modes.

**7.52** Policies SP11(b): District and Local Centres and CD5: Live-Work Units are expected to have a minor positive effect for SA objective 7: Sustainable Travel. This is because policy SP11(b): District and Local Centres makes provision for a new local centre as part of the new residential development scheme at Langley Park, ensuring all new residents to the area are within walking and cycling distance of local amenities. Policy CD5: Live-Work Units is expected to have a minor positive effect because it supports proposals for the conversion of rural buildings to employment generating uses with ancillary living accommodation provided they are not situated in an isolated location relative to local services such as shops, schools and public transport. Therefore, this policy is also expected to encourage uptake of more sustainable travel modes, despite development being located in more rural areas.

**7.53** Policy CD8: Farm Shops in the Countryside is expected to have a minor negative effect in relation to SA objective 7: Sustainable Travel because supporting the retail sales of fresh produce at the point of production, is likely to encourage use of the private car as farm shops tend to be located in more rural, isolated areas that are not easily accessible by walking and cycling, or public transport.

**7.54** Policy SP11: Economic Development is expected to have a significant positive effect in relation to SA objective 9: Soils because it supports the retention, intensification and regeneration of economic development premises. Therefore, development will make efficient use of previously developed land. However, this is mixed with a minor negative effect because the policy also supports the expansion of premises, which may result in development taking place on greenfield land, which would not be an efficient use of land. Policy SP11(a): Retention of Employment Sites is expected to have a minor positive effect for this objective because it supports the retention of existing employment sites, which will reduce the

need to develop greenfield land elsewhere in order to meet demand.

**7.55** Policies CD6: New Agricultural Buildings and Structures and CD9: Equestrian Development are expected to have a minor positive effect in relation to SA objective 10: Water and SA objective 12: Flooding because they both require structures to address how surface water run-off will be dealt with and controlled within the boundaries of the site. Policy TLR1: Mooring Facilities and Boat Yards is also expected to have a minor positive effect for this objective because it prevents any ancillary riverbank development associated with small scale and short-term mooring facilities from resulting in any loss of the flood plain or land raising. The measures outlined above are likely to help prevent flooding and any surface water run-off.

**7.56** Policies CD1: Town, District and Local Centres and CD3: Leisure and Community Uses are expected to have a significant positive in relation to against SA objective 11: Air Quality and SA objective 13: Climate Change for the reasons outlined above under SA objective 7: Sustainable Travel. Promoting development at defined centres where residents are located is expected to encourage walking, cycling and public transport use, which will reduce reliance on the private car and help minimise greenhouse gas emissions and associated pollution. Policies SP11(b): District and Local Centres and CD5: Live-Work Units are expected to have a minor positive effect in relation to these two objectives for the reason outlined above under SA objective 7: Sustainable Travel. Similarly, the reason why policy CD8: Farm Shops in the Countryside is expected to have a minor negative effect against these two objectives is outlined above, under SA objective 7: Sustainable Travel.

**7.57** Policy TLR1: Mooring Facilities and Boat Yards is the only policy expected to have an effect in relation to SA objective 14: Biodiversity. A minor positive effect is expected because this policy only supports proposals for ancillary riverbank development where ecology will be preserved. Furthermore, there should be no loss of the flood plain and facilities will be provided for the disposal of boat toilet contents. These measures will help prevent any adverse effects on biodiversity.

**7.58** Policies SP11(a): Retention of Employment Sites, CD5: Live-Work Units, CD6: New Agricultural Buildings and Structures, CD7: Expansion of Existing Businesses in Rural Areas, CD9: Equestrian Development, TLR1: Mooring Facilities and Boat Yards and TLR2: Holiday Lets, Caravan and Camp Sites are expected to have a minor positive effect in relation to SA objective 16: Landscape because they support development that is appropriate in scale and in keeping with the landscape, so as to avoid any adverse visual impact.

**7.59** None of the policies are expected to have an effect against SA objective 8: Minerals and SA objective 15: Historic Environment. Policy SP11(c): Employment Allocations is expected to have a negligible effect against all sixteen SA objectives because it lists a small number of site allocation policies which have already been appraised. The policy does not provide any further detail to these site allocation policies.

## Recommendations

**7.60** The only minor negative effects identified from this group of policies are in relation to policy SP11: Economic Development, policy CD8: Farm Shops in the Countryside and policy TLR2: Holiday Lets, Caravan and Camp Sites. Promoting the expansion of economic development premises may result in development taking place on greenfield land, which is not an efficient use of land. However, it is difficult for the expansion of premises to avoid this and policy SP11 already promotes the retention, intensification and regeneration of existing premises.

**7.61** Supporting the retail sales of fresh produce at the point of production, is likely to encourage use of the private car as farm shops tend to be located in more rural, isolated areas that are not easily accessible by walking and cycling, or public transport. However, the policy already seeks to limit development to that which primarily actively supports the maintenance of land in agricultural and other appropriate land-based uses. Given the one-off, isolated nature of these types of development, it would be difficult to impose sustainable travel criteria.

**7.62** Policy TLR2 supports proposals for holiday lets, caravans and/or holiday tents. However, the policy prevents use of any unit as a permanent dwelling. Therefore, this policy would not help meet local housing need, instead providing for visitors to the area. No measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended.

## Sustainable transport

### Reasonable alternatives tested

**7.63** As described in the Local Plan Review, the Council's transport modelling has identified that required growth will add journeys onto the existing road network, which is already at capacity during peak hours at certain points. The policies proposed by the Local Plan Review therefore aim to direct development to areas with travel choice, bring forward mitigation measures aimed at encouraging journeys to be taken by more sustainable modes, as well as increasing capacity where it is needed. As such, no reasonable alternatives were identified to the policies appraised here.

**7.64** The appraisal of potential effects in relation to sustainable transport objectives of reasonable alternative spatial strategies and site allocation options is set out in the separate SA options report<sup>47</sup>.

#### **Policy SP12: Sustainable Transport and non-strategic sustainable transport policies TRA1 to TRA4**

**7.65** This section presents the appraisals of the following Local Plan Review policies:

- SP12: Sustainable Travel
- TRA1: Air Quality
- TRA2: Assessing the Transport Impacts of Development
- TRA3: Park and Ride
- TRA4: Parking Standards

**7.66** Policy SP12: Sustainable Travel seeks to promote sustainable transport modes, including public transport, whilst also mitigating the impact of development on the strategic road network and improving highway network capacity at key locations and junctions in the borough. The policy also aims to make the bus an attractive alternative to the car. Reference is made in the policy to electric vehicle infrastructure.

**7.67** Policy TRA1: Air Quality requires development that may have a negative impact on air quality, to consider the potential impacts of pollution by submitting an Air Quality Impact Assessment. Policy TRA2: Assessing the Transport Impacts of Development requires development proposals to demonstrate that the impacts of trips generated to and from the development are remediated or mitigated, whilst also encouraging more sustainable travel modes, including public transport. Policy TRA3: Park and Ride lists two previously designated Park & Ride sites within Maidstone Borough. Policy TRA4: Parking Standards sets out the car parking standards for residential and non-residential development, whilst also making provision for cycle parking facilities and referencing electric vehicle infrastructure.

**7.68 Table 7.3** summarises the sustainability effects for all of the above policies in relation to the SA objectives, and the findings are described below the table.

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<sup>47</sup> LUC (November 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

Table 7.3: SA findings for strategic policy SP12: Sustainable Transport and non-strategic sustainable transport policies TRA1 to TRA4

Policy	SP12: Sustainable Travel	TRA1: Air Quality	TRA2: Assessing the Transport Impacts of Development	TRA3: Park and Ride	TRA4: Parking Standards
SA1: Housing	0	0	0	0	0
SA2: Services & Facilities	0	0	0	0	0
SA3: Community	0	0	0	0	0
SA4: Health	+	+	+	0	0
SA5: Economy	++	0	0	0	0
SA6: Town Centre	++	0	0	0	0
SA7: Sustainable Travel	++	0	++	0	++/-
SA8: Minerals	0	0	0	0	0
SA9: Soils	0	0	0	0	0
SA10: Water	0	0	0	0	0
SA11: Air Quality	++	++	++	0	++/-
SA12: Flooding	0	0	0	0	0
SA13: Climate Change	++	0	++	0	++/-
SA14: Biodiversity	0	0	0	0	0
SA15: Historic Environment	0	0	0	0	0
SA16: Landscape	0	0	0	0	0



### Explanation of SA findings for strategic policy SP12: Sustainable Transport and non-strategic sustainable transport policies TRA1 to TRA4

**7.69** Policies SP12: Sustainable Travel, TRA1: Air Quality, and TRA2: Assessing the transport impacts of development, are expected to have a minor positive effect in relation to SA objective 4: Health because they all encourage walking and cycling, which is likely to improve people's fitness levels. These sustainable transport modes, in addition to public transport, are also likely to reduce use of the private car and associated emissions, which will help improve air quality with beneficial effects on people's health. Indeed, policy TRA1: Air Quality requires development proposals that are likely to have a negative impact on air quality, to produce an Air Quality Impact Assessment to demonstrate how the air quality impacts of development will be mitigated to acceptable levels.

**7.70** Policy SP12: Sustainable Travel is expected to have a significant positive effect in relation to SA objectives 5: Economy and 6: Town Centre because it requires the preparation of an Integrated Transport Strategy, with the aim to facilitate economic prosperity and improve accessibility across Maidstone Borough and to Maidstone Town Centre, in order to promote the town as a regionally important transport hub. The policy also promotes public transport links to and from Maidstone Borough, and increased bus service frequency into the town centre. This is expected to increase footfall in the town centre, with beneficial effects on the economy. The policy also seeks to improve bus links to rural areas, which is likely to have positive effects on the rural economy.

**7.71** Policies SP12: Sustainable Travel and TRA2: Air Quality are expected to have a significant positive effect in relation to SA objective 7: Sustainable Travel because, as mentioned previously, these policies promote walking, cycling and public transport, particularly the Park & Ride. Indeed, policy SP12: Sustainable Travel seeks to deliver a modal shift towards sustainable modes of transport. The policy makes reference to securing the provision of a new bus interchange facility and making public transport more attractive through improved journey times and reliability.

**7.72** Policy TRA4: Parking Standards is expected to have a mixed significant positive and minor negative effect in relation to SA objective 7: Sustainable Travel because although its primary function is to deliver car parking spaces, it intends to restrict the number of car parking spaces available, particularly in areas accessible by public transport. The policy makes provision for cycle parking facilities and also promotes the incorporation of electric vehicle charging points into development, discouraging use of the private car. Despite this, the policy makes provision for car parking spaces, which may

result in the private car becoming the preferred mode of transport.

**7.73** Policies SP12: Sustainable Travel and TRA2: Assessing the Transport Impacts of Development are expected to have a significant positive effect in relation to SA objective 11: Air Quality because walking, cycling and public transport will discourage use of the private car and improve air quality through a reduction in vehicular emissions. Policy SP12: Sustainable Travel specifically states that the council and its partners will address the air quality impact of transport. Policy TRA1: Air Quality is also expected to have a significant positive effect for SA objective 11 because it requires development proposals to demonstrate how the air quality impacts of development will be mitigated to acceptable levels.

**7.74** Policy TRA4: Parking Standards is expected to have a mixed significant positive and minor negative effect in relation to SA objective 11: Air Quality because it promotes cycling and use of electric vehicles, which is expected to improve air quality. However, it makes provision for car parking spaces and may therefore encourage use of the private car which could increase vehicular emissions.

**7.75** For the reasons outlined above, policies SP12: Sustainable Travel and TRA2: Air Quality are also expected to have a significant positive effect in relation to SA objective 13: Climate Change because they discourage use of the private car, which could potentially result in a reduction in CO<sub>2</sub> emissions.

**7.76** Similarly, policy TRA4: Parking Standards is expected to have a mixed significant positive and minor negative effect in relation to SA objective 13: Climate Change because it promotes cycling and use of electric vehicles as alternatives to petrol and diesel cars, which can generate high levels of CO<sub>2</sub> emissions. However, the policy does make provision for car parking spaces, which could encourage use of the private car and increase CO<sub>2</sub> emissions.

**7.77** Policy TRA3: Park and Ride is expected to result in negligible effects in relation to all sixteen SA objectives since it only lists two previously designated Park & Ride sites within Maidstone Borough that are already operational.

### Recommendations

**7.78** None identified.

### Infrastructure

#### Reasonable alternatives tested

**7.79** The Local Plan Review states that retention of the currently adopted policy framework was considered but rejected because the methodology in policy INF1: Publicly Accessible Open Space and Recreation contains a

shortcoming in that the calculation of the ranges of open space required to be delivered per 1,000 head of population can be larger than the site developed at higher densities. As such, this is considered not to be a reasonable alternative for the purposes of the SA. In any event, having no new policy and relying on currently adopted policy represents the baseline against which the Local Plan Review is being appraised and would not, therefore, be a reasonable alternative for the purposes of this SA. Strategic policies SP13a: Infrastructure to SP13(b): Open Space Development and non-strategic infrastructure policies INF1 to INF4

**7.80** This section presents the appraisals of the following Local Plan Review policies:

- SP13(a): Infrastructure Delivery
- SP13(b): Open Space Development
- INF1: Publicly Accessible Open Space and Recreation
- INF2: Community Facilities
- INF3: Renewable and Low Carbon Energy Schemes
- INF4: Digital Communications and Fibre To The Premises (FTTP)

**7.81** Policy SP13(a): Infrastructure Delivery specifies that developers will be expected to provide or contribute towards new or improved infrastructure provision, where it is needed. It lists what infrastructure types the Council will prioritise through Section 106 agreements, and which infrastructure types take priority over others. Policy SP13(b): Open Space Development supports the creation or enhancement of open space, whilst policy INF1: Publicly Accessible Open Space and Recreation sets out the open space quantity and quality standards for new housing or mixed-use development sites. Policy INF2: Community Facilities requires new residential development to have adequate accessibility to community facilities, whilst also preventing the loss of community facilities. Policy INF3: Renewable and Low Carbon Energy Schemes sets out the circumstances in which applications for large scale renewable or low carbon energy projects will be supported. Policy INF4: Digital Communications and Fibre To The Premises (FTTP) seeks to improve the digital communications network across Maidstone Borough.

**7.82 Table 7.4** summarises the sustainability effects for all of the above policies in relation to the SA objectives, and the findings are described below the table.

Table 7.4: SA findings for strategic policies SP13a: Infrastructure to SP13(b): Open Space Development and non-strategic infrastructure policies INF1 to INF4

Policy	SP13(a): Infrastructure Delivery	SP13(b): Open Space Development	INF1: Publicly Accessible Open Space and Recreation	INF2: Community Facilities	INF3: Renewable and Low Carbon Energy Schemes	INF4: Digital Communications and Fibre To The Premises (FTTP)
SA Objective						
SA1: Housing	++	0	0	0	0	0
SA2: Services & Facilities	++	++	++	++	0	0
SA3: Community	++	++	++	++	0	0
SA4: Health	++	++	++	+?	+	0
SA5: Economy	++	0	0	0	+	++
SA6: Town Centre	+?	0	0	0	0	0
SA7: Sustainable Travel	++?	0	++	0	0	0
SA8: Minerals	?	0	0	0	0	0
SA9: Soils	?	0	0	0	++	0
SA10: Water	+?	0	+	0	0	0
SA11: Air Quality	++?	0	++	0	0	0
SA12: Flooding	+?	0	+	0	0	0
SA13: Climate Change	++?	0	++	0	++	0
SA14: Biodiversity	+	+	++	0	+	0
SA15: Historic Environment	?	0	0	0	+	0
SA16: Landscape	+?/-?	+	+	0	+	+

### Explanation of SA findings for strategic policies SP13a: Infrastructure to SP13(b): Open Space Development and non-strategic infrastructure policies INF1 to INF4

**7.83** Policy SP13(a): Infrastructure Delivery is expected to have a significant positive effect in relation to SA objective 1: Housing because it lists affordable housing provision as the main infrastructure priority for residential development. Affordable housing delivery will help meet the housing needs of the population.

**7.84** Policies SP13(a): Infrastructure Delivery, SP13(b): Open Space Development, INF1: Publicly Accessible Open Space and Recreation and INF2: Community Facilities are expected to have a significant positive effect in relation to SA objective 2: Services & Facilities and SA objective 3: Community. Policy SP13(a): Infrastructure Delivery is expected to have a significant positive effect for these two objectives because it requires the delivery of infrastructure, which includes a range of services and facilities, such as new schools, public libraries and other similar uses, many of which also provide a space for community activities. Policies SP13(b): Open Space Development and INF1: Publicly Accessible Open Space and Recreation make provision for public open space, with policy INF1 specifically setting out the open space standards for Maidstone Borough. Open space provision is expected to support high levels of pedestrian activity and outdoor interaction. Policy INF2: Community Facilities requires new residential development to have easy access to community facilities, which includes social facilities, as well as education and other similar facilities. The policy also specifically encourages the dual use of education facilities, for recreation and other purposes.

**7.85** Policies SP13(a): Infrastructure Delivery, SP13(b): Open Space Development and INF1: Publicly Accessible Open Space and Recreation are expected to have a significant positive effect in relation to SA objective 4: Health because open space provision is expected to encourage walking and other recreation activities, particularly if the open spaces are accessible via walking and cycling routes in close proximity to people's homes. This has the potential to increase people's fitness levels, with beneficial effects on their physical and mental wellbeing. Policy INF1: Publicly Accessible Open Space and Recreation specifically states that all new open spaces should be designed in a way that encourages physical activity, so as to improve mental wellbeing and health. The provision of healthcare facilities as part of infrastructure delivery will also ensure that people are located within close proximity to healthcare facilities, for when they are required.

**7.86** Policies INF2: Community Facilities and INF3: Renewable and Low Carbon Energy Schemes are expected to have minor positive effects in relation to SA objective 4: Health. As mentioned previously, policy INF2: Community

Facilities promotes the dual use of education facilities for recreation, which will enable members of the community to have access to things like school playing fields, which they would not normally have access to. This is expected to encourage recreational activity, with beneficial effects on people's health. However, the facilities available differ between schools and it is unknown whether all schools would be willing to enable dual use of their facilities. As such, the effect is recorded as uncertain. Policy INF3: Renewable and Low Carbon Energy Schemes is expected to have a minor positive effect for this objective because it reduces reliance on non-renewable sources of energy, which are often more polluting than renewable energy sources. Therefore, the reduction in emissions is expected to improve air quality, with beneficial effects on people's health.

**7.87** Policies SP13(a): Infrastructure Delivery and INF4: Digital Communications and Fibre To The Premises (FTTP). Policy SP13(a): Infrastructure Delivery is expected to have a significant positive effect in relation to SA objective 5: Economy because where development creates a requirement for new or improved infrastructure beyond existing provision, there is a requirement for developers to provide this. This will enable the borough to continue to compete economically with places elsewhere. Likewise, policy INF4: Digital Communications and Fibre To The Premises (FTTP) will make working from home a lot easier for many who may choose to do so more frequently following Covid-19, through the proposed improvements to the digital communications network. This will have beneficial effects on work efficiency and the economy overall.

**7.88** Policy INF3: Renewable and Low Carbon Energy Schemes is expected to have a minor positive effect in relation to SA objective 5: Economy because developing renewable energy technologies further will help generate employment opportunities, whilst also increasing the country's energy independence.

**7.89** Policy SP13(a): Infrastructure Delivery is expected to have a minor positive but uncertain effect for SA objective 6: Town Centre because it is assumed that infrastructure delivery will also include better public transport links to Maidstone Town Centre, as well as improved walking and cycling routes, although this is unknown. Therefore, the effect is recorded as uncertain.

**7.90** Policy SP13(a): Infrastructure Delivery is expected to have a significant positive effect against SA objective 7: Sustainable Travel because infrastructure delivery tends to include better public transport links, in addition to walking and cycling routes. It is also likely that infrastructure delivery will include charging points for electric vehicles, although this is also not mentioned in the policy. As such, the significant positive effect against this objective is recorded as uncertain.

Policy INF1: Publicly Accessible Open Space and Recreation is also expected to have a significant positive effect for SA objective 7: Sustainable Travel because the policy requires all new open spaces to connect with local routes and green corridors, which is likely to encourage walking and cycling. The policy also states that any new open spaces should be found and accessible by road, cycleway, footpaths and public transport. This will discourage people getting in their cars to reach open spaces.

**7.91** Uncertain effects are recorded for policy SP13(a): Infrastructure Delivery in relation to SA objective 8: Minerals and SA objective 9: Soils because depending on the infrastructure being delivered and where, it could result in a loss of best and most versatile agricultural land, in addition to the sterilisation of mineral resources.

**7.92** Policy INF3: Renewable and Low Carbon Energy Schemes is expected to have a significant positive effect for SA objective 9: Soils. This is because the policy requires preference to be given to existing commercial and industrial premises, previously developed land, or agricultural land that is not classified as the best and most versatile, for the development of renewable and low carbon energy schemes.

**7.93** Policies SP13(a): Infrastructure Delivery and INF1: Publicly Accessible Open Space and Recreation are expected to have minor positive effects in relation to SA objective 10: Water. Policy SP13(a) requires the delivery of infrastructure, which is likely to include water storage and management schemes, although this is unknown. Therefore, the effect against SA objective 10 is recorded as uncertain. Policy INF1: Publicly Accessible Open Space and Recreation is expected to have a minor positive effect against this objective because it requires all new open spaces to provide multi-functional benefits such as addressing surface water management priorities. This could help avert flooding, whilst also preventing groundwater contamination.

**7.94** Policies SP13(a): Infrastructure Delivery and INF1: Publicly Accessible Open Space and Recreation are expected to have a significant positive effect in relation to SA objective 11: Air Quality, for the reasons outlined above under SA objective 7: Sustainable Travel. Encouraging public transport use, in addition to walking and cycling, is expected to reduce reliance on the private car, whilst also reducing vehicular emissions and making the air cleaner. However, the effect for policy SP13(a): Infrastructure Delivery has been recorded as uncertain because the policy does not state whether infrastructure delivery includes promoting sustainable transport modes.

**7.95** Policies SP13(a): Infrastructure Delivery and INF1: Publicly Accessible Open Space and Recreation are expected to have minor positive effects in relation to SA objective 12: Flooding for the reasons outlined above, under SA objective

10: Water. New open spaces will be required to incorporate surface water management measures to help prevent flooding under policy INF1. It is expected that infrastructure delivery under policy SP13(a) will include flood mitigation schemes, although this is unknown. Therefore, the effect of policy SP13(a) for SA objective 12 is recorded as uncertain.

**7.96** Policies SP13(a): Infrastructure Delivery and INF1: Publicly Accessible Open Space and Recreation are expected to have a significant positive effect in relation to SA objective 13: Climate Change for the reasons outlined above under SA objective 7: Sustainable Travel and SA objective 11: Air Quality. Promoting sustainable transport links is expected to reduce reliance on the private car and associated CO<sub>2</sub> emissions. As with the other objectives, the effect for policy SP13(a): Infrastructure Delivery is recorded as uncertain because the policy does not specifically state whether infrastructure delivery includes the incorporation of sustainable transport links into development.

**7.97** Policy INF3: Renewable and Low Carbon Energy Schemes is also expected to have a significant positive effect for SA objective 13: Climate Change because it encourages applications for renewable and low carbon energy schemes, including district heating schemes and combined heat and power and district heating schemes. This will help minimise the borough's contribution to climate change.

**7.98** Policy INF1: Publicly Accessible Open Space and Recreation is expected to have a significant positive effect in relation to SA objective 14: Biodiversity because in addition to making provision for open spaces, this policy also requires open spaces to form part of the green infrastructure network by connecting green corridors together and benefiting wildlife. The policy requires the provision of a range of planting, with an appropriate mix of predominantly indigenous species, whilst also promoting biodiversity on-site through design, choice of species and management practices. Applicants are also required to submit an Open Space Layout and Design Statement, and to list any ecological management measures required.

**7.99** Policies SP13(a): Infrastructure Delivery, SP13(b): Open Space Development and INF3: Renewable and Low Carbon Energy Schemes are expected to have a minor positive effect in relation to SA objective 14: Biodiversity. Open space provision under policies SP13(a) and SP13(b) is expected to improve the existing green infrastructure network, whilst also enhancing biodiversity through design and landscaping. Policy INF3: Renewable and Low Carbon Energy Schemes is expected to have a minor positive effect for this objective because it only permits development where consideration has been given to the impact the development might have on ecology and biodiversity, including the identification of

measures to mitigate impact and provide ecological or biodiversity enhancement.

**7.100** Policy INF3: Renewable and Low Carbon Energy Schemes is expected to have a minor positive effect in relation to SA objective 15: Historic Environment because the policy only permits development of renewable and low carbon energy schemes where consideration has been given to the impact of development on heritage assets and their settings.

**7.101** An uncertain effect has been recorded for policy SP13(a): Infrastructure Delivery in relation to SA objective 15: Historic Environment because depending on the infrastructure being delivered and where, its development could have an adverse effect on the historic environment, although this is unknown.

**7.102** Policies SP13(b): Open Space Development, INF1: Publicly Accessible Open Space and Recreation, INF3: Renewable and Low Carbon Energy Schemes and INF4: Digital Communications and Fibre To The Premises (FTTP) are expected to have a minor positive effect in relation to SA objective 16: Landscape. Policy SP13(b): Open Space Development supports open space development, including the enhancement of existing open spaces, which is likely to have positive effects on the landscape and/or townscape. Open space delivery is also expected, indirectly, to help protect the landscape from obtrusive development. Policy INF1: Publicly Accessible Open Space and Recreation requires all new open spaces to contribute to local landscape character. Policy INF3: Renewable and Low Carbon Energy Schemes only permits development when consideration has been given to the landscape and visual impact of development, whilst policy INF4: Digital Communications and Fibre To The Premises (FTTP) only permits proposals for new masts and antennae when every effort has been made to minimise the visual impact of the proposal.

**7.103** Policy SP13(a): Infrastructure Delivery is expected to have a mixed minor positive and minor negative but uncertain effect for SA objective 16: Landscape because depending on the infrastructure being delivered and where, its development could have an adverse effect on the landscape or, alternatively, a positive effect because it makes provision for open space.

### Recommendations

**7.104** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy SP13(a): Infrastructure Delivery could provide more specific information on what infrastructure will be delivered (e.g. sustainable transport links, electric vehicle charging points, flood mitigation schemes).

- Policy SP13(a): Infrastructure Delivery could require any infrastructure development to not have an adverse effect on the landscape and/or townscape.

## The environment

### Reasonable alternatives tested

**7.105** No reasonable alternatives to these thematic policies were identified by the Council.

### Strategic policies SP14(a): Natural Environment to SP14(c): Climate Change and non-strategic environment policies ENV1 to ENV3

**7.106** This section presents the appraisals of the following Local Plan Review policies:

- SP14(a): Natural Environment;
- SP14(b): Historic Environment;
- SP14(c): Climate Change;
- ENV1: Development Affecting Heritage Assets;
- ENV2: Change of Use of Agricultural Land to Domestic Garden Land; and
- ENV3: Caravan Storage in the Countryside.

**7.107** Policies SP14(a): Natural Environment, SP14(b): Historic Environment and SP14(c): Climate Change all seek to ensure that the borough's natural and historic environment is conserved and enhanced during the Local Plan Review period from 2022 to 2037.

**7.108** Policy SP14(a): Natural Environment predominantly focuses on protecting and enhancing the ecological network and water quality through supporting measures to deliver biodiversity net gain and protecting designated and sensitive/vulnerable assets and areas.

**7.109** Policy SP14(b): Historic Environment ensures a proactive approach is taken in protecting and enhancing the borough's characteristics, distinctiveness, diversity and quality of heritage assets.

**7.110** The requirements set out in policy SP14(c): Climate Change seeks to ensure that development brought for by the Local Plan Review will mitigate and adapt to climate change.

**7.111** As the title of policy ENV1: Development Affecting Heritage Assets suggests, this policy sets out requirements for developments that may affect heritage assets by providing assessment and evaluation requirements.

**7.112** Responding to the selling of individual agricultural plots, policy ENV2: Change of Use of Agricultural Land to Domestic Garden Land sets out criteria that proposals need to meet for

the change of use from agricultural land to domestic use to be permitted.

**7.113** For planning permission to be granted, development relating to caravan storage will need to meet the criteria outlined in policy ENV3: Caravan Storage in the Countryside. This policy seeks to prevent open storage of caravans in the countryside.

Table 7.5: SA findings for strategic policies SP14(a): Natural Environment to SP14(c): Climate Change and non-strategic environment policies ENV1 to ENV3

Policy	SP14(a): Natural Environment	SP14(b): Historic Environment	SP14(c): Climate Change	ENV1: Development Affecting Heritage Assets	ENV2: Change of Use of Agricultural Land to Domestic Garden Land	ENV3: Caravan Storage in the Countryside
SA objective						
SA1: Housing	0	0	+	0	0	0
SA2: Services & Facilities	+?	0	+?	0	0	0
SA3: Community	+?	0	+?	0	0	0
SA4: Health	+	0	+	0	0	0
SA5: Economy	0	0	0	0	+	0
SA6: Town Centre	+	+	0	+	0	0
SA7: Sustainable Travel	+	0	++	0	0	0
SA8: Minerals	+	0	0	0	0	0
SA9: Soils	0	+	0	0	+	0
SA10: Water	+	0	+	0	0	0
SA11: Air Quality	0	0	+	0	0	0
SA12: Flooding	+	0	+	0	0	0
SA13: Climate Change	0	0	++	0	0	0
SA14: Biodiversity	++	0	+	0	0	0
SA15: Historic Environment	+?	++	+?	++	0	0
SA16: Landscape	+	+	+	+	-	-



**Explanation of SA findings for strategic policies SP14(a): Natural Environment to SP14(c): Climate Change and non-strategic environment policies ENV1 to ENV3**

**7.114** Policies SP14(c): Climate Change is expected to lead to minor positive effects for SA objective 1: Housing. Although this policy will not directly lead to the delivery of housing, policy SP14(c): Climate Change encourages the provision of low carbon energy, low carbon heat networks and high levels of water efficiency in new developments meaning that new homes will be sustainably designed, enabling residents to live at lower cost.

**7.115** Minor positive effects are expected in relation to SA objective 2: Services and Facilities, SA objective 3: Community, and SA objective 4: Health. Policy SP14(a) Natural Environment seeks to improve the accessibility of public open space and new links, including links to the Public Rights of Way network and to blue and green spaces. Similarly, policy SP14(c): Climate Change promotes the use of sustainable transport through good provision and connectivity of walking and cycling routes and access to public transport. These provisions will support new communities as services and facilities will be more accessible as routes, such as Public Rights of Way, are improved and created. In addition, these policy requirements promote active travel, facilitating residents to lead a healthy lifestyle and so for these reasons a minor effect is identified for SA objective 4: Health. Uncertainty is attached the minor positive effects in relation to SA objective 2: Services and Facilities and SA objective 3: Community as it is not known at this time whether the improved connectivity and creation of new routes will link directly to services, facilities and public open spaces.

**7.116** Policy ENV2: Change of Use of Agricultural Land to Domestic Garden Land is likely to lead to a minor positive effect in relation to SA objective 5: Economy as this change of use, which would take agricultural land out of commercial use, is generally unacceptable, including where it would lead to loss of the best and most versatile land or would result in the remainder of the agricultural holding becoming unviable.

**7.117** Policies SP14(b): Historic Environment and ENV1: Development Affecting Heritage Assets are likely to have indirect, minor positive effects in relation to SA objective 6: Town Centre as Maidstone Town Centre has a high concentration of heritage assets. Through these policies, new developments are expected to conserve, and where possible enhance, heritage assets and their setting and these requirements will lead to a high quality public realm, helping to increase the draw of the town centre for visitors and businesses.

**7.118** A significant positive effect is identified for policy SP14(c): Climate Change in relation to SA objective 7:

Sustainable Travel. Criterion 1 sets out that the council will seek to adopt a strategy for growth to ensure that development is located in sustainable locations, such as those that have a good level of service provision and/or sites with accessible public transport links thereby reducing the need to travel using private vehicles. Furthermore, criterion 5 of this policy specifically promotes sustainable travel, including the delivery of connecting routes for active travel (such as walking and cycling), accessibility to public transport and the provision of electric vehicle infrastructure. Policy SP14(a): Natural Environment is anticipated to lead to a minor positive effect in relation to SA objective 7: Sustainable Travel as the policy seeks to improve the accessibility of natural greenspace and links to the Public Rights of Way Network, thereby supporting active and sustainable travel.

**7.119** Policy SP14(a): Natural Environment seeks to protect features of geological interest and so a minor positive effect is recorded for SA objective 8: Minerals.

**7.120** Policy SP14(b): Historic Environment is likely to have an indirect, minor positive effect in relation to SA objective 9: Soils as it encourages the council to support measures that secure the sensitive restoration, reuse, and conservations/enhancement of heritage assets. These measures promote development of under-utilised land and buildings, thereby making efficient use of land and helping to reduce the need for greenfield development.

**7.121** A minor positive effect is also identified in relation to SA objective 9: Soils from Policy ENV2: Change of Use of Agricultural Land to Domestic Garden Land as this policy resists the change the use of vacant agricultural land to domestic garden, specifically safeguarding the borough's best and most versatile agricultural land.

**7.122** Both policy SP14(a): Natural Environment and policy SP14(c): Climate Change are appraised as having minor positive effects in relation to SA objective 10: Water. Policy SP14(a): Natural Environment contains a requirement to mitigate against the deterioration of water bodies including and adverse impacts on Groundwater Source Protection Zones, through controlling pollution and protecting ground and surface waters. This policy further requires Applicants to demonstrate that Nutrient Neutrality requirements, set out by Natural England, have been met through the provision of an Appropriate Assessment for development located within the Stour Catchment, or where sewage from a development will be treated at a Waste Water Treatment Works that discharges into the river Stour or its tributaries. All these requirements will help maintain and improve water quality within the borough.

**7.123** Policy SP14(c): Climate Change sets out that blue-green infrastructure is to be integrated into development and this is to integrate into SuDS networks. Additionally, this policy

also requires new development to operate high levels of water efficiency, thereby supporting sustainable water management.

**7.124** One minor positive effect is identified for SA objective 11: Air Quality as policy SP14(c): Climate Change supports the reduction in congestion through requiring growth to occur in sustainable locations which are able to deliver good services and good public transport connections and promoting sustainable and active transport provision.

**7.125** This policy also encourages reductions in emissions through encouraging the delivery of sustainable buildings, a reduction of CO<sub>2</sub> emissions in new development and reflecting requirements set out in the Kent and Medway Energy and Low Emissions Strategy.

**7.126** Policies SP14(a): Natural Environment and SP14(c): Climate Change are both set to lead to minor positive effects in relation to SA objective 12: Flooding. Each of these policies refer to SuDS, and this provision will help reduce flood risk in the borough. Policy SP14(c): Climate Change also requires new development to plan for and respond to climate change which is likely to consider flood risk, where appropriate.

**7.127** SP14(c): Climate Change is recorded as having a significant positive effect in relation to SA objective 13: Climate Change as the policy's aim aligns directly with that of the SA objective's. There are opportunities for the policy to be strengthened by including specific references to the provision of renewable energy infrastructure in new development. This omission does not dilute the policy's intention as SP14(c): Climate Change includes a series of provisions, such as promoting active and sustainable travel modes and delivering sustainable buildings, to minimise the Borough's contribution to climate change.

**7.128** Although criterion of 1(vi) of policy 14(a): Natural Environment states to mitigate and adapt to the effects of climate change, there are no specific measures within the policy that will aid the borough in reducing its emissions. A negligible effect is therefore scored in relation to SA objective 13: Climate Change.

**7.129** A significant positive effect is anticipated for policy 14(a): Natural Environment in relation to SA objective 14: Biodiversity as this policy sets out a number of measures that conserve, connect and enhance the borough's ecological assets. Measures in the policy include delivering biodiversity net gain in new development and the creation of links in the blue-green infrastructure network. These policy requirements directly align with those set out in SA objective 14: Biodiversity.

**7.130** Criterion 4 in policy SP14(c): Climate Change seeks to integrate the blue-green infrastructure network in new developments and enhance urban biodiversity. A minor

positive effect is therefore recorded in relation to SA objective 14: Biodiversity.

**7.131** Two significant positive effects are expected for SA objective 15: Historic Environment as both policy SP14(b): Historic Environment and policy ENV1: Development Affecting Heritage Assets seek to conserve, and where possible enhance heritage assets and their setting, thereby directly aligning with the intentions of SA objective 15: Historic Environment. Policy SP14(b) Historic Environment includes active measures such as collaboration between local groups and preparing specific heritage initiatives including bids for funding. This policy also supports measures that secure the sensitive restoration, reuse, enjoyment and conservation/enhancements of heritage assets.

**7.132** Minor positive effects are expected for policies P14(a): Natural Environment and SP14(c): Climate Change in relation to SA objective 15: Historic Environment as improvements to the ecology network and blue-green infrastructure can contribute to the enhancement of heritage assets. An uncertain effect is attached here as it is not known at this stage where these benefits will be encountered.

**7.133** Four minor positive effects are SA objective 16: Landscape as policies SP14(a): Natural Environment and SP14(c): Climate Change are likely to deliver blue-green infrastructure and biodiversity improvements which will enhance the character and distinctiveness of the borough's settlements and landscape. Through supporting the enhancement of heritage assets, policies SP14(b): Historic Environment and ENV1: Development Affecting Heritage Assets are likely to contribute to protecting the Borough's sensitive landscape character and the distinctive characters of settlements.

**7.134** Policies ENV2: Change of Use of Agricultural Land to Domestic Garden Land and ENV3: Caravan Storage in the Countryside are likely to lead to minor negative effects in relation to SA objective 16: Landscape as these policies support the storage of 'intrusive features' and changes of use in the countryside respectively. Both these policies contain mitigation measures such as ensuring no harm to the character of the country side (policy ENV2: Change of Use of Agricultural Land to Domestic Garden Land) and screening requirements (policy ENV3: Caravan Storage in the Countryside), so no significant negative effects are identified.

### Recommendations

**7.135** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy SP14(c): Climate Change should support the provision of renewable energy infrastructure within new developments and retrofitting.

## Quality & design

### Reasonable alternatives tested

**7.136** Policy Q&D6: Technical Standards has three reasonable alternatives:

1. No policy: No new policy is brought forward.
2. Amalgamate with other policies: To bring forward the issue as part of another broader design policy or amend an existing policy to allow for this.
3. Have a separate independent policy: To develop a separate preferred approach to deal with the issue independently of other design policies.

**7.137** With regard to the first of these three reasonable alternatives, having no new policy represents the baseline against which the Local Plan Review is being appraised and is therefore not a reasonable alternative for the purposes of this SA. With regard to the remaining two reasonable alternatives, there is no indication of any alternative policy direction as described. As such, this represents an alternative approach to the presentation rather than the content of the policy and is therefore not a reasonable alternative for the purposes of this SA.

**7.138** No reasonable alternatives were identified by the Council for the remaining policies in this section.

### Strategic policy SP15: Design and non-strategic quality & design policies Q&D1 to Q&D7

**7.139** This section presents the appraisals of the following policies:

- SP15: Design
- Q&D1: Sustainable Design
- Q&D2: External Lighting
- Q&D3: Signage and Building Frontages
- Q&D4: Design Principles in the Countryside
- Q&D5: Conversion of Rural Buildings
- Q&D6: Technical Standards
- Q&D7: Private Amenity Space Standards

**7.140** Policy SP15: Design seeks to achieve high quality design throughout Maidstone Borough by requiring proposals to enhance the character of their surroundings and also reflect local context. The policy also includes a focus on using design

to create accessibility for all, crime reduction, improved vehicle and pedestrian movement and biodiversity enhancement.

**7.141** Policy Q&D1: Sustainable Design sets out how the sustainability aspirations set out in Policy SP15 will be achieved at the building level and through development layouts. The policy provides support for energy efficiency measures and incorporation of renewable energy.

**7.142** Policy Q&D2: External Lighting sets out criteria under which proposals for external lighting in new developments will be permitted.

**7.143** Policy Q&D3: Signage and Building Frontages seeks to ensure that any changes to sign and building frontages in town centres in the borough are appropriate and do not disrupt the existing character of the area.

**7.144** Policy Q&D4: Design Principles in the Countryside sets out requirements for development proposals outside of settlement boundaries and Policy Q&D5: Conversion of Rural Buildings sets out requirements to be met to prevent inappropriate change of uses in the borough's rural building stock.

**7.145** Policy Q&D6: Technical Standards sets out the specific internal space standards that are required in new development and Policy Q&D7: Private Amenity Space Standards ensures that there is a minimum level of outdoor space provided with new residential development.

Table 7.6: SA findings for strategic policy SP15: Design and non-strategic quality & design policies Q&D1 to Q&D7

Policy	SP15: Design	Q&D1: Sustainable Design	Q&D2: External Lighting	Q&D3: Signage and Building Frontages	Q&D4: Design Principles in the Countryside	Q&D5: Conversion of Rural Buildings	Q&D6: Technical Standards	Q&D7: Private Amenity Space Standards
SA1: Housing	++	+	0	0	+	+	+	+
SA2: Services & Facilities	+	0	0	0	0	0	0	0
SA3: Community	++	0	+	0	0	0	0	0
SA4: Health	++	0	+	0	0	0	+	+
SA5: Economy	+	0	0	0	0	+	0	0
SA6: Town Centre	+	0	0	+	0	0	0	0
SA7: Sustainable Travel	+	0	0	0	+	0	0	0
SA8: Minerals	0	0	0	0	0	0	0	0
SA9: Soils	0	0	0	0	0	0	0	0
SA10: Water	0	+	0	0	0	0	0	0
SA11: Air Quality	+	0	0	0	+	0	0	0
SA12: Flooding	0	0	0	0	0	0	0	0
SA13: Climate Change	+	++	0	0	0	0	0	0
SA14: Biodiversity	+	0	+	0	0	0	0	0
SA15: Historic Environment	+	0	+	+	+	+	0	0
SA16: Landscape	+	0	+	0	+	+	0	0

### Explanation of SA findings for strategic policy SP15: Design and non-strategic quality & design policies Q&D1 to Q&D7

**7.146** The majority of the policies are expected to have positive effects in relation to SA objective 1: Housing due to their potential to provide opportunities for residents in Maidstone Borough to live in well-designed and sustainably constructed homes. In the case of policy SP15: Design, significant positive effects are identified due to the comprehensive nature of the policy aims in relation to design. As well as requiring proposals to create attractive new developments, the policy also includes commitments to accessibility, protecting and enhancing existing landscape, heritage and biodiversity assets and climate change mitigation. A minor positive effect is also expected in relation SA objective 2: Services and Facilities for policy SP15: Design due to the provision it make towards ensuring that design layouts maximise opportunities for links to local services.

**7.147** Policies SP15 and Q&D2: External Lighting are likely to have positive effects in relation to SA objective 3: Community. In the case of the latter, well-designed external lighting may have potential to reduce the incidence of crime and anti-social behaviour in communities. For the former, a significant positive effect is expected as the policy may contribute to local regeneration through public realm improvements. The policy also makes specific reference to creating a safe and secure environment, which includes measures to deter crime and fear of crime.

**7.148** Delivering high quality design could improve the health and well-being of residents in Maidstone Borough. Policy SP15: Design may be particularly effective in this respect as it requires development proposals to maximise opportunities for access to sustainable transport modes, which is likely to include walking and cycling, and therefore may increase physical activity amongst residents. General well-being benefits may also arise from the policy through commitments to creating high quality public realms that include the delivery of features like trees and vegetation. As such, significant positive effects are expected for this policy in relation to SA objective 4: Health. At the building level, policies Q&D6: Technical Standards and Q&D7: Private Amenity Space Standards will contribute to a high quality of life through residential space standards inside and outside. Policy Q&D2: External Lighting ensures that residents would not be subject to inappropriate levels of external lighting, which will also contribute to overall wellbeing of residents. Minor positive effects are therefore expected for these policies in relation to SA objective 4: Health.

**7.149** Policies SP15: Design and Q&D3: Signage and Building Frontages are expected to have minor positive effects in relation to SA objective 6: Town Centre because they would potentially provide improvements to the public realm in town centre locations and ensure that changes to shop frontages are appropriate and do not harm their existing character. As well as delivering high quality residential development, the design standards set out in Policy SP15 may also deliver attractive new locations for employment. A minor positive effect is therefore expected for the policy in relation to SA objective 5: Economy due to the potential to attract new businesses and workers to Maidstone town centre and provide support to the local economy. Policy Q&D5: Conversion of Rural Buildings is also likely to have a minor positive effect in relation to SA objective 5 as it will only permit conversion to residential use where a business use cannot be found for an existing building. This may provide some support to the economy in rural areas of the borough.

**7.150** As previously mentioned, Policy SP15 promotes the inclusion of sustainable travel links as part of design. Policy Q&D4: Design Principles in the Countryside suggests that proposals will not be permitted where they may give rise to unacceptable traffic levels on nearby roads, which may contribute to mitigating congestion on key routes into Maidstone Town Centre. As such, a minor positive effect is expected for both of these policies in relation to SA objective 7: Sustainable Travel. A minor positive effect is also expected in relation to SA objective 11: Air Quality for these policies because their promotion of sustainable travel and congestion mitigation may reduce the potential for poor air quality from transport to arise in the borough.

**7.151** As well as orientating development layouts to maximise access to sustainable transport, Policy SP15: Design also promotes reduced reliance on less sustainable energy sources. The considerations are likely to ensure long term mitigation of carbon emissions is present in the design of new developments. A minor positive effect is therefore expected for Policy SP15: Design in relation to SA objective 13: Climate Change. Policy Q&D1: Sustainable Design expands on the above by requiring that new development must incorporate energy efficiency measures into new buildings, demonstrate how consideration has been given to the incorporation of on-site renewable or low carbon energy production and that development layout has considered the need to adapt to the impacts of climate change over its lifetime. A significant positive effect is therefore expected for Policy Q&D1: Sustainable Design in relation to SA objective 13: Climate Change.

**7.152** Policies SP15: Design, Q&D4: Design Principles in the Countryside and Q&D5: Conversion of Rural Buildings are

expected to have a minor positive effect in relation to SA objective 15: Historic Environment and SA objective 16: Landscape. All policies require development proposals to conserve and enhance local distinctiveness, which includes landscape features, and ensure that development is sympathetic to the existing built environment and does not result in adverse impacts on its historic integrity. Policy Q&D2: External Lighting is also likely to have a positive effect in relation to these SA objectives as it requires that proposals are not detrimental to intrinsically dark landscapes, which may also provide key historic environment settings.

**7.153** Policy SP15: Design will support development proposals that protect and enhance any on-site biodiversity and geodiversity features, which includes providing mitigation measures if needed. Furthermore, policy Q&D3: External Lighting includes minimising ecological impacts as a key consideration in criteria for permitting external lighting. As such, a minor positive effect is expected for the above policies in relation to SA objective 14: Biodiversity.

**7.154** Policy Q&D1: Sustainable Design is expected to have a positive effect in relation to SA objective 10: Water. This is due to a requirement that non-residential development should aspire to meet BREEAM Technical Standard (2018) Very Good rating, which includes water efficiency.

### Recommendations

**7.155** Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy SP15: Design could include specific mention of avoidance of flood risk areas as part of design and the incorporation of SuDs as part of new developments.
- Policy SP15: Design could include specific mention of walking and cycling. Currently, it only makes reference to sustainable transport.

## Chapter 8

### Cumulative effects

## This chapter presents the appraisal of cumulative effects

### Introduction

**8.1** It is a requirement of the SEA Regulations to identify cumulative effects. With respect to the Maidstone Local Plan Review, these can be divided into two categories:

- The total effects of the policies in the Local Plan Review as a whole.
- The cumulative effects of the Local Plan Review with development proposed in other plans or projects covering Maidstone Borough and the surrounding area.

### Conclusions on the total effects of the policies in the Local Plan Review

**8.2** The SA of the Local Plan Review policies considered the likely effects of each policy on its own merits. The purpose of this part of a cumulative effects assessment is to consider how the Local Plan Review policies inter-relate with one another, either to result in effects that are greater than those identified for individual policies, or alternatively for the effects of one or more policies to offset the effects identified for other policies. The sustainability effects of the Maidstone Local Plan Review as a whole in relation to each SA objective are described below.

**8.3** A summary of all of the SA scores for all of the preferred Local Plan Review policies that were subject to appraisal is presented in **Table 8.1** at the end of this section. This presents the policies in the order in which they have been appraised in the main body of the SA Report. Broadly this is:

- The spatial vision and objectives;
- The spatial strategy (policy SS1);
- The spatial strategic policies (SP1 to SP9) with the detailed, site specific allocation policies for the corresponding growth locations; and
- The thematic strategic policies (SP10 to SP15) and corresponding non-strategic development management policies.

**SA Objective 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home**

**8.4** The appraisal of the Local Plan Review in relation to this SA objective focussed on the total amount of housing to be provided relative to identified need. The Local Plan Review intends to deliver the full quantum of the total objectively assessed housing need and, as such, significant positive effects are anticipated.

**8.5** Positive effects were also identified as a result of policies that will help to ensure that the new homes are sustainably constructed and well designed and that they meet the needs of all sections of society, including via policy provisions requiring homes to be affordable and for homes to be of a mix of types and tenures, including generational living.

**8.6** Overall, it is considered that the Local Plan Review will have a significant positive effect in relation to SA Objective 1: Housing.

**SA Objective 2: To ensure ready access to essential services and facilities for all residents**

**8.7** The spatial strategy of the Local Plan Review is to focus development at Maidstone, the borough's main town, as well as at the rural service centres and larger villages where jobs and essential services are more likely to be available. Development will also be directed to two new garden settlements that will be required to provide appropriate, new local services and employment space that equates to one job for every household. The Local Plan Review also requires higher development density where most services and facilities are to be found. These aspects of the Local Plan Review are expected to have positive or significant positive effects in relation to SA objective 2: Services & Facilities.

**8.8** Despite this spatial approach, there are significant numbers of individual development site allocations that score negatively in relation to this SA objective because a number of key services and facilities are not available within walking distance of the sites. In some cases, these effects are mitigated by policies designed to provide for new or enhanced social infrastructure and open space alongside new development.

**8.9** Overall, it is considered that the Local Plan Review will have a mixed significant positive and minor negative effect in relation to SA objective 2: Services & Facilities.

**SA Objective 3: To strengthen community cohesion**

**8.10** Almost all of the effects of the Local Plan Review in relation this SA objective are expected to be positive, most of these being minor positive.

**8.11** The spatial strategy directs most development to settlements with the highest levels of service provision and largest existing communities. These locations have greater capacity to absorb new development without significantly altering the identity of the existing community and focussing development in them should help to support economic activity, as well as provide an increased opportunity for greater mixing of different population groups and those with different skills and experiences. These factors are likely to result in positive effects on community cohesion.

**8.12** However, there is also the potential for residents of existing communities near large scale new developments, such as the new garden settlements, to be affected in negative ways, for example experiencing increased congestion and pollution and less capacity at existing infrastructure and services. Negative effects are likely to be more pronounced where the large scale development is close to comparatively smaller existing communities. For example, Heathlands garden settlement is likely to change the local context considerably for existing residents of Lenham and Lenham Heath. However, there is also the potential for such communities to positively benefit from new services and facilities and the infrastructure provided as part of garden settlements other large scale developments.

**8.13** Overall, it is considered that the Local Plan Review will have a minor positive effect in relation to SA objective 3: Community.

**SA Objective 4: To improve the population's health and wellbeing and reduce health inequalities**

**8.14** The majority of policies in the Local Plan Review are expected to have either significant positive or minor positive effects in relation to SA Objective 4: Health.

**8.15** In terms of direct effects, the Local Plan Review aims to deliver the healthcare and community facilities needed to support a growing population and new development. The housing policies seek to supply the numbers and types of housing required to meet housing need, placing great emphasis on the quality of housing, and specific needs, such as for an ageing population, which should all have a positive effect on health.

**8.16** Policies that address environmental protection and open space provision should help to provide conditions that encourage mental and physical wellbeing. Policies that



promote sustainable transport modes, such as walking and cycling, should encourage active lifestyles, and therefore improve health.

**8.17** With respect to the site allocations policies, almost all are anticipated to have a net positive effect in relation to SA objective 4 because of their access to open space, sport and recreation facilities, or to public rights of way, again supporting active lifestyles and wellbeing.

**8.18** Some potential for significant negative effects exists where development will bring new residents into locations that are subject to negative health determinants such as high levels of air pollution or of noise pollution associated with the borough's major roads. It should also be noted that during the construction phase of development there may be some temporary negative effects to local residents from noise and disturbance, but these will cease once the developments are completed.

**8.19** Overall, it is considered that the Local Plan Review will have a significant positive effect in relation to SA Objective 4: Health.

#### **SA Objective 5: To facilitate a sustainable and growing economy**

**8.20** Most of the effects of the Local Plan Review in relation to this SA objective are expected to be positive, a number of these being significant positive.

**8.21** The Local Plan Review provides for the full amount of additional employment floorspace forecast to be required by its employment need assessment<sup>48</sup>. This level of employment is anticipated to aid in the development of a stronger economy in the borough, resulting in significant positive effects.

**8.22** In terms of spatial distribution, Maidstone town will be the main focus for development (specifically including retail and office development) and urban renewal will be prioritised in the centre. Since Maidstone town is the main urban area in the borough and is well connected to other areas outside it, employment opportunities provided here are considered likely to be accessible to and benefit other communities in the borough. The Local Plan also provides for a prestigious business park at Junction 8 of the M20 that is well connected to the motorway network, significant provision at the garden settlements, and suitably scaled employment at the rural service centres. It is considered that this distribution of economic development is likely to increase employment

opportunities throughout the borough, leading to a stronger economy.

**8.23** Some significant negative effects were identified from individual site allocations due to loss of existing employment space but overall, it is considered that the Local Plan Review will have a significant positive effect in relation to SA objective 5: Economy.

#### **SA Objective 6: To support vibrant and viable Maidstone town centre**

**8.24** All of the Local Plan Review policies with effects in relation to this SA objective are expected to have positive effects, a number of these being significant positive.

**8.25** As described for SA objective 5: Economy above, the spatial strategy focuses development on Maidstone town and it will remain the primary retail and office location in the borough. The increase in population in the urban area is likely to increase potential expenditure in the town centre as well as an increased labour force and increased skills supply. The Local Plan Review also prioritises renewal in the town, which will help to enhance the vibrancy of Maidstone town.

**8.26** As the primary settlement in the borough it is likely that occupants of development elsewhere in the borough will also utilise facilities and services in Maidstone town, thereby also increasing the likely expenditure and labour supply. As such, much of the other development in the borough is likely to have a positive effect in relation to this SA objective, particularly where the growth location has good transport links to Maidstone town centre.

**8.27** Overall, it is considered that the Local Plan Review will have a significant positive effect in relation to SA objective 6: Town Centre.

#### **SA Objective 7: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion**

**8.28** The majority of Local Plan Review policies with an effect in relation to this SA objective have positive effects, with a number of these being significant positive.

**8.29** The fact that the spatial strategy focuses development to Maidstone town and to service centres which generally cater for day to day needs is likely to result in significant positive effects. However, a significant number of individual development allocations outside of Maidstone town centre

<sup>48</sup> <https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/Maidstone-Economic-Development-Needs-Study-Stage-Two.pdf>

were identified as having negative effects as they are not within walking distance of rail or bus services. In some cases, mitigation of the potential negative effects in relation to SA objective 7: Sustainable Travel is provided by policy requirements for improved bus services, cycle routes, or in the case of Heathlands garden settlement, a new railway station.

**8.30** The Local Plan Review's thematic policies also support improved provision of and access to sustainable transport modes with positive effects in relation to this SA objective.

**8.31** Overall, it is considered that the Local Plan Review will have a mixed significant positive and minor negative effect in relation to SA objective 7: Sustainable Travel.

#### **SA Objective 8: To conserve the borough's mineral resources**

**8.32** The majority of Local Plan Review policies with an effect in relation to this SA objective have negative effects, most of these being minor negative.

**8.33** Around half of the borough is covered by Mineral Safeguarding Areas (MSAs) designated in the Kent Minerals & Waste Local Plan and a number of safeguarded mineral sites are also identified.

**8.34** Although the spatial strategy focuses development on Maidstone town, there are many allocated development sites development at the edge of the urban area and at the borough's other settlements that may result in sterilisation of mineral resources, including Heathlands garden settlement.

**8.35** Minor positive effects were identified from the Local Plan Review from policy protection for features of geological interest.

**8.36** Overall, it is considered that the Local Plan Review will have a minor negative effect in relation to SA objective 8: Minerals.

#### **SA Objective 9: To conserve the borough's soils and make efficient and effective use of land**

**8.37** Most of the effects identified for the Local Plan Review in relation to this SA objective were negative, the majority of these being significant negative.

**8.38** Although the spatial strategy focuses development at Maidstone town where loss of greenfield land and potential loss of high quality agricultural land will be avoided, the majority of the Local Plan Review's development allocations, including the new garden settlements at Lidsing and Heathlands, are greenfield and/or contain high quality agricultural land. These effects are generally unlikely to be

avoidable and will result in significant negative effects in relation to SA objective 9: Soils.

**8.39** Some of the Local Plan Review's policies are expected to have significant positive effects due to their support for development on brownfield land, the re-use of existing commercial or industrial premises, and the setting of minimum development densities.

**8.40** Overall, however, it is considered that the Local Plan Review will have a significant negative effect in relation to SA objective 9: Soils.

#### **SA Objective 10: To maintain and improve the quality of the borough's waters and achieve sustainable water resources management**

**8.41** Most of the effects identified for the Local Plan Review in relation to this SA objective were negative, the majority of these being minor negative.

**8.42** Much of the borough, including Maidstone town, is within a surface water drinking water safeguarding zone, and the spatial strategy directs most development to locations which intersect with this, this being borne out by the large number of site allocation policies being appraised as having minor negative effects. In addition, the entirety of the Lidsing garden settlement falls and approximately two fifths of the Heathlands site within SPZ 3 is within SPZ 3.

**8.43** Minor positive effects were identified from a number of the Local Plan Review's thematic policies due to support for green infrastructure and SuDS (with potential benefits for surface water quality), requirements to control pollution and protect ground and surface waters, and a requirement that non-residential development should aspire to achieve a BREEAM rating that includes water efficiency.

**8.44** Overall, it is considered that the Local Plan Review will have a minor negative effect in relation to SA objective 10: Water.

#### **SA Objective 11: To reduce air pollution ensuring lasting improvements in air quality**

**8.45** Minor negative effects were identified for the spatial strategy and garden settlement policies, these being subject to some uncertainty. The spatial strategy directs a significant amount of development to the Maidstone urban area, which may result in increases in motorised transport in this area and particularly the AQMAs that follow the carriageways of the main roads. In addition, it is likely that development at Junction 8 of the M20, the Leeds-Langley Corridor, Lidsing garden settlement and to an extent, Heathlands garden settlement may also result in increased motorised vehicles

driving through the AQMAs in Maidstone town. The development dispersed to the strategic development locations may also result in increased travel through the AQMAs in Maidstone town.

**8.46** While the garden settlements in particular have the potential to be developed in a manner which prioritises and facilitates active travel, the likelihood of no or very limited movement by motorised vehicle is highly unlikely.

**8.47** Insufficient evidence was available to come to inform appraisal of the likely effects of individual site allocations on air quality.

**8.48** Many of the Local Plan Review's thematic policies were appraised as likely to have positive effects in relation to air quality. These reflect support for sustainable travel modes and associated infrastructure,

**8.49** Although there is considerable uncertainty about how and where people will choose to travel, it is likely that the total volume of road traffic will increase as a result of the development provided for by the Local Plan Review. While it is recognised that car engines are becoming less polluting over time, air pollution in the form of fine particulate matter also occurs from brake and tyre wear.

**8.50** Overall, it is considered that the Local Plan Review will have a minor negative effect in relation to SA objective 11: Air Quality.

#### **SA Objective 12: To avoid and mitigate flood risk**

**8.51** Most of the effects identified for the Local Plan Review in relation to this SA objective were negative, these being a mixture of minor and significant negative.

**8.52** The spatial strategy directs a significant amount of development to Maidstone town centre and wider urban area and the Rural Service Centres in the south of the borough, including Marden, Staplehurst, and Headcorn. These locations each contain areas identified as being in an area of fluvial flood risk (Flood Zones 2 or 3). More limited areas of the borough are subject to surface water or groundwater flood risk.

**8.53** Reflecting these risks, negative effects were identified for many of the site allocations, particularly those in the settlements named above. A substantial part of the Heathlands garden settlement location has relatively high groundwater flood risk.

**8.54** In addition, the creation of more impermeable surfaces may create additional flood risk downstream of development sites, although the likelihood and potential severity of this will

be affected by the design of new development, for example the inclusion of SuDS, where feasible.

**8.55** Positive effects were identified from some of the Local Plan Review's thematic policies due to requirements to for surface water management measures, including as part of open space provision, and integration of blue-green infrastructure into SuDS networks.

**8.56** Overall, it is considered that the Local Plan Review will have a mixed significant negative and minor positive effect in relation to SA objective 12: Flooding.

#### **SA Objective 13: To minimise the borough's contribution to climate change**

**8.57** The effects of the Local Plan Review were mixed in relation to this SA objective.

**8.58** There is little doubt that the amount of development proposed by the Local Plan Review will increase carbon emissions, both through the construction process and use of materials, and also when operational (e.g. for heating and lighting) as well as through traffic generation.

**8.59** The spatial distribution of development provided by the Local Plan Review will influence carbon emissions relating to transport and travel. The spatial strategy focuses development to Maidstone urban area which, as reported in relation to SA objective 2: Services & Facilities and SA objective 7: Sustainable Travel, may result in a comparatively reduced need to travel and facilitate the use of active modes of travel and public transport, which will in turn reduce the potential for greenhouse gas emissions. In addition, the focus of development to other service centres, including garden settlements and rural service centres should similarly (although to a lesser extent) facilitate the use of more sustainable modes of travel when accessing lower tier services.

**8.60** However, as also described in relation to SA objective 2: Services & Facilities and SA objective 7: Sustainable Travel, many individual site allocations were not within walking distance of key services, facilities, and public transport, which will increase the likelihood of travel by less sustainable modes and attendant carbon emissions. This led to a number of site allocations scoring negatively in relation to SA objective 13: Climate Change.

**8.61** Various thematic policies in the Local Plan Review seek to respond to the challenges of climate change and attract positive effects in relation to SA objective 13. These include a strategic policy dedicated to climate change.

**8.62** Overall, it is considered that the Local Plan Review will have a mixed significant positive and significant negative effect in relation to SA objective 13: Climate Change.

#### **SA Objective 14: To conserve, connect and enhance the borough's wildlife, habitats and species**

**8.63** The effects of the Local Plan Review were mixed in relation to this SA objective.

**8.64** Development has the potential to negatively affect biodiversity via a variety of mechanisms, including direct loss of habitat, increased severance, pollution, and disturbance. As such the total quantum of development provided for by the Local Plan Review has the potential for significant negative effects.

**8.65** The spatial strategy's focus of development on Maidstone urban area reduces the potential for adverse effects on biodiversity to some extent implications in relation to international designations. However, a significant number of site allocations were appraised as having negative effects in relation to SA objective 14, with a particularly high proportion scoring negatively at Harrietsham and at Coxheath. This reflected their potential to affect not only on designated biodiversity sites but also wider ecological networks including, for example, priority habitats. This is because the wider ecological resource needs to be in a healthy condition for the designated sites to thrive.

**8.66** However, there is considerable uncertainty in these findings. This is because very few of the site allocations overlap designated sites themselves and in many instances the risks are indirect (e.g. from recreation or pollution) or have the potential to be mitigated by avoiding the most ecologically sensitive parts of the site.

**8.67** Many of the Local Plan Review's relevant thematic policies were identified as having positive effects in relation to biodiversity. These included significant positive effects from a dedicated strategic policy on the natural environment and from policy requirements for open spaces to form part of the green infrastructure network by connecting green corridors together and benefiting wildlife.

**8.68** Potential effects on internationally designated wildlife sites are covered by the separate HRA Screening report, the findings of which are also summarised in **Chapter 9**. Potential effects on European sites in relation to water quantity and quality, air pollution, and recreation will need to be further examined via an Appropriate Assessment before adverse effects on the integrity of certain European sites and hence significant adverse effects in relation to SA objective 14: Biodiversity can be ruled out.

**8.69** In light of these preliminary HRA findings and the large number of site allocations for which potential (mostly minor) negative effects were identified but also the strong policy protection for biodiversity within the Local Plan Review, the overall effects are considered to be mixed significant positive and significant negative with uncertainty in relation to SA objective 14: Biodiversity.

#### **SA Objective 15: To conserve and/or enhance the borough's historic environment**

**8.70** The effects of the Local Plan Review were mainly significant negative with uncertainty in relation to this SA objective.

**8.71** The spatial strategy sets out that Maidstone town will remain the focus of development in the borough. Maidstone town includes numerous heritage designations including listed buildings, conservation areas, scheduled monuments and areas of archaeological potential and Mote Park registered Park and Garden. Although at a lesser density, designations are also found in the rural service centres and garden settlement sites.

**8.72** The potential exists for development focussed on Maidstone town, the rural service centres and garden settlements to result in either direct or setting impacts on these designations. This is borne out by the significant negative effects with uncertainty identified for the majority of the site allocations, indicating their proximity to heritage assets and the absence of site-specific mitigation to address these risks. For a smaller proportion of sites, mitigation is identified in the allocation policies.

**8.73** However, considerable uncertainty around these potential effects exists due to the absence of a heritage impact assessment to inform judgements and the fact that effects will be influenced by the form and design of new development.

**8.74** Many of the Local Plan Review's relevant thematic policies were identified as having positive effects in relation to the historic environment. These included significant positive effects from a dedicated strategic policy and from a non-strategic policy setting out assessment and evaluation requirements for developments that may affect heritage assets.

**8.75** Overall, it is considered that the Local Plan Review will have a mixed significant negative and minor positive effect in relation to SA objective 15: Historic Environment, these effects being subject to considerable uncertainty.

**SA Objective 16: To conserve and enhance the character and distinctiveness of the borough's settlements and landscape**

**8.76** The effects of the Local Plan Review in relation to this SA objective were mainly negative, with some being significant negative.

**8.77** The spatial strategy focusses development primarily to existing settlements. Development within existing settlements should have a lower risk of adversely affecting the landscape, although this will depend on the scale and massing of development, and whether development is on the edge of settlements and on greenfield or previously developed land. The proposed garden settlements will result in the introduction of large urban developments at Lidsing and Heathlands. Lidsing lies on the edge of the Kent Downs AONB and is mainly within an area of moderate landscape sensitivity. The Heathlands location lies within areas of both high and low landscape sensitivity. In addition, the majority of Rural Service Centres and Larger Villages are within close to or within Landscape of Local Value or the Kent Downs AONB. As a result of spatial strategy, there is therefore the potential for development to significantly adversely affect the landscape.

**8.78** Considering the individual site allocation policies, a large proportion of those outside of Maidstone town centre and urban area are identified as having negative effects due to the sensitivity of the landscape character areas in which they are located. In some cases, potential significant negative effects are reduced to minor ones by provisions to reduce the potential for landscape impacts in the allocation policies.

**8.79** Many of the Local Plan Review's relevant thematic policies were identified as having positive effects in relation to the landscape or townscape. These included provisions to protect positive landscape character and avoid significant adverse impacts from development

**8.80** Overall, it is considered that the Local Plan Review will have a mixed significant negative and minor positive effect in relation to SA objective 16: Landscape.

Table 8.1: Summary of SA scores for the Local Plan Review

LPR Policy	SA1: Housing	SA2: Services & Facilities	SA3: Community	SA4: Health	SA5: Economy	SA6: Town Centre	SA7: Sustainable Travel	SA8: Minerals	SA9: Soils	SA10: Water	SA11: Air Quality	SA12: Flooding	SA13: Climate Change	SA14: Biodiversity	SA15: Historic Environment	SA16: Landscape
<b>Vision</b>	+?	+?	+?	+?	+?	0	+?	0	0	+?	+?	+?	+?	+?	+?	0
Objective 1	+	+	0	0	++	++	0	0	0	0	0	0	0	0	0	0
Objective 2	+	+	0	0	++	0	+?	0	+/-	+?	+?	+?	+?	0	0	++
Objective 3	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	++
Objective 4	0	+	0	0	+	0	++	0	0	+	+	+	+	0	0	0
Objective 5	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0
Objective 6	+	++	+	+	++	++	0	0	0	0	0	0	0	+	0	0
Objective 7	0	0	0	0	++	+	0	0	0	0	0	0	0	0	0	0
Objective 8	++	+	0	+	0	0	0	0	0	0	0	0	0	0	0	++
Objective 9	0	0	0	0	0	0	0	0	0	+	0	+	0	++	0	+
Objective 10	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+
Objective 11	0	0	0	0	0	0	0	0	0	++	0	++	++	+	0	0
<b>SS1: Spatial Strategy</b>	++	++	++/--?	++/--	++	++	++?/-?	--	--	-	-?	--	--/+	--	-?	--?

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Maidstone Town Centre 2050 Vision	+	++	++	++	++	++	++/-	0	0	+	++/-	+	++/-	+	0	0
<b>SP1: Maidstone Town Centre</b>	+	0	0	+	+	++	++?	0	0	0	N/A	0	+	0	+	+
LPRSA009: Right Kard	0	+	+	+	+	++	++	0	0	-	N/A	0	++	-	--?	0
LPRSA053: 12-14 Week Street	0	+	+	+	+	++	++	0	0	-	N/A	0	+	-	--?	0
LPRSA144: Medway/ High St	0	+	+	+	+	++	++	0	0	-	N/A	-	+	-	--?	0
LPRSA145: Len House	0	+	+	0	+	++	++	0	0	-	N/A	--	+	-	--?	0
LPRSA146: Maidstone East	0	+	+	++?	+	++	++	0	0	-	N/A	-	++	-	--?	0
LPRSA147: Gala Bingo & Granada House	0	+	+	++?	+	++	+	0	0	-	N/A	--	+	-	--?	0
LPRSA148: Maidstone Riverside	0	+	+	++?	+	++	++	-	0	-	N/A	-	++	-	--?	--?
LPRSA149: Maidstone West	0	+	+	++?	+	++	++	-	0	-	N/A	--	++	-	--?	0
LPRSA150: Mill Street Car Park	0	+	+	++?	+	++	++	0	0	-	N/A	-	+	-	--?	0
LPRSA151: Mote Road	0	+	++?	++?	+	0?	+	0	0	-	N/A	0	+	-	--?	0
<b>SP2: Maidstone Urban Area</b>	0	+	+	+	+	0	0	0	0	0	N/A	0	0	+	0	0

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LPRSA152: Former Royal British Legion Social Club	0	0	+	0	-	+	-	0	0	-	N/A	0	-	-?	0?	-
LPRSA298: Dorothy Lucy Centre	0	-	+	+	0	+	-	-	0	-	N/A	-	0	-?	-?	0
RdLPRSA156: Danebury, College Road	0	+	+	+	0	+	+	0	0	-	N/A	0	+	0	0?	0
LPRSA362: Maidstone Police HQ, Sutton Rd	0	-	+	+	-	+	-	-	0	-	N/A	-	-	0	-?	-
LPRSA303: EIS Oxford Rd	0	-	0	+	-	+	-	0	0	-	N/A	-	-	0	0?	0
LPRSA366: Springfield Tower, Royal Engineers Road	0	+	+	+	0	+	++	0	0	-	N/A	-	+	0	-?	0
<b>SP3 Development at the edge of Maidstone</b>	0	+	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA246 - Land Rear of Appletree House, Maidstone	0	-	+	+	0	+	+	-	-	-	N/A	-	-	0	-?	-
LPRSA266 - Land at Ware Street, Maidstone	0	-	+	+	0	+	+	-	-	-	N/A	-	-	0	-?	-
LPRSA196 - Land at Willow Farm, the Countryside	0	-	+	+	0	+	+	0	-	-	N/A	-	-	0	-?	0



LPR Policy	SA1: Housing	SA2: Services & Facilities	SA3: Community	SA4: Health	SA5: Economy	SA6: Town Centre	SA7: Sustainable Travel	SA8: Minerals	SA9: Soils	SA10: Water	SA11: Air Quality	SA12: Flooding	SA13: Climate Change	SA14: Biodiversity	SA15: Historic Environment	SA16: Landscape
LPRSA216 - Rochester Meadow, the Countryside	0	-	+	+	0	+	+	0	-	-	N/A	-	-	0	-?	0
LPRSA010 - Bydews Place, South West of Maidstone Urban Extension	0	-	+	+	0	+	-	-	-	-	N/A	0	-	-	-?	-
PRSA265 - Land at Abbey Farm, South West of Maidstone Urban Extension	0	-	+	+	0	+	-	-	-	-	N/A	-	-	-	-?	-
LPRSA235 – Land at Boughton Lane, South of Maidstone Urban Extension	0	-	+	+	0	+	-	-	-	-	N/A	0	-	0	-?	-
LPRSA270 - Land South West of Police HQ, South of Maidstone	0	-	+	+	0	+	-	-	-	-	N/A	-	-	-	-?	-
LPRSA172 - Land at Sutton Road, South East of Maidstone	0	-	+	+	0	+	-	-	-	-	N/A	0	-	-	-?	-
<b>Policy SP4: Garden settlements</b>	++	++?	+	+	++	+	+	0	--	--	-	0	-	+	0	-
Policy SP4(a): Heathlands Garden Settlement	++	++?	--?/+?	++/--	++	+	+	--	--	--	-	-	-	+	--	-
Policy SP4(b): Lidsing Garden Settlement	++	++?	+?/-?	++/--	++	+	-?	0	--	--	-	0	-	+	--	-

LPR Policy	SA1: Housing	SA2: Services & Facilities	SA3: Community	SA4: Health	SA5: Economy	SA6: Town Centre	SA7: Sustainable Travel	SA8: Minerals	SA9: Soils	SA10: Water	SA11: Air Quality	SA12: Flooding	SA13: Climate Change	SA14: Biodiversity	SA15: Historic Environment	SA16: Landscape
<b>SP5(a): Development in the Leeds-Langley Corridor</b>	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
<b>SP6: Rural Service Centres</b>	0	+	+	+	+	0	0	0	0	0	N/A	0	0	0	0	0
SP6(a): Harrietsham	0	+	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA071: Land adjacent Keilen Manor, Marley Rd, Harrietsham	+	-	+	+	0	+	+	0	--	-	N/A	0	-	-	--?	-
LPRSA101: Land south of A20, Harrietsham	+	-	+	-	0	+	+	0	--	-	N/A	-	-	-	--?	-
SP6(b): Headcorn	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA310 – Mote Road Headcorn	0	-	+	+	0	+	+	-	--	-	N/A	-	-	-	--?	-
SP6 (c): Lenham	N/A	0	N/A	0	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA260 – Ashford Road Lenham	N/A	-	N/A	+	+	0	0	0	--	0	N/A	-	-	0	--?	--?
LPRSA285 – Land at Dickley Courte Lenham	N/A	--	N/A	+	+	0	+	0	++	-	N/A	0	-	-	--?	--
SP6(d) - Marden	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA295 – Land north of Copper Lane, Marden	0	-	+	+	0	+	+	-	--	-	N/A	-	-	-	--?	--

LPR Policy	SA1: Housing	SA2: Services & Facilities	SA3: Community	SA4: Health	SA5: Economy	SA6: Town Centre	SA7: Sustainable Travel	SA8: Minerals	SA9: Soils	SA10: Water	SA11: Air Quality	SA12: Flooding	SA13: Climate Change	SA14: Biodiversity	SA15: Historic Environment	SA16: Landscape
Policy LPRSA314 - Land east of Albion Rd, Marden	0	-	+	+	0	+	+	-	-	-	N/A	-	-	0	-?	-
SP6(e) - Staplehurst	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA066 – Land east of Lodge R, Staplehurst	0	-	+	+	0	+	+	0	-	-	N/A	-	-	-	0?	-
LPRSA114 – Land at Home Farm, Staplehurst	0	-	+	+	-	+	+	0	-	-	N/A	-	-	0	-?	-
<b>SP7: Larger Villages</b>	0	+	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
SP7(a): Boughton Monchelsea	0	+	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA122 – The Orchard, Land Adjacent to White Cottage, Boughton Monchelsea	+	-	+	+	-	+	-	-	-	-	N/A	0	-	0	-?	-?
LPRSA360 – Campfield Farm, Boughton Monchelsea	+	-	0	+	0	+	-	0	-	-	N/A	0	-	0	-?	-?
SP7(b) - Coxheath	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA005 - Land Adjacent to Dingley Dell, the Countryside	+	-	0	+	-	+	-	-	-	-	N/A	0	-	0	-?	-

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LPRSA084 - Land off Heath Road, Coxheath	+	-	+	+	0	+	-	-	-	-	N/A	0	-	-	-?	-
LPRSA202 - Land at Forstal Lane, Coxheath	+	-	+	+	0	+	-	-	-	-	N/A	0	-	-	0?	-?
LPRSA257 - Land at Junction of Heath Road/ Dean Street, the Countryside	+	-	0	+	0	+	-	-	-	-	N/A	0	-	-	-?	-
SP7(c) - Eyehorne Street (Hollingbourne)	0	0	+	0	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA204 - Land south east of Eyehorne Street, Eyehorne St (Hollingbourne)	+	-	+	+	0	+	+	0	-	-	N/A	0	-	+	-?	-?
SP7(d) Sutton Valence	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA021 - Land adjacent 4 Southways, Sutton Valence	0	-	+	+	0	+	-	-	-	-	N/A	0	-	0	-?	--
LPRSA078 - Haven Farm, Sutton Valence	0	-	+	+	0	+	-	-	-	-	N/A	0	-	0	-?	0
LPRSA335 - Fir Tree and Norton Lea (South), Sutton Valence	0	-	0	+	0	+	-	-	-	-	N/A	0	-	0	-?	--
SP7(e) Yalding	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA248 - Land North of Kenward Road, Yalding	0	-	?	+	0	+	+	-	-	-	N/A	-	0	-?	-?	--

LPR Policy	SA1: Housing	SA2: Services & Facilities	SA3: Community	SA4: Health	SA5: Economy	SA6: Town Centre	SA7: Sustainable Travel	SA8: Minerals	SA9: Soils	SA10: Water	SA11: Air Quality	SA12: Flooding	SA13: Climate Change	SA14: Biodiversity	SA15: Historic Environment	SA16: Landscape
<b>SP8 – Smaller Villages</b>	0	+/-?	+	+?	?	0	-?	?	-?	-?	N/A	?	-	?	?	-?
<b>SP9: Development in the Countryside</b>	0	0	0	0	0	0	0	0	+	0	N/A	0	0	0	0	+
LPRSA001 - Land Adjacent to Brhemar Garage, the Countryside	0	--	0	0	--	0	-	0	-	-	N/A	0	-	0	--?	-?
LPRSA329 - Land at Sapphire Kennels, the Countryside	0	--	0	+	--	0	-	0	-	-	N/A	0	-	0	--?	-?
PRSA273 - Land between Maidstone Road and Whetsted Road, the countryside	N/A	--	N/A	0	+	0	0?	0	--	-	N/A	--?	--?	0	--?	-?
SP10(a): Housing Mix	++	0	++	+	+	0	0	0	0	0	0	0	0	0	0	0
<b>SP10(b): Affordable Housing</b>	++	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0
SP10(c): Gypsy & Traveller Site Allocations	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HOU1: Development on Brownfield Land	+	+?	0	0	0	+?	++	0	++	0	++	0	++	+?	0	+
HOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the Built-up Area	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+

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HOU3: Residential Premises above Shops & Businesses	++	++	0	+	+	++	++	0	++	0	++	0	++	0	0	0
HOU4: Residential Garden Land	+	+?	0	+	+	+?	+?	+?	+/-	0	+?	0	+?	-	0	0
HOU5: Density of Residential Development	+	++	0	+	+	++	++	0	++	0	++	0	++	0	0	+
HOU6: Affordable Local Housing Need on Rural Exception Sites	++	++	+	+	+	0	++	-?	-?	0	++	0	++	+?/-	+?	+
HOU7: Specialist Residential Accommodation	++	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+
HOU8: Gypsy, Traveller and Travelling Showpeople Accommodation	++	+	0	+	0	0	0	0	0	0	0	0	0	+	0	+
HOU9: Custom & Self-Build Housing	+	+	0	+?	0	0	++	0	0	0	++	0	++	0	0	+
HOU10: Build to Rent Proposals	++	++	0	+?	+	++	++	0	0	0	++	0	++	0	0	0
HOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside	+	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+
<b>SP11: Economic Development</b>	0	+	0	0	++	++	0	0	++/-	0	0	0	0	0	0	0
SP11(a): Retention of Employment Sites	0	0	0	0	++	0	0	0	+	0	0	0	0	0	0	+

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LPR Policy	SA1: Housing	SA2: Services & Facilities	SA3: Community	SA4: Health	SA5: Economy	SA6: Town Centre	SA7: Sustainable Travel	SA8: Minerals	SA9: Soils	SA10: Water	SA11: Air Quality	SA12: Flooding	SA13: Climate Change	SA14: Biodiversity	SA15: Historic Environment	SA16: Landscape
SP11(b): District and Local Centres	0	++	0	+	++	0	+	0	0	0	+	0	+	0	0	0
SP11(c): Employment Allocations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CD1: Town, District and Local Centres	0	++	+	+	++	++	++	0	0	0	++	0	++	0	0	0
CD2: Primary and Secondary Frontages	0	++	+	0	++	++	0	0	0	0	0	0	0	0	0	0
CD3: Leisure and Community Uses	0	++	++	+	+	+	++	0	0	0	++	0	++	0	0	0
CD4: Accommodation for Rural Workers	+	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
CD5: Live-Work Units	0	+	0	+	+	0	+	0	0	0	+	0	+	0	0	+
CD6: New Agricultural Buildings and Structures	0	0	0	+	+	0	0	0	0	+	0	+	0	0	0	+
CD7: Expansion of Existing Businesses in Rural Areas	0	0	0	+	++	0	0	0	0	0	0	0	0	0	0	+
CD8: Farm Shops in the Country-side	0	+	0	0	+	0	-	0	0	0	-	0	-	0	0	0
CD9: Equestrian Development	0	0	0	0	+	0	0	0	0	+	0	+	0	0	0	+
TLR1: Mooring Facilities and Boat Yards	+	0	0	0	0	0	0	0	0	+	0	+	0	+	0	+

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TLR2: Holiday Lets, Caravan and Camp Sites	+/-	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+
<b>SP12: Sustainable Travel</b>	0	0	0	+	++	++	++	0	0	0	++	0	++	0	0	0
TRA1: Air Quality	0	0	0	+	0	0	0	0	0	0	++	0	0	0	0	0
TRA2: Assessing the Transport Impacts of Development	0	0	0	+	0	0	++	0	0	0	++	0	++	0	0	0
TRA3: Park and Ride	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TRA4: Parking Standards	0	0	0	0	0	0	++/-	0	0	0	++/-	0	++/-	0	0	0
<b>SP13(a): Infrastructure Delivery</b>	++	++	++	++	++	??	++?	?	?	??	++?	??	++?	+	?	++/-?
SP13(b): Open Space Development	0	++	++	++	0	0	0	0	0	0	0	0	0	+	0	+
INF1: Publicly Accessible Open Space and Recreation	0	++	++	++	0	0	++	0	0	+	++	+	++	++	0	+
INF2: Community Facilities	0	++	++	??	0	0	0	0	0	0	0	0	0	0	0	0
INF3: Renewable and Low Carbon Energy Schemes	0	0	0	+	+	0	0	0	++	0	0	0	++	+	+	+



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INF4: Digital Communications and Fibre To The Premises (FTTP)	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	+
<b>SP14(a): Natural Environment</b>	0	+?	+?	+	0	+	+	+	0	+	0	+	0	++	+?	+
<b>SP14(b): Historic Environment</b>	0	0	0	0	0	+	0	0	+	0	0	0	0	0	++	+
<b>SP14(c): Climate Change</b>	+	+?	+?	+	0	0	++	0	0	+	+	+	++	+	+?	+
ENV1: Development Affecting Heritage Assets	0	0	0	0	0	+	0	0	0	0	0	0	0	0	++	+
ENV2: Change of Use of Agricultural Land to Domestic Garden Land	0	0	0	0	+	0	0	0	+	0	0	0	0	0	0	-
ENV3: Caravan Storage in the Countryside	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-
<b>SP15: Design</b>	++	+	++	++	+	+	+	0	0	0	+	0	+	+	+	+
Q&D1: Sustainable Design	+	0	0	0	0	0	0	0	0	+	0	0	++	0	0	0
Q&D2: External Lighting	0	0	+	+	0	0	0	0	0	0	0	0	0	+	+	+
Q&D3: Signage and Building Frontages	0	0	0	0	0	+	0	0	0	0	0	0	0	0	+	0
Q&D4: Design Principles in the Countryside	+	0	0	0	0	0	+	0	0	0	+	0	0	0	+	+

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Q&D5: Conversion of Rural Buildings	+	0	0	0	+	0	0	0	0	0	0	0	0	0	+	+
Q&D6: Technical Standards	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Q&D7: Private Amenity Space Standards	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0

## Cumulative effects with development proposed by other relevant plans and projects

**8.81** Development proposed in the Local Plan Review will not be delivered in isolation from development proposals in other plans and projects covering Maidstone Borough and the surrounding area. This section outlines the development proposed by nationally significant infrastructure projects, plans covering Kent county as a whole, and the Local Plans of the five neighbouring authorities which may combine with the Maidstone Local Plan Review to produce cumulative effects.

### Nationally significant infrastructure projects

**8.82** The following nationally significant infrastructure projects are identified within Maidstone Borough on the National Infrastructure Planning website<sup>49</sup>:

#### Extension to Allington Energy from Waste Facility

**8.83** Extension of an existing energy generating station at Allington, close to the north-west boundary of Maidstone urban area. to process circa 910,000tpa of residual non-hazardous waste in total, with a total gross electrical generating capacity of circa 72.5MW. The application is not expected to be submitted to the Planning Inspectorate until October 2020 therefore no environmental impact assessment (EIA) is available yet. The EIA Scoping Report<sup>50</sup> proposed that the following topics be scoped into the EIA:

- cultural heritage;
- landscape and visual;
- geology, hydrogeology, contaminated land and ground stability;
- ecology;
- surface water, flood risk and drainage;
- air quality and odour;
- noise;
- transport;

- socio-economics;
- health; and
- climate change.

**8.84** The Inspectorate's Scoping Opinion<sup>51</sup> additionally recommended that Risk of Major Accident Events should be included in the EIA.

### Potential for cumulative effects with Nationally significant infrastructure projects

**8.85** The extension to Allington Energy from Waste Facility close to the north-west boundary of Maidstone urban area may result in cumulative effects with development proposed by the Maidstone Local Plan Review, particularly development in the centre, north and north-east of Maidstone town, such as at the Invicta Park Barracks site. Types of cumulative effect could include water quality in the River Medway; air quality, including from increased road traffic on the nearby M20 and A20; noise and vibration; biodiversity; and landscape and visual amenity. There is uncertainty in relation to this, given that the environmental impact assessment for this project has not yet been submitted.

### County level plans

**8.86** At the county level, the main planning responsibilities are with respect to minerals and waste, and transport.

#### Kent Minerals and Waste Local Plan

**8.87** The Kent Minerals and Waste Local Plan 2013-30<sup>52</sup> 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. Around half of the borough is covered by Mineral Safeguarding Areas designated in the Minerals & Waste Local Plan. Geological mapping is used to indicate the likely existence of a mineral resource but 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

<sup>49</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/>

<sup>50</sup> FCC Environment (2019) Proposed Extension to the Existing Allington Energy from Waste Generating Station, Kent – EIA Scoping Report [online] Available from:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/?ipcsection=docs>

<sup>51</sup> The Planning Inspectorate (2019) SCOPING OPINION: Proposed Extension to the Existing Allington Energy from Waste Generating

Station [online]

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/?ipcsection=docs>

<sup>52</sup> 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>

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.

### Kent Local Transport Plan

**8.88** Kent County Council's Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031<sup>53</sup> 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 north-west 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.
- 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.

### Potential for cumulative effects with County level plans

**8.89** The Maidstone Local Plan Review has the potential to combine with proposals in the Kent Minerals and Waste Local Plans to generate cumulative negative effects within the Maidstone area, for example in relation to SA9: Soils, SA11: Air quality, SA14: Biodiversity, SA15: Historic environment, and SA16: Landscape.

**8.90** The SEA of the Minerals and Waste Local Plan did not identify any significant negative effects, however there remains an ongoing debate related to the potential for impacts

to the Kent Downs AONB from silica and sand extraction, in addition to some uncertainty around the landscape/biodiversity implications of making provision for both sand and sharp sand/gravel landbanks, which is relevant to SA14: Biodiversity and SA16: Landscape. All effects identified were positive.

**8.91** Given that many of the development growth areas delivered through the Maidstone Local Plan Review would be areas where mineral resources have been identified, there is potential for these to be sterilised, resulting in cumulative negative effects at the strategic scale. However, it may be possible to adopt a phased approach, where economically viable, to recover mineral resources prior to the delivery of economic and housing development.

**8.92** The Kent Local Transport Plan is designed to deliver the transport solutions required to support development delivered through Local Plans in Kent, while also addressing existing transport challenges and issues, including improving the public transport network to deal with Kent's ageing population and greater reliance on public transport. Specific mention is made of the need to ease congestion and disruption along Kent's motorway network, in addition to the need to improve bus and rail services to support the ageing population and the growing commuter demand.

**8.93** Many of these enhancements are already described in the Council's Local Plan Review Topic Papers and reflected in assumptions about what would be provided under different spatial strategy options that have been appraised by the SA.

### Neighbouring authorities' Local Plans

**8.94** Maidstone Borough is adjoined by the neighbouring local authorities of Medway, Swale, Ashford, Tunbridge Wells, and Tonbridge and Malling. The main development proposed by their respective strategic Local Plans is summarised below.

### Medway Local Plan

**8.95** The Medway Local Plan was adopted in 2003<sup>54</sup>. Since the new Local Plan has not yet been published for Regulation 19 consultation on a Proposed Submission version, only the adopted plan has been reviewed.

**8.96** The LDP set out to deliver 13,000 dwellings between 1991 and 2006, with a focus on maximising the use of previously developed land within the urban area.

**8.97** The Medway Local Plan identifies a target of creating 11,000 jobs in four main sectors: financial and business

<sup>53</sup> 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](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>54</sup> Medway Council (2003) Medway Local Plan 2003 [online] Available at: [https://www.medway.gov.uk/info/200149/planning\\_policy/146/current\\_planning\\_policies/3](https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/3)

services, high technology manufacturing, transport and distribution and other key sectors including retail, education and construction.

**8.98** The main development opportunities have been identified at the following locations:

- Chatham;
- Maritime;
- Rochester Riverside;
- Gillingham Business Park; and
- Frindsbury Peninsula

#### Swale Local Plan

**8.99** Swale Borough Council adopted its Local Plan in 2017<sup>55</sup>.

**8.100** The Local Plan sets out to deliver a minimum of 13,192 dwellings between 2014 and 2031 (776 per annum, 190 required as affordable dwellings).

**8.101** Key locations proposed for development are:

- Sittingbourne;
- West Sheppey; and
- Faversham

**8.102** Particular focus for growth in the borough is within Sittingbourne since it is the largest settlement with strong opportunities for urban regeneration, employment and new services.

**8.103** In rural areas, growth within the borough will be focused in Rural Local Service Centres, with development providing local housing employment needs for their home and surrounding communities, while supporting existing and new services.

**8.104** The Local Plan also sets out to deliver an estimated 10,900 jobs between 2014 and 2031, with most of the job growth anticipated to occur in retail, services, health and education, requiring 60 hectares on new employment land.

#### Ashford Local Plan

**8.105** Ashford Borough Council adopted its Local Plan in 2019<sup>56</sup>.

**8.106** The Local Plan sets out to deliver 16,872 dwellings between 2011 and 2030. After taking into account the housing completions since 2011, this figure is reduced to 13,118 between 2018 and 2030.

**8.107** The majority of the new housing development will occur within Ashford and its periphery, as the principal settlement of the borough and based on its access to a range of services and facilities. It is proposed that Ashford will 4,872 dwellings through new land allocations and existing commitments.

**8.108** A proportion of new development will be directed to rural areas and will be of scale that is consistent with the relevant settlement's accessibility, infrastructure provision, site suitability and services available. It is proposed that these areas will contribute 1,017 dwellings.

**8.109** The Local Plan also sets out to deliver 63 hectares of new employment land and a total of 11,100 jobs in the borough between 2014 and 2030. This will be concentrated in and around Ashford town with the town centre on brownfield sites.

#### Tunbridge Wells Local Plan

**8.110** Tunbridge Wells Borough Council adopted its Local Plan Core Strategy in 2010<sup>57</sup>. Since the new Local Plan has not yet been published for Regulation 19 consultation on a Proposed Submission version, only the adopted plan has been reviewed.

**8.111** The Local Plan sets out to deliver 6,00 dwellings in the borough between 2006 and 2026, with at least 65% of all housing development within this period to be delivered on previously developed land.

**8.112** It is anticipated that 70% of new housing will be delivered in Royal Tunbridge Wells. Other key locations proposed for development are:

- 8.113** Southborough;
- 8.114** Paddock Wood;
- 8.115** Cranbrook; and
- 8.116** Hawkhurst.

**8.117** A small proportion (6%) of new development will also be directed to villages and rural areas to support rural housing needs and local services and facilities.

<sup>55</sup> 6.15 Swale Borough Council (2017) Bearing Fruits 2031 – The Swale Borough Local Plan [online] Available from: <https://www.swale.gov.uk/local-plan-for-swale/>

<sup>56</sup> Ashford Borough Council (2019) Ashford Local Plan 2030 [online] Available from: [https://www.ashford.gov.uk/planning-and-](https://www.ashford.gov.uk/planning-and-development/planning-policy/adopted-development-plan-documents/adopted-local-plan-to-2030/)

[development/planning-policy/adopted-development-plan-documents/adopted-local-plan-to-2030/](https://www.ashford.gov.uk/planning-and-development/planning-policy/adopted-development-plan-documents/adopted-local-plan-to-2030/)

<sup>57</sup> Tunbridge Wells Borough Council (2010) Tunbridge Wells Borough Core Strategy DPD [online] Available from: <https://beta.tunbridgewells.gov.uk/planning/planning-policy/existing-local-plans/core-strategy>

**8.118** Employment provision will be achieved by maintaining the overall net amount of employment floorspace across the borough, the encouragement of new floorspace in Key Employment Areas and through the intensification or redevelopment of existing sites. The Key Employment Areas are defined as follows:

- Royal Tunbridge Wells Town Centre;
- Royal Tunbridge Wells, North Farm/Longfield Road Industrial Area;
- Paddock Wood;
- Gills Green, former Hawkhurst Railway Station and sidings; and
- Capel, Brook Farm.

#### Tonbridge and Malling Local Plan

**8.119** Tonbridge and Malling Borough Council submitted its Local Plan for Examination in 2019<sup>58</sup>.

**8.120** The Local Plan sets out to deliver 13,920 dwellings between 2011 and 2031 (696 per annum). The strategic housing market assessment also identified that the need for affordable housing was 277 dwellings per annum. Five strategic allocations have been identified for residential development. These are:

- Bushey Wood, Eccles;
- South Aylesford;
- Borough Green Gardens;
- Broadwater Farm, north of Kings Hill; and
- South-West Tonbridge.

**8.121** Provisions is made for a net increase of around 38.5ha of employment land, as identified by the Council

#### Potential for cumulative effects with Neighbouring authorities' Local Plans

**8.122** The five districts surrounding the Maidstone Borough are relatively rural, with Maidstone being the major town of the borough, accounting for approximately 70% of its total population.

**8.123** All Local Plans, whether adopted or in the process of preparation, provide for both increases in housing supply as well as job creation. Cumulative significant positive effects

with the Maidstone Local Plan Review are likely in relation to SA1: Housing, SA5: Economy and SA6: Maidstone Town Centre, reflecting the significant amounts of residential and employment development to be provided across the wider area. Cumulative significant negative effects could occur on the environment, for example with respect to SA14: Biodiversity, SA15: Historic Environment, and SA16: Landscape.

**8.124** The increased development in neighbouring authorities is also likely to combine with the development proposed in the Maidstone Local Plan Review to lead to increased traffic, which in turn could increase air pollution, and carbon emissions, with cumulative significant negative effects in relation to SA11: Air Quality and SA13: Climate Change. To a certain extent this would happen wherever development takes place and to mitigate this, the Local Plans aim to support sustainable transport modes and energy efficiency in built development. Whether this leads to a marked shift to the use of sustainable transport modes is difficult to predict, and therefore the cumulative effects on these SA objective and on SA7: Active and sustainable travel behaviour are uncertain. However, the development proposed in the Local Plans should, in combination, provide support for additional services and investment in infrastructure, resulting in a cumulative minor positive effect against SA2: Access to essential services and facilities, which could also help to address carbon emissions.

**8.125** The cumulative effects on SA3: Community cohesion are difficult to predict but are likely to be mixed, with some existing and new communities and their services and facilities strengthened by additional development and others having their character and sense of identity adversely affected.

**8.126** The cumulative effects on SA4: Health are also likely to be mixed. The provision of new homes, especially sustainably constructed and affordable homes, and new employment opportunities through the Maidstone Local Plan Review and neighbouring authorities' Local Plans, together are likely to result in cumulative significant positive effects, but there could be temporary adverse effects on health during construction disturbance, and potentially through increased noise, light and air pollution from new development.

**8.127** There is the potential for cumulative negative effects on SA10: Water resources and quality and SA12: Flood risk arising from the in-combination demands of new development for water supply and treatment and increased urban run-off. However, these will have been planned for through Water

<sup>58</sup> Tonbridge and Malling Borough Council (2019) Tonbridge & Malling Borough Council Local Plan Regulation 22 Submission [online] Available from: [https://www.tmbc.gov.uk/services/planning-and-](https://www.tmbc.gov.uk/services/planning-and-development/planning/planning-local-plans/local-plan-reg-19-consultation)

[development/planning/planning-local-plans/local-plan-reg-19-consultation](https://www.tmbc.gov.uk/services/planning-and-development/planning/planning-local-plans/local-plan-reg-19-consultation)

Resource Management Plans, and through policies designed to avoid and reduce the risk of flooding

**8.128** Many of the identified cumulative effects at a sub-regional scale are likely to be concentrated within and around the larger settlements and along the strategic transport corridors such as the M20. In addition, a number of the locations targeted for large-scale growth by neighbouring plans are close the Maidstone Borough border, increasing the potential for more localised cumulative effects. Examples include South Aylesford in Tonbridge and Malling, Chatham and Gillingham Business Park in Medway, Sittingbourne in Swale, and Paddock Wood in Tunbridge Wells.

## Chapter 9

### Other reporting requirements

This chapter reports on the HRA, the Council's reasons for choosing the plan, and monitoring arrangements

#### Habitats Regulations Assessment

**9.1** The Local Plan Review at the current stage of plan development has been subject to the screening stage of Habitats Regulations Assessment, the detailed method and findings of which are set out in a separate report.

**9.2** At the Screening stage, Likely Significant Effects (LSEs) on European sites, either alone or in combination with other policies and proposals, were predicted, or could not be ruled out, for the following Local Plan Review policies:

- Policy SS1: The Borough Spatial Strategy
- Policy SP1: Maidstone Town Centre
- Policy SP2: Maidstone Urban Area
- Policy SP3: Development at the Edge of Maidstone
- Policy SP4a: Heathlands Garden Settlement
- Policy SP4b: Development North of M2/Lidsing
- Policy SP5b: Development at Invicta Barracks
- Policy SP5c: Lenham Broad Location for Housing Growth
- Policy SP6a: Harrietsham
- Policy SP6a: Headcorn
- Policy SP6c: Lenham
- Policy SP6d: Marden
- Policy SP6e: Staplehurst
- Policy SP7a: Boughton Monchelsea
- Policy SP7b: Coxheath
- Policy SP7c: Eyhome Street (Hollingbourne)
- Policy SP7d: Sutton Valence



- Policy SP7e: Yalding
- Policy SP11c: Employment Allocations

**9.3** The findings of the HRA screening determined that impacts from air pollution, recreation and water quantity and quality could result in a likely significant effect in relation to:

- **Air Pollution:** in relation to North Downs Woodlands SAC, Medway Estuary and Marshes SPA and Ramsar and The Swale SPA and Ramsar.
- **Recreation:** North Downs Woodlands SAC, Queendown Warren SAC, Medway Estuary and Marshes SPA and Ramsar.
- **Water Quantity and Quality:** Medway Estuary and Marshes SPA and Ramsar, The Swale SPA and Ramsar, Thames Estuary SPA and Ramsar and Stodmarsh SPA and Ramsar.

**9.4** An Appropriate Assessment will be required to assess each European site, which could not be ruled out at the Screening stage, to determine whether the Local Plan Review will result in an adverse effect on integrity (AEoI) on European sites alone or in-combination with other plans and projects. This stage of the assessment would seek to identify mitigation measures, which would avoid or mitigate for impacts to ensure no AEoI.

### Reasons for choosing the plan

**9.5** The following statement by the Council outlines how environmental considerations have been integrated into the Local Plan Review, how the Sustainability Appraisal has been taken into account, how consultation responses have been taken into account, the reasons for choosing the adopted Local Plan Review policies in light of alternative options and the measures that will be taken to monitor the effects of the Local Plan Review.

#### How environmental and sustainability considerations have been integrated into the Maidstone Local Plan Review

The SA has been conducted in such a way that it meets the requirements of the EU Strategic Environment Assessment Directives (including through EU exit legislation) and UK Government guidance on the preparation of Sustainability Appraisals. As required by the regulations, the Sustainability Appraisal has been developed through an iterative process and has informed decision making at every stage of developing the Maidstone Local Plan Review.

The initial informative stage of the Sustainability Appraisal was the scoping process. The scoping process included a review of other relevant plans, programmes and strategies that have an influence on sustainability and provide the policy context for the Local Plan Review. The social, environmental and economic baselines were established which identified the key sustainability issues to be addressed and provided the basis from which the potential effects of the Local Plan Review could be assessed. The information originally published in the Scoping Report has been updated as the plan has developed over time and incorporated, as relevant, in the reports at later stages of SA, providing the basis upon which the Local Plan Review was appraised.

#### How the Sustainability Appraisal has been taken into account

The policies and sites within the Local Plan Review have been subject to SA throughout their development, along with reasonable alternative options. Each policy and proposal has been assessed against the social, environmental and economic objectives in the SA Framework in order to establish the likely positive and negative effects. Where significant negative effects were found, potential mitigation measures were identified wherever possible. The results of the appraisals were used to inform the decision making process and establish appropriate options to take forward into the Local Plan Review. Each stage of developing the Local Plan Review has included undertaking SA to take account of new evidence and new policy options. These updates helped further refine the options to include in the Local Plan Review.

This SA Report and the accompanying SA of Options Report<sup>59</sup> include the individual appraisals for each policy option taken forward into the Local Plan as well as all of the reasonable alternative options considered. The reasonable alternative options considered by the Council and appraised by the SA are set out in separate SA of Options report and in the SA findings chapters of this SA report, as relevant. The SA report also includes an overview of all of the policies included in the final draft Local Plan to show the cumulative impact of the policies (see **Chapter 8**).

#### How the results of consultation have been taken into account

<sup>59</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

The SEA Directive requires that opinions expressed by consultees be taken into account during the development of a plan before the plan is adopted. The SA Scoping Report was previously consulted upon and representations were taken into account and used to further refine the SA, as set out in **Appendix A**. The SA will continue to be consulted upon at each stage of consultation on the Local Plan Review.

### **The reasons for choosing the Local Plan Review (Regulation 18 Preferred Approach), in light of reasonable alternatives considered**

The Local Plan Review sets out the spatial strategy and supporting policies that the Council believes will best enable it to meet the housing and other development pressures faced by the Maidstone Borough, in the most sustainable pattern and in a manner which will maximise existing infrastructure and, where this is not possible, new infrastructure to be provided.

The Local Plan Review sets out a spatial vision of the place that Maidstone Borough will become by 2037 as follows:

*“By 2037: Embracing growth which provides improved infrastructure, economic opportunity, services, spaces, and homes for our communities, while protecting our heritage, natural and cultural assets, and addressing the challenges of climate change.”*

The preferred approach within the Local Plan Review has been developed with the aim of delivering this spatial vision, informed by a range of evidence-based studies and the SA. In producing the Local Plan Review and associated evidence base the Council has, and will continue to, engage with its council neighbours, Kent County Council and statutory organisations on matters which have cross-boundary implications.

#### Scale of growth

Housing need was objectively calculated by undertaking a Strategic Housing Market Assessment (SHMA) using the standard method set out in national planning practice guidance at the time of publication. It took account of demographic trends and income to house price affordability ratios to determine an appropriate housing amount for the borough. The Council also carried out a Strategic Land Availability Assessment (SLAA) which identified the known supply of homes for the Local Plan Review period (2022-2037) expected to be provided from allocations in the currently adopted local plan, existing permissions and from windfall development. The balance of homes to be provided by the Local Plan Review was calculated by deducting the known supply from the total identified need and the Local Plan Review seeks to provide sufficient land allocations to enable this quantum of development to come forward. Given the requirements of national planning policy in terms of calculating housing need and this logical assessment of supply likely to come forward over the plan period and the balance to be provided, there were considered not to be any reasonable alternatives to the total amount of housing to be provided by the Local Plan Review.

In relation to business development needs, the Council carried out an Employment Need Assessment which identified the minimum floorspace for B-Uses required to meet need, based on job growth forecasts (labour demand) over the period 2022-2037. Based on expected population growth, combined with analysis of national and local retail trends and Experian forecasts, the Council also objectively assessed retail floorspace requirements for the first ten years of the plan period, as required by national planning policy. As a result of potential future changes to the economy resulting from COVID-19 and Brexit, the Local Plan Review seeks to provide an oversupply of employment land at this stage. This allows flexibility and responsiveness to emerging trends and will continually be reviewed as the Plan progresses from Regulation 18 to Regulation 19 stage. Following this logical approach, there were considered not to be any reasonable alternatives to the total amounts of business and retail development to be provided by the Local Plan Review.

#### Distribution of growth

The process followed for identifying the spatial strategy options to be subject to SA and the results of the SA are described in detail in the separate SA of Options report that has been published alongside this SA document. The Council's development of the spatial strategy followed an iterative process with the findings at each stage communicated to Council officers to inform further options development. The development of the Preferred Approach had regard to two levels of reasonable alternatives testing through the SA, which in turn were informed by the SLAA.

The Council identified a set of three initial spatial strategy options that were based on a fixed quantum of growth that would meet identified local, and that were deliberately distinctive to highlight the sustainability differences the elements of a spatial strategy that were considered reasonable. These were interrogated using the SA criteria, as well as through Transport Modelling. The outcomes were that Maidstone was suggested to be the most sustainable location for more development, with the RSCs and Larger Villages being relatively sustainable due to their existing infrastructure assets. The Garden Settlements were not sustainable locations at present. This is because they do not have allocated

infrastructure and services. It is expected that they would become more sustainable when properly planned with supporting infrastructure.

The Council then defined a set of refined spatial strategy options, having regard to the results of the initial appraisal. These options were based on the allocation of amounts of development to different areas based on site availability. After completion of the Garden Settlements Deliverability Assessment, there were three proposals that could be considered as deliverable within the Plan period: north of Marden, Lidsing, and Heathlands. As such the testing of refined alternatives consisted of three key variables: higher or Lower development in Maidstone; zero, one, or two Garden Settlements; and higher or lower growth in the rest of the borough. A key assumption made at this stage was the decision that due to the risk profile of garden settlements, that the Local Plan Review should only include two such projects.

The preferred spatial strategy was derived from a number of factors. These included the availability of and ability to deliver the required infrastructure, creating a coherent strategy and balanced growth pattern, and the availability and distribution of sites that came forward in the SLAA. It was arrived at following consultation with borough councillors, as well as engagement on potential site allocations with Parishes. The following political preferences were expressed, in addition to technical evidence coming forward, such as input from infrastructure providers, constraints studies such as the SFRA, topic papers and land availability and deliverability studies:

- There is a clear political desire for garden settlements to be included within the LPR, and linked to this;
- There is a clear political desire for growth to be limited, both in Maidstone and in rural settlements;
- There is a preference for development in Maidstone town centre to focus on improving the local employment and infrastructure offer in preference to housing.

#### Site selection

The call-for-sites exercise delivered a range of sites that had the potential to be suitable for inclusion in the plan, from which the most appropriate sites were selected for inclusion at this Regulation 18b preferred approaches stage. The decision-making process that informed this selection was based on a range of types of information, including technical feedback, local knowledge and consultation with locally elected representatives. Further feedback and technical information will be reviewed as the plan progresses to Regulation 19 stage.

#### Other key policy objectives and issues

The SA also supported an iterative and rational method for refining the other reasonable alternative options considered throughout the Local Plan Review.

Based on the overarching objectives of the Local Plan Review and informed by the supporting evidence and the SA, the plan policies seek to ensure the delivery of appropriate housing, enabling sustainable economic growth, enhancing and protecting the environment, supporting strong and healthy communities and delivering infrastructure. The SA reports and Local Plan Review describe the reasonable alternative options that were considered and evaluated.

#### **Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan**

The effects of the Local Plan Review, once adopted, will be monitored according to a monitoring framework to be included in the Local Plan Review at Proposed Submission stage. This framework will draw on existing Local Plan indicators set out in the Authority Monitoring Report. This will enable the significant effects of implementing the Local Plan Review sites and policies to be assessed and compared to those predicted in the SA report and help to ensure that any unforeseen adverse effects can be identified, and remedial action taken if required.

## Monitoring

**9.6** This section recommends indicators to monitor the effects of implementing the Local Plan Review.

**9.7** The SEA Regulations require that *"the responsible authority shall monitor the significant environmental 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"* and that the environmental report should provide information on *"a description of the measures envisaged concerning monitoring"*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

**9.8** Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to

enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA Framework. As the Local Plan Review is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan Review likely to be significantly adverse.

**9.9 Table 9.1** sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan Review. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Council remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 9.1: Proposed monitoring indicators

SA Objectives	Proposed Monitoring Indicators
<p>SA 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home.</p>	<ul style="list-style-type: none"> <li>■ Number of households on the Housing Register</li> <li>■ Number of dwellings built compared to targets</li> <li>■ Net additional Gypsy, Traveller and Travelling Showpeople pitches</li> <li>■ Residential property prices and sales</li> <li>■ Number of households registered on the 'Self-Build Register'</li> <li>■ Net additional dwellings and proportion of these in towns, villages and countryside areas</li> <li>■ 5 Year Housing Land Supply (expressed as a % and years)</li> <li>■ Affordable dwelling completions expressed as a percentage of total dwelling completions on developments</li> <li>■ Size and age of housing stock</li> <li>■ Homelessness</li> </ul>
<p>SA 2: To ensure ready access to essential services and facilities for all residents.</p>	<ul style="list-style-type: none"> <li>■ Distance travelled to services</li> <li>■ Number of schools that are at capacity/surplus</li> <li>■ Pupils achieving grades A-C</li> <li>■ S. 106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services</li> <li>■ Percentage of the borough's population having access to a natural greenspace within 300 metres of their home.</li> <li>■ Length of greenways constructed</li> <li>■ Hectares of accessible open space per 1000 population</li> </ul>
<p>SA 3: To strengthen community cohesion.</p>	<ul style="list-style-type: none"> <li>■ Loss/gain of community facilities</li> <li>■ Crime rates per 1,000 people</li> </ul>
<p>SA 4: To improve the population's health and wellbeing and reduce health inequalities.</p>	<ul style="list-style-type: none"> <li>■ Percentage of residents that consider their health to be good</li> <li>■ Difference in levels of deprivation between the most and least deprived areas</li> <li>■ Performance against relevant indices of multiple deprivation indicators</li> <li>■ Obesity rates in adults and children</li> </ul>

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Access to doctors surgeries and average wait times for appointments</li> <li>■ Residents opinion on availability of open space/leisure facilities</li> <li>■ Life expectancy</li> </ul>
SA 5: To facilitate a sustainable and growing economy.	<ul style="list-style-type: none"> <li>■ Levels of unemployment</li> <li>■ Unemployment rate</li> <li>■ Number of visits to the borough</li> <li>■ Total amount of additional floorspace by type</li> <li>■ Amount of new employment land generated</li> <li>■ Jobs per ha within different use classes</li> <li>■ Shop occupancy and vacancy rates in service centres</li> <li>■ Employment rates</li> <li>■ Employment status by resident and job type</li> <li>■ Number of people claiming Jobseeker's Allowance</li> <li>■ Proportion of businesses in rural locations</li> </ul>
SA 6: To support vibrant and viable Maidstone town centre.	<ul style="list-style-type: none"> <li>■ Total number of shops within town centre</li> <li>■ Total number of vacant shops within town centres</li> <li>■ Levels of crime in town centres</li> <li>■ Net additional square metres of retail floorspace</li> <li>■ Net dwelling completions per annum within town centres</li> <li>■ Implemented and outstanding planning permissions for retail, office and commercial use</li> <li>■ Pedestrian footfall count</li> </ul>
SA 7: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion.	<ul style="list-style-type: none"> <li>■ Percentage of relevant applications where a Travel Plan is secured</li> <li>■ Percentage of trips to work, school, leisure using public transport, walking and cycling</li> <li>■ Peak traffic flow</li> <li>■ Travel times</li> <li>■ Investment in road infrastructure</li> <li>■ Car ownership</li> <li>■ Public transport punctuality and efficiency</li> </ul>
SA 8: To conserve the borough's mineral resources.	<ul style="list-style-type: none"> <li>■ Number of planning applications approved within a Minerals Consultation Area</li> </ul>

SA Objectives	Proposed Monitoring Indicators
SA 9: To conserve the borough's soils and make efficient and effective use of land.	<ul style="list-style-type: none"> <li>■ Percentage of development on previously developed land</li> <li>■ Net loss of agricultural land</li> <li>■ Number of new allotment pitches provided through development contributions</li> </ul>
SA 10: To maintain and improve the quality of the borough's waters and achieve sustainable water resources management.	<ul style="list-style-type: none"> <li>■ Water availability/consumption ratios</li> <li>■ Ecological/chemical status of water bodies</li> <li>■ Water use per household</li> <li>■ Water pollution incidents recorded by the Environment Agency</li> <li>■ Percentage of developments implementing SUDS</li> </ul>
SA 11: To reduce air pollution ensuring lasting improvements in air quality.	<ul style="list-style-type: none"> <li>■ Percentage of trips to work, school, leisure using public transport, walking and cycling</li> <li>■ Air pollution data</li> <li>■ Car ownership</li> </ul>
SA 12: To avoid and mitigate flood risk.	<ul style="list-style-type: none"> <li>■ New development in the floodplain.</li> <li>■ Development permitted contrary to advice by the Environment Agency on flood risk</li> <li>■ Percentage of developments implementing SUDS</li> <li>■ Amount of housing and employment land delivered within Flood Zones 2 and 3</li> </ul>
SA 13: To minimise the borough's contribution to climate change.	<ul style="list-style-type: none"> <li>■ CO<sub>2</sub> emissions per capita</li> <li>■ Number of new residential developments where the energy/emissions standards in the Building Regulations Part L have been exceeded.</li> <li>■ Number of developments where 'adaptation statements' have been produced</li> <li>■ New installed renewable energy capacity</li> <li>■ Total energy consumption</li> </ul>
SA 14: To conserve, connect and enhance the borough's wildlife, habitats and species.	<ul style="list-style-type: none"> <li>■ Net loss/gain of designated wildlife habitats</li> <li>■ Condition of wildlife sites</li> <li>■ Number and hectares of SSSIs</li> <li>■ % of District's SSSI in a favourable or unfavourable condition</li> <li>■ Number and Ha of Local Nature Reserves, Local Wildlife Sites, Ancient Woodland and Priority Habitats</li> </ul>

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance</li> <li>■ Percentage of major developments generating overall biodiversity enhancement</li> <li>■ Hectares of biodiversity habitat delivered through strategic site allocations</li> </ul>
<p>SA 15: To conserve and/or enhance the borough's historic environment.</p>	<ul style="list-style-type: none"> <li>■ Number of entries on the Heritage at Risk Register</li> <li>■ Number of entries removed from the Heritage at Risk Register</li> <li>■ Number of planning applications approved contrary to Historic England and/or Conservation Officer advice</li> <li>■ Number of heritage restoration projects completed</li> <li>■ Number of designated and non-designated heritage assets</li> <li>■ Number of planning applications approved in Archaeological Priority Areas</li> </ul>
<p>SA 16: To conserve and enhance the character and distinctiveness of the borough's settlements and landscape.</p>	<ul style="list-style-type: none"> <li>■ Landscape character appraisals and impacts</li> <li>■ % of development built on brownfields sites/previously developed land</li> <li>■ Green Infrastructure secured through development</li> <li>■ Number and extent of field boundaries affected</li> <li>■ Number of landscape enhancement schemes secured</li> <li>■ Amount of new development in AONB with commentary on likely impact</li> <li>■</li> </ul>



## Chapter 10

### Next steps

## This chapter sets out the next steps for the Local Plan Review and SA

### Next steps

**10.1** This SA Report and the accompanying SA of Options report will be available for consultation alongside the Preferred Approaches version (Regulation 18) of the Local Plan Review in December 2020.

**10.2** Following this consultation, the Council will consider the representations received from stakeholders and additional, emerging evidence in order to prepare a revised version of the Local Plan review for Regulation 19 consultation. That consultation will be on the version of the Local Plan Review that the Council proposes to submit to the Secretary of State for examination and will be accompanied by an updated and amended SA report. Consultation at that stage will be limited to issues of soundness or legal failings, as set out in national policy, guidance and legislation.

**10.3** Following the above periods of public consultation, the LPR will be independently examined by a Government-appointed Planning Inspector appointed by the Secretary of State, who will consider and challenge its content and any objections to it and reach a decision on its overall 'soundness' before it can proceed to be adopted.

**LUC**

**November 2020**

# Appendix A

## Consultation comments

## Consultation comments on the SA Scoping Report

Table A.1: Summary of comments received in response to the SA Scoping Report and actions taken as a result of these

Summary of comments	Action taken
Environment Agency	
<p><b>Water Resources</b></p> <p>The report seems well-informed. We welcome the high-level references to, and ambition for, water efficiency in objective SA10. We hope to see something more specific in the Local Plan itself.</p> <p>Paragraph 11.2 asks "Whether the baseline information provided is robust and comprehensive, and provides a suitable baseline for the SA of the Maidstone Local Plan Review." I would expect to find more baseline information in the SA itself than in the Scoping Report</p> <p>The final paragraph in Table 5.1 states "Water use in the borough is very high by both national and international standards" Perhaps the word "very" may be deleted.</p> <p>In section 5.43, the figure for Maidstone's per capita water use (164 litres/head/day) is taken from a Water Cycle study dated 2010. This is compared with figures for Kent taken from the Kent Environmental Strategy, dated 2016 (154 litres/head/day), and it is concluded that Maidstone's water use is particularly high. Between 2010 and 2016, water use has shown a decreasing tendency from progressive metering and water efficiency initiatives, and a more comparable figure for Maidstone (3 years to 2015) is 160 litres/head/day. So Maidstone's use is high by both standards as stated, but the extent is exaggerated.</p> <p>The policy does not explain the extent to which the Drinking Water supply relies on Groundwater sources which are being depleted and some of which are now unusable because of phosphate contamination.</p> <p>The projected increase in population will place greater pressure on the need to provide potable water and wastewater services in the borough. It may also increase the risk of urban run-off affecting water quality. This is already evident in parts of the Catchment. This will also increase the risk of over abstraction.</p> <p>Section 6.18 refers to climate projections from UKCP09. I expect these figures will soon be superseded by new information from UKCP18. From an initial inspection the results are not greatly different.</p>	<p>Noted.</p> <p>With regard to Chapter 5, the word 'very' has been deleted from the table of key sustainability issues. In addition, updated information has been included as appropriate within the water section and the climate change adaptation and mitigation sections that present the policy context and baseline information.</p>
<p><b>Fisheries, Biodiversity and Geomorphology</b></p>	<p>This comment relates largely to the options for the Maidstone Local Plan Review itself, rather than the SA Scoping Report. The role of the SA is to assess the</p>

Summary of comments	Action taken
<p>The most important aspect of the revised NPPF and 25 year Environment Plan is to achieve a net gain for biodiversity. It is therefore critical that the scope of the review demonstrates how it will achieve this, and specifically how development will contribute to this, including the green/blue infrastructure.</p>	<p>policies of the plan against the SA objectives, which include reference to enhancement of biodiversity.</p>
<p><b>Groundwater and Contaminated Land</b></p> <p>We note that contaminated land is mentioned under Air, Land and Water Quality policy. Detailed comments on any specific site will be provided at the planning application stage, to ensure adequate investigation and if necessary remediation is carried out to address any identified contamination and risks to controlled waters.</p>	<p>Noted.</p>
<p><b>Flood Risk</b></p> <p>The projected increase in population will place greater pressure on the need to manage Flood risk and to provide potable water and wastewater services in the borough.</p> <p>Climate change and population growth could make the risk of flooding increase. Unless suitable mitigation measures are taken.</p> <p>We note that the main fluvial flood risks have been identified and that the plan iterates the importance of steering new development into the low flood risk zones.</p>	<p>Noted.</p>
<p><b>Further comments</b></p> <p>This Strategy seems to overlook the value of the Catchment in contributing to many of the outstanding designated Landscapes in and around the borough. E.g. the “Valley of Visions “or Kent Weald AONB.</p> <p>It is also important to make reference to the contribution made by the Catchment to leisure and recreational pursuits in Boating and Angling.</p>	<p>Additional information regarding the Medway Catchment and its relationship with the landscape has been added to the baseline information on these topics.</p>
<p>Historic England</p>	
<p>We are content that the scoping report for Maidstone adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p>	<p>Support noted.</p>
<p>Natural England</p>	
<p><b>Chapter 2: Population, Health and Wellbeing</b></p>	<p>Support noted for Figure 5.2: Agricultural land classification, Figure 6.1: Flood risk, and Figure: 7.1: Biodiversity.</p>

Summary of comments	Action taken
<p>We advise that in addition to 'Table 2.3: Quantity of publicly accessible green space' it would be extremely beneficial to take account of the location and accessibility of this open space. Natural England's 'Nature Nearby' guidance on Accessible Natural Greenspace recommends that everyone, wherever they live should have an accessible natural green space:</p> <ul style="list-style-type: none"> <li>■ of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;</li> <li>■ at least one accessible 20 hectare site within two kilometres of home;</li> <li>■ one accessible 100 hectare site within five kilometres of home; and</li> <li>■ one accessible 500 hectare site within ten kilometres of home; plus</li> <li>■ a minimum of one hectare of statutory Local Nature Reserves per thousand population.</li> </ul> <p>This baseline information could include mapping of areas which are lacking in or deprived of access to natural greenspace. This information would be a useful tool to overlay with 'Figure 2.1: Index of Multiple Deprivation' and to make a connection between available open space provision and the health of the population.</p> <p>Paragraph 2.54 discusses public accessible green space across the borough. We advise that maps indicating the location of the green infrastructure network will further enhance this baseline information and identify gaps in the network which can be addressed in accordance with the existing Green Infrastructure strategy and through this Local Plan review. The review of the Plan provides opportunity to readdress issues such as green infrastructure to support the growing population and demand for development.</p> <p><b>Chapter 5: Air, Land and Water Quality</b></p> <p>The inclusion of 'Figure 5.2: Agricultural Land Classification is welcomed. This provides a good baseline to conserve the borough's Best and Most Versatile (BMV) agricultural land.</p> <p><b>Chapter 6: Climate Change Adaptation and Mitigation</b></p> <p>'Figure 6.1: Flood Risk' provides a good baseline to determine where resources should be invested to mitigate flood risk. The success of the Plan's policies on flood risk can be realised by extended areas</p>	<p>The SA of development site options will take account of walking distance to open space but an analysis of accessibility to different sizes of accessible natural greenspace is beyond the scope of the SA.</p> <p>The SA of development site options will take account of intersection with the wider ecological network by reference to priority habitat inventory.</p> <p>With regard to Chapter 9, the Kent Downs AONB Management Plan is already referenced at paragraph 9.4.</p>

Summary of comments	Action taken
<p>benefiting from flood defences (including in the form of Natural Flood Management). We advise that the advice of the Environment Agency is sought with regards to flood risk.</p> <p><b>Chapter 7: Biodiversity</b></p> <p>The inclusion of Figure 7.1 provides a clear baseline of the location and distribution of statutory and non-statutory designated sites within Maidstone. In line with Paragraph 174(b) of the NPPF, plans should “promote the conservation, restoration and enhancement of priority habitats [...]”. In order to assess the success of the plan in achieving this, baseline information should include the mapping of Priority Habitats in Maidstone. Such maps, when overlaid with Figure 7.1 and green infrastructure mapping will allow the wider ecological network to be visualised, monitored and to identify areas for enhancement.</p> <p><b>Chapter 9: Landscape</b></p> <p>We advise that clear reference should be made in Chapter 9 to the Kent Downs AONB Management Plan. The Local Plan should positively contribute to the aims and objectives of the AONB Management Plan, with consideration given to the special characteristics of the Management Plan.</p>	
<p>Natural capital accounts of the Plan area could be a useful tool to establish baseline conditions across the borough. Natural capital accounting can help to safeguard natural capital assets over the long term. Natural England would be pleased to work with Maidstone on this and elaborate further on this topic separately to this consultation.</p> <p>It is noted that natural capital is referenced on p49 with regard to the key sustainability issues in relation to BMV agricultural Land. In line with the 25 Year Plan we advise that the natural capital approach can be used as a key tool for making better-informed decisions for more than just BMV agricultural land. It is worth bearing in mind that not all aspects of natural capital (e.g. wildlife) can be robustly valued in monetary terms and as such we advise that, in line with the 25 Year Environment Plan, that this approach be used as a tool and not as an absolute arbiter. As mentioned above, Natural England would be happy to discuss this theme further.</p>	<p>Noted.</p>
<p>We note that there is no reference to the restoration or enhancement of designated and undesignated biodiversity assets, with the issues referring only to conserving. We recommend that a need to achieve biodiversity net gain is included as a key issue.</p> <p>We note that there is no mention of Natural Flood Management measures. Natural Flood Management is described by the 25 Year Environment Plan as the use of a variety of measures including tree planting,</p>	<p>With regard to SA objective 14, the appraisal question in relation to ecological assets now includes reference to enhancement.</p> <p>With regard to SA objective 12, the appraisal question now includes reference to natural flood management measures.</p>

Summary of comments	Action taken
<p>river bank restoration, building small-scale woody dams, reconnecting rivers with their flood plains and storing water temporarily on open land in order to mitigate flood risk. We advise that these be identified within the Plan alongside the use of SuDS and flood resilient design.</p>	
<p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, we advise that Maidstone Borough Council may wish to consider making these indicators of success more easily measurable. For example the following may be considered:</p> <p><b>Biodiversity:</b></p> <ul style="list-style-type: none"> <li>■ Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.</li> <li>■ Percentage of major developments generating overall biodiversity enhancement.</li> <li>■ Hectares of biodiversity habitat delivered through strategic site allocations.</li> </ul> <p><b>Landscape:</b></p> <ul style="list-style-type: none"> <li>■ Amount of new development in AONB with commentary on likely impact.</li> </ul> <p><b>Green infrastructure:</b></p> <ul style="list-style-type: none"> <li>■ Percentage of the borough's population having access to a natural greenspace within 300 metres of their home.</li> <li>■ Length of greenways constructed.</li> <li>■ Hectares of accessible open space per 1000 population.</li> </ul> <p>In order to strengthen this framework we advise that the Council consider the indicators of success above and take note of our specific comments on the appraisal questions corresponding to the SA Objectives of 1, 2, 4, 6, 12, 14 and 16.</p> <p><b>SA 1:</b> We advise that the provision of green infrastructure is a key aspect of "decent, well-designed, sustainably constructed [...]". As such we advise that "Provide attractive places to live via multifunctional green infrastructure?" would be a beneficial appraisal question. This recognises the cross-cutting benefits of green infrastructure and the natural environment in general.</p>	<p>With regard to the additional appraisal questions for the SA objectives specified, the additional questions suggested have now been included.</p> <p>With regard to SA objectives 2, 14 and 16, the monitoring indicators suggested has been included within the proposed monitoring framework.</p>

Summary of comments	Action taken
<p><b>SA 2:</b> We advise that accessible green space / multifunctional green infrastructure is included in the list of facilities detailed with the first appraisal question. We suggest adding a supporting question to the objective SA2 or SA4 ‘Does the plan impact on the quality and extent of existing recreational assets, including formal or informal footpaths?’</p> <p><b>SA 4:</b> The six appraisal questions set out the importance of creating and enhancing multifunctional green spaces, green infrastructure, etc. However, we note that there is limited reference to improving people’s access to nature (be that to linear routes or open space). This should be included as a key issue. In addition to “maintaining, connecting and creating”, we advise that “enhancing” would be a valuable inclusion to assess the success of the Plan in relation to SA 4.</p> <p><b>SA 6:</b> We advise that retrofitting green infrastructure could play an important role in supporting a vibrant and viable town centre. The retrofitting of green infrastructure would provide multiple benefits for health and wellbeing, climate change adaptation, recreation and public benefits (e.g. shade and air quality).</p> <p><b>SA 12:</b> We advise that Natural Flood Management schemes are included alongside SuDS and flood resilient design.</p> <p><b>SA 14:</b> We advise that “Conserve and enhance designated and undesignated ecological assets” be included.</p> <p>There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding “Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?”</p> <p>We advise that the second appraisal question be amended to “Help to Conserve, connect and enhance ecological networks”.</p> <p>We advise that the following is included; “Does the Plan ensure that the biodiversity value of brownfield sites is identified, protected and enhanced?”</p> <p>Natural England would strongly encourage your Authority to begin engaging with the concept of net gain and consider including a supporting Appraisal question for the objective SA14 to test the Plan’s delivery of it.</p>	



Summary of comments	Action taken
<b>SA 16:</b> We advise that the number of landscape enhancement schemes secured would provide a useful indicator for measuring the success of the Plan. In addition, as suggested above, the amount of new development in AONB with commentary on likely impact could provide a useful indicator of success.	

# Appendix B

## Policy review and baseline information

### Population, health and wellbeing

#### Policy context

##### International

**B.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.

**B.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.

**B.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

**B.4** National Planning Policy Framework (NPPF)<sup>60</sup> 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 into account and support the delivery of local strategies to*

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<sup>60</sup> Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

*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.
- 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”.*

**B.5 National Planning Practice Guidance (PPG)<sup>61</sup>** 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.

**B.6 Select Committee on Public Service and Demographic Change report Ready for Ageing<sup>62</sup>**: 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.

**B.7 Fair Society, Healthy Lives<sup>63</sup>**: investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*”.

**B.8 Planning Policy for Traveller Sites<sup>64</sup>**: 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.

**B.9 Planning for the Future White Paper 2020<sup>65</sup>**: Sets out ways to simplify the planning system to be achieved through a new vision that aims to provide ‘net gain’ not ‘net harm’, a user friendly planning system, increase the supply of land available for new homes and help businesses expand with readier access to commercial space. The white paper aims to achieve the vision through proposals that fall under three pillars: planning for development, planning for beautiful and

<sup>61</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>62</sup> 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>

<sup>63</sup> The Marmot Review (2011) Fair Society, Healthy Lives. [online] Available at: <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>

<sup>64</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

<sup>65</sup> Ministry of Housing, Communities and Local Government (2020) Planning for the Future [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

sustainable places and planning for infrastructure and connected places.

**B.10 Housing White Paper 2017 (Fixing our broken housing market)<sup>66</sup>:** 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.

**B.11 Laying the foundations: a housing strategy for England<sup>67</sup>:** Aims to provide support to deliver new homes and improve social mobility.

**B.12 Public Health England, PHE Strategy 2020-25<sup>68</sup>:** identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

**B.13 Healthy Lives, Healthy People: Our strategy for public health in England<sup>69</sup>:** 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.

**B.14 A Green Future: Our 25 Year Plan to Improve the Environment<sup>70</sup>:** 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:
  - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
  - Help people improve their health and wellbeing by using green spaces including through mental health services.
  - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.

<sup>66</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf)

<sup>67</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf)

<sup>68</sup> Public Health England (2019) PHE Strategy 2020-25 [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/831562/PHE\\_Strategy\\_2020-25.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)

<sup>69</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf)

<sup>70</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

- ‘Green’ our towns and cities by creating green infrastructure and planting one million urban trees.
- 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

#### **B.15 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**<sup>71</sup>:

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.
- 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.

2.16 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.

#### **B.16 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**<sup>72</sup>:

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.

**B.17 Strategic Plan 2015-2020 Action Plan**<sup>73</sup>: 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.

#### **Cross cutting objectives:**

- Heritage is respected.
- Health inequalities are addressed and reduced.
- Deprivation is reduced and social mobility is improved.

<sup>71</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

<sup>72</sup> 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/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf](https://www.maidstone.gov.uk/__data/assets/pdf_file/0016/121129/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf)

<sup>73</sup> 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>

- Biodiversity and Environmental sustainability is respected.

**B.18** A complete updated version of the action plan is expected to be released February 2019.

**B.19 Contaminated Land Strategy 2016-2021<sup>74</sup>:** 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.

**B.20 Maidstone's Parks & Open Spaces -10 Year Strategic Plan 2017-2027<sup>75</sup>:** 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.

**B.21 Green and Blue Infrastructure Strategy<sup>76</sup>:** 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.

**B.22 Maidstone Green and Blue Infrastructure Strategy: Action Plan<sup>77</sup>:** 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.

**B.23 Homelessness Strategy 2014-2019<sup>78</sup>:** 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.

<sup>74</sup> Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: [https://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf)

<sup>75</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf)

<sup>76</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>77</sup> Maidstone Borough Council (2017) Maidstone Green and Blue 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=%2BdXJsPW0dHBzJTnBJTJGJTJGbwVldGluZ3MubWFpZHN0b25lLmdvdii51ayUyRmRvY3VtZW50cyUyRnM1ODlzMlUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPW0dHBzJTnBJTJGJTJGbwVldGluZ3MubWFpZHN0b25lLmdvdii51ayUyRmRvY3VtZW50cyUyRnM1ODlzMlUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x)

<sup>78</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0005/164669/Homelessness-Strategy-2014-2019-Sept-2014.pdf)

- 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.

**B.24 Housing Strategy 2016-2020<sup>79</sup>:** 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.

**B.25 Low Emissions Strategy (December 2017)<sup>80</sup>:** 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

**B.26** The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area<sup>81</sup>. Maidstone Borough occupies a central location within the County of Kent. The River Medway flows through the western part of the borough including through Maidstone itself<sup>82</sup>.

**B.27** Maidstone's population in mid-2018 was estimated as 169,980 persons compared to 167,730 in 2017, an estimated rise of 1.3%. In 2017 the estimated population was made up of 51% females and 49% males, there has been no change since then. The two largest age groups in 2018 were 45-49 and 50-54 and they made up 14% of the total population<sup>83</sup>. The overall population is expected to increase between the years 2020-2040, from 174,062 persons to 200,461 persons; a percent increase of 15.1%<sup>84</sup>.

**B.28** 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 2020 to 2040, which is in line with the expected population increase within the same time period<sup>85</sup>.

**B.29** 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<sup>86</sup>. 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<sup>87</sup>.

<sup>79</sup> 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](http://www.maidstone.gov.uk/__data/assets/pdf_file/0004/9517/Housing-Strategy-2016-20.pdf)

<sup>80</sup> 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](https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf)

<sup>81</sup> Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: [https://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf](https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf)

<sup>82</sup> 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/EN-V-018-Heritage-Topic-Paper-September-2016.pdf](https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/EN-V-018-Heritage-Topic-Paper-September-2016.pdf)

<sup>83</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>84</sup> Sourced from ONS 2018-based projections for local authorities available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>85</sup> Office for National Statistics, 2018-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>

<sup>86</sup> 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>

<sup>87</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

**B.30** 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<sup>88</sup>.

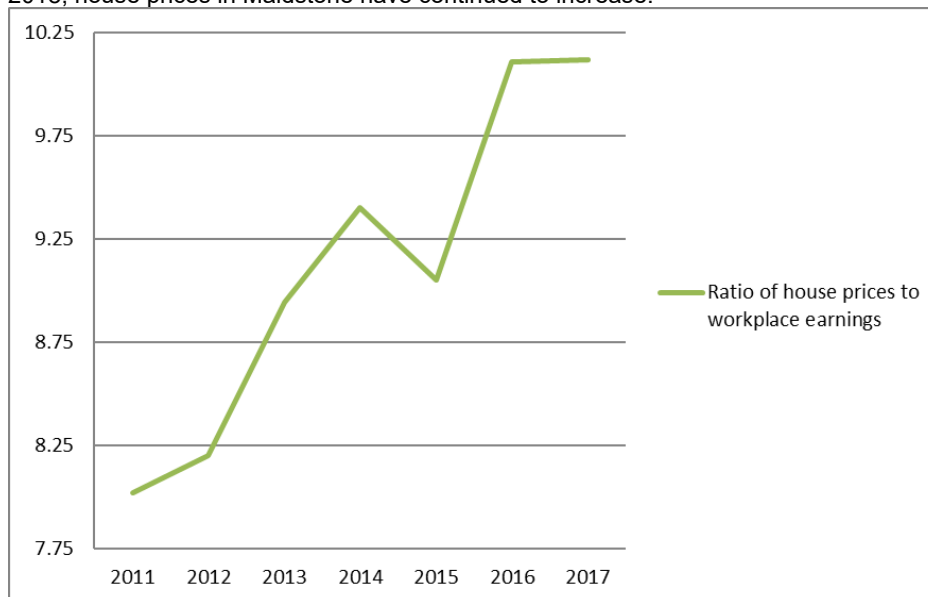
### Housing

**B.31** 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<sup>89</sup>.

**B.32** 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. Between 2017 and 2018, house prices in Maidstone have continued to increase.

There has been an increase of 5.1%, which is greater than the Kent average. There has also been a decrease in the number of house sales in the borough of 14%, which is also reflected in the Kent average. The house price to earnings ratio has increased from 10.30 in 2017 to 11.20 in 2018<sup>90</sup>. 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 total dwellings sold<sup>91</sup>. Maidstone saw 3,127 property sales during 2017. This was the highest number of sales within a Kent local authority.

**B.33** The average property price in Kent during 2019 was £342,070. This is higher than the national average of £300,054 but lower than the average in the South East which was £383,324. Property prices in Kent in 2019 rose 0.7% compared to the year before. The average price rise across the County varied from 3.3% in Thanet to 0.8% in Dover and Gravesham. The overall average price paid per property in Maidstone was £336,426<sup>92</sup>. 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<sup>93</sup>.



<sup>88</sup> UK Census Data (2011) [online] available at: <http://www.ukcensusdata.com/maidstone-e07000110#sthash.diAdxxtt.dpbs>

<sup>89</sup> 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>

<sup>90</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>91</sup> 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>

<sup>92</sup> Kent County Council (2020) Business Intelligence Statistical Bulletin: Property Prices & Sales in Kent: 2019 [online] Available at: [https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0004/28354/house-price-annual-bulletin.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0004/28354/house-price-annual-bulletin.pdf)

<sup>93</sup> 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>



**B.34** 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%<sup>94</sup>.

**B.35** 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<sup>95</sup>.

**B.36** 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<sup>96</sup>.

**B.37** Table B.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<sup>97</sup>.

**Table B.1: Completed dwellings on allocated sites measured against Local Plan trajectory<sup>98</sup>**

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

**B.38** For the past eight years a total of 6,437 dwellings have been completed which represents with over 50% of completed dwellings were completed on previously developed land.

**B.39** 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 1,378 dwellings.

<sup>94</sup> 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>

<sup>95</sup> 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>

<sup>96</sup> 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>

services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports

<sup>97</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0004/144967/Housing-Land-Supply-Paper-1-April-2018.pdf)

<sup>98</sup> 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>

Table B.2: 20 Year Housing Land Supply 1 April 2011 to 31 March 2031<sup>99</sup>

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 2019	6,437	
Extant planning permissions as at 1 April 2018 (including a 5% non-implementation discount)	7,350	
Local Plan allocated sites (balance of Local Plan allocations not included in line 3 above)	1,132	
Local Plan broad locations for future housing development	2,337	
Windfall sites contribution	1,782	
Total housing land supply		19,038
Housing land supply surplus 2011/2031		1,378

**B.40** 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<sup>100</sup>.

**B.41** 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<sup>101</sup>. The delivery of affordable housing is on target and does not significantly deviate from the policy target.

#### Gypsy, Traveller and Travelling Showpeople

**B.42** Between 1 April 2018 and 31 March 2019 there has been permission for:

- 31 Permanent non-personal pitches.
- 2 Permanent personal pitches.
- 0 Temporary non-personal pitches.
- 2 Temporary personal pitches<sup>102</sup>.

**B.43** Between 2011 and 2019 some 173 pitches were granted permanent planning permission. These pitches contribute to the target in the Maidstone Borough Local Plan of 187 pitches needed by 2031. As such, as of April 2019, the rate at which permanent permissions have been granted is ahead of target.

**B.44** 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<sup>103</sup>. An updated Gypsy and Traveller and Travelling Showpeople Accommodation needs study is expected to be completed in Spring 2020.

#### Education

**B.45** 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<sup>104</sup>.

<sup>99</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at:

[http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>100</sup> 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>

<sup>101</sup> 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>

<sup>102</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>103</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at:

[http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>104</sup> NOMIS – Local Area Report (2011) – Maidstone [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=1946157316>

**B.46** In 2011 there were 3,463 school children and full-time students in the borough, and 3,356 students aged 18 and over<sup>105</sup>.

**B.47** 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<sup>106</sup>.

**B.48** 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.

**B.49** In 2017, Maidstone Borough saw the biggest influx of pre-school net internal migration with the equivalent of a new primary school required. Currently, there is capacity for non-selective and selective sixth form capacity in the short and medium term, however there will be a deficit throughout the Plan period in the borough and across the County. In addition, forecasts indicate that Year R and total primary school rolls will continue to rise across the Plan period and will result in an overall deficit of places from 2022-23. Future pressure is also anticipated within the town centre of Maidstone.

**B.50** 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<sup>107</sup>.

### Deprivation

**B.51** When considering all Indices of Deprivation (2019), the borough of Maidstone falls within the 50% of least deprived areas in the country. However, as shown in Figure B1, 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.

**B.52** 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<sup>108</sup>.

### Health

**B.53** Maidstone (69.2%) has a consistently higher percentage of adults who consider themselves physically active nationally (66.3%) but is just below the Kent average (69.8%)<sup>109</sup>. 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<sup>110</sup>.

**B.54** Average life expectancy in Maidstone is slightly above the national average, being 80.5 for males and 83.7 for

<sup>105</sup> NOMIS – Local Area Report (2011) – Maidstone [online] Available at:

<https://www.nomisweb.co.uk/reports/localarea?compare=1946157316>

<sup>106</sup> Kent County Council (2018) Commissioning Plan for Education Provision in Kent [online] available at: Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)[https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0003/66990/Kent-Commissioning-Plan-for-Education-Provision-2018-22.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0003/66990/Kent-Commissioning-Plan-for-Education-Provision-2018-22.pdf)

<sup>107</sup> Kent County Council (2019) Commissioning Plan for Education Provision in Kent 2019 -2023 [online] Available at:

[https://democracy.kent.gov.uk/documents/s88604/KCP%202019%20-%202023%20\\_Cabinet%20Committee%20-%20FINAL%20PW.pdf](https://democracy.kent.gov.uk/documents/s88604/KCP%202019%20-%202023%20_Cabinet%20Committee%20-%20FINAL%20PW.pdf)

<sup>108</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at:

[http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>109</sup> Public Health England (2020) Maidstone Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000110.html?area-name=maidstone>

<sup>110</sup> NOMIS – Local Area Report (2011) – Maidstone [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=1946157316>

females<sup>111</sup>. 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.

**B.55** Estimated levels of adult excess weight in the borough are just below the national average, with an average of 61.4%, compared to the England average of 62%<sup>112</sup>.

### Open spaces, sports and recreation

**B.56** 27% of the borough forms part of the Kent Downs Area of Outstanding Natural Beauty (AONB), which is an important informal recreational resource<sup>113</sup>. Maidstone contains 425 hectares of greenspace, 30 large parks, 80 Neighbourhood greenspaces, 68 play areas, 700 allotment plots across 12 sites and 4 Green Flag parks<sup>114</sup>.

**B.57** 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 B.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 B.3: Quantity (m2) 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

**B.58** 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<sup>115</sup>.

**B.59** In 2018/19, qualifying major sites provided 25.82 hectares of on-site open space provision, and payments for off-site open space provision totalling £833,858. There has

been no loss of designated open space as a result of development during the monitoring year 2018/19<sup>116</sup>.

### Crime

**B.60** 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 has seen an increase of 20% in crime between 2015 and 2018 from 5,403 to 6,501 reported crimes. There was a sharp

<sup>111</sup> Life Expectancy at birth by Sex, UK 2016-2018 [online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyatbirthandage65bylocalareasuk>

<sup>112</sup> Public Health England (2020) Maidstone District: Health Profile 2019 [online] Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132696/pat/6/par/E12000008/ati/101/are/E07000110>

<sup>113</sup> Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: [https://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf)

<sup>114</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf)

<sup>115</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>116</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

decline in the number of crimes in the colder months of October to December<sup>117</sup>.

**B.61** Within Kent, anti-social behaviour and violent crime are two principal contributors of crime together accounting for over half of all crimes committed<sup>118</sup>.

**B.62** There has been a general increase in all reported crime both within Maidstone and Kent between 2017/18 and 2018/19. For the borough, crime rate per 1,000 population has risen from 90 in 2017/18 to 104 2018/19 an increase of 16%<sup>119</sup>.

### Air and noise pollution

**B.63** 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 B.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.
Levels of obesity in the borough are just below 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.

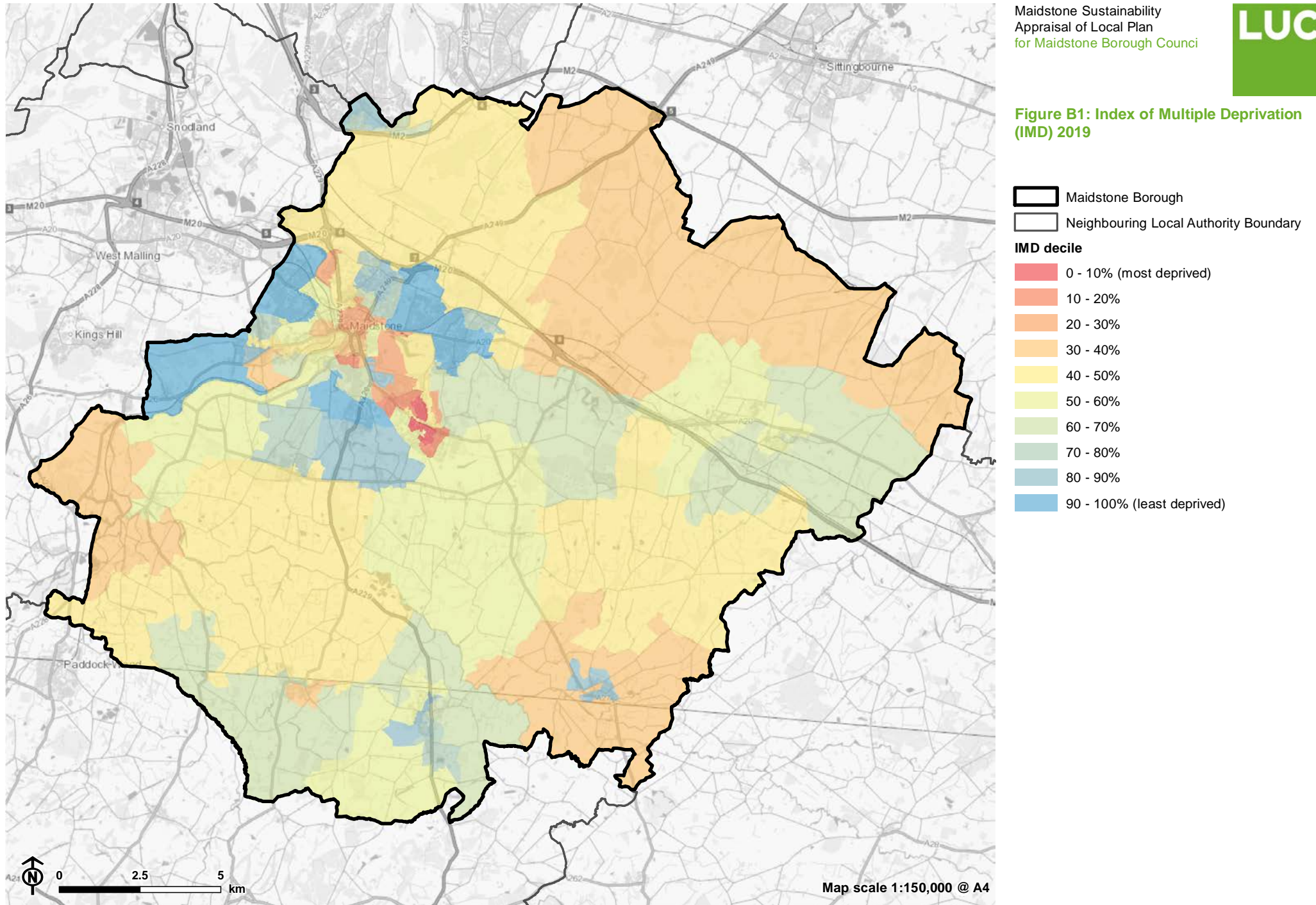
<sup>117</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>118</sup> UK Crime Stats (2018) Kent Police [http://ukcrimestats.com/Police\\_Force/Kent\\_Police](http://ukcrimestats.com/Police_Force/Kent_Police)

<sup>119</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
<p>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).</p>	<p>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.</p>
<p>There has been a general increase in all reported crimes both within Maidstone and Kent between 2017/18 and 2018/19 (SA Framework objective SA 3).</p>	<p>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.</p>

**Figure B1: Index of Multiple Deprivation (IMD) 2019**



## Economy

### Policy context

#### International

**B.64** 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

**B.65** National Planning Policy Framework (NPPF)<sup>120</sup> 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 adaptation. 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.”

#### **B.66 National Planning Practice Guidance (PPG)<sup>121</sup>:**

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.

**B.67 The Local Growth White Paper (2010)<sup>122</sup>** : 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.

**B.68 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)<sup>123</sup>:** 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.
- 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

#### **B.69 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update<sup>124</sup>:**

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

<sup>120</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf)

<sup>121</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>122</sup> 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>

<sup>123</sup> 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>

<sup>124</sup> 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](https://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)



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.

**B.70 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**<sup>125</sup>: 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.

**B.71 Strategic Plan 2015-2020 Action Plan**<sup>126</sup>: 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:

**B.72 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.

**B.73 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.

**B.74 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.

**B.75** A complete updated version of the action plan is expected to be released February 2019.

**10.4 Maidstone Economic Development Strategy 2015-2031**<sup>127</sup>: 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.

**B.76 The Kent Environment Strategy**<sup>128</sup>: 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.

**B.77 Housing Development & Regeneration Investment Plan**<sup>129</sup>: 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

**B.78** Wholesale and retail trade (including the repair of motor vehicles) makes up the largest industry in the borough with 16.4% of the working population employed in this industry.

<sup>125</sup> 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/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0016/121129/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf)

<sup>126</sup> 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>

<sup>127</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0011/164657/Economic-Development-Strategy-2015-31-June-2015.pdf)

<sup>128</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at:

[http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>129</sup> 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>

The next largest industries are human health and social work activities 15.1% and administrative and support service activities with 12.3%<sup>130</sup>.

**B.79** 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 workplace earnings. Average residence earnings of £29,468 compared to the average workplace earnings of £28,891. 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%<sup>131</sup>.

**B.80** 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<sup>132</sup>.

**B.81** 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%<sup>133</sup>.

**B.82** 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<sup>134</sup>.

**B.83** In 2019 there was an increase of 1,593sqm in net sales area of convenience and a decrease of 897sqm of comparison retail floorspace from completed permissions. However, consent permissions result in a gain of 640sqm of convenience floor space and a loss of 3,036sqm of comparison floorspace. Since 2016/17 there has been a total overall gain of retail floorspace, but this includes a loss in comparison floorspace<sup>135</sup>. For the plan period 2022-2037, the Economic Development Needs Study identified a need for 101,555sqm B-use floorspace, approximately 67% related to industrial and distribution/warehousing, and a need for 16,146sqm of A-use floorspace<sup>136</sup>.

**B.84** 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<sup>137</sup>. Maidstone's unemployment rate is currently 1.4%, which is better than the regional and national rates, 2.4% and 2.7% respectively<sup>138</sup>.

**B.85** 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, however in 2017 the number of jobs dropped to 86,000<sup>139</sup>. Forecasts of job growth indicate overall growth of 11,200 workforce jobs for Maidstone over the 15-year Local Plan period from 2022 to 2037, equivalent to around 747 jobs per year on average. The projected net increase of 2,210 office jobs, which equates to an average of 147 per annum, is slightly lower than the average annual

<sup>130</sup> NOMIS – Labour Market Profile (2017) – Maidstone [online] Available at:

<https://www.nomisweb.co.uk/reports/lmp/la/1946157316/report.aspx>

<sup>131</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0003/47640/Economic-Sensitivity-Testing-and-Employment-Land-Forecast-February-2014.pdf)

<sup>132</sup> 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>

<sup>133</sup> 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>

<sup>134</sup> 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>

<sup>135</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at:

[http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>136</sup> Lichfields (2020) Maidstone Economic Development Needs Study Stage Two [online] Available at:

<https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/Maidstone-Economic-Development-Needs-Study-Stage-Two.pdf>

<sup>137</sup> 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>

<sup>138</sup> Kent County Council (2019) Unemployment in Kent available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0019/8182/District-unemployment-bulletin.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0019/8182/District-unemployment-bulletin.pdf)

<sup>139</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

office-based job growth of 154 recorded for the period 1997 to 2022<sup>140</sup>.

**B.86** The UK left the European Union in January 2020. It is still 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 B.5: 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
<p>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).</p>	<p>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.</p>

## Transport connections and travel habits

### Policy context

#### International

**B.87 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

**B.88 National Planning Policy Framework (NPPF)<sup>141</sup> :** 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.

#### **B.89 National Planning Practice Guidance (PPG)<sup>142</sup>**

Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

#### **B.90 Department for Transport, The Road to Zero (2018)<sup>143</sup>:**

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.

#### **B.91 Department for Transport, Decarbonising Transport: Setting the Challenge (2020)<sup>144</sup>**

sets out the strategic priorities for a new Transport Decarbonisation Plan (TDP), to be published later in 2020, will set out in detail what government, business and society will need to do to deliver

<sup>140</sup> Lichfields (2020) Maidstone Economic Development Needs Study Stage Two [online] Available at: <https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/Maidstone-Economic-Development-Needs-Study-Stage-Two.pdf>

<sup>141</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>142</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>143</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

<sup>144</sup> Department for Transport (2020) Decarbonising Transport Setting the Challenge [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)

the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies<sup>145</sup> to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP will take a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

### Sub-national

**B.92 Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031**<sup>146</sup> 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.
- 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.

**B.93 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**<sup>147</sup>: 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.

**B.94** 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.

**B.95 The Kent Design Guide**<sup>148</sup>: 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.

**B.96 Network Rail South East Route: Kent Area Route Study (May 2018)**<sup>149</sup>: 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

<sup>145</sup> These have not been summarised in this Scoping Report, since the upcoming TDP will supersede them to some extent: the Road to Zero strategy, Maritime 2050 and the Clean Maritime Plan, the Aviation 2050 Green Paper and forthcoming net zero aviation consultation and Aviation Strategy, the Cycling and Walking Investment Strategy, Future of Mobility: Urban Strategy, the 2018 amendments to the Renewable Transport Fuel Obligation, Freight Carbon Review, the Rail Industry Decarbonisation Taskforce and the Carbon Offsetting for Transport Call for Evidence.

<sup>146</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>147</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

<sup>148</sup> 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](https://www.kent.gov.uk/__data/assets/pdf_file/0014/12092/design-guide-foreword.pdf)

<sup>149</sup> 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>

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.

**B.97 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**<sup>150</sup>: 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.

**B.98 Maidstone Borough Council Integrated Transport Strategy 2011-2031**<sup>151</sup>: 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.

**B.99 Maidstone Walking and Cycling Strategy 2011-2031**<sup>152</sup>: 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.

**B.100 Strategic Plan 2015-2020 Action Plan**<sup>153</sup>: 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:

**B.101 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.

**B.102** A complete updated version of the action plan is expected to be released February 2019.

**B.103 Low Emission Strategy (December 2017)**<sup>154</sup>: 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.

**B.104 Air Quality Annual Status Report (2018)**<sup>155</sup>: Contains an action plan for the borough of Maidstone that outlines many projects varying in topic and timeframe. Some include:

<sup>150</sup> 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](https://www.maidstone.gov.uk/__data/assets/pdf_file/0016/121129/SUB-011-Infrastructure-Delivery-Plan-May-2016.pdf)

<sup>151</sup> 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](http://www.maidstone.gov.uk/__data/assets/pdf_file/0008/164672/Integrated-Transport-Strategy-2011-31-September-2016.pdf)

<sup>152</sup> 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](https://old.maidstone.gov.uk/__data/assets/pdf_file/0008/131849/Walking-and-Cycling-Strategy-2011-31-September-2016.pdf)

<sup>153</sup> 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>

<sup>154</sup> 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](https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf)

<sup>155</sup> Maidstone Borough Council (2018) Air Quality Annual Status Report, [online] Available at: <http://www.kentair.org.uk/Pagesfiles/Maidstone%20ASR%202018.pdf>

transport, planning, carbon management and public health, with timeframes ranging from 1-3 years to 5+ years.

**B.105 Kent and Medway Air Quality Planning Guidance (2015)<sup>156</sup>:**

**B.106** 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.

**B.107 Green and Blue Infrastructure Strategy<sup>157</sup>:** 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.

**B.108 Maidstone Green and Blue Infrastructure Strategy: Action Plan<sup>158</sup>:** 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

**B.109** 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<sup>159</sup>.

**B.110** 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<sup>160</sup>.

**B.111** Figure B2 shows the major transport links in the borough.

**B.112** 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<sup>161</sup>. Maidstone is experiencing increased congestion in its town centre and growth will be constrained unless investment goes into increasing capacity or reducing the demand on the network.

**B.113** 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

<sup>156</sup> 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](http://kentair.org.uk/documents/K&MAQP_Air_Quality_Planning_Guidance_Mitigation_Option_A.pdf)

<sup>157</sup> 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](https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>158</sup> Maidstone Borough Council (2017) Maidstone Green and Blue 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=%2BdXJsPWh0dHBzJTNBjTJGjTJGjVWVldGluZ3MubWFpZHN0b25lmdvdi51ayUyRmRvY3VtZW50cyUyRnM1O](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTNBjTJGjTJGjVWVldGluZ3MubWFpZHN0b25lmdvdi51ayUyRmRvY3VtZW50cyUyRnM1O)

[DizMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbWlMTcucGRmJmFsbD0x](http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>159</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>160</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>161</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

within the area<sup>162</sup>. The expected completion date for the range of projects is Spring 2021<sup>163</sup>.

**B.114** 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<sup>164</sup>.

**B.115** 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<sup>165</sup>.

**B.116** 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<sup>166</sup>.

**B.117** 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 B.6: 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 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.

<sup>162</sup> 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](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>163</sup> 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/>

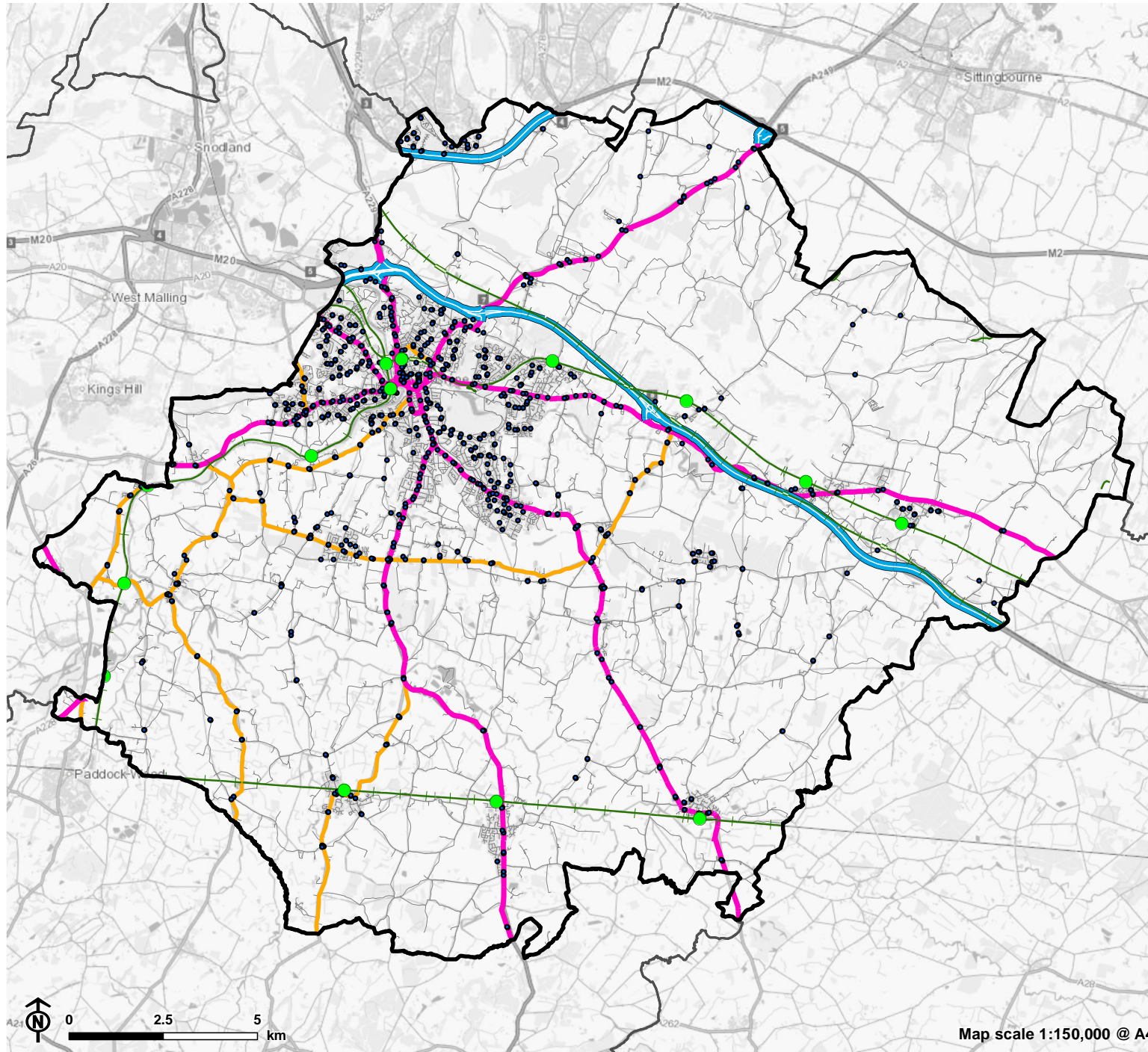
<sup>164</sup> Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at:

[http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>165</sup> 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>

<sup>166</sup> 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](https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=cell&cols=rural_urban)

Figure B2: Transport



- Maidstone Borough
- Neighbouring Local Authority Boundary
- Railway Line
- Railway Tunnel
- Railway Station
- Bus Stop
- A Road
- B Road
- Motorway
- Local Road

0 2.5 5 km

Map scale 1:150,000 @ A4



## Air, land and water quality

### Policy context

#### International

**B.118 European Nitrates Directive (1991):** Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

**B.119 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.

**B.120 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.

**B.121 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.

**B.122 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.

**B.123 European Water Framework Directive (2000):** Protects inland surface waters, transitional waters, coastal waters and groundwater.

**B.124 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.

**B.125 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

**B.126 National Planning Policy Framework (NPPF)<sup>167</sup>** 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.

**B.127 National Planning Practice Guidance (PPG)<sup>168</sup>:** Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development where it has been demonstrated that significant development is required on agricultural land.

**B.128 Waste management plan for England<sup>169</sup>:** 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.

**B.129 National Planning Policy for Waste (NPPW)<sup>170</sup>:** 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.

<sup>167</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>168</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>169</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf)

<sup>170</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

### **B.130 Safeguarding our Soils – A Strategy for England<sup>171</sup>:**

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.

**B.131 Water White Paper<sup>172</sup>:** 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.

**B.132 Water for Life White Paper<sup>173</sup>:** 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.
- 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.

**B.133 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland<sup>174</sup>:** 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.

**B.134 Future Water: The Government's Water Strategy for England<sup>175</sup>:** 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.

**B.135 A Green Future: Our 25 Year Plan to Improve the Environment<sup>176</sup>:** 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

<sup>171</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf)

<sup>172</sup> 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>

<sup>173</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf)

<sup>174</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf)

<sup>175</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf)

<sup>176</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

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:
  - Embed a ‘net environmental gain’ principle for development, including natural capital benefits to improved and water quality.
  - Protect best agricultural land.
  - Improve soil health, and restore and protect peatlands.
- Recovering nature and enhancing the beauty of landscapes:
  - Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
  - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

**B.136 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations**<sup>177</sup>: 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 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.

**B.137 Clean Air Strategy 2019**<sup>178</sup>: This draft strategy sets out the comprehensive action that is required from across all parts of government and society to meet these goals. New legislation will create a stronger and more coherent framework for action to tackle air pollution. 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. The goal is to reduce the harm to human health from air pollution by half.

**B.138 Department for Transport, The Road to Zero (2018)**<sup>179</sup>: 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.

**B.139 Draft South East Marine Management Plan (2020)**<sup>180</sup>: Introduces a strategic approach to planning within the inshore waters between Felixstowe, in Suffolk and near Dover, including a small part of Maidstone Borough, the River Medway near Allington. This plan will help identify areas suitable for investment.

### Sub-national

**B.140 Kent Environment Strategy**<sup>181</sup> 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.

**B.141 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**<sup>182</sup>: Sets out the fundamental

<sup>177</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

<sup>178</sup> DEFRA, Clean Air Strategy 2019 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

<sup>179</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

<sup>180</sup> Marine Management Organisation (2020) [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/857296/DRAFT\\_SE\\_Marine\\_Plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/857296/DRAFT_SE_Marine_Plan.pdf)

<sup>181</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>182</sup> 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](http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

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.

**B.142 Kent Minerals and Waste Local Plan 2013-30<sup>183</sup>:** 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.

**B.143 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)<sup>184</sup>:** 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.

**B.144 Strategic Plan 2015-2020 Action Plan<sup>185</sup>:** 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:

**B.145 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.

**B.146 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.

**B.147 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.

**B.148** A complete updated version of the action plan is expected to be released February 2019.

**B.149 Low Emission Strategy (December 2017)<sup>186</sup>:** 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.

**B.150 Green and Blue Infrastructure Strategy<sup>187</sup>:** sets out a vision for the borough's green and blue infrastructure for the next 20 years. The vision is for greener, healthier, attractive

<sup>183</sup> Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30 [online] Available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1>  
<sup>184</sup> 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/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0016/121129/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf)  
<sup>185</sup> 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>  
<sup>186</sup> 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](https://www.maidstone.gov.uk/_data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf)  
<sup>187</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

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

**B.151 Maidstone Green and Blue Infrastructure Strategy: Action Plan<sup>188</sup>:** 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.

**B.152 Contaminated Land Strategy 2016-2021<sup>189</sup>:** 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.

**B.153 Thames River Basin Management Plan 2009 (Updated December 2015)<sup>190</sup>:** 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

**B.154** 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<sup>191</sup>.

**B.155** 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<sub>2</sub>) 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<sub>2</sub> 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<sup>192</sup>.

<sup>188</sup> Maidstone Borough Council (2017) Maidstone Green and Blue 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=%2BdXJsPWh0dHBzJTNBjTJGJTJGbwVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODlzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTNBjTJGJTJGbwVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODlzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x)

<sup>189</sup> Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: [https://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf)

<sup>190</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718342/Thames_RBD_Part_1_river_basin_management_plan.pdf)

<sup>191</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>192</sup> Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at:

**B.156** 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<sup>193</sup>. Figure B3 shows the AQMAs that have been designated in Maidstone and the surrounding area.

**B.157** There are still significant challenges ahead in order to achieve air quality objectives. Further reductions in NO<sub>2</sub> 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

**B.158** 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<sup>194</sup>.

**B.159** 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<sup>195</sup>. 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.

**B.160** 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<sup>196</sup>.

### Soils

**B.161** 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. 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 coarse 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.

**B.162** 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<sup>197</sup>.

**B.163** 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)<sup>198</sup>.

[http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>193</sup> UK Air, Air Information Resource (2018) AQMA Interactive Map [online] Available at: <https://uk-air.defra.gov.uk/aqma/maps>

<sup>194</sup> Maidstone Borough Council with Jacobs Consulting (2013) Maidstone Landscape Character Assessment [online] Available at: [http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20haracter%20Assessment%202012%20\(July%202013\).pdf](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20haracter%20Assessment%202012%20(July%202013).pdf)

<sup>195</sup> Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-2030: 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>

<sup>196</sup> Kent County Council (2020) 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>

<sup>197</sup> Maidstone Borough Council with Jacobs Consulting (2013) Maidstone Landscape Character Assessment [online] Available at: [http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20haracter%20Assessment%202012%20\(July%202013\).pdf](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20haracter%20Assessment%202012%20(July%202013).pdf)

<sup>198</sup> Maidstone Borough Council with Jacobs Consulting (2013) Maidstone Landscape Character Assessment [online] Available at: [http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20haracter%20Assessment%202012%20\(July%202013\).pdf](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20haracter%20Assessment%202012%20(July%202013).pdf)

**Contaminated land**

**B.164** 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<sup>199</sup>.

**Water**

**B.165** 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<sup>200</sup>. In 2010, water use within Maidstone was high by both national and international standards with approximately 164 litres per person per day<sup>201</sup>. Between 2010 and 2016, water use has shown a decreasing tendency from progressive metering and water efficiency initiatives, and a more comparable figure for Maidstone (3 years to 2015) is 160 litres per person per day, however this is still high by both national and international standards.

**B.166** 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<sup>202</sup>.

**B.167** Pressures, including the projected increase in population, 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. There may also be an increased risk of urban run-off that could affect water quality; this is already evident in parts of the Catchment. This will also increase the risk of over abstraction. 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<sup>203</sup>.

**B.168** 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<sup>204</sup>.

**B.169** 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<sup>205</sup>.

**Table B.7: 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
<p>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 NO2 and PM10, 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.</p>	<p>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</p>

<sup>199</sup> Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: [https://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf](https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MB-C-Contaminated-Land-Strategy-2016-Final.pdf)

<sup>200</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>201</sup> 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](http://www.maidstone.gov.uk/__data/assets/pdf_file/0020/12089/Water-Cycle-Study-Outline-Report-Summary-2010.pdf)

<sup>202</sup> Environment Agency (2016) <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3055/Summary>

<sup>203</sup> Aecom (2017) Kent Water for Sustainable Growth Study

<sup>204</sup> Aecom (2017) Kent Water for Sustainable Growth Study

<sup>205</sup> 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
	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 other benefits of the best and most versatile agricultural land.' <sup>206</sup>
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.' <sup>207</sup>
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 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

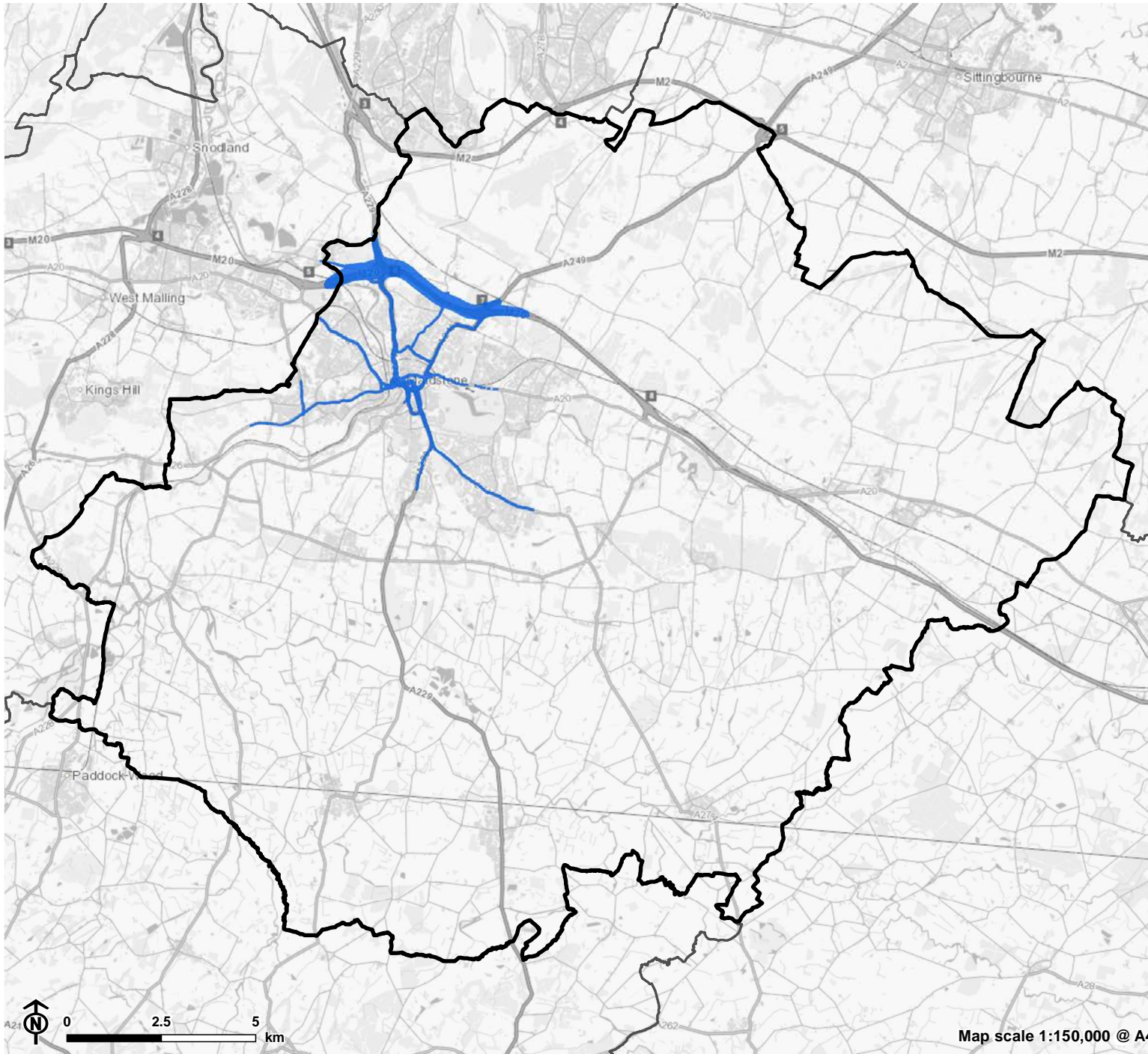
<sup>206</sup> MHCLG (2019), National Planning Policy Framework pg. 49 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>207</sup> MHCLG (2019), National Planning Policy Framework pg. 35 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)



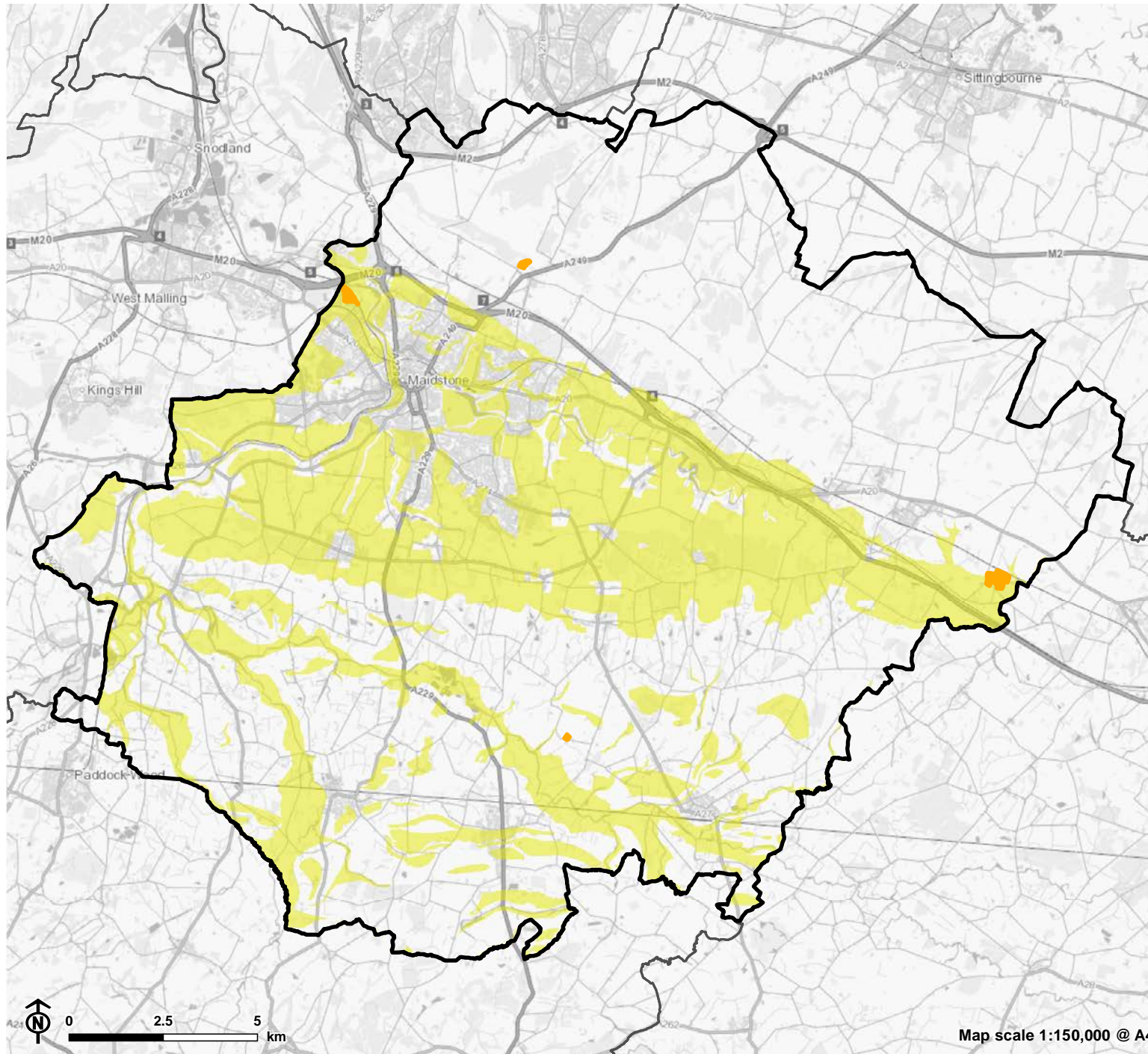
Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
	water table and provide an opportunity to encourage better and more sustainable use of water resources. Currently, there is no policy within the current Local Plan that addresses use of water resources.





**Figure B3: Air Quality Management Areas (AQMA)**



- Maidstone Borough
- Neighbouring Local Authority Boundary
- Air Quality Management Area

Figure B4: Mineral Resources

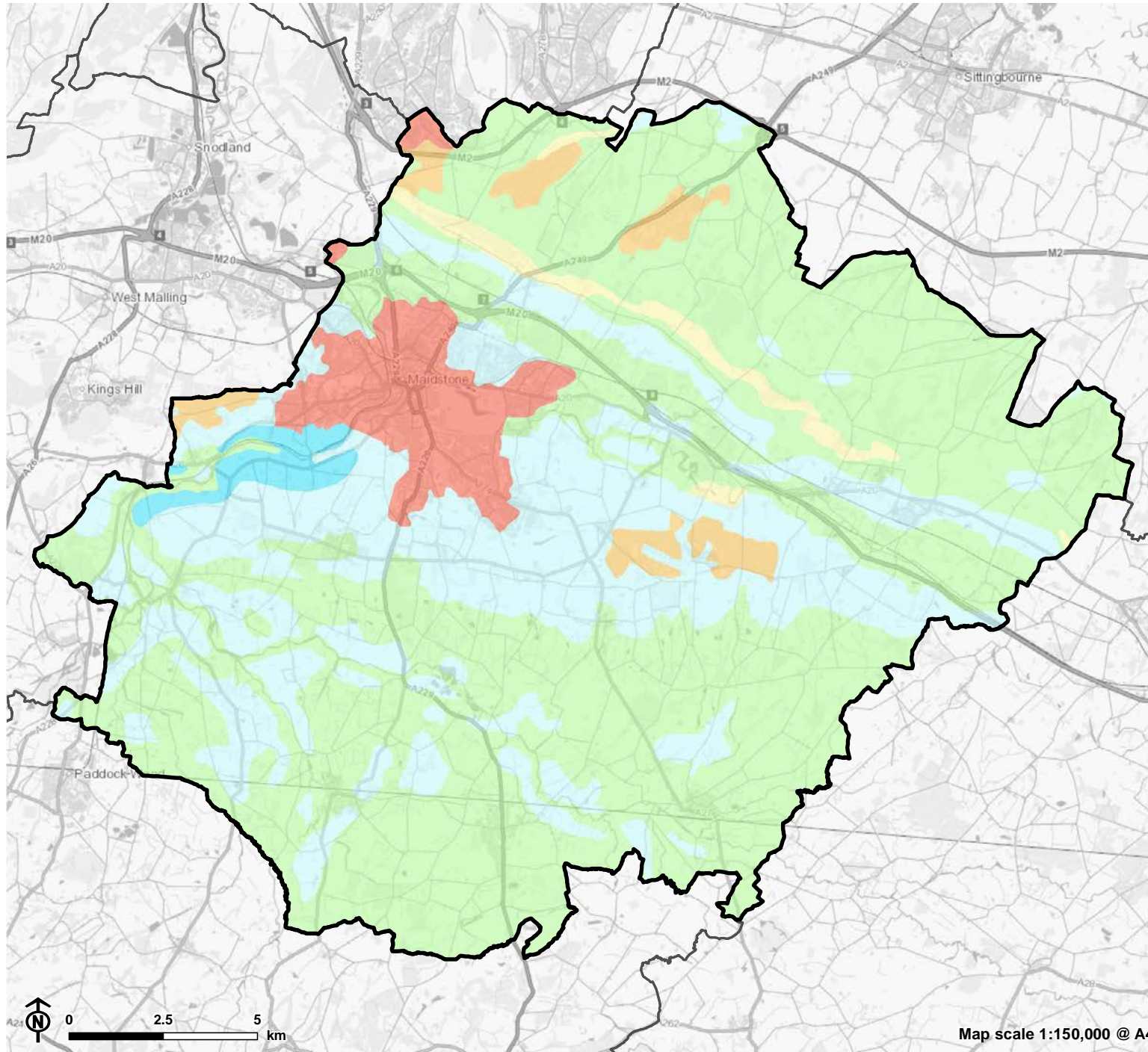


-  Maidstone Borough
-  Neighbouring Local Authority Boundary
-  Safeguarded Minerals Site
-  Minerals Safeguarding Area

0 2.5 5 km

Map scale 1:150,000 @ A4

**Figure B5: Agricultural Land Classification**



- Maidstone Borough
- Neighbouring Local Authority Boundary
- Agricultural Land Classification**
  - Grade 1
  - Grade 2
  - Grade 3
  - Grade 4
  - Non agricultural
  - Urban



Map scale 1:150,000 @ A4

## Climate change adaptation and mitigation

### Policy context

#### International

**B.170 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.

**B.171 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.

**B.172 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

**B.173 National Planning Policy Framework (NPPF)<sup>208</sup>:** 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.

**B.174 National Planning Practice Guidance (PPG)<sup>209</sup>:** 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.

**B.175 Climate Change Act 2008<sup>210</sup>:** Sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO<sub>2</sub> emission reductions of at least 26% by 2015, against a 1990 baseline.

**B.176 Flood and Water Management Act (2010)<sup>211</sup>:** 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).

**B.177 The UK Renewable Energy Strategy<sup>212</sup>:** Sets out the ways in which we will tackle climate change by reducing our CO<sub>2</sub> emissions through the generation of a renewable electricity, heat and transport technologies.

**B.178 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK<sup>213</sup>:** 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.

**B.179 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate<sup>214</sup>:** Sets out visions for the following sectors:

<sup>208</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>209</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>210</sup> HM Government (2008) Climate Change Act 2008 [online] Available at: [https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga\\_20080027\\_en.pdf](https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf)

<sup>211</sup> 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](http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf)

<sup>212</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf)

<sup>213</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf)

<sup>214</sup> 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/u>

- 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.”

**B.180 Understanding the risks, empowering communities, building resilience:** The national flood and coastal erosion risk management strategy for England<sup>215</sup>: 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.

**B.181 A Green Future: Our 25 Year Plan to Improve the Environment<sup>216</sup>:** 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:

- Using and managing land sustainably:
  - 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:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

#### Sub-national

**B.182 Kent Environment Strategy<sup>217</sup>:** 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.

**B.183 Growing the Garden of England: A strategy for environment and economy in Kent<sup>218</sup>:** 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:

ploads/attachment\_data/file/727252/national-adaptation-programme-2018.pdf

<sup>215</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)

<sup>216</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

<sup>217</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>218</sup> 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>

- Make homes and public sector buildings in Kent energy and water efficient, and cut costs for residents and taxpayers.
- Ensure new developments and infrastructure in Kent are affordable, low carbon and resource efficient.
- Turn our waste into new resources and jobs for Kent.
- 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:
  - Reduce future carbon emissions.
  - Manage the impacts of climate change, in particular extreme weather events.
  - Support the development of green jobs and business in Kent.

**B.184 Low Emission Strategy (December 2017)<sup>219</sup>:** 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.

**B.185 Green and Blue Infrastructure Strategy<sup>220</sup>:** 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:

**B.186 Mitigating and adapting to climate change.**

**B.187 Thames River Basin Management Plan 2009 (Updated December 2015)<sup>221</sup>:** 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.

**B.188 Maidstone Borough Council Draft Climate Change Strategy/Action Plan (TBC)<sup>222</sup>:** Maidstone is currently producing a draft climate change strategy, which may help steer the future direction in terms of Maidstone's response to the climate emergency.

#### Current baseline

**B.189** Maidstone Borough Council declared a Biodiversity and Climate Emergency in April 2019. The Council has formed a cross party working group to develop an action plan to protect and enhance local biodiversity and address the climate emergency.

**B.190** 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 (UKCP18) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present<sup>223</sup>. Specifically

<sup>219</sup> 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](https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Low-Emissions-Strategy-December-2017.pdf)

<sup>220</sup> 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](https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>221</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718342/Thames_RBD_Part_1_river_basin_management_plan.pdf)

<sup>222</sup> Maidstone Borough Council (TBC) Draft Climate Change Strategy/Action Plan

<sup>223</sup> UK Climate Projections (2018) Land Projections Maps: Probabilistic Projections [online] Available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>

- 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.

**B.191** A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Although the precise nature of environmental changes is not fully understood, changes to precipitation patterns (and river flow) and flooding have implications for the location, longevity and viability of waste developments. Conversely, predicted dry, hot summers will cause problems of low flows for some of the rivers in the area which will increase demand for water. Extreme weather events may also increase disruption to supply chains, infrastructure and transport of waste.

**B.192** 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.

**B.193** The most significant flood events reported to have affected the borough occurred in 1927, 1963, 1968, 2000, 2013/14, and 2019/2020 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 at East Farleigh (upstream of Maidstone), whilst elsewhere in Maidstone Borough, the event ranked 1st or 2nd largest<sup>224</sup>.

**B.194** 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<sup>225</sup>.

**B.195** 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<sup>226</sup>.

**B.196** Figure B6 shows areas at risk of flooding in the borough, based on current Environment Agency flood zones.

**B.197** The Government publishes data on the CO2 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<sup>227</sup>.

**B.198** The Council produced a Carbon Management Plan with the aim of reducing CO2 emissions from its activities by 20% from the 2008-2009 baseline by 2015. This equates to 5,295 tonnes CO2 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 CO2 reductions that the plan achieved<sup>228</sup>. 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.

<sup>224</sup> Maidstone Borough Council and JBA Consulting (2020) Level 1 Strategic Flood Risk Assessment update and Level 2 – Final Report [online] Available at: <https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/7-SFRA-Level-1-update-and-Level-2.pdf>

<sup>225</sup> Maidstone Borough Council and JBA Consulting (2020) Level 1 Strategic Flood Risk Assessment update and Level 2 – Final Report [online] Available at: <https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/7-SFRA-Level-1-update-and-Level-2.pdf>

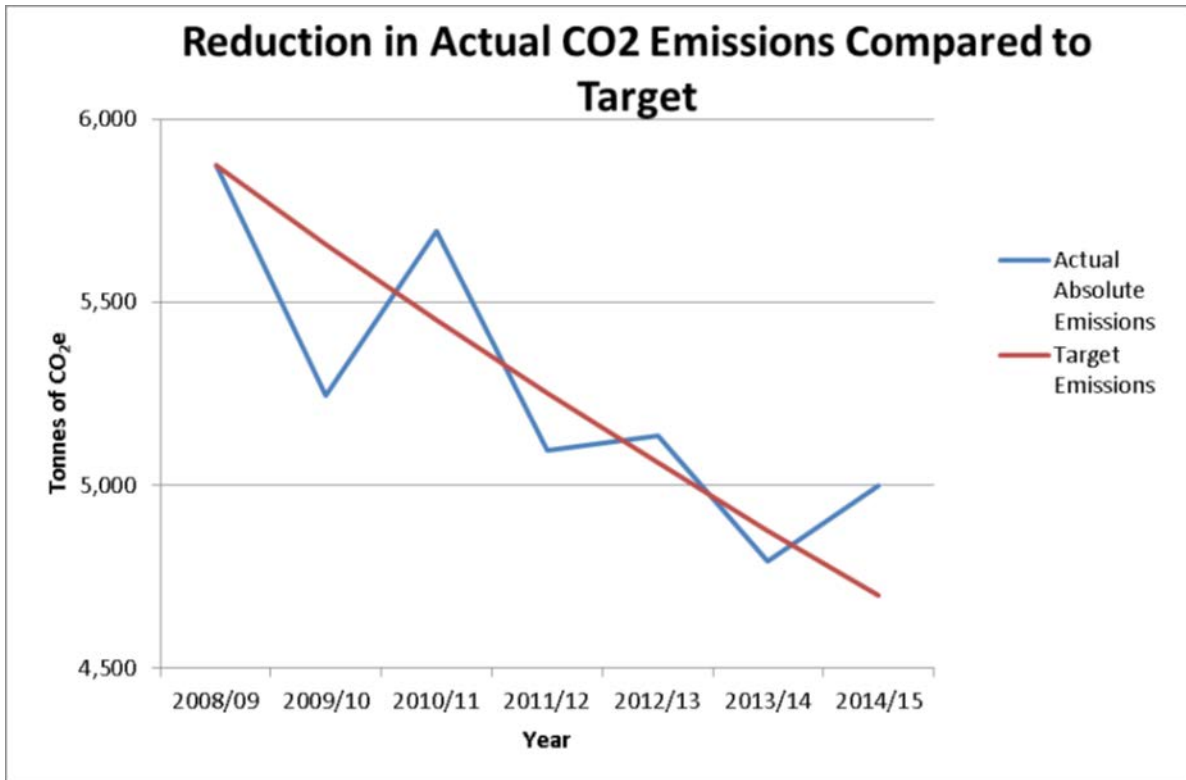
<sup>226</sup> Maidstone Borough Council and JBA Consulting (2020) Level 1 Strategic Flood Risk Assessment update and Level 2 – Final Report

[online] Available at: <https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/7-SFRA-Level-1-update-and-Level-2.pdf>

<sup>227</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>228</sup> Maidstone Borough Council (2017) Low Emission Strategy [online] Available at: [https://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0010/164674/Lo-w-Emissions-Strategy-December-2017.pdf](https://www.maidstone.gov.uk/__data/assets/pdf_file/0010/164674/Lo-w-Emissions-Strategy-December-2017.pdf)





**B.199** For the year 2005 Maidstone had an average rate of 7.8 tonnes of CO<sub>2</sub> emissions per capita, however in 2016 the rate decreased to 5.1 tonnes per capita. Table 6.1 shows CO<sub>2</sub> (kilotonne) emissions for Maidstone for 2005 and 2016 across

industrial, domestic and transport sectors. As can be seen in Table B.8, there has been a reduction between 2005 and 2016 across all sectors and transport accounts for the largest amount of CO<sub>2</sub> emissions<sup>229</sup>.

Table B.8: CO<sub>2</sub> 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

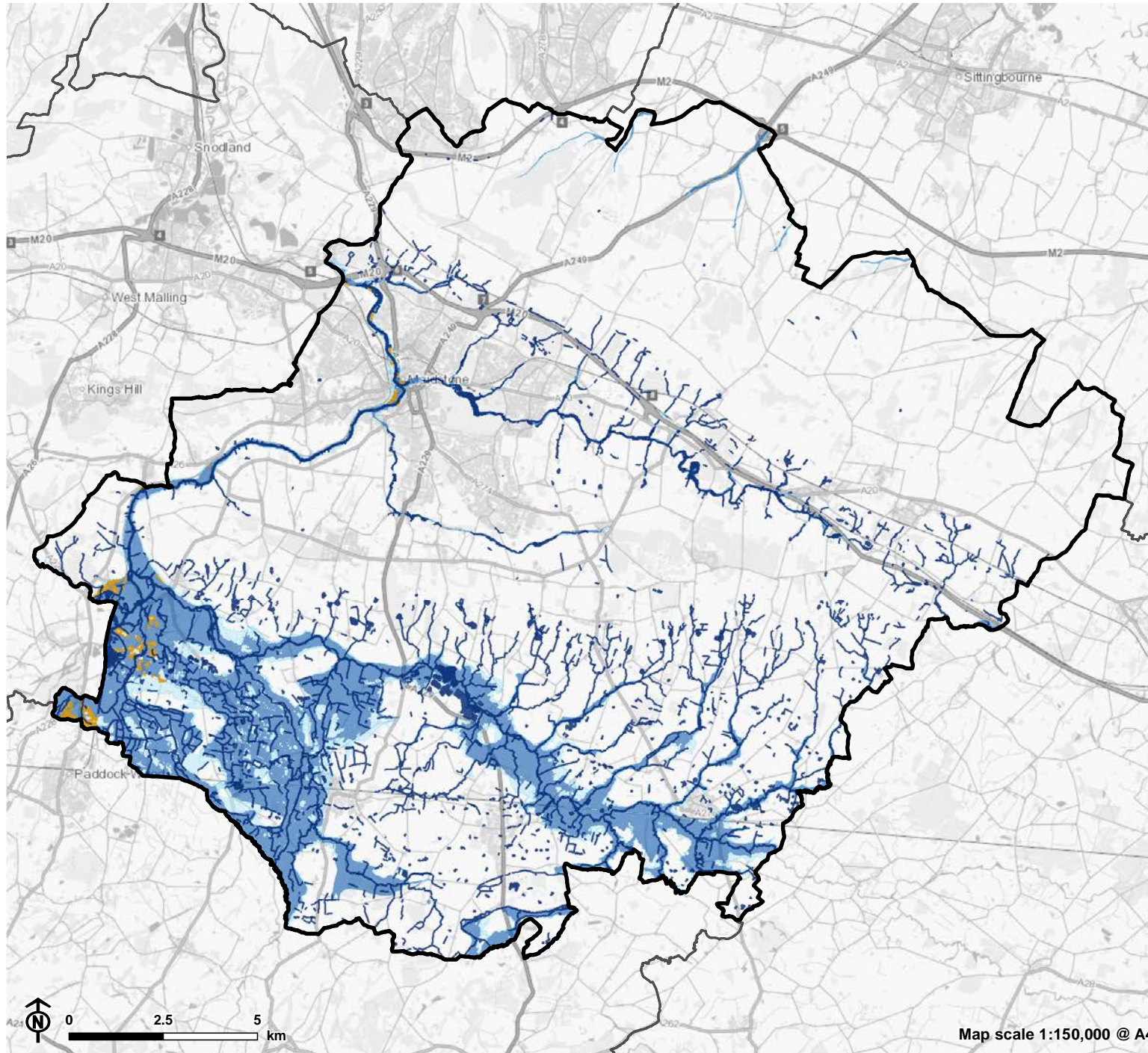
<sup>229</sup> UK Local Authority and Regional Carbon Dioxide Emissions National Statistics: 2005-2016 Available at:

<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>

**Table B.10: 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
<p>Extreme weather events (e.g. intense rainfall, prolonged high temperatures) are likely to become more common and more intense. (SA Framework objective SA 13).</p>	<p>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.</p>
<p>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).</p>	<p>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.</p>
<p>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).</p>	<p>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.</p>

Figure B6: Flood Risk



- Maidstone Borough
- Neighbouring Local Authority Boundary
- Watercourse or Waterbody
- Area Benefiting from Flood Defences
- Flood Zone 3
- Flood Zone 2



Map scale 1:150,000 @ A4

## Biodiversity

### Policy context

#### International

**B.200 International Convention on Wetlands (Ramsar Convention)** (1976): International agreement with the aim of conserving and managing the use of wetlands and their resources.

**B.201 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).

**B.202 International Convention on Biological Diversity** (1992): International commitment to biodiversity conservation through national strategies and action plans.

**B.203 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.

**B.204 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.

**B.205 United Nations Declaration on Forests (New York Declaration)** (2014): international commitment to cut natural forest loss by 2020 and end loss by 2030.

#### National

**B.206 National Planning Policy Framework (NPPF)**<sup>230</sup>: 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.

**B.207 National Planning Practice Guidance (PPG)**<sup>231</sup>: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

**B.208 Natural Environment and Rural Communities Act 2006**<sup>232</sup>: Places a duty on public bodies to conserve biodiversity.

**B.209 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services**<sup>233</sup>: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, 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.

**B.210 Biodiversity offsetting in England Green Paper**<sup>234</sup>: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

**B.211 A Green Future: Our 25 Year Plan to Improve the Environment**<sup>235</sup>: 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

<sup>230</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>231</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>232</sup> 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](http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf)

<sup>233</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf)

<sup>234</sup> 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](https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf)

<sup>235</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

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:
  - 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:
  - 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:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
  - Support and protect international forests and sustainable agriculture.

### Sub-national

**B.212 Kent Biodiversity 2020 and Beyond – a Strategy for the Natural Environment 2015-2025**<sup>236</sup>: sets out a vision and mission for the biodiversity in Kent and Medway. The vision states, 'by 2050 our land and seas will be rich in wildlife, our biodiversity will be conserved, restored, managed sustainably and be more resilient and able to adapt to change will be enjoyed and valued by all, underpinning our long-term economic, social and personal wellbeing.'

**B.213 Kent Environment Strategy**<sup>237</sup>: 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 species in Kent and Medway are quantified.
- Complete a natural capital assessment for Kent by 2017.

**B.214 A Living Landscape for the South East**<sup>238</sup>: 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.
- 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.

**B.215 Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019**<sup>239</sup>: 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.

**B.216 Green and Blue Infrastructure Strategy**<sup>240</sup>: 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

<sup>236</sup> Kent Nature Partnership (2015) Kent Biodiversity 2020 and beyond – a strategy for the natural environment 2015-2025 [online] Available at: <http://kentnature.org.uk/uploads/files/Nat-Env/Kent-Biodiversity-Strategy-final.pdf>

<sup>237</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>238</sup> The South East Wildlife Trusts (2006) A Living Landscape for the South East [online] Available at:

<https://assets.sussexwildlifetrust.org.uk/Files/alivinglandscapeforthesouth-east.pdf>

<sup>239</sup> 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](http://www.kentdowns.org.uk/uploads/documents/1__The__Kent__Downs__AONB.pdf)

<sup>240</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

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.

**B.217 Medway Valley Strategic Landscape Enhancement Plan (2015)**<sup>241</sup>: 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.

**B.218 Maidstone's Biodiversity Strategy: A Local Biodiversity Action Plan, Phase 1: 2009-2014**<sup>242</sup>: 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

**B.219** 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. 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<sup>243</sup>.

**B.220** 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<sup>244</sup>.

**B.221** There are nine sites designated as Sites of Special Scientific Interest (SSSI) in the borough<sup>245</sup>. The SSSIs are listed below with Natural England's SSSI condition summary from May 2018 shown in brackets after each SSSI<sup>246</sup>

- 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).

**B.222** 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

<sup>241</sup> 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>

<sup>242</sup> 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=%2BdXJsPWh0dHBzJTNBJTJGJTJGJGbwVldGluZ3MubWFpZHN0b25lMdvdi51ayUyRmRvY3VtZW50cyUyRnM1OTE3OCUyRk1haWRzdG9uZXMIMjBmb2NhbcUyMEJpb2RpdmVyc2l0eSUyMEFjdGlvbiUyMFBsYW4IMjAyMDA5LTlwMTQucGRmJmFsbD0x](https://maidstone.gov.uk/home/primary-services/council-and-democracy/primary-areas/your-councillors?sq_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGJGbwVldGluZ3MubWFpZHN0b25lMdvdi51ayUyRmRvY3VtZW50cyUyRnM1OTE3OCUyRk1haWRzdG9uZXMIMjBmb2NhbcUyMEJpb2RpdmVyc2l0eSUyMEFjdGlvbiUyMFBsYW4IMjAyMDA5LTlwMTQucGRmJmFsbD0x)

<sup>243</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>244</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>245</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>246</sup> Natural England (2018) SSSI Condition Summary

development pressures since it is a densely populated region<sup>247</sup>.

**B.223** 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.

**B.224** 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.<sup>248</sup>

**B.225** Figure B7 shows the biodiversity designations in the borough.

**B.226** 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.<sup>249</sup>

**Table B.11: 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
<p>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)</p>	<p>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.</p>

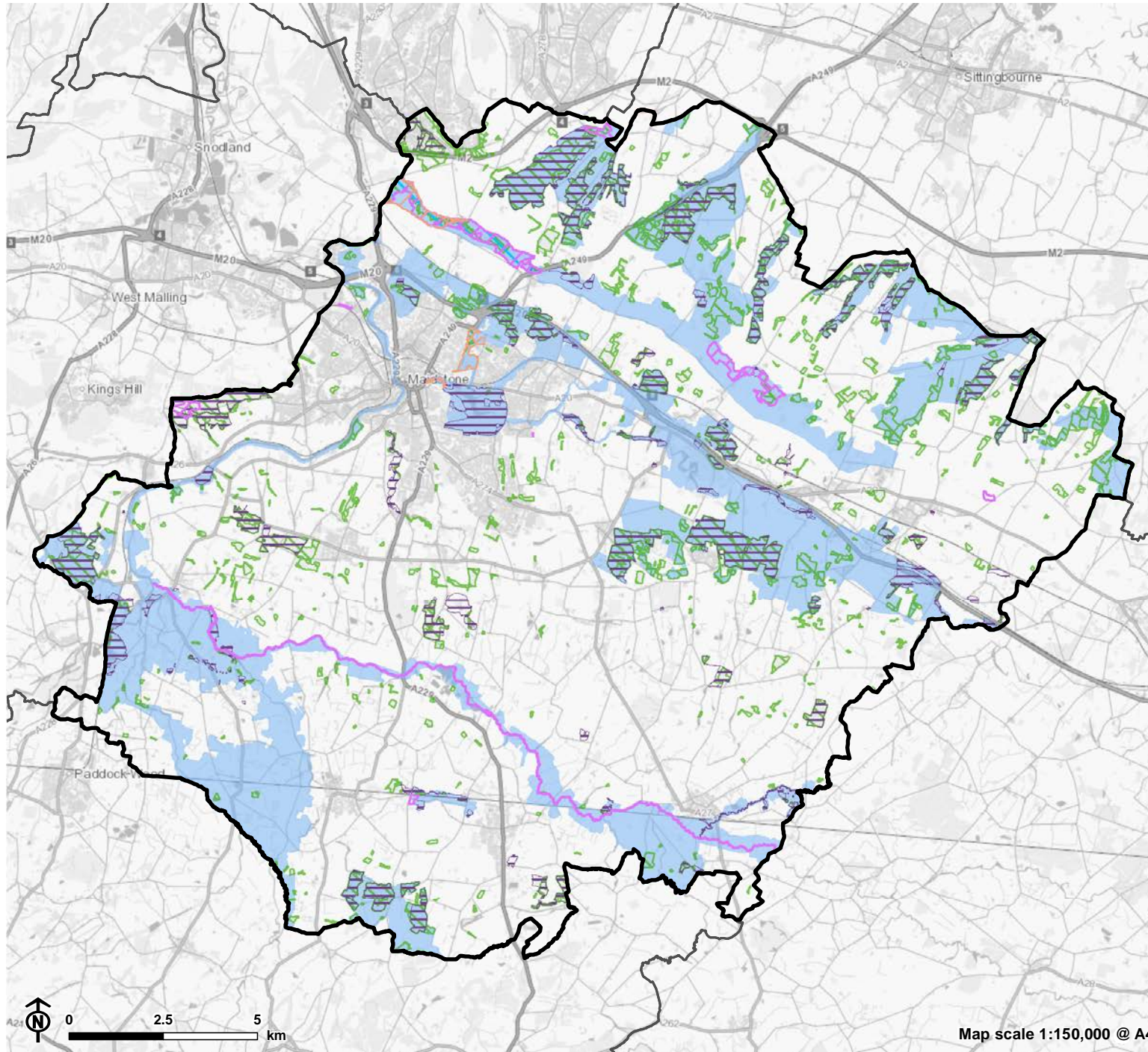
<sup>247</sup> Weald and Downs Ancient Woodland Survey (2012) A revision of the Ancient Woodland Inventory for Maidstone borough, Kent [online] Available at: [https://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0015/12084/Maidstone-Ancient-Woodland-Inventory-2012.pdf](https://www.maidstone.gov.uk/__data/assets/pdf_file/0015/12084/Maidstone-Ancient-Woodland-Inventory-2012.pdf)

<sup>248</sup> 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](https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>249</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf)

Figure B7: Biodiversity Designations



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

0 2.5 5 km

Map scale 1:150,000 @ A4



## Historic environment

### Policy context

#### International

**B.227 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.

**B.228 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)<sup>250</sup>:** Aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

#### National

**B.229 National Planning Policy Framework (NPPF):** 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. a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b. b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c. c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d. d) opportunities to draw on the contribution made by the historic environment to the character of a place.”

**B.230 National Planning Practice Guidance (PPG)<sup>251</sup>:** 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.

**B.231 The Government’s Statement on the Historic Environment for England 2010<sup>252</sup>:** 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.

**B.232 The Heritage Statement 2017<sup>253</sup>:** 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 maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

**B.233 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8<sup>254</sup>:** 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

**B.234 The Kent Design Guide<sup>255</sup>:** 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

<sup>250</sup> Council of Europe (1992) Valletta Treaty [online] Available at: <https://rm.coe.int/168007bd25>

<sup>251</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>252</sup> 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>

<sup>253</sup> Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017 [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_](https://www.gov.uk/government/uploads/system/uploads/attachment_)

[data/file/664657/Heritage\\_Statement\\_2017\\_\\_final\\_-\\_web\\_version\\_.pdf](data/file/664657/Heritage_Statement_2017__final_-_web_version_.pdf)

<sup>254</sup> 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>

<sup>255</sup> 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](https://www.kent.gov.uk/__data/assets/pdf_file/0014/12092/design-guide-foreword.pdf)

developments where people really want to live, work and enjoy life.

**B.235 Strategic Plan 2015-2020 Action Plan<sup>256</sup>:** 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:

**B.236 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.

**B.237 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.

**B.238 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.

**B.239** A complete updated version of the action plan is expected to be released February 2019.

**B.240 Medway Valley Strategic Landscape Enhancement Plan (2015)<sup>257</sup>:** 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 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**

**B.241** 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<sup>258</sup>. 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.

**B.242** There are 41 Conservation Areas throughout the borough, mainly focused around traditional settlement centres<sup>259</sup>. 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.<sup>260</sup>

<sup>256</sup> 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>

<sup>257</sup> 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>

<sup>258</sup> 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/EN V-018-Heritage-Topic-Paper-September-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0019/131725/EN V-018-Heritage-Topic-Paper-September-2016.pdf)

<sup>259</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>260</sup> 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/EN V-018-Heritage-Topic-Paper-September-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0019/131725/EN V-018-Heritage-Topic-Paper-September-2016.pdf)

**B.243** 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<sup>261</sup>.

**B.244** Maidstone Borough contains 5 sites included on the national Register of Historic Parks and Gardens<sup>262</sup>:

- Leeds Castle.
- Linton Park.

- Boughton Monchelsea Place.
- Chilston Park.
- Mote Park.

**B.245** The Borough's designated heritage assets are shown in Figure B8.

**B.246** There are 13 entries for Maidstone on the 'heritage at risk' register; this is an increase of 1 since 2011/12<sup>263</sup>. The 13 entries consist of a mix of Scheduled Monuments, Conservation Areas and Listed Buildings<sup>264</sup>.

**Table B.12: 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.

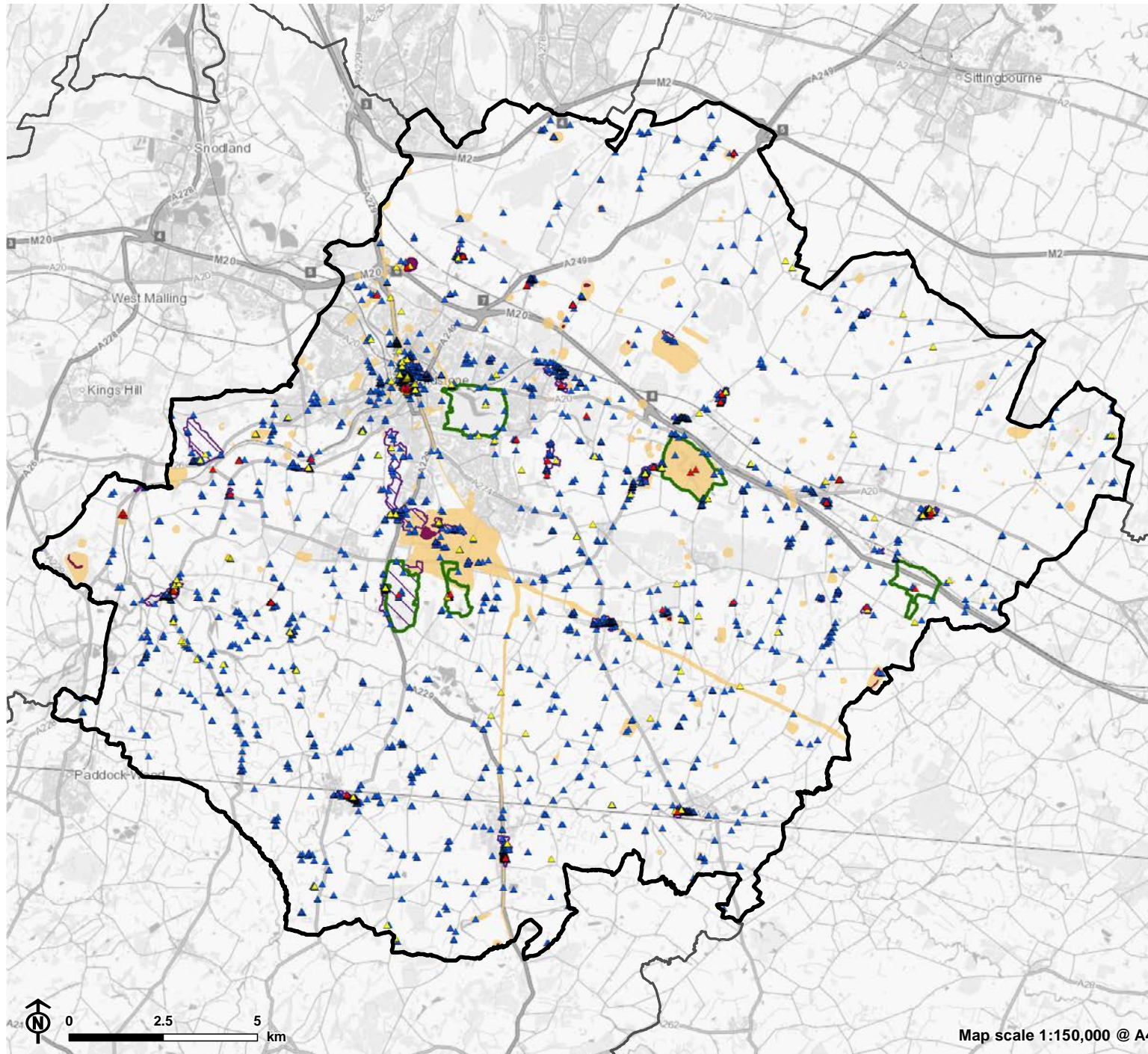
<sup>261</sup> Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at: [https://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0019/131725/EN-V-018-Heritage-Topic-Paper-September-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0019/131725/EN-V-018-Heritage-Topic-Paper-September-2016.pdf)

<sup>262</sup> 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/EN-V-018-Heritage-Topic-Paper-September-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0019/131725/EN-V-018-Heritage-Topic-Paper-September-2016.pdf)

<sup>263</sup> 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>

<sup>264</sup> Historic England (2020) South East Register, Heritage at Risk [online] Available at: <https://historicengland.org.uk/images-books/publications/har-2020-registers/lon-se-har-register2020/>

Figure B8: Historic Environment



- Maidstone Borough
- Neighbouring Local Authority Boundary
- Areas of Archaeological Potential
- Conservation Area
- Registered Parks and Gardens
- Scheduled Monument
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building



Map scale 1:150,000 @ A4

## Landscape

### Policy context

#### International

**B.247 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

**B.248 National Planning Policy Framework (NPPF)<sup>265</sup>:** 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.

**B.249 A Green Future: Our 25 Year Plan to Improve the Environment<sup>266</sup>:** 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.

**B.250 Draft South East Marine Management Plan (2020)<sup>267</sup>:** Introduces a strategic approach to planning within the inshore waters between Felixstowe, in Suffolk and near Dover, including a small part of Maidstone Borough, the River Medway near Allington. This plan will help identify areas suitable for investment.

#### Sub-national

**B.251 Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019<sup>268</sup>:** 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.

**B.252 Kent and Medway Growth and Infrastructure Framework (GIF) update 2018<sup>269</sup>:** 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.

**B.253 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)<sup>270</sup>:** 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.

**B.254 Green and Blue Infrastructure Strategy<sup>271</sup>:** 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 –

<sup>265</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>266</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

<sup>267</sup> Marine Management Organisation (2020) [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/857296/DRAFT\\_SE\\_Marine\\_Plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/857296/DRAFT_SE_Marine_Plan.pdf)

<sup>268</sup> 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\\_\\_Dons\\_\\_AONB.pdf](http://www.kentdowns.org.uk/uploads/documents/1_The__Kent__Dons__AONB.pdf)

<sup>269</sup> 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](http://www.kent.gov.uk/_data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

<sup>270</sup> 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/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0016/121129/SU-B-011-Infrastructure-Delivery-Plan-May-2016.pdf)

<sup>271</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

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.

#### **B.255 Maidstone Green and Blue Infrastructure Strategy:**

**Action Plan**<sup>272</sup>: 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.

#### **B.256 Medway Valley Strategic Landscape Enhancement Plan (2015)**<sup>273</sup>:

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**

**B.257** 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. A mixture of urban, parkland, agricultural and recreational sites make up the habitats across the Middle Medway Catchment. Along the length of the river and streams in the catchment there are several issues, which prevent them from filling their full potential for wildlife, including barriers to fish migration and pollution. However, through funding and support from the Environment Agency and local authorities, Medway Valley Partnership have set up catchment improvement groups for rivers in the Middle Medway catchment and the Kent High Weald Partnership are leading on the River Teise catchment. The aim is to prioritise needs and develop catchment improvement plans to improve the river quality in the short and long-term through all partners. The catchment improvement groups look at the chemical water quality, physical structures,

river flow, biodiversity, accessibility, recreation, abstraction, diffuse and point source pollution<sup>274</sup>.

**B.258** 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<sup>275</sup>

- 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.
- 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,

<sup>272</sup> Maidstone Borough Council (2017) Maidstone Green and Blue 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=%2BdXJsPWh0dHBzJTNBJTJGJTJGbvVWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODIzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbWlMTcucGRmJmFsbD0x](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGbvVWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODIzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbWlMTcucGRmJmFsbD0x)

<sup>273</sup> Kent County Council and Fiona Fyfe Associates Limited (March 2015) Medway Valley Strategic Landscape Enhancement Plan [online] Available at: [http://healthsustainabilityplanning.co.uk/wp-](http://healthsustainabilityplanning.co.uk/wp-content/uploads/2015/06/MVSLEP-Complete-FINAL-Low-Res-27.03.151.pdf)

[content/uploads/2015/06/MVSLEP-Complete-FINAL-Low-Res-27.03.151.pdf](http://healthsustainabilityplanning.co.uk/wp-content/uploads/2015/06/MVSLEP-Complete-FINAL-Low-Res-27.03.151.pdf)

<sup>274</sup> 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](https://old.maidstone.gov.uk/_data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>275</sup> 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](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf)

gill woodlands and streams, hedgerows, heathlands, exposed sand rock faces, parklands and ponds.

**B.259** 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<sup>276</sup>.

**B.260** 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<sup>277</sup>.

**B.261** 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<sup>278</sup>.

**B.262** 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<sup>279</sup>. 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.

**B.263** Maidstone has started the process of applying to change one of the Landscapes of Local Value, the 'Greensands Ridge,' to an AONB<sup>280</sup>.

<sup>276</sup> 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](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf)

<sup>277</sup> 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](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf)

<sup>278</sup> 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](http://www.maidstone.gov.uk/__data/assets/pdf_file/0007/99547/Landscapes-of-Local-Value-October-2015.pdf)

<sup>279</sup> The National Association Areas of Outstanding Natural Beauty, Kent Downs AONB Available at: <http://www.landscapesforlife.org.uk/about-aonbs/visit-aonbs/kent-downs-aonb/>

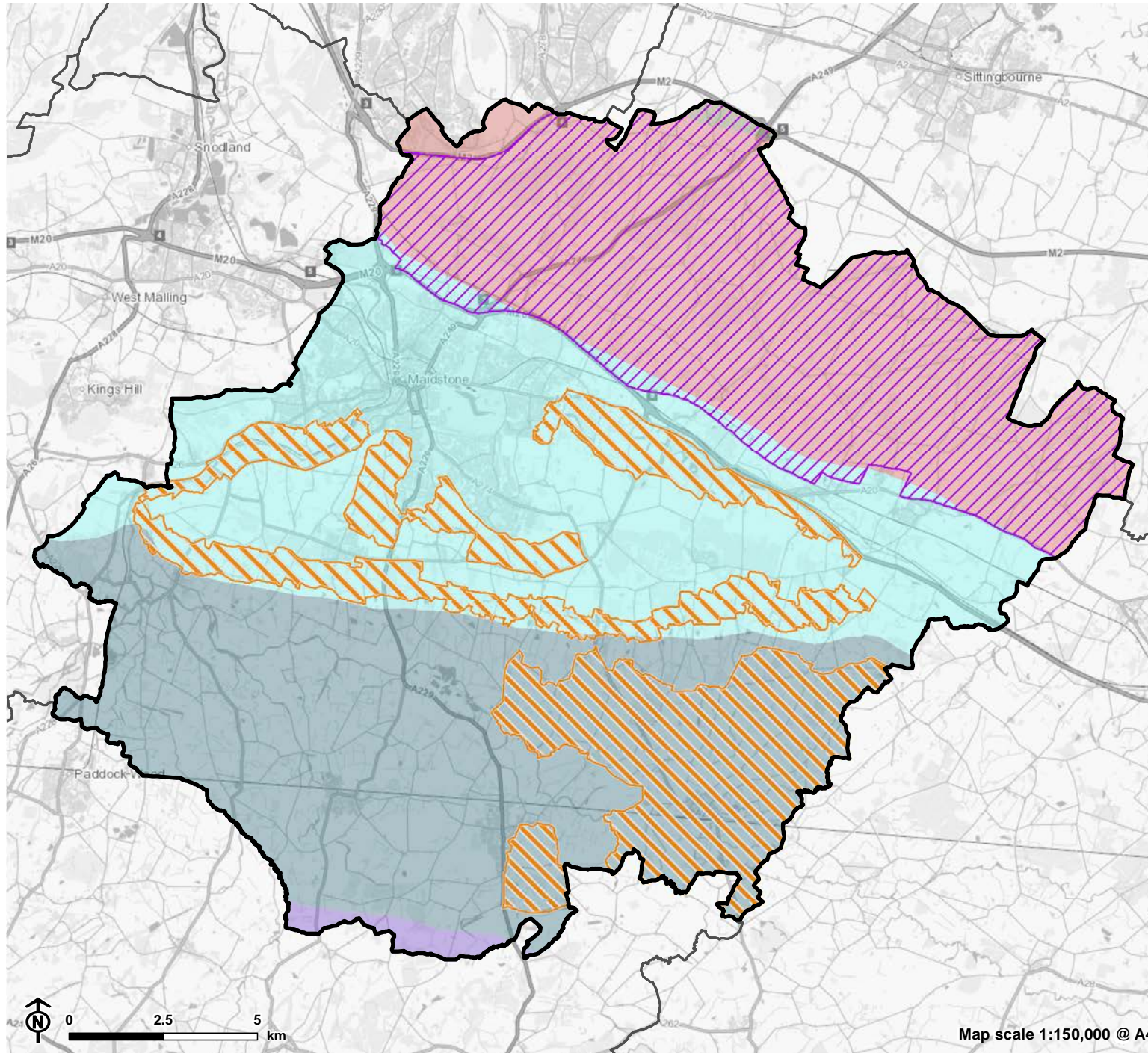
<sup>280</sup> Strategic Planning, Sustainability and Transportation Committee (2018), Review of National Parks and Areas of Outstanding Natural Beauty – Response [online] Available at: <https://meetings.maidstone.gov.uk/documents/s63716/Review%20of%20National%20Parks%20and%20Areas%20of%20Outstanding%20Natural%20Beauty-%20Response.pdf>










**Table B.13: 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
<p>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).</p>	<p>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.</p>



Figure B9: Landscape Designations



-  Maidstone Borough
-  Neighbouring Local Authority Boundary
-  Kent Downs AONB
-  Landscape of Local Value
- National Landscape Character Areas**
-  High Weald
-  Low Weald
-  North Downs
-  North Kent Plain
-  Wealden Greensand