

**Maidstone Borough Council**

# **Sustainability Appraisal of Maidstone Local Plan Review**

## **Regulation 19 Pre- submission Consultation**

**Final report**

Prepared by LUC

September 2021



**Maidstone Borough Council**

**Sustainability Appraisal of Maidstone Local Plan Review**  
**Regulation 19 Pre-submission Consultation**

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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 the Local Plan Review.

**1.2** SA is an assessment process designed to consider and report upon the significant sustainability effects of emerging plans and policies, including their reasonable alternatives. SA iteratively informs the plan-making process, helping to refine the plan so that it maximises the benefits of sustainable development and avoids, or at least minimises, 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<sup>1</sup>. 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 railway 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 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

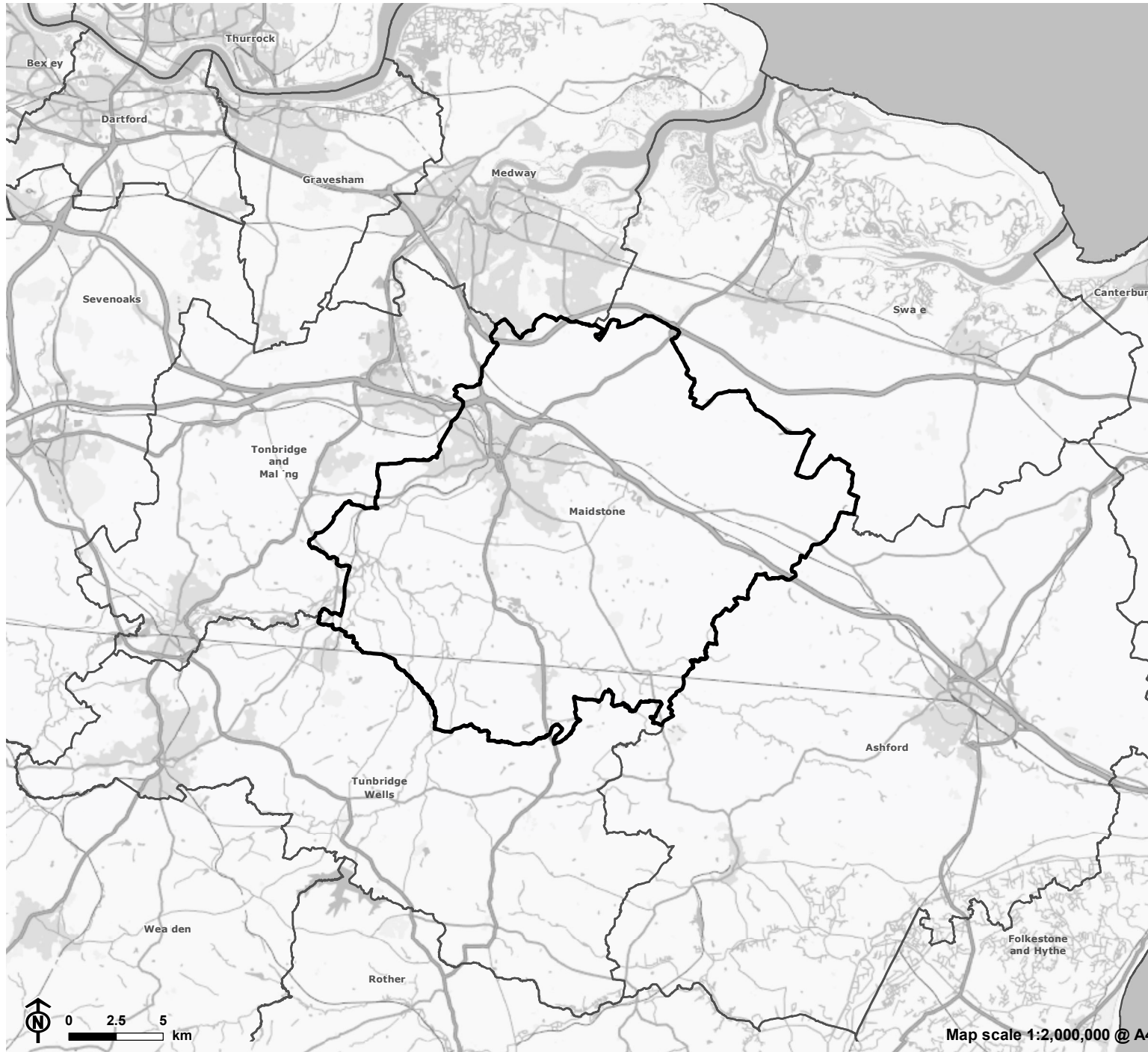
areas of ancient woodland, there are 63 local wildlife sites, 34 verges of nature conservation interest, 11 sites of special scientific interest, three local nature reserves and a European designated special area of conservation. The River Medway flows through the borough and the town centre and, together 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, while 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 Local Plan Review is to manage the potential impacts of future growth to ensure that development takes place in a sustainable manner that supports the local economy while safeguarding the valuable natural and built assets of the borough.

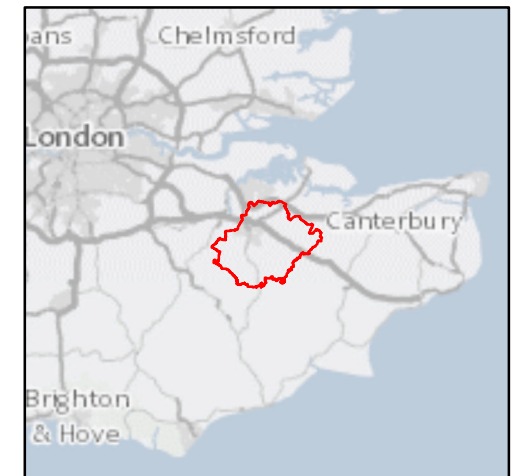
**1.13** The location and extent of Maidstone Borough, the plan area, is shown in **Figure 1.1**.

<sup>1</sup> Rochester, Chatham, Gillingham, Rainham and Strood

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



- Maidstone Borough
- Neighbouring Local Authority Boundary



## The Local Plan Review

**1.14** The Maidstone Borough Local Plan (MBLP) was adopted in October 2017 and covers the period to 2031, anticipating and planning for the new homes, business premises, shops and infrastructure needed over the plan period.

**1.15** The Local Plan Review document updates and supersedes the 2017 Local Plan, whilst ‘saving’ relevant policies contained within it, and ensuring that it is in line with the latest national planning requirements, including extending the plan period to 2037/38. The Local Plan Review is a key document that sets the framework to guide the future development of the borough. It plans for homes, jobs, shopping, leisure and the environment, including biodiversity and climate change, as well as the associated infrastructure to support new development. It explains the ‘why, what, where, when and how’ development will be delivered through the strategy that plans for growth and renewal whilst at the same time protects and enhances the borough’s natural and built assets.

**1.16** The Maidstone Borough Local Plan Review is supported by a robust and proportionate evidence base, has been produced in accordance with government requirements, including the duty-to-co-operate, and takes into account of a number of relevant national and local plans and strategies.

**1.17** The National Planning Policy Framework (NPPF) is published by the government. The NPPF explains the statutory provisions and provides guidance to both the community and local government about the operation of the planning system and how the government’s planning policies should be applied. The suite of online National Planning Practice Guidance (NPPG) adds further context, and should be read in conjunction with, the NPPF. The Local Plan Review does not repeat national policy but it does explain how the policy has been applied.

**1.18** The Local Plan Review:

- Sets out the scale and distribution of development;
- Identifies, by site, where development will be located;
- Identifies where development will be constrained; and
- Explains the infrastructure required to help deliver the plan.

**1.19** In considering proposals for development, the Borough Council will apply all relevant policies of the plan. It is therefore assumed that the plan will be read as a whole and cross-referencing between plan policies has been minimised.

**1.20** The Local Plan forms part of the overall Development Plan for the borough. Development Plans, which include adopted Local Plans and adopted Neighbourhood

Development Plans, are central to the planning system and are needed to guide the decision making process for land uses and development proposals. Other documents within the Maidstone Development Plan are:

- North Loose Neighbourhood Plan 2015-2031 (2016)
- Staplehurst Neighbourhood Plan 2016-2031 (2020)
- Loose Neighbourhood Plan 2018-2031 (2019)
- Marden Neighbourhood Plan 2017-2031 (2020)
- Boughton Monchelsea Neighbourhood Plan (2021)
- Lenham Neighbourhood Plan 2017-2031 (2021)
- Kent Minerals and Waste Local Plan 2013-30 as amended by Early Partial Review (2020)
- Kent Mineral Sites Plan (2020)
- South East Marine Plan (2021)

**1.21** The Minerals and Waste Local Plan identifies Mineral Safeguarding Areas whose purpose is to avoid the unnecessary sterilization of any minerals resources through incompatible development. Development proposals coming forward within the Minerals Safeguarding Areas located within Maidstone Borough will therefore need to comply with minerals safeguarding policies in the Minerals and Waste Local Plan. The extent of the Minerals Safeguarding Areas are shown on the Policies Map accompanying the Local Plan Review.

**1.22** Neighbourhood Development Plans, which are also called Neighbourhood Plans are prepared by Parish Councils and Neighbourhood Forums. A Neighbourhood Plan attains the same legal status as other documents within the Development Plan once it has been agreed at referendum and is made (brought into legal force) by the Borough Council. Government advises that a Neighbourhood Plan should support the strategic development needs set out in an adopted Local Plan and plan positively to support local development. Neighbourhood Plans must be prepared in accordance with the NPPF and be in general conformity with the strategic policies of the adopted Maidstone Borough Local Plan Review.

**1.23** There are a number of adopted supplementary planning documents (SPD) and planning advice notes prepared by the Council, which provide supplementary guidance to local and national planning policies.

### Local Plan Review timetable

**1.24** The process being followed to develop the Local Plan Review has 6 main stages, as set out in **Figure 1.2**. Currently the council is at stage 4.



Figure 1.2: Local Plan Review timetable



**1.25** A proportionate evidence base has been gathered for the preparation of the Local Plan Review.

**1.26** 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.

**1.27** The Local Plan Review is now at stage 4 and will undergo Regulation 19 consultation on the Pre-submission plan document. This sets out the framework to guide the future development of the borough. It plans for homes, jobs, shopping, leisure and the environment, including biodiversity and climate change, as well as the associated infrastructure to support new development. This version of Local Plan Review is the one that the Council intends to submit to the Secretary of State who will appoint an Inspector to carry out an independent examination. The council is complying with the consultation requirements set out in its Statement of Community Involvement.

**1.28** The remaining stages of the Local Plan Review process are described in the 'Next steps' section of this SA Report.

## Sustainability Appraisal and Strategic Environmental Assessment

**1.29** Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the SEA Regulations (as amended)<sup>2</sup>. The SEA Regulations remain in force post-Brexit and it is a legal requirement for the Local Plan Review to be subject to SA and SEA throughout its preparation.

**1.30** SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. SEA considers only the environmental effects of a plan, while SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. SA should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, so a separate SEA should not be required.

**1.31** Although the requirements to carry out SA and SEA are distinct, it is possible to satisfy both using a single appraisal process. As advocated in the Government's Planning Practice Guidance (PPG)<sup>3</sup>, users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken by Maidstone Borough Council.

**1.32** From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

**1.33** The SA process comprises a number of stages as, shown below.

**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.

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).

<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>.

## Meeting the requirements of the SEA Regulations

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

**1.35** 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

**1.36** 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 options** summarises the SA findings for reasonable alternatives considered by the Council for the total amount of development, the spatial strategy, the garden settlements, and the site allocations and how well they perform in relation to the SA objectives.
- **Chapter 5: SA findings for spatial vision and objectives** presents the SA findings for the spatial vision and objectives.
- **Chapter 6: SA findings for the Borough spatial strategy** presents the SA findings for the spatial strategy.
- **Chapter 7: SA findings for spatial strategic policies and detailed site allocation policies** presents the SA findings for the spatial strategic policies and detailed site allocation policies.
- **Chapter 8: SA findings for thematic strategic policies and non-strategic policies** presents the SA

findings for the non-spatial policies in the Local Plan Review.

- **Chapter 9: Cumulative effects** considers the effects of the Local Plan Review as a whole, and with other plans and programmes.
- **Chapter 10: Other reporting requirements** outlines the findings of the separate Habitats Regulations Assessment (HRA) of the Local Plan Review and the Council's reasons for choosing the plan in light of the alternatives. It also 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 for the Local Plan Review and SA.

**1.37** The main body of the SA 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 December 2020 SA of the Preferred Approaches Local Plan Review document 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.
- **Appendix C** presents the detailed SA findings for options identified for the Local Plan Review in relation to the total amount of housing development; initial spatial strategy options; refined spatial strategy options; garden settlement options; and site allocation options.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations Requirement	Covered in this Report?
<b>Environmental Report</b>	
<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 constitutes the ‘environmental report’ produced to accompany consultation on the Regulation 19 Pre-submission Local Pan 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 1, 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 national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.</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> </ol>	<p><b>Chapters 4, 5, 6, 7, 8 and 9.</b></p>

SEA Regulations Requirement	Covered in this Report?
<p>f. soil;  g. water;  h. air;  i. climatic factors;  j. material assets;  k. cultural heritage, including architectural and archaeological heritage;  l. landscape; and  m. the interrelationship between the issues referred to in sub-paragraphs (a) to (l).</p>	
<p>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.</p>	<p><b>Chapters 4, 5, 6, 7, 8 and 9.</b></p>
<p>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.</p>	<p><b>Chapters 2, 4 and 10.</b></p>
<p>A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p><b>Chapter 10.</b></p>
<p>A non-technical summary of the information provided under paragraphs 1 to 9.</p>	<p>A separate non-technical summary document has been prepared to accompany this report.</p>
<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>	<p>The Environmental Report at each stage of the SA has adhered to this requirement.</p>
<b>Consultation</b>	
<p>When deciding on the scope and level of detail of the information that must be included in the environmental</p>	<p>Comments on the SA Scoping Report were sought from the statutory consultees (Historic England, Natural England and the Environment Agency) in February-March 2019.</p>

SEA Regulations Requirement	Covered in this Report?
<p>report, the responsible Authority shall consult the consultation bodies.</p> <p>(Regulation 12(5))</p>	
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).</p>	<p>Consultation on the Pre-submission Local Plan Review document is taking place between 25 October 2021 and 06 December 2020. The consultation document is accompanied by this SA Report.</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</p>	<p>The Local Plan Review is not expected to have significant effects on other EU Member States.</p>
<p>Taking the environmental report and the results of the consultations into account in decision making (relevant extracts of Regulation 16)</p>	
<p>Provision of information on the decision:</p> <ul style="list-style-type: none"> <li>■ When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:           <ul style="list-style-type: none"> <li>– The plan or programme as adopted;</li> <li>– A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and 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 decided concerning monitoring.</li> </ul> </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><b>Chapter 10</b> describes the measures that should be taken to monitoring the likely significant effects of the Local Plan Review.</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 good practice and the guidance on SA/SEA set out in the National Planning Practice Guidance. This includes 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 how this approach has been applied to the SA of the Maidstone Local Plan Review.

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 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 SA 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 appraisal of the Maidstone Local Plan Review, which includes 16 SA objectives and a series of supporting appraisal questions. The table also shows which of the appraisal topics stipulated by the SEA Regulations are covered by each SA objective.

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

**2.9** This section provides an overview of how and why the appraisal of options was undertaken and how this fed into the development of the Maidstone Local Plan Review.

**2.10** 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.

**2.11** 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."*

**2.12** 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.

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



**2.14** The National Planning Practice Guidance on SEA and SA<sup>4</sup>, includes the following:

- Paragraph 1 which states “A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.”
- Paragraph 18 which states “The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves...In doing so it is important to:
  - outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option)...identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;
  - provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.”
- Paragraph 18 continues to say that : “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.”

**2.15** As such, it is important that the SA process runs alongside the plan-making process and identifies and appraises the options being considered at each stage. 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 considered by plan-makers when selecting preferred options for the plan.

## Identification and appraisal of options

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

**2.17** Reasonable alternatives were identified and appraised in relation to the total amount of development, spatial strategy, garden settlement allocations, other site allocations, and some of the thematic policy areas set out in the Local Plan Review. The iterative process followed to identify these options and the SA findings for them are summarised in **Chapter 4**. Detailed results of the options appraisal are set in in **Appendix C**.

## Stage C: Preparing the Sustainability Appraisal Report

**2.18** The ‘environmental report’ at the Regulation 19 Pre-submission Local Plan Review stage comprises this SA Report. It describes the process that has been undertaken to date in carrying out the SA of the Maidstone Local Plan Review. It also describes the Council’s reasons for selecting or rejecting certain options during the preparation of the plan.

**2.19** The focus of the appraisal has been the identification of significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), in accordance with the SEA Regulations.

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

**2.21** A draft of this SA Report was provided to the Council prior to finalisation of the Local Plan Review for Regulation 19 consultation to allow an opportunity for the SA findings to influence the emerging plan. Examples of this are described in the ‘recommendations’ sections of the chapters that set out the findings of the SA at Regulation 19 stage.

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

**2.22** Maidstone Borough Council is inviting comments on the Regulation 19 Pre-submission Local Plan Review and this SA Report. These documents are being published on the Council’s website for consultation from 29 October to 12 December 2021.

**2.23** **Appendix A** presents the consultation comments received on the 2019 SA Scoping Report and the environmental report<sup>5</sup> for the December 2020 Regulation 18b

<sup>4</sup> HM Government, Strategic environmental assessment and sustainability appraisal, last updated 16 July 2020

<sup>5</sup> The environmental report at this stage comprised: LUC for Maidstone Borough Council (November 2020) Sustainability

Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements and LUC for Maidstone Borough Council (November 2020) Interim Sustainability Appraisal of Maidstone Local Plan Review Regulation 18b

Preferred Approach Local Plan Review document. An explanation is given of how the consultation comments have been addressed during the course of the SA.

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

**2.24 Chapter 10** recommends indicators to monitor the effects of implementing the Local Plan Review.

## Appraisal methodology

### SA framework

**2.25** 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.

**2.26** 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.

**2.27** The relationship between the SA objectives and the 'SEA topics', which are the specific topics that SEA is required to cover in line with 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, reflecting their interrelationship.

### Approach to appraisal of site allocation options

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

such as designated biodiversity sites or from key services and facilities such as service centres and public transport links.

**2.29** The criteria, many of which were applied through the analysis of spatial data using a Geographical Information System (GIS), are presented in **Appendix C** of this SA Report (see **Table C.2** and **Table C.4**). The performance of the site options against the site assessment criteria is set out in **Chapter 4** and **Appendix C** of this SA Report. This assumptions-driven approach also formed the starting point for the subsequent, more qualitative appraisals of the site-specific policies for the sites that were selected to be allocated by the Council.

**2.30** Each site option was appraised using the detailed assessment criteria and associated assumptions set out in **Table C2** (residential sites) and **Table C4** (employment sites) of **Appendix C**. As set out in these tables, there is not a one to one relationship between the site assessment criteria and the SA objectives. In many cases, a number of different criteria were used to inform the significance of the likely effect of site options on an SA objective. The rules used to consolidate scores against multiple criteria into a single significance effect are also set out in the tables.

**2.31** The size/development capacity of individual site options was not taken into account in assigning the likely significance of the effects. This is because it was not known at the site option appraisal stage whether development needs would be met by the allocation of a smaller number of relatively high capacity sites or a larger number of relatively low capacity sites. Once a complete draft of the Local Plan was produced, the significance of the total effects of all proposed site allocations and policies was considered as part of the cumulative effects assessment (see **Chapter 9**).

**2.32** Most potential effects of site options are subject to a degree of uncertainty, e.g. due to the particular development design and site layout that come forward, but that uncertainty was generally made explicit in the effects scores only if it was so great that it was not possible to come to a judgement on the likely effect, in which case the score was shown as "?".

**2.33** At the option identification stage of plan-making, individual site options were appraised on a 'policy off' basis, i.e. based on existing conditions and without taking into account opportunities to mitigate potential negative effects by, for example, providing new social infrastructure, by development design that seeks to minimise effects, or by site layouts that avoid sensitive environmental receptors within the site boundary. This served to highlight potential effects on the environment and potential gaps in existing services, facilities and sustainable transport links. It also provided a more consistent basis for assessment than reliance on indicative site masterplans or offers of infrastructure provision that some site promoters may have made because this information was

not available for all site options. Consideration by the SA of any proposed site layouts would also be inappropriately detailed in light of the relatively high level of detail contained in a Local Plan. The findings of this policy-off appraisal are set out in **Chapter 4** and **Appendix C**.

**2.34** Once Local Plan site allocation policies were drafted, site assessment scores were revisited to reflect the Local Plan's site-specific policy requirements. The SA findings for the site allocation policies are set out in **Chapter 7**. In addition, once a complete draft of the Local Plan had been produced, discussion of the performance of the plan as a whole (see **Chapter 9**) also took account of the mitigation offered by development management policies and regulatory mechanisms external to the plan.

**2.35** It is not appropriate for appraisal at the scale of a Local Plan to make recommendations in relation to the mitigation of the effects of individual site options. Instead, these were made in general terms when discussing the results for all site options.

**2.36** Appraisal scores relying on intersection with areas of environmental sensitivity such as flood zones or areas of ecological value were not based on the proportion of the site intersecting with the sensitive area. As such the assessment scores were designed to highlight potential adverse effects and flag these for closer examination of the potential for avoidance or mitigation of negative effects by the Council before allocation. For example, the potential for a significant negative effect may be identified for SA objective 14: Biodiversity as a result of a small part of a site option falling within a designated wildlife site or containing valued habitat. This is potentially significant in the context of national policy protection for designated sites and requirements for biodiversity net gain and also served to highlight that the Council should consider whether habitat loss could be avoided by a minor amendment to the site allocation boundary or by a site-specific policy requirement to avoid development in or enhance the area of valued habitat.

**2.37** The site options appraisals were subject to a number of difficulties and limitations, as set out in the 'Difficulties encountered' section below.

### Significance of effects

**2.38** The dividing line between sustainability effects 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.

**2.39** 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.

**2.40** 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 multiple appraisal criteria into a single 'significance' score for each SA objective, an additional step was introduced across all site option appraisals. The approach is set out in the 'significance scoring' column of the site appraisal criteria tables in **Appendix C** of this SA Report (see **Table C.2** and **Table C.4**) for residential and then for employment sites.

**2.41** For each SA objective, one of two approaches was 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

**2.42** 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 (--)

**2.43** 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.

**2.44** 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 effect symbols

**2.45** The findings of the SA are presented as colour coded symbols showing the significance of the effect of each policy or site option in relation to each SA objective, accompanied by a concise justification for the effect identified, where appropriate.

**2.46** The colour coding is shown in **Table 2.1**.

Table 2.1: Key to SA effect 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
0	Negligible effect likely
?	Likely effect uncertain
N/A	Not applicable or relevant

### Difficulties encountered

**2.47** 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.

**2.48** 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.

**2.49** 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.

**2.50** The site appraisal criteria and assumptions are presented in **Appendix C** of this SA Report and include a range of distance thresholds. These are based on the suggested acceptable walking distances presented in relevant guidance<sup>6</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.

**2.51** 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.

**2.52** 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.

**2.53** 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.

**2.54** 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>7</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

<sup>6</sup> The Institution of Highways and Transportation (2000) Guidelines for Providing for Journeys on Foot

<sup>7</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.

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.

**2.55** In relation to SA objective 15: Historic environment, 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. For those sites that the Council identified through the SLAA process as having a risk of effects on the historic environment, Council conservation officers carried out a high level heritage assessment that drew together information from various sources, including its in-house heritage teams and Kent County Council. For allocated sites included in this officer assessment of heritage impact, the potential for effects identified by the SA on a proximity basis was cross-referenced against officer comments to check for any additional potential effects.

**2.56** 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.

**2.57** In a small number of cases, GIS-based scores shown for sites in the SA of Options Report<sup>8</sup> do not match those cited in appraisals of related preferred site allocation in the Interim Sustainability Appraisal at the Regulation 18b stage<sup>9</sup>. 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. Some of the site boundaries for the proposed allocations have subsequently been updated in the Regulation 19 Pre-submission Local Plan and the effects identified in this SA Report reflect the latest position in this regard.

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

<sup>9</sup> LUC for Maidstone Borough Council (November 2020) Interim Sustainability Appraisal of Maidstone Local Plan Review Regulation 18b

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

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.

**3.5** It should be noted that the policy context within which the Local Plan Review and its SA are being prepared is inherently uncertain given the following key factors:

- **Brexit** - Following the United Kingdom's (UK) departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. For completeness relevant EU legislation has still been referred to in this report where UK legislation is yet to be amended.
- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors, notably the success of the ongoing vaccination programme to combat the disease. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development; changes to permitted development rights; increased remote working and reduced commuting and related congestion and air pollution; increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.
- **Planning for the Future White Paper** – The August 2020 consultation sets out proposals for the reform of the planning system in England, covering plan-making, development management, development contributions, and other related policy proposals. Potential implications include reducing the period of a Local Plan period to 10 years; a move towards a zonal planning system with areas of England allocated as either Growth Areas; Renewal Areas or Protected Areas; and the abolition of Community Infrastructure Levy (CIL) and Section 106.

### Key international plans, policies and programmes

**3.6** 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.

**3.7** 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.

**3.8** 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

**3.9** 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 most recently updated and revised in 2021. 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.”*

**3.10** 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.

**3.11** 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

**3.12** 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
- Tonbridge and Malling Borough Council
- Medway Council

**3.13** 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 a unitary authority which works with Kent County Council in the delivery of some services.

### Neighbourhood Plans

**3.14** 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.

**3.15** At the time of writing, there were six '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
- Boughton Monchelsea Neighbourhood Plan 2021-2031
- Lenham Neighbourhood Plan (2017-2031)

**3.16** In addition, the Otham Neighbourhood Plan passed referendum in 2021.

### Baseline information

**3.17** 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."*

**3.18** 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.

**3.19** 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.

**3.20** 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**.

**3.21** 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 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 important 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

3.22 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."*

3.23 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.

3.24 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.

**3.25** 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.

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 reduce crime by incorporating good design principles that should address the functioning of an area.

Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
<b>Economy</b>	
<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>
<b>Transport connections and travel habits</b>	
<p>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).</p>	<p>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 by providing clarity for infrastructure providers, policy that promotes alternative forms of transport, and sustainable locations for development that minimise the need to travel by car on the local network. This 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.</p>
<p>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).</p>	<p>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.</p>
<b>Air, land and water quality</b>	
<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 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.</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 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.</p>



Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
<p>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).</p>	<p>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>10</sup></p>
<p>The Borough contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth (SA Framework objective SA 8).</p>	<p>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.</p>
<p>The Borough contains 1,000 sites of contaminated land (SA Framework objective SA 9).</p>	<p>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>11</sup></p>
<p>Some water bodies in Maidstone are failing to meet the Water Framework Directive objective of ‘Good Status’. (SA Framework objective SA 10).</p>	<p>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.</p>
<p>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).</p>	<p>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.</p>

<sup>10</sup> MHCLG (2021), National Planning Policy Framework pg. 50 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

<sup>11</sup> MHCLG (2021), National Planning Policy Framework pg. 35 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.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>

Key sustainability issues for Maidstone Borough	Likely evolution without the Local Plan Review
Landscape	
<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 options

**This chapter sets out the SA findings for the reasonable alternatives considered by the Council for the total amount of development, the spatial strategy, the garden settlements, and the site allocations**

**4.1** Reasonable alternatives (or options) were considered by the Council throughout the preparation of the Local Plan Review for a number of different elements of the plan. At each stage in the plan preparation process, the reasonable alternatives were subject to SA and the findings presented in earlier SA Reports published alongside consultations on the Local Plan Review. For completeness and to meet the SEA Regulations reporting requirements, the SA findings are re-presented in **Appendix C**, and summarised in this chapter.

**4.2** The sections below for each type of option begin with a description of when the option assessment was carried out. The findings of the options assessments in this chapter correspond to the options as they were defined at the time of assessment. As options were taken forward as the basis of the policy approach set out in the Regulation 19 Pre-submission plan, some of them will have changed, for example site allocation boundaries or the amount of development to be provided may have been amended. Such changes are not reflected in the descriptions of options in this chapter but were taken into account in assessing corresponding elements of the Pre-submission plan.

#### SA of options for the total amount of development

**4.3** These options were assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report (November 2020).

#### Identification of reasonable alternatives

**4.4** A Strategic Housing Market Assessment (SHMA) for Maidstone Borough was prepared by Icen Projects (March

2021). It identified a total housing requirement of 1,157 homes per year which, including a contingency, equates to an overall need of 17,355 over the period 2022-2037. MBC also published a draft Strategic Housing Land Availability Assessment (SLAA). This identifies a known supply of homes for the period 2022-2037 from the following sources:

- 9,097 homes from allocations in the currently adopted local plan 2017 and existing permissions (6,914 modelled supply to 2031 + 1,300 at the Invicta Barracks + 883 additional units at town centre opportunity sites).
- 2,718 units from windfall development.

4.5 When this total of 11,815 homes is deducted from the overall requirement of 17,355, it results in a balance to provide

### Appraisal of the total amount of housing development

4.7 Table 4.1 summarises the likely sustainability effects of delivering the total housing requirement (plus a small

of 5,540 homes. The Local Plan Review seeks to provide sufficient land allocations to enable this quantum of development to come forward (plus a small contingency).

4.6 It is important to note that this housing requirement has been ascertained by undertaking a SHMA which complied with the national planning policy and planning practice guidance at the time of publication. The balance to find is based on a logical assessment of supply likely to come forward over the plan period. As such, there is not considered to be any other reasonable alternative option for the total amount of housing to be provided for within the Local Plan Review. The SA therefore considers this option alone.

contingency), identifying those effects that are considered to be significant. A detailed description of the effects by SA objective is set out in **Appendix C**.

Table 4.1: Summary of SA effects for housing quantum

Total amount of housing	SA objective															
	SA 1 Housing	SA 2 Services & Facilities	SA 3 Community	SA 4 Health	SA 5 Economy	SA 6 Town Centre	SA 7 Sustainable Travel	SA 8 Minerals	SA 9 Soils	SA 10 Water	SA 11 Air Quality	SA 12 Flooding	SA 13 Climate Change	SA 14 Biodiversity	SA 15 Historic Environment	SA 16 Landscape
Proposed housing provision of 5,790 homes 2022-2037	++	N/A	++/	N/A	++	+	N/A				?					?

### SA of initial spatial strategy options

4.8 These options were assessed in autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report (November 2020) drawing on appraisal of Spatial Approaches in the Topic Paper Options SA Report (August 2020).

#### Identification of reasonable alternatives

4.9 The first column of **Table 4.2** lists the broad categories of location referred to in the spatial strategy options. The second column of the table lists the particular settlements or locations that fall within each of these broad categories and for which amounts of development were specified in the refined spatial strategy options. Note that the terminology in the first column

(e.g. 'Larger Villages' rather than 'Main Villages') and the categorisation of locations in the second column (e.g. Boughton Monchelsea being a Larger Village rather than Smaller Village) reflect the situation at the time the SA of initial spatial strategy options was carried out; some re-categorisation and changes in terminology subsequently took place, informed by the Council's 2021 settlement hierarchy study. These growth locations provided the building blocks for defining a range of reasonable alternative spatial strategy options.

Table 4.2 Growth locations providing building blocks for spatial strategy options

Growth location category	Growth location name
Maidstone Urban Area	Maidstone Town Centre
Maidstone Urban Area	Maidstone Urban Area
Maidstone Urban Area	South of Maidstone Urban Area
Maidstone Urban Area	South West of Maidstone Urban Area
Maidstone Urban Area	South East of Maidstone Urban Area
Rural Service Centres & Larger Villages	Marden
Rural Service Centres & Larger Villages	Staplehurst
Rural Service Centres & Larger Villages	Headcorn
Rural Service Centres & Larger Villages	Lenham
Rural Service Centres & Larger Villages	Harrietsham
Rural Service Centres & Larger Villages	Boughton Monchelsea
Rural Service Centres & Larger Villages	Coxheath
Rural Service Centres & Larger Villages	Eyhorne St (Hollingbourne)
Rural Service Centres & Larger Villages	Sutton Valence
Rural Service Centres & Larger Villages	Yalding
Garden Settlements	North of M2/ Lidsing Urban Extension
Garden Settlements	Heathlands
Garden Settlements	North of Marden
Garden Settlements	Leeds-Langley Corridor

Growth location category	Growth location name
The Countryside	Smaller villages, hamlets and open countryside

**4.10** The Council defined the potential growth locations by reference to sites selected from the suite of sites submitted through the Call for Sites process. The “suitability” of individual sites for inclusion within these alternatives was set out in the Council’s (draft) Strategic Land Availability Assessment, and they were grouped into growth locations according to the Local Plan settlement hierarchy. Potentially suitable garden settlement locations were identified using Stantec’s Stage 1 Garden Settlement (Suitability) Assessment. The potential garden settlement locations were drawn from submissions to the Council’s 2019 Call for Sites.

**4.11** In summer 2020, the Council identified initial spatial strategy options. These constituted a range of broad, high-level options for distributing the housing and economic development (including retail and leisure) needed to meet future growth within the Borough. No development site boundaries were identified at this level of plan-making. The three initial spatial strategy options 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** - all 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.

**4.12** In addition, the Council prepared a series of ‘topic papers’ to inform emerging policy options for the Local Plan Review as follows:

- Housing Strategy Topic Paper (June 2020)
- Economic Strategy Topic Paper (June 2020)
- Transport and Air Quality Topic Paper (June 2020)

- Infrastructure Topic Paper (June 2020)
- Retail and Leisure Strategy Topic Paper (June 2020)
- Environment Topic Paper (June 2020)

**4.13** Four 'Spatial Approaches' were identified within the Council's topic papers, being high-level, alternative distributions of the housing and economic development needed during the Plan period. A number of these 'Spatial Approaches' were very similar to the three initial spatial

strategy options outlined above. Where relevant, these topic papers were therefore used to inform assumptions about what would be likely to be provided under each spatial strategy option.

#### Appraisal of initial spatial strategy options

**4.14** A summary of the SA findings for the initial spatial strategy options is presented in this section; the detailed findings are described in **Appendix C**.

Table 4.3 Summary of SA effects for initial spatial strategy options

Spatial strategy options	SA objective															
	SA 1 Housing	SA 2 Services & Facilities	SA 3 Community	SA 4 Health	SA 5 Economy	SA 6 Town Centre	SA 7 Sustainable Travel	SA 8 Minerals	SA 9 Soils	SA 10 Water	SA 11 Air Quality	SA 12 Flooding	SA 13 Climate Change	SA 14 Biodiversity	SA 15 Historic Environment	SA 16 Landscape
RA1: Local Plan Review Continued	++/	++/	++/	+	++	++/	++/	?	+/?		+/			?	?	?
RA1a: No Maidstone	++/	++/?	++/	++/?	+/	+/	+/	?	?	+/?	+/	+/	+/?	+/?	?	?
RA2a: Maidstone + 4 Garden Settlements	++/?	++/?	+/	++/?	++/	++/	++/	?	+/?	+/?	++/	+/	++/?	+/?	?	?

**4.15** The SA of the three initial spatial strategy options is necessarily high level, and as a result there are a lot of uncertainties attached to the judgements of potential effects.

**4.16** Nonetheless, some clear findings emerge from the SA. Options RA1 (Local Plan Review Continued) and RA2a (Maidstone + 4 Garden Settlements) perform most strongly across the SA objectives. This is because these options would concentrate development where there is the greatest number and range of jobs, services and facilities and where there are the best opportunities to use sustainable modes of transport, including walking, cycling and bus, thereby also helping to reduce air pollution and greenhouse gas emissions.

**4.17** However, there would also be development within the rural areas of the Borough, which could lead to greater car dependency, as well as dispersed but potentially both localised and cumulative effects on environmental assets.

**4.18** In addition, option RA2a would also provide garden settlements which would be concentrated settlements. At the time of appraisal there were four potential locations and these vary in terms of their relationship with the town of Maidstone as well as smaller communities, and some are in more sensitive environmental locations than others. This is particularly important when introducing new settlement-scale urban development into a rural landscape. Garden settlements, though, offer the opportunity to design from the outset a development that encourages energy and water efficiency, cycling and walking, and a sense of community. Set

against this is experience from elsewhere that suggests garden settlements can often be car dependent, despite best intentions. They can also have long lead-in times, which means that they can take a long time to develop a critical mass capable of supporting the range of jobs, services and facilities characteristic of a sustainable community. They could also divert homes and investment from existing communities elsewhere in the Borough. Garden Settlements, in principle, offer an attractive and potentially relatively sustainable solution to meeting the Borough's needs but it is important that a realistic assessment of their deliverability in practice underpins any decision, if this potential is to be realised.

### SA of refined spatial strategy options

**4.19** These options were assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report (November 2020).

#### Identification of reasonable alternatives

**4.20** The initial approaches identified above were intended to test the sustainability of different strategic but potentially reasonable approaches to growth across the borough. The approaches were constrained by potentially available land identified in the SLAA, and each would be expected to meet overall need. SLAA evidence showed that no individual area (Maidstone town, any Rural Service Centre, Garden Settlements) could meet overall need on its own and as such, it was apparent that a blended approach with a mix of these



geographies would be required to provide a consistent and sufficient land supply across the plan period.

**4.21** The Council's identification of refined spatial strategy options for further testing in autumn 2020 was influenced by the following considerations from the initial options stage:

- Maidstone town had a generally high sustainability rating from the SA of initial options and was therefore proposed to be included in all scenarios. This could be higher or lower - Maidstone could be maximised (i.e. all potentially suitable sites used, and an aspirational target set for the regeneration of the town centre), or more modest targets could be included for this area.
- Garden Settlements are either on or off as policy choices. It was considered prudent by the Council in terms of risk management that the number of Garden Settlements be limited to two in the Local Plan Review.
- From the SLAA: some development will have to be directed to Rural Service Centres and Larger Villages. These demonstrate relative sustainability when compared to countryside sites. This growth will be

“residual”, i.e. having regard to the growth allocated to Garden Settlements and Maidstone.

**4.22** Subsequently to the identification of initial spatial strategy options, the Council's Garden Communities Deliverability and Viability Assessment<sup>12</sup> ruled out the Leeds-Langley Corridor garden settlement option that formed part of the initial spatial strategy options. Following early discussion about the Leeds Langley Corridor it was agreed by land promoters in the area that while there may be merit in exploring the potential of a new garden settlement as a part of the options appraisal of the corridor, there was unlikely to be a specific, worked up, garden settlement proposal available for analysis at the current time. As such, the Council decided to consider the location as a potential Broad Location rather than garden settlement for inclusion within the Plan.

**4.23** The assessment of refined options explored all combinations of 0, 1, or 2 garden settlements, and a higher or lower amount of growth in Maidstone town, which framed a residual amount of growth in Rural Service Centres and Larger Villages, as summarised in **Table 4.4**.

Table 4.4: 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

- Scenario 1 Local Plan 2017 Continued was considered to be a reasonable alternative having regard to the SLAA. This scenario maximises growth in Maidstone and allocates the residual to Rural Service Centres and Larger Villages on a tiered basis, having regard to capacity identified through the SLAA. This is an appropriate “base” scenario – continuing the current pattern of growth.
- Reasonable alternatives 2a-c have a more modest level of growth in Maidstone, supplemented by 2,500 units being delivered through two garden settlements (the three possible combinations of North of Marden, Heathlands and Lidsing), with a residual amount allocated to the Rural Service Centres & Larger Villages, again on a tiered basis.
- Reasonable Alternatives 3a-c have a Maidstone Maximised quantum of growth, with each of the three

<sup>12</sup> Stantec (2020) Maidstone Garden Communities Deliverability and Viability Assessment

garden settlements turned on individually. This allows the testing of the delivery of each of the garden settlements alongside an ambitious regeneration of Maidstone and with residual growth allocated to the Rural Service Centres and Larger Villages, again on a tiered basis.

**4.24** The refined spatial strategy options (termed ‘scenarios’ by the Council) are set out in **Table 4.5**. This shows the distribution of residential development, B-class uses (business and industrial), and A-class uses (retail and some services) that would be provided across various locations in the Borough. All existing Local Plan allocations would be carried through in all scenarios. As noted above for the initial spatial strategy options, the terminology (e.g. ‘Larger Villages’ rather than ‘Main Villages’) and the categorisation of locations (e.g. Boughton Monchelsea being a Larger Village rather than Smaller Village) referred to below reflect the situation at the time the SA of refined spatial strategy options was carried out; some re-categorisation and changes in terminology subsequently took place, informed by the Council’s 2021 settlement hierarchy study.

Table 4.5: Distribution of housing and employment development under the refined spatial strategy options

Location	Scenario 1 Local Plan 2017 Continued			Scenarios 2 a c Two Garden Settlements Approach			Scenarios 3 a c One Garden Settlement Approach		
	Residential (dwellings)	B class space (m <sup>2</sup> )	A class space (m <sup>2</sup> )	Residential (dwellings)	B class space (m <sup>2</sup> )	A class space (m <sup>2</sup> )	Residential (dwellings)	B class space (m <sup>2</sup> )	A class space (m <sup>2</sup> )
<i>Maidstone</i>									
Maidstone Town Centre	2,000	34,116	36,458	600	20,116	22,458	2,000	34,116	36,458
Maidstone Urban Area	719	24,750	14300	300	24,750	14,300	719	24,750	14300
South of Maidstone Urban rea	532	-	-	300	-	-	532	-	-
South West of Maidstone Urban	595	-	-	300	-	-	595	-	-
South East of Maidstone Urban	324	-	-	300	-	-	324	-	-
<i>Garden Settlements</i>	-	-	-	2,500	121,566	3,500	1,200	60,783	2,500
<i>Rural Service Centres &amp; Larger Villages</i>									
Marden	113	16,993	1400	113	16,993	1,400	75	16,993	1,400
Staplehurst	233	3,964	-	239	3,964	-	75	3,964	-
Headcorn	233	5,500	-	239	5,500	-	75	5,500	-
Lenham	232	3,108	-	-	3,108	-	-	3,108	-
Harrietsham	183	-	-	239	-	-	75	-	-
Boughton Monchelsea	67	-	-	67	-	-	27	-	-
Coxheath	184	2,806	-	127	2,806	-	27	2,806	-
Eyhome St (Hollingbourne)	11	-	-	11	-	-	11	-	-
Sutton Valence	183	375	413	127	375	413	27	375	413
Yalding	181	45,332	-	128	45,332	-	28	45,332	-
<i>The Countryside</i>	-	-	-	-	-	-	-	-	-
<i>Smaller Villages and Hamlets</i>	-	49,000	-	200	49,883	1,389	-	49,000	-
<b>Total</b>	<b>5,790</b>	<b>185,944</b>	<b>52,571</b>	<b>5,790</b>	<b>294,393</b>	<b>43,460</b>	<b>5,790</b>	<b>273,677</b>	<b>55,071</b>

#### Appraisal of refined spatial strategy options

**4.25** A summary of the SA findings for the refined spatial strategy options is presented in this section; the detailed findings are described in **Appendix C**.

**4.26** As noted in the Methodology chapter, the appraisals of spatial strategy options comprised a top-down consideration of the likely effects of different broad distributions of

development, in contrast to the bottom-up appraisals carried out for site options. This was commensurate with the stage in the plan-making process and ensured that different locational elements of the strategy options (Maidstone urban area; garden settlements; Rural Service Centres and Larger Villages) were appraised to similar levels of detail. More detailed appraisals of garden settlement and site options are presented later in the SA Report.

Table 4.6: Summary of SA effects for refined spatial strategy options

Refined spatial strategy option	SA objective															
	SA 1 Housing	SA 2 Services & Facilities	SA 3 Community	SA 4 Health	SA 5 Economy	SA 6 Town Centre	SA 7 Sustainable Travel	SA 8 Minerals	SA 9 Soils	SA 10 Water	SA 11 Air Quality	SA 12 Flooding	SA 13 Climate Change	SA 14 Biodiversity	SA 15 Historic Environment	SA 16 Landscape
Scenario 1: Local Plan 2017 Continued	++/	++/	++/	+	++	++/	++/	?	+/?	?	+/	?	+/	?	?	?
Scenario 2a: Two Garden Settlements (Heathlands + North of Marden)	++/	++/?	++/	++/	+/	+/	+/		+/	+/?	+/	+/	+/?	+/	?	?
Scenario 2b: Two Garden Settlements (Heathlands + Lidsing)	++/	++/?	++/	++/	+/	+/	+/		+/?	+/?	+/	+/	+/?	+/	?	?
Scenario 2c: Two Garden Settlements (North of Marden + Lidsing)	++/	++/?	++/	++/	+/	+/	+/		+/	+/?	+/	+/	+/?	+/	?	?
Scenario 3a: One Garden Settlement Approach (Lidsing)	++/?	++/?	+/	++/	++/	++/	++/	0	+/?	/+?	++/	+/	++/?	+/?	?	?
Scenario 3b: One Garden Settlement (Heathlands)	++/?	++/?	+/	++/	++/	++/	++/		+/?	+/?	++/	+/	++/?	+/?	?	?
Scenario 3c: One Garden Settlement (North of Marden)	++/?	++/?	+/	++/	++/	++/	++/		+/?	+/?	++/	+/	++/?	+/?	?	?

**4.27** SA was undertaken of the following refined spatial strategy scenarios:

- Scenario 1 (Local Plan 2017) - maximises growth in Maidstone town and allocates the residual to Rural Service Centres and Larger Villages on a tiered, flat basis, having regard to capacity identified through the SLAA. This is an appropriate “base” scenario – continuing the current pattern of growth.
- Scenarios 2 a-c (Two garden settlement approaches) - have a more modest level of growth in Maidstone, supplemented by 2,500 units being delivered through two garden communities (the three possible combinations of North of Marden, Heathlands and Lidsing), with a residual amount allocated to the Rural Service Centres & Larger Villages, again on a flat, tiered basis.
- Scenarios 3a-c (One garden settlement approaches) - have a Maidstone Maximised quantum of growth, with each of the three garden settlements turned on individually. This allows the testing of the delivery of each of the garden settlements alongside an ambitious regeneration of Maidstone and with residual growth allocated to the Rural Service Centres and Larger Villages, again on a flat, two tiered basis.

**4.28** The SA found that:

- The scenarios that performed most strongly were Scenarios 3a-c (One garden settlement approaches). This is primarily because they would concentrate development where there is the greatest number and range of jobs, services and facilities, and the best opportunities to use sustainable modes of transport, including walking, cycling and bus, thereby also helping to reduce air pollution and greenhouse gas emissions. These scenarios would also provide a garden settlement, which offers the opportunity to design-in from the outset a development that encourages energy and water efficiency, cycling and walking, and a sense of community. Set against this, however, is experience from elsewhere which suggests that garden settlements can often be car dependent, despite best intentions, and can also have long lead-in times, which means that they can take a long time to develop a critical mass capable of supporting the range of jobs, services and facilities characteristic of a sustainable community. They could also divert homes and investment from elsewhere in the Borough for existing communities in need. Garden settlements, in principle, offer an attractive and potentially relatively sustainable solution to meeting the Borough’s needs but it is important that a realistic

assessment of their deliverability in practice underpins any decision, so that this potential can be realised. The top-down appraisal of refined spatial strategy options found little difference between Scenarios 3a, 3b and 3c – the individual appraisals of the three garden settlements should be referred to in order to understand their relative sustainability merits.

- Scenario 1 (Local Plan 2017 Continued) also performs relatively well because development would be distributed based on the settlement hierarchy with the focus on Maidstone urban area then to the Rural Service Centres and then the Countryside. Therefore, it would also concentrate development where there is the greatest number and range of jobs, services and facilities, where there are the best opportunities to use sustainable modes of transport, including walking, cycling and bus, thereby also helping to reduce air pollution and greenhouse gas emissions. However, the remaining development would be focused within the rural areas of the Borough which are more likely to lie within areas of higher landscape and biodiversity value.
- Scenarios 2a-c (Two garden settlement approaches) performed least well. They are expected to have similar effects to those described above for Scenarios 3a-c with regard to garden settlements. However, these options would provide two garden settlements instead of one, therefore the negative effects associated with the garden settlements are intensified for these options. In addition, the majority of development would be provided at the garden settlements and then targeted at the Rural Service Centres, the Countryside and lastly Maidstone urban area. As such, there is a risk that the additional development will be provided in areas of higher landscape and biodiversity value, similar to Scenario 1.

**4.29** In overall terms, the SA of the refined spatial strategy options concluded that spatial scenarios that include a substantial proportion of the total amount of development at Maidstone urban area (i.e. Scenarios 1 and 3) are likely to prove more sustainable across a range of SA objectives. They generally provide good access to the town’s higher order services, facilities, jobs, and transport links. They also reduce the need to develop the more rural areas of the Borough, these being generally of higher landscape and biodiversity value. However, scenarios that provide garden settlements (Scenarios 2 and 3) could provide longer term benefits, as the settlements would be masterplanned to employ SuDS and environmentally, climate and water sensitive planning through the incorporation of design codes.

## SA of garden settlement options

**4.30** These options were assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report (November 2020).

### Identification of reasonable alternatives

**4.31** The Council's site identification and selection process began with a Call for Sites during March-May 2019 and is detailed in its Strategic Land Availability Assessment (SLAA)<sup>13</sup>. This formed the basis for the identification of the reasonable alternative garden settlement options that were subject to SA at this stage.

**4.32** In total, seven sites were submitted to the council for consideration with the potential to accommodate at least 1,500 new homes – these were considered as potential garden settlement options. On behalf of the Council, Stantec undertook a two-stage suitability and deliverability assessment of these options.

**4.33** The stage 1 garden settlement suitability assessment<sup>14</sup> used the suitability criteria in the SLAA and information from relevant Kent County Council and MBC specialists. The stage 1 report concluded the following:

- Three locations (namely Binbury Park, North of Staplehurst and Pagehurst Farm) were unsuitable.
- Two sites were recommended to be taken forward to the next stage assessment: North of Marden and Lidsing, North of the M2.
- Two sites were considered potentially suitable locations for garden communities but considerable further work would be needed to develop them further, address key issues identified and provide evidence they would be deliverable: Heathlands and Leeds Langley Corridor.

**4.34** These four sites were taken forward to Stantec's second stage assessment<sup>15</sup>, which considered deliverability matters including potential viability. However, following early discussion about the Leeds Langley Corridor it was agreed by land promoters in the area that while there may be merit in exploring the potential of a new garden settlement as a part of the options appraisal of the corridor, there was unlikely to be a specific, worked up, garden settlement proposal available for analysis at the current time. As such, the Council decided to consider Leeds Langley Corridor as a potential Broad Location rather than garden settlement for inclusion within the Plan and

the site was excluded from detailed deliverability and viability work in the stage 2 assessment.

**4.35** The conclusion of the second stage assessment was that each of the three garden settlement sites has the potential to be deliverable. These three sites were therefore considered to be reasonable alternative garden settlement options as they were considered to have sufficient potential to be achievable in principle. They were therefore subject to SA, as reported below.

**4.36** In order to inform the SA, MBC provided a summary of what the three garden settlement options would be expected to provide, including development quantum, design form and the key elements of anticipated policy requirements relating to employment and infrastructure provision. This summary is set out in **Table 4.7**.

*Table 4.7: Anticipated provision at each garden settlement option*

Garden settlement	Anticipated policy compliant provision
North of Marden	<ul style="list-style-type: none"> <li>■ 1,750-2,000 houses (1,300 in plan period)</li> <li>■ Employment at 1:1 job to house ratio</li> <li>■ Station improvements, including enhanced pedestrian &amp; cycle permeability to/from Marden Village</li> <li>■ Road junction improvements towards Maidstone</li> <li>■ Nursery</li> <li>■ 2 form entry primary school</li> <li>■ New health centre</li> <li>■ 1 community facility</li> <li>■ 50% open space</li> <li>■ 1 Local Centre</li> <li>■ 2 neighbourhood centres</li> </ul>
Lidsing	<ul style="list-style-type: none"> <li>■ 2,100-2,400 houses (1,100 in plan period)</li> <li>■ 20Ha business park</li> </ul>

<sup>13</sup> Maidstone Borough Council (2020) Draft SLAA December 2020  
<sup>14</sup> Stantec on behalf of Maidstone Borough Council (April 2020)  
Maidstone Garden Communities Suitability Assessment Final Draft

<sup>15</sup> Stantec on behalf of Maidstone Borough Council (August 2020)  
Maidstone Garden Communities Deliverability and Viability Assessment Final Draft

Garden settlement	Anticipated policy compliant provision
	<ul style="list-style-type: none"> <li>■ New arm to M2 J4, improved N Dane Way link</li> <li>■ Improvements to existing bus services</li> <li>■ 2-3 form entry primary school</li> <li>■ GP facility</li> <li>■ Community facility</li> <li>■ 50% open space</li> <li>■ Village centre &amp; local centre network</li> </ul>
Heathlands	<ul style="list-style-type: none"> <li>■ 5,000 houses (1,600 in plan period)</li> <li>■ Employment at 1:1 job to house ratio</li> <li>■ New train station</li> <li>■ Improved buses linking to Lenham, Charing &amp; Ashford</li> <li>■ A20 corridor cycle route upgrade linking to destinations outside the site</li> <li>■ Nursery</li> <li>■ 2 x 3 form entry primary schools</li> <li>■ 2 community centres</li> <li>■ Potentially GP surgery in longer term</li> <li>■ 50% open space</li> <li>■ New district centre &amp; local centre network</li> <li>■ Comprehensive review of wastewater treatment works (WwTW)</li> <li>■ Aspiration that the site contributes to a new M20 junction</li> </ul>

#### Approach to appraisal of garden settlement options

**4.37** As set out in **Appendix C**, a set of detailed site assessment criteria was developed to inform the appraisal of the likely effects of potential development sites, including potential garden settlement options. The detailed assessment criteria and associated assumptions in relation to residential uses are outlined in **Table C2** and the detailed criteria for employment uses are outlined in **Table C4** of that appendix.

**4.38** The site assessment criteria used a GIS-based approach that considered the distance of the relevant site boundary to

various items recorded in the GIS database. For example, access to services and facilities (SA objective 2) was assessed by considering the distance of site options to existing facilities such as GP surgeries, bus and rail stops. As set out in **Appendix C**, there is not a one to one relationship between the site assessment criteria and the SA objectives. In many cases, a number of different criteria were used to inform the significance of the likely effect of site options in relation to achievement of an SA objective. The rules used to consolidate scores against multiple criteria into a single significance score are also set out in the assessment criteria tables.

**4.39** This GIS-based approach was well-suited to informing the likely sustainability effects before policy mitigation of the large number of potential site allocations identified through the call for sites process. However, while this detailed site assessment provides very useful data that indicates the potential sustainability effects of different sites, SA of garden settlement options requires a more nuanced and site-specific approach. This is because garden settlements are, by their nature, large areas of development which are intended to be developed for substantial housing, employment and service land uses, allowing them to be self-sustaining in a number of ways. As a general rule they are expected to be designed in ways that overcome potential negative sustainability effects and take advantage of opportunities. For example, their strategic scale can help them to achieve threshold levels of demand that support on-site provision of services, facilities and infrastructure, such as public transport links or primary healthcare provision. This is particularly the case if enhanced land value capture is achieved (in line with garden city principles) or additional government funding is available, thereby improving the financial viability of such provision. Also, the large size of garden settlements and the opportunity they provide to design all aspects of the new community from scratch increases the potential to enhance their environmental sustainability. For example, while a garden settlement may be near to or intersect environmental features which could cause negative effects, such as air quality management areas or areas of flood risk, their scale and greenfield nature often allow for avoidance of such sensitive areas through the masterplanning process and for features such as sustainable drainage systems and district heating networks to be designed in.

**4.40** The appraisal of garden settlement options took the potential sustainability advantages outlined above into account by relying on the Council's views on what the options would be likely to provide in terms of social infrastructure provision and other positive sustainability features. These assumptions are set out in **Table 4.7**. However, it is important to note that at the time of appraisal of the options (initial draft findings were reported to the Council in September 2020), the

preferred garden settlement option(s) had not been selected and detailed allocation policies had not been drafted. Once Local Plan site allocation policies had been drafted for inclusion in the Regulation 18b Preferred Approaches document, garden settlement assessment scores were revisited to reflect the site-specific policy requirements. In addition, once a complete draft of the Local Plan had been produced, discussion of the performance of the plan as a whole also took account of the mitigation offered by development management policies and regulatory mechanisms external to the plan (first carried out in November 2020 for the Regulation 18b Preferred Approaches document and then updated to reflect the Regulation 19 Pre-submission document).

**4.41** The appraisals of garden settlement options also made reference, where relevant and appropriate, to the wider evidence base, as outlined in the Maidstone Borough Council Report to the Strategic Planning and Infrastructure Committee titled 'Report on the Local Plan Review Evidence Base' (22 September 2020), in particular the Maidstone Garden Communities Suitability Assessment prepared by Stantec (April 2020), as updated by the Maidstone Garden Communities Deliverability and Viability Assessment, also prepared by Stantec (August 2020).

**4.42** It should be noted that the potential effects of site options are subject to a degree of uncertainty, e.g. due to the particular development design and site layout that come forward. This uncertainty was generally only made explicit in the effects scores if it was so great that it was not possible to come to a judgement on the likely effect, in which case the score was shown as "?".

**4.43** The appraisal of the garden settlement options was subject to a number of difficulties and limitations, as follows.

- Discussions between the Council and site promoters about likely boundaries to the garden settlements were ongoing. Appraisals were based on SLAA site boundaries as follows:
  - Heathlands: site reference 289;
  - North of Marden: site reference 309; and
  - Lidsing: site references 245 plus 330.
- The appraisal was not able to draw on site-specific heritage impact assessments. In the absence of such evidence, the proximity tests used in the detailed site assessment criteria were intended to provide a basis for screening for the potential for adverse effects on the historic environment.
- No digital data was available to confirm the location of Regionally Important/Local Geological Sites so these were excluded from the appraisal.

**4.44** If additional, relevant evidence became available at Regulation 19 Pre-submission stage, the SA drew on this as appropriate (findings reported in **Chapter 7**).

#### Appraisal findings for garden settlement options

**4.45** The findings of the appraisal of garden settlement options are set out in **Table 4.8** using the scoring format set out in **Chapter 2**. The following text then summarises the appraisal findings; the detailed findings are described in **Appendix C**.

Table 4.8: SA results for garden settlement options

Garden settlement option	SA objective															
	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
North of Marden	N/A		+/?	++/	+?	0	+?				?				?	
Lidsing	N/A	+	+/?	++/	++?	0	?	0			?				?	
Heathlands	N/A		+/?	++/	+?	0	+?				?				?	



**4.46** Three reasonable alternative garden settlement options were appraised – North of Marden, Lidsing, and Heathlands.

**4.47** The SA found that the garden settlement option that performed most strongly in sustainability terms was Lidsing, followed by North of Marden; Heathlands performed least well across the range of sustainability objectives.

**4.48** Considering social and economic SA objectives, (sustainability objectives 1-8), Lidsing was rated the most sustainable of the three options in relation to access to services and facilities (SA objective 2), community cohesion (SA objective 3), supporting economic growth (SA objective 5), and in conserving mineral resources (SA objective 8). Although it sometimes performed less sustainably than one of the other options, effects were found to be of a similar scale to the third option in each case. The exception to this is SA7: Sustainable travel, whereby the location next to the M2 and the associated junction improvements are considered likely to reduce the attractiveness of sustainable travel modes. In this case, Lidsing was found to be the least sustainable option.

**4.49** In relation to SA objective 2: Services and facilities, while all garden settlement options propose a new service centre and a variety of social infrastructure and employment opportunities, Lidsing is also well related to existing urban areas at the Medway Towns Conurbation (including the district centre at Hempstead Valley) while the other two options are more remote. For Lidsing, it is also clearer how the high levels of on-site job provision sought by the Council will be achieved, in the form of a 20Ha business park, and Lidsing is also located in a part of the Borough that has somewhat shorter average commuting journeys for residents than the other two garden settlement options.

**4.50** In relation to SA objective 5: Economy, all of the garden settlement options propose significant areas of land for economic uses and the information provided by MBC summarised in **Table 4.7** sets an ambition of one on-site job for every house. However, only the Lidsing proposal currently includes sufficient employment provision to achieve this ambition in the form of a 20Ha business park.

**4.51** In relation to SA objective 8: Minerals, the Lidsing site is the only one of the three garden settlement options that does not intersect with a Mineral Safeguarding Area or Safeguarded Mineral Site and therefore risk sterilisation of mineral resources.

**4.52** Considering environmental SA objectives (sustainability objectives 9-16), there were fewer differences between the SA effects for the three garden settlement options. The only sustainability objective against which the options were given different effects was SA 12: Flooding. For this, Lidsing and North of Marden performed better than Heathlands because

the extent of land with a relatively high flood risk was small for both of these sites.

**4.53** Notwithstanding the differences between the sustainability performance of the garden settlement options highlighted above, many of the SA findings at this stage are subject to considerable uncertainty. Many aspects of the actual sustainability performance of any garden settlements that are taken forward in the Local Plan will depend on the extent to which garden community principles such as sustainable access to jobs, education, and services and delivery of environmental net gains can be delivered in practice. The uncertainties and the types of mitigation that could improve the sustainability of the garden settlement options have been described in the detailed appraisals in **Appendix C**.

**4.54** Although Lidsing was appraised as being most sustainable across the range of SA objectives, potential significant negative effects (sometimes mixed with more positive effects) were nevertheless identified in relation to six SA objectives - SA objective 4: Health; SA objective 9: Soils; SA objective 13: Climate change; SA objective 14: Biodiversity; SA objective 15: Historic environment; and SA objective 16: Landscape. Whichever of the garden settlement options is taken forward, it will be important to further investigate the potential negative sustainability effects highlighted by the SA and to ensure that they are avoided or reduced as far as possible, including by reference to the potential mitigation outlined in **Appendix C**.

**4.55** As noted in the SA of refined spatial strategy options, spatial scenarios that include a substantial proportion of the total amount of development at Maidstone urban area were likely to prove more sustainable across a range of SA objectives because they generally provide good access to higher order services and facilities, centres of employment, and public transport networks and are more likely to avoid some of the effects on the natural environment associated with development in rural areas. As such, many of the potential significant effects identified for the three garden settlement options would be equally likely to result from any development remote from main urban centres, whether it be other garden settlements or more dispersed development around rural settlements. The potential sustainability advantages and disadvantages of new garden settlements relative to other forms of development have already been discussed in the SA of refined spatial strategy options.

## SA of site allocation options

**4.56** These options were assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report (November 2020).

**4.57** The detailed approach to appraisal of site allocation options and related difficulties encountered have already been described in **Chapter 2**.

#### Identification of reasonable alternatives

**4.58** The Council's site identification and selection process is detailed in its SLAA. The purpose of the SLAA was to identify the future supply of land for housing, economic, retail and leisure purposes. Maidstone Borough Council is in the process of producing a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSA). The evidence gathering stage of this was stalled due to the COVID-19 pandemic. Consequently, the Council was not in a position to analyse the potential of Gypsy, Traveller and Travelling Showpeople site allocations at this time as it was still establishing the need and further work will be carried out on a pitch deliverability assessment. This data is expected to be available in late summer 2022. Additionally, the Call for Sites exercise invited the submission of Gypsy, Traveller and Travelling Showpeople sites, however only a small number were put forward for inclusion in the plan.

**4.59** Stage 1 of the SLAA, the identification of new sites, commenced with the Call-for-Sites exercise which was undertaken in March to May 2019. 329 responses were received with most of those being the submission of new sites.

**4.60** Sites were assessed by the Council to test whether they were available, suitable, and achievable. Only if they met these three criteria would they be considered to be deliverable, and potentially included in the Local Plan Review. All sites received as part of the Call-for-Sites exercise were considered to be available by virtue of their submission during this process.

**4.61** Suitability and achievability was assessed by the Council using the criteria established in the Call-for-Sites proforma. The sites were initially assessed or reviewed against constraints that would prevent any development on the site. If there was a such a constraint present, the site was considered to be unsuitable. A very limited number of sites were considered to be unachievable on the basis that while there wasn't a single wholly constraining issue, a number of smaller constraints would conspire to mean the site would be unlikely to come forward over the Plan period. These unsuitable and unachievable sites were not taken forward. The assessment undertaken consisted of site visits by officers alongside GIS analysis against a number of constraints. Sites initially considered by the Council to be reasonable alternatives

(flagged as 'amber' in the SLAA process) were subject to SA, although some of these were subsequently considered unreasonable after further investigation by the Council.

**4.62** Stage 2 of the SLAA categorised the sites as 'Red' or 'Green', with Green sites considered suitable and deliverable, and Red sites having been ruled out through the process as not being suitable or deliverable during the plan period.

**4.63** The SLAA also identified a range of geographies into which the sites were grouped. For each of these areas a "Minimum" amount of growth was calculated; this was the accumulation of the capacity of all development delivered 2011-2020, plus extant planning permissions and allocated sites. A "Maximum" amount of growth was also calculated, consisting of the "Minimum" plus the potentially suitable Call for Sites offerings in that area.

**4.64** The SLAA process outlined above formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA at this stage. 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 for a use for which there was no identified need.

**4.65** The reasonable alternative sites that were subject to SA are listed in **Table C1** (residential sites) and **Table C3** (employment sites) of **Appendix C**. To avoid potential bias and allow a consistent basis for appraisal, information on the development uses for which the sites should be appraised and their likely development capacity were provided by the Council rather than being based on any such information provided by site promoters.

**4.66** A summary of the SA findings, including tables of the sustainability effects for the residential and employment sites, and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided below. More detailed findings are presented in **Appendix C**. Both the detailed and summary findings for the site options were previously made available to Council officers to help inform selection of the Preferred Approaches and were published to help inform Regulation 18 consultation on the Preferred Approaches plan in the SA of Options Report<sup>16</sup>.

**4.67** Subsequent to the Regulation 18 Preferred Approaches consultation, some of the sites identified as preferred allocations were deleted from the Regulation 19 Pre-submission plan's allocations. The Council stated that there

<sup>16</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

were a range of reasons why sites were not taken forward, for example because more suitable sites in that settlement were found or in response to consultation responses on the Regulation 18 Preferred Approaches document. Other preferred sites were subject to changes in site attributes between the Preferred Approaches and Pre-submission stages, for example adjustments to the site boundary or the amount of development to be provided. Where this was the case, the revised site attributes formed the basis of the appraisals of the corresponding site allocation policies, as set out in **Chapter 7**. In addition, one new site that was not identified as an allocation or reasonable alternative at the time of the Regulation 18 SA work was allocated in the Pre-submission plan – site 364 Kent Ambulance HQ. The corresponding allocation policy, LPRSA364, was appraised in the same way as other site allocation policies and the results are set out in **Chapter 7**. An audit trail of these changes to site allocations between the Regulation 18 and Regulation 19 stages is provided in **Table C5** at the end of **Appendix C**.

#### Appraisal findings for residential site options at Regulation 18 Preferred Approaches stage

**4.68** The sites that were considered by the Council to be reasonable alternatives for residential development (including mixed use with a residential component) at the Regulation 18 Preferred Approaches stage are listed in **Table C1** of **Appendix C** by unique site identification number, along with key site attributes provided by the Council.

**4.69** **Table 4.9** summarises the likely effects of the residential site options in relation to each of the SA objectives that was scoped-in for the site appraisals. The table is followed by a description of the broad pattern of findings. More detailed findings by SA objective and the potential for mitigation are described in **Appendix C**.

#### Appraisal findings for employment site options at Regulation 18 Preferred Approaches stage

**4.70** The sites that were considered by the Council to be reasonable alternatives for class A (retail, financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways) or class B (business, general industrial, or storage or distribution) employment uses (including mixed use with a residential component) at the Regulation 18 Preferred Approaches stage are listed in **Table C3** of **Appendix C** by unique site identification number, along with key site attributes provided by the Council.

**4.71** **Table 4.10** summarises the likely effects of the employment site options in relation to each of the SA objectives that was scoped-in for the site appraisals. The table is followed by a description of the broad pattern of findings,

and the potential for mitigation. More detailed findings by SA objective and the potential for mitigation are described in **Appendix C**.

#### Appraisal findings for additional site option identified at Regulation 19 Pre-submission stage

**4.72** As noted above, one new site option - site 364 Kent Ambulance HQ - was identified at the Regulation 19 Pre-submission stage. For completeness, the 'policy-off', GIS-based effects score for this additional site are presented in **Table 4.11**. These formed the starting point for the qualitative appraisal of site allocation policy LPRSA364, as presented in **Chapter 7**. Had this site option been appraised at Preferred Approaches stage it would not have materially altered the sustainability findings for the site options that are summarised in this chapter.

Table 4.9: SA results for the residential site options considered at Regulation 18b Preferred Approaches stage

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
1	Land Adj Brhemar Garage	0.9	Residential	16					0			0		0	?	
2	The Homestead	1.2	Residential	22		+	0		0			0			?	
5	Land Adj to Dingly Dell	1.3	Residential	17		+						0			?	
7	The Paddocks, Staplehurst	2.6	Residential	49		0	0	+						0	?	
8	Bassetts Bungalow, Marden	0.8	Mixed	19			0								?	
9	116 to 120 Week St	0.0	Mixed	2	+	+		++	0	0		0	+	0	?	0
10	Bydews Place Site 1 ACK	0.7	Residential	16		+	0					0			?	
11	Bydews Place Site 2 ACK	0.2	Residential	5		+	0					0			?	
12	Land at Forsham House	0.6	Residential	11		0	0							0	?	
13	Land at Chartway Sutton	1.6	Residential	30		+	0					0		0	?	
15	KIA site, Ashford Road	3.8	Residential	69		+	0	+	0						?	
16	Fir Tree Farm and Norton Lea (North)	58.5	Residential	1245			0							0	?	
17	Land East of Maidstone Road, Headcorn	3.7	Residential	42		+	0								?	
18	Land rear of Beech House	0.3	Residential	5		+	0					0		0	?	
19	Land at Lenham Rd, Headcorn	4.7	Residential	47		+	0							0	?	
21	Land at Southways, Sutton Valence	0.6	Residential	12		+	0					0		0	?	
27	Land at George Street	2.3	Residential	43		+	0	+	0						?	
29	Court Lodge Farm	13.3	Residential	126	+	+	0	+	0		0		+		?	
34	Land at George St, Staplehurst	2.8	Residential	52			0	+	0						?	
37	Land ro The Gables, Staplehurst	1.6	Residential	31		+	0								?	
48	Plot off S side Forge Ln, E. Farleigh	6.3	Residential	133		+	0	+				0		0	?	
50	Army Hut Farm Stables, Stockett Ln, East Farleigh	5.2	Residential	88		+									?	
53	12-14 Week St	0.1	Mixed	3	+	+		++	0	0		0	+	0	?	0
54	Chainhurst	3.5	Residential	66		0	0								?	

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
55	Victoria's Cabaret Club	0.3	Residential	6		+		+	0			0			?	
56	Orchard House, Clapper Ln, Staplehurst	1.5	Residential	29		+	0		0						?	
57	Land at Oak Farm Gardens, Headcorn	0.9	Residential	6		+	0	+						0	?	
58	Green Lane Farm	2.3	Mixed	31		+	0					0			?	
59	Fellinpits, Beltring	39.4	Residential	748		0	0	+							?	
60	Land at Rush Farm, Staplehurst	1.0	Residential	18		0	0							0	?	
64	Land South of Marden Rd, Staplehurst	4.6	Residential	88		+	0								?	
66	Land at Lodge Rd, Staplehurst	4.2	Mixed	34		+	0	+	0						0?	
70	Land at Willow Wood	0.8	Residential	17		+	0					0		0	?	
71	Marley Rd, Harrietsham	2.6	Residential	37		+	0	+	0			0			?	
73	Bearstead Golf Course	0.9	Residential	19		+	0		0			0			?	
77	Teiside Nurseries, Laddingford	2.7	Residential	12		+	0	+							?	
78	Haven Farm	2.8	Residential	41		+	0					0			?	0
79	Land South of Heath Road	1.1	Residential	21		+	0					0			?	0
80	Land west of Loder Close and Westwood Close	2.0	Residential	38		+	0	+	0				+		?	
81	Land off Lenham Road	2.1	Residential	40		+	0		0					0	?	
82	Land rear of Firenze	4.6	Residential	87			0							0	?	
83	Land at Hartley Dene	1.9	Residential	37		+	0		0						?	
84	Land off Heath Road	1.7	Residential	33		+	0					0			?	
86	Elsfield Cottages, Ashford Road	0.0	Residential	1			0	+							?	
88	Land south of Ashford Road	0.4	Residential	8		+	0	+				0			?	
90	Land adjacent to Bridgehurst Oast	1.1	Residential	20		+	0		0						?	
91	Teston Field	4.3	Residential	82		+	0		0						?	
93	Land at Linden Farm	0.5	Residential	9		+	0								?	
94	Land South of Tumblers Hill	0.9	Residential	16		+	0					0		0	?	
95	Land at Halfe Yoke	2.2	Residential	46		+	0	+						0	?	

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
98	Land south of Ashford Rd, Harrietsham	5.0	Residential	96			0		0						?	
101	Land south of A20, Harrietsham	3.2	Residential	60			0	+	0						?	
102	Ringles Nursery & Ringles Gate, Headcorn	15.6	Residential	133		+									?	
104	Gowan Park, Kingswood	1.0	Residential	19		+	0								?	
105	Land at junction of Vicarage Lane & Lower Rd, East Farleigh	6.8	Residential	130		0	0	+				0		0	?	
107	Land adjacent to Westholme, Sutton Valance	1.0	Residential	19		+	0					0			?	
108	Land at South Lane, Sutton Valance	2.1	Residential	39		+			0					0	?	
109	Land south of Orchard End	1.3	Residential	24		+	0					0			?	
112	Sutton Valance Group GP Practice	0.5	Residential	4		+			0					0	?	
114	Land at and Adjacent to home Farm	2.6	Residential	49		+			0						?	
115	Farm and Yard at Boughton Mount Farm	5.9	Residential	125		+						0		0	?	
117	Land at Loose Court Farm Cottage	3.9	Residential	84		+	0								?	
118	Gibbs Hill Farm	0.6	Residential	9		+			0						?	
119	North of Thorn View	6.1	Residential	84			0								?	
120	Rowan House Farm and Fairview (Broomfield Park)	38.9	Residential	738		+	0								?	
122	The Orchard Land adjacent to White Cottage	1.2	Residential	18		+						0		0	?	
124	Old Goods Yard phase 2	1.3	Residential	25		+	0	+	0		0		0		?	
125	Old Goods Yard phase 3	2.2	Residential	42		+	0	+	0		0		0		?	
128	Land at Westfield Sole Rd, Ledsging	0.3	Residential	5		+	0		0			0			0?	
129	Land Rear of Bearstead Rd	5.4	Residential	114			0	+							?	
130	Land adjacent to Ivans Field, Chart Sutton	2.7	Residential	50		+	0					0			?	
131	M W Wickham Estate	2.3	Residential	44		+	0		0					0	?	
132	Knoll House & Tower House, Staplehurst	2.1	Residential	40		+	0	+	0						?	
133	Land NE of Old Beltingham Hall	0.8	Residential	14		+	0		0			0		0	?	
134	Baldwins Farm	4.6	Residential	88		+	0		0			0			?	
135	South of Ashford Rd, Bearstead	2.1	Residential	45		+	0	+							?	

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
136	Land N of West St, Harrietsham	3.5	Residential	66		+	0	+							?	
137	Land South of Marden Rd, Staplehurst	6.1	Residential	116		+	0					0			?	
140	Land at Squerryes Oast, Otham	0.7	Residential	8		+	0	+							?	
141	Eastwood Rd, Ulcombe	0.9	Residential	18			0		0					0	?	
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	20		+	0								?	
144	34- 35 High Street, Maidstone	0.1	Mixed	2	+	+		++	0	0			+	0	?	0
145	Len House	1.1	Mixed	29	+			++	0	0			+	0	?	0
146	Maidstone East	1.6	Mixed	65	+	0		++	0	0			++	0	?	0
147	Gala Bingo and Granada House	0.4	Mixed	71	+	0		+	0	0			+		?	0
148	Maidstone Riverside	6.9	Mixed	650	+	0		++		0			++	0	?	
149	Maidstone West	2.1	Mixed	130	+	0		++		0			+	0	?	0
150	Mill St Car Park	0.4	Mixed	15	+		0	++	0	0			+	0	?	0
151	Mote Rd	0.3	Mixed	84	+		0	+	0	0			+		?	0
152	Royal British Legion Social Club	0.3	Mixed	4	0				0	0		0			0?	
156	Danebury	0.2	Residential	3	+	+	0	+	0	0		0	+	0	0?	0
157	Harrietsham Rectory	0.3	Residential	5			0	+	0			0		0	?	
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	114		0	0							0	?	
159	Yalding Hill	0.4	Residential	7		+	0		0						?	
161	Bell Farm, Harrietsham	8.3	Residential	126		0	0	+							?	
162	Land north of Headcorn	15.6	Residential	275			0	+							?	
167	North & West of Leeds	98.3	Mixed	1359		0	0								?	
168	Land at Forge Lane	4.9	Mixed	68		+	0					0		0	?	
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	0		0	0		0						?	
171	Land adjoining Homewell House	0.4	Residential	7			0					0		0	?	0
172	Land at Sutton Rd	10.9	Residential	139		+	0					0			?	
173	Durrants Farm	3.1	Residential	59		+	0		0						?	

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
174	Land South of Sutton Road	9.1	Residential	185		+	0							0	?	
175	Land at Vicarage Road Yalding	1.0	Residential	20		+	0		0						?	
176	Land North and South of Ashford Rd	23.2	Mixed	320		+	0								?	
177	Land between Lower St & George St	6.5	Mixed	90		+	0								?	
178	Land South of Warmlake Road	10.5	Residential	199		0	0					0		0	?	
179	Land at Westerhill	0.7	Mixed	33		+	0					0			?	
180	Land west of Otham Road	7.1	Residential	135		+	0					0			?	
182	Invicta Park Barracks	47.1	Residential	1002	+			++					+		?	0
184	Brickfields Farm and Rosemount	14.3	Residential	272		0	0	+							?	
185	Otham Glebe, Church Road	2.2	Residential	27		+	0	+							?	
186	Land at Headcorn Road Staplehurst	9.3	Residential	132		+	0								?	
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	89		+	0	+							?	
188	Land at Old Ashford Road Lenham	28.8	Residential	437		0	0				0				?	
189	Land north of Ashford Road Harrietsham	1.5	Residential	28		+	0	+							?	
191	Land adjacent to South Lane Sutton Valence	0.3	Residential	5			0		0			0		0	?	
192	Land adjacent to Headcorn Road Sutton Valence	0.6	Residential	10			0		0					0	?	
193	Land East of Upper Street Langley	6.0	Mixed	83		+	0								?	
195	Waterside Park	16.2	Mixed	224		+	0								?	
196	Land at Willow Farm	2.3	Residential	45		0	0	+	0					0	?	0
197	Golf Course Car Park Staplehurst	0.8	Residential	8		+			0						?	
198	Staplehurst Golf Course	20.0	Residential	227		+									?	
199	Old Cricket Ground Loose	1.5	Residential	32		+	0								?	
200	Land at former cricket field, Loose	2.3	Residential	49		+	0					0			?	
201	Land at Inkstand Cattery and Stables Lenham	1.3	Residential	21		+		+	0		0		0		?	
202	Land at Forstal Lane Coxheath	4.7	Residential	89		+	0					0			0?	
203	Land at Bydews Place Tovil	2.7	Residential	47		+	0					0			?	



Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
204	South of Eyhorne Street Hollingbourne	0.6	Residential	11		+	0	+	0			0		0	?	
206	Summer Place Caring Lane Bearsted	0.1	Residential	2		+	0								?	
207	Ledian Farm	1.7	Mixed	24		+	0					0			?	
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	6		+	0					0		0	?	
210	Land at Newlyn's Farm, Sutton Valence	1.7	Residential	31		+	0					0		0	?	
211	Wheeler Lane Linton	0.2	Residential	4		+	0		0			0		0	?	
212	Land at the Grange Staplehurst	6.9	Residential	130			0	+	0						?	
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	142					0						?	
216	Rochester Meadow	2.1	Residential	39		0	0	+	0					0	?	0
220	Land at Bydews Farm	27.3	Residential	366			0	+							?	
222	Land at Henhurst Farm, Staplehurst	16.3	Residential	309		+	0								?	
224	Land West of Lenham	18.6	Residential	275			0	+	0						?	
225	Tanglewood Loose	1.0	Residential	19		+	0							0	?	
226	Land north of Staplehurst - Garden village	109.3	Mixed	1658			0								?	
227	Land South of Green Lane, Boughton Monchelsea	2.9	Residential	50		+	0					0			?	
228	Land to North West View, Staplehurst	1.0	Residential	18			0		0					0	?	
229	Land at Stanley Farm Staplehurst	2.1	Residential	32		+	0							0	?	
231	Land at Lested Farm Chart Sutton	28.2	Residential	534		+	0								?	
233	Land west of Chart Corner Plough Wents Road Junction Chart Sutton	0.8	Residential	16		+	0		0			0		0	?	
234	west of North St, Barming site submission	8.6	Residential	182		+	0					0			?	
235	Land at Boughton Lane Maidstone	9.8	Residential	69		+	0					0			?	
236	Fairview Farm (North Parcel)	10.6	Residential	200		+	0					0			?	
239	Land to south Shangri-La, Langley	0.8	Mixed	12		+	0								?	
240	Banky Meadow, Bearstead	3.5	Residential	75		+	0								?	
244	Land at Iden Park, Staplehurst	3.2	Residential	21		+	0		0						?	

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
245	Land north of the M2 liding - urban extension	135.3	Mixed	1974		+	0		0						?	
246	Land rear of Appletree House, Bearstead	1.2	Residential	25		+	0								?	
247	Land south of Court Lodge Road Harrietsham	4.3	Residential	82			0	+	0			0			?	
248	Land north & south of Kenward Road Yalding	9.9	Residential	160		+	0	+					0		?	
250	Land rear of Butlers Farm Langley	3.6	Mixed	49		+	0					0		0	?	
251	Land at Heath Road Coxheath	0.2	Residential	4		+			0			0		0	?	
252	Land rear of Lavender Cottage, Langley	1.0	Mixed	14		+	0					0			?	
254	Land to South of Cotuams Hall Hollingbourne	0.7	Residential	9		+	0	+						0	?	
255	Land east of Yew Tree House Leeds	0.5	Mixed	7		+	0							0	?	
257	Land at junction of Heath Road & Dean Street Coxheath	1.0	Residential	20		+	0					0			?	
262	Land at Fant Farm Maidstone	12.2	Residential	260		+	0	+				0	+	0	?	
263	Land west of Ledian Farm, Leeds	1.4	Mixed	19		+	0					0		0	?	
265	Land at Abbey Farm Tovil	31.0	Residential	527			0								?	
266	Land North of Ware Street Bearstead	4.2	Residential	67		+	0	+							?	
269	Land east of Copper Lane Marden	3.1	Residential	59		+	0	+	0						?	
270	Land at Pested Bars Road, Boughton Monchelsea (option 1)	43.5	Residential	463		+	0								?	
271	Fir Tree Farm and Norton Lea (South)	22.8	Residential	432		+	0								?	0
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	0			0		0					0	?	
274	South of Leeds	104.4	Mixed	1443		+	0								?	
279	Langley Heath - Strategic Settlement	98.4	Mixed	1360			0								?	
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	9		+		+	0			0			?	
286	Underlyn Lane	1.3	Mixed	0		0	0		0						?	
288	Hill Farm Linton-Coxheath	5.7	Residential	107		+	0					0			?	
289	Heathlands Garden Community	373.3	Mixed	5161			0	+							?	
291	Bridge Farm Water Lane	4.2	Residential	90		+		+						0	?	

Chapter 4  
SA findings for options

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Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
292	Land at Old Ashford Rd, Lenham	14.5	Residential	138		+	0	+			0		+		?	
294	Land to East of Jubilee Cottages, Sutton Valence	2.8	Residential	53		+	0		0			0			?	
295	Land north of Copper Lane, Marden	3.9	Residential	74		+	0	+							?	
296	Astor Hever	2.4	Residential	45	+	+	0	+	0	0			+	0	?	0
297	Bearstead Library	0.1	Mixed	1		+	0	+	0					0	?	0
298	Dorothy Lucy Centre	0.7	Residential	16		+	0			0			0		?	0
299	Maidstone AEC	0.1	Mixed	3	+			++	0	0			+	0	?	0
302	Oakwood Overflow Car Park	0.2	Residential	3	+	+	0	+	0	0			+		0?	0
303	IS Oxford Rd	0.9	Mixed	14		+			0	0				0	0?	0
304	Land east of Hunton Rd, Chainhurst	0.3	Residential	6			0								?	
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	42	+	0		++		0			++	0	?	0
306	Land South of Gore Court, Otham	2.1	Residential	45		+	0								?	
307	Land N Marden Rd E of Clapper Lane, Staplehurst	1.4	Residential	27		0	0		0			0			?	
308	58 Church St, Boughton Monchelsea	0.9	Residential	16		0	0		0			0			?	0
309	Strategic Expansion of Marden	134.1	Mixed	1854			0	+							?	
310	Land north of Mote Rd, Headcorn	7.2	Residential	116		+	0	+							?	
312	Land north of Heath Rd, Coxheath	10.2	Residential	193		+	0					0			?	
314	East of Albion Rd, Marden	2.1	Residential	39		0	0	+						0	?	
316	Binbury Park, Detling	191.0	Mixed	2113											?	
317	Langley Heath	2.0	Mixed	27		+	0								?	
318	Pagehurst Farm	82.1	Mixed	1134		+	0								?	
319	Beaux Aires Farm	43.0	Mixed	476		+	0		0						?	
322	Lughorse Lane, Yalding	1.1	Residential	21		+	0		0						?	
324	The Grange Ashford Road	0.6	Residential	8		+	0	+	0			0			?	
326	Land at Amsbury Wood, Hunton	4.4	Residential	83		+	0					0			?	
327	Land at Hockers Farm, Detling	1.0	Residential	19		+	0	+	0						?	

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
328	Land at 59 Linton Rd, Loose	0.5	Residential	10		+	0					0			?	
329	Land at Sapphire Kennels, Sutton Valence	0.5	Residential	9					0			0		0	?	
330	Land at Seeburg, Bredhurst	1.1	Mixed	16		+	0		0					0	?	
331	Land south of the Lodge, Yalding	3.9	Residential	73		+	0		0						?	
332	Fairview Farm (South Parcel)	10.4	Residential	198		+	0					0			?	
333	Land at Old Ham Lane, Lenham - Kilnwood	9.7	Residential	184			0	+	0						?	
334	Land at Old Ham Lane, Lenham - Old Goods Yard	0.4	Residential	7		+		+	0		0		0	0	?	
335	Fir Tree Farm and Norton Lea (South)	52.8	Residential	501		+	0					0			?	

Table 4.10: SA results for the employment site options considered at Regulation 18 Preferred Approaches stage

Site ID	Site name	Site area (ha)	Use	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA6 Town Centre	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
8	Bassetts Bungalow, Marden	0.8	Mixed	0	0			+	0								?	
9	116 to 120 Week St	0.0	Mixed	38	19	+	+	+	++	++	0	0		0	++		?	0
53	12-14 Week St	0.1	Mixed	81	41	+	+	+	++	++	0	0		0	+		?	0
58	Green Lane Farm	2.3	Mixed	531	0		+	+	0					0			?	
66	Land at Lodge Rd, Staplehurst	4.2	Mixed	3964	0		+	+	0	+	0						0?	
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	334	0		+	+	0								?	
144	34- 35 High Street, Maidstone	0.1	Mixed	56	28	+	+	+	++	++	0	0			+		?	0
145	Len House	1.1	Mixed	531	265	+		+	++	++	0	0			+		?	0
146	Maidstone East	1.6	Mixed	1573	787	+	+	+	++	++	0	0			++		?	0
147	Gala Bingo and Granada House	0.4	Mixed	201	100	+	+	+	++	+	0	0			+		?	0
148	Maidstone Riverside	6.9	Mixed	5149	2574	+	+	+	++	++		0			++		?	
149	Maidstone West	2.1	Mixed	1035	517	+	+	+	++	++		0			++		?	0
150	Mill St Car Park	0.4	Mixed	358	179	+		+	++	++	0	0			+		?	0
151	Mote Rd	0.3	Mixed	2000	0	+	+	+	0	+	0	0			+		?	0
152	Royal British Legion Social Club	0.3	Mixed	FALSE	0			+	0		0	0		0			0?	
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	2778	1389		+	+	0								?	
167	North & West of Leeds	98.3	Mixed	23097	1000		+	+	0								?	
168	Land at Forge Lane	4.9	Mixed	1158	0		+	+	0					0			?	
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	5363	0		0	+	0		0						?	
176	Land North and South of Ashford Rd	23.2	Mixed	5444	0		+	+	0								?	
177	Land between Lower St & George St	6.5	Mixed	1530	0		+	+	0								?	
179	Land at Westerhill	0.7	Mixed	2806	0		+	+	0					0			?	
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	1508	0		+	+	0	+							?	
193	Land East of Upper Street Langley	6.0	Mixed	1406	0		+	+	0								?	

Site ID	Site name	Site area (ha)	Use	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA6 Town Centre	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
195	Waterside Park	16.2	Mixed	3814	0		+	+	0								?	
207	Ledian Farm	1.7	Mixed	409	0		+	+	0				0				?	
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	101	0		+	+	0				0				?	
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	0	0		0	+	0		0						?	
226	Land north of Staplehurst - Garden village	109.3	Mixed	0	1000		0	+	0								?	
239	Land to south Shangri-La, Langley	0.8	Mixed	198	0		+	+	0								?	
245	Land north of the M2 liding - urban extension	135.3	Mixed	33564	1000		+	+	0		0						?	
250	Land rear of Butlers Farm Langley	3.6	Mixed	838	0		+	+	0				0				?	
252	Land rear of Lavender Cottage, Langley	1.0	Mixed	235	0		+	+	0				0				?	
255	Land east of Yew Tree House Leeds	0.5	Mixed	112	0		+	+	0								?	
260	Land at Ashford Road Lenham	0.8	Employment	3108	0		+	+	0				0			0	?	
263	Land west of Ledian Farm, Leeds	1.4	Mixed	322	0		+	+	0				0				?	
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	41023	0		0	+	0		0						?	
274	South of Leeds	104.4	Mixed	24528	1000		+	+	0								?	
279	Langley Heath - Strategic Settlement	98.4	Mixed	23114	1000		0	+	0								?	
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	188	0		+	+	0	+	0			0			?	
286	Underlyn Lane	1.3	Mixed	4127	0		0	+	0		0						?	
289	Heathlands Garden Community	373.3	Mixed	87733	2500			+	0	+							?	
297	Bearstead Library	0.1	Mixed	FALSE	0		+	+	0	+	0						?	0
299	Maidstone AEC	0.1	Mixed	74	37	+	0	+	++	++	0	0			+		?	0
303	IS Oxford Rd	0.9	Mixed	FALSE	0		+	+	0		0						0?	0
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	1020	510	+	+	+	++	++		0			++		?	0
309	Strategic Expansion of Marden	134.1	Mixed	31511	1000	+	0	+	0	+					0		?	
316	Binbury Park, Detling	191.0	Mixed	0	1500			+	0								?	

Chapter 4  
SA findings for options

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Site ID	Site name	Site area (ha)	Use	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA6 Town Centre	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
317	Langley Heath	2.0	Mixed	458	0		+	+	0								?	
318	Pagehurst Farm	82.1	Mixed	0	500		+	+	0								?	
319	Beaux Aires Farm	43.0	Mixed	0	0		+	+	0		0						?	
330	Land at Seeburg, Bredhurst	1.1	Mixed	269	0		+	+	0		0						?	

Table 4.11: Policy-off SA results for additional site option identified at Regulation 19 Pre-submission stage

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
364	Kent Ambulance Headquarters Heath Road	0.4	Residential	7		+	0		0			0		0	?	



**4.73** Over 200 potential residential site allocation options and over 50 employment site options were subject to SA. Some general patterns were apparent in relation to the overall sustainability performance of the site options, as follows:

- Most of the residential site options with the best performance against the SA objectives as a whole were brownfield sites within Maidstone Town Centre. A small proportion of the best performing sites overall were within or adjacent to the wider Maidstone Urban Area, Medway Urban Area (an Edge of Maidstone Urban Extension), Lenham (a Rural Service Centre), and Coxheath (a Larger Village).
- The residential site options with the worst performance against the SA objectives as a whole were more widely distributed across the location typologies and were found within or adjacent to Edge of Maidstone Urban Extensions (South West of Maidstone Urban Extension); New Settlements (Binbury Park; Junction 8 M20; Langley Heath; Pagehurst Farm); Rural Service Centres (Harrietsham, Headcorn); Larger Villages (Coxheath; North of Staplehurst GS); and The Countryside.
- A similar picture was evident for the employment site options, although these sites were located in a narrower range of location typologies, with most of them in Maidstone Town Centre or in New Settlements. The best performing sites as a whole were brownfield sites in Maidstone Town Centre; the worst performing sites overall were within or adjacent to New Settlements (Binbury Park; Junction 8 M20; Langley Heath; Pagehurst Farm); or Larger Villages (North of Staplehurst GS).

**4.74** This pattern is, perhaps, not surprising given that Maidstone town (and particularly the Town Centre) contains the greatest number and range of services, facilities, public transport and jobs so that sites in the town are most likely to score well against several of the SA objectives, including those relating to access to services & facilities (SA objective 2), sustainable travel (SA objective 7), and climate change (SA objective 13). These same sites within Maidstone town are also much less likely to result in some of the potential negative environmental effects considered by the appraisal of site options, notably loss of agricultural land (SA objective 9) or harm to sensitive landscapes (SA objective 16).

**4.75** Although a number of sites are anticipated to result in positive effects, a large number of potentially negative effects have been identified for many of the sites. This is not surprising, as they will require land take, often of greenfield land, potentially placing pressure on biodiversity and other environmental assets such as best and most versatile

agricultural land. The large number of historic assets across the Borough, the high sensitivity of much of its landscape, and the wide extent of zones designed to protect drinking water quality also mean that many potential locations have the potential to have negative effects in relation to these environmental assets. Also, the rural nature of much of the Borough means that development in many locations is likely to result in increased car use, and associated carbon emissions and air pollution.

**4.76** In considering the large number of negative effects identified for the site options, it should be remembered that sites have been appraised on a “policy-off basis” at this stage of plan-making. This means that mitigation, such as may be available from requirements to provide new social infrastructure or transport to serve new communities, has not been factored in at this stage, although suggestions have been made as to the form this could take (see mitigation sections in **Appendix C**).

**4.77** The likely sustainability effects of the residential site options vary quite widely in relation to some sustainability objectives such as SA objective 2: Services & facilities; SA objective 4: Health; SA objective 7: Sustainable travel; SA objective 8: Minerals; SA objective 12: Flooding; and SA objective 14: Biodiversity as the effects are dependent on how close the site is to different environmental assets or services and facilities. For the other SA objectives scoped in for the site appraisals, more than three quarters of the residential site options achieved the same sustainability score. In relation to these sustainability objectives, effects are less dependent on the site location so there is less potential to influence sustainability via site selection, and it may therefore be necessary to place a greater reliance on site-specific or Local Plan policy requirements to achieve related sustainability objectives.

**4.78** For the employment site options, a reasonable level of variation in scoring between site options existed for many more SA objectives. This offers a greater potential to achieve more sustainable outcomes by selecting sites for allocation that score well in sustainability terms. There were only three SA objectives (SA objective 5: Economy; SA objective 10: Water; SA objective 15: Historic environment) in relation to which more than three quarters of the employment site options achieved the same sustainability score.

**4.79** Having identified some broad patterns in the findings, it should be noted that there are also sites that do not follow the general pattern. For example, many sites in that part of Maidstone Urban Area outside of the Town Centre do not perform particularly well. Reasons for this may include that the larger service centres found in the Town Centre and Rural Service Centres are too far away to walk to, the site is within

an area of poor air quality associated with major roads, or the site occupies a pocket of greenfield land within the urban area or close to environmental assets. Similarly, some of the sites in Rural Service Centres, Larger Villages, and the Countryside perform well, for example because they are close to a service centre and avoid many environmental assets.

**4.80** The site option appraisals serve to highlight the different types of significant sustainability effect that could occur as a result of allocating sites in different locations for residential development or for employment development and to indicate how these might be mitigated, thereby informing development of a more sustainable plan. In selecting its preferred sites for allocation, performance against the SA's site appraisal criteria needed to be taken into account by the Council. However, SA is not a decision-making tool and can only aid this process. Local priorities will influence the weight that is attached to different sustainability issues considered by the SA as well as to sustainability or wider planning matters beyond the scope of the SA of site options.

### SA of thematic topic paper options

**4.81** These options were assessed in summer 2020 and presented in the Topic Paper Options SA Report, August 2020.

#### Identification of reasonable alternatives

**4.82** In 2020 a series of 'topic papers' was prepared by the Council to inform emerging policy options for the Local Plan Review. The 'topic papers' published in June 2020 were as follows:

- Housing Strategy
- Economic Strategy
- Transport and Air Quality
- Social Infrastructure
- Retail and Leisure Strategy
- Environment

**4.83** The relationship of the Spatial Approaches identified within the Council's topic papers to the spatial strategy options appraised by the SA is described earlier in this chapter. The topic papers also outlined a number of additional options that were not reflected in the Spatial Approaches. These described potential policy directions in relation to the environment, types of housing, and social infrastructure. The results of the appraisals of these options were provided to the Council during July-August 2020 to help inform policy development with the final version set out in the August 2020 document 'Sustainability Appraisal – Topic Paper Options'.

**4.84** The appraisal results are reproduced in **Appendix C** and are cross-referenced in the relevant policy appraisal sections of **Chapter 8**.

### SA of thematic policy options

**4.85** Where alternative approaches were considered by the Council in arriving at the thematic policies of the Local Plan Review, these were set out alongside the preferred approach in the Regulation 18b Preferred Approaches plan document. These alternatives, where considered reasonable for the purposes of SA, were appraised and the results first reported in the November 2020 SA Report that accompanied consultation on the Regulation 18b document. These findings are reproduced in the 'reasonable alternatives tested' sections of **Chapter 8**.

## Chapter 5

# 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

5.1 The spatial vision is as follows:

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

5.2 The spatial vision is supported by eleven spatial objectives:

1. Through the Local Plan Review the Council will provide for, during the Plan period, a balance of new homes and related retail and employment opportunities 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. Ensuring that development adequately mitigates and adapts to climate change, whilst addressing the issues of flooding and water supply, and the need for dependable infrastructure for the removal of sewage and waste water.
5. Protection and enhancement of biodiversity, and protection and promotion of the multi-functional nature of the Borough's open spaces, rivers and other watercourses.
6. Provision of strategic and local infrastructure to support new development and growth including a sustainable Integrated Transport Strategy, adequate water supply, sustainable waste and minerals management, energy

infrastructure, and social infrastructure such as health, schools and other educational facilities.

7. Improve the quality of air within the Air Quality Management Area (AQMA).
8. Renewal of Maidstone Urban Area with particular focus on Maidstone the Town Centre and areas of social and environmental deprivation.
9. Redressing the low wage economy by expanding the employment skills base to target employment opportunities.
10. 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.
11. Ensuring that all new development is built to a high standard of sustainable design and construction.

**5.3 Table 5.1** 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 5.1: SA findings for Spatial Vision and Objectives

	Spatial Vision	Spatial Objective 1	Spatial Objective 2	Spatial Objective 3	Spatial Objective 4	Spatial Objective 5	Spatial Objective 6	Spatial Objective 7	Spatial Objective 8	Spatial Objective 9	Spatial Objective 10	Spatial 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
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
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

**5.4** 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.

**5.5** 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 and address climate change challenges. 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.

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

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

**5.8** 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

**5.9** 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, including the Invicta Barracks strategic development location. 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 objectives 6: Town Centre and 5: Economy.

**5.10** Minor positive effects are expected in relation to SA objectives 1: Housing and 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 emphasis will be on increasing skilled employment opportunities, having regard to the roles of centres and existing and improved accessibility patterns.

#### Spatial objective 2

**5.11** 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.

**5.12** 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.

**5.13** 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.

**5.14** 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.

**5.15** 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 objectives 7: Sustainable Travel and 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 objectives 10: Water, 12: Flooding and 13: Climate Change.

### **Spatial objective 3**

**5.16** 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.

**5.17** A minor positive effect is expected in relation to SA objective 15: Historic Environment because the spatial objective also requires development to conserve and enhance heritage designations.

**5.18** 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**

**5.19** Spatial objective 4 supports development that mitigates and adapts to climate change, by addressing issues of flooding and water supply. There is also an ambition for the borough to become carbon neutral by 2030. Therefore, significant positive effects are expected in relation to SA objectives 13: Climate Change, 12: Flooding and 10: Water.

**5.20** 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.

### **Spatial objective 5**

**5.21** Spatial objective 5 seeks to protect and enhance biodiversity, in addition to the protection and enhancement of the multi-functional nature of the Borough's open spaces, rivers and other watercourses. It recognises the biodiversity emergency and specifically makes reference to green and blue infrastructure and linking areas of environmental value. Therefore, a significant positive effect is expected in relation to SA objective 14: Biodiversity.

**5.22** 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.

**5.23** 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 6**

**5.24** Spatial objective 6 supports the provision of infrastructure, with specific reference made to transport, water supply, waste and minerals 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 objectives 8: Minerals, 10: Water, 12: Flooding, 13: Climate Change and 2: Services & Facilities.

**5.25** 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 7**

**5.26** Spatial objective 7 seeks to improve air quality within the Air Quality Management Area, including on human health. Therefore, a significant positive effect is expected in relation to SA objective 11: Air Quality and a minor positive effect is expected in relation to SA objective 4: Health.

### **Spatial objective 8**

**5.27** Spatial objective 8 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 objectives 5: Economy, 6: Town Centre, 2: Services & Facilities and 1: Housing.

**5.28** 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 objectives 3: Community and 4: Health.

**5.29** 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 9**

**5.30** Spatial objective 9 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 10**

**5.31** Spatial objective 10 seeks to meet housing needs by delivering affordable housing, housing for the elderly and pitches for Gypsies, Travellers and Travelling Showpeople. Therefore, a significant positive effect is expected in relation to SA objectives 1: Housing 4: Health.

**5.32** 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.

**5.33** 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 11**

**5.34** Spatial objective 11 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.

**5.35** 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 objectives 14: Biodiversity, 15: Historic Environment and 16: Landscape.

**5.36** An earlier draft of this SA Report noted that none of the spatial objectives explicitly addressed SA objective 8: Minerals. This has been addressed by the Council by an amendment to spatial objective 6.



## Chapter 6

# SA findings for the Borough spatial strategy

This chapter presents the appraisal findings for the spatial strategy

### Spatial strategy

#### Reasonable alternatives tested

**6.1** The iterative process followed to identify spatial strategy options and the SA findings for them are summarised below. Detailed results of the options appraisal are set out in **Appendix C**

**6.2** 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.

**6.3** 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 need 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 2017 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 very low residual growth allocated to Rural Service Centres and Larger Villages.

**6.4** 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 a maximum of 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 development in rural service centres/ larger villages/ smaller villages & hamlets/ the countryside

**6.5** The refined spatial strategy options that were subject to SA are summarised in **Table 6.1**.

Table 6.1: Rationale for refined spatial strategy options

Location	Scenario 1 Local Plan 2017 continued	Scenario 2 Two garden settlements approaches			Scenario 3 One garden settlement approaches		
		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 LPRSS1: Maidstone Borough Spatial Strategy

**6.6** 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

**6.7** These locations form a hierarchy with the strategy seeking to focus development within or close to 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.

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

*Table 6.2: SA findings for policy LPRSS1: Maidstone Borough Spatial Strategy*

SA objective	LPRSS1: 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	LPRSS1: Spatial Strategy
SA12: Flooding	
SA13: Climate Change	/+
SA14: Biodiversity	
SA15: Historic Environment	?
SA16: Landscape	?

### Explanation of SA findings for policy LPRSS1: 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**

**6.9** The housing quantum of 18,223 dwellings between 2022-2037 identified in policy LPRSS1 is based on the objectively assessed housing need following the Standard Method as set out in the Planning Practice Guidance. It takes account of demographic trends and income to house price affordability ratios to determine an appropriate housing amount for the borough. The housing quantum set out in policy LPRSS1 factors in a 5% contingency “buffer” to ensure robustness of delivery of the Plan and introduce flexibility in meeting housing need, in addition to 5% of housing capacity being brought into the first 5 years from later in the plan period. The housing target is to be reviewed in the run up to the Examination of the plan to include the most up to date affordability ratios which will mean the figure included in the adopted plan will be based on the most recent available evidence base relating to the local housing need.

**6.10** National planning policy requires that at least 10% of the housing requirement is provided on sites no larger than 1 ha in size. The supporting text of the policy states that this requirement will be met through sites on the brownfield register including sites allocated in previous plans and those planning consent, as well as sites included in the Regulation 19 plan which are less than 1 ha in size. This should help to ensure that the planned supply of homes is met, particularly during the earlier part of the plan period, given that small and medium size sites are often built-out relatively quickly.

**6.11** Given that the Local Plan Review intends to deliver the full quantum of the total objectively assessed housing need and takes steps to increase the robustness of housing delivery, significant positive effects are anticipated in relation to this SA objective.

## Mitigation

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

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

**6.13** Policy LPRSS1 sets out the principles for the distribution of development across the borough, setting out that Maidstone urban area will be a main focus for development in the borough, along with new garden settlements at Lidsing and Heathlands. The rural service centres of Coxheath, 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. This includes at the smaller villages where only limited development is to be provided, with its location and timing to be influenced by Neighbourhood Plans. Incorporating an approach which allows for new development to be influenced by the neighbourhood planning process may provide additional safeguards in terms of ensure that required service provision is delivered to support new housing growth at the smaller villages.

**6.14** 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.

**6.15** The Borough of Maidstone covers 40,000 hectares and approximately 75% of its population lives in the urban area of Maidstone town<sup>17</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>18</sup>. In accordance with policy LPRSS1, 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.

**6.16** The policy maintains the position of Harrietsham, Headcorn, Lenham, Marden and Staplehurst as rural service centres as part of the settlement hierarchy. These settlements 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>19</sup>. Policy LPRSS1 also promotes Coxheath, which is included as a larger village in the adopted Local Plan, to a rural service centre. The reclassification of this settlement reflects the findings of the 2021 Settlement Hierarchy Assessment<sup>20</sup> which concludes that Coxheath holds comparable characteristics to other rural service centres across the borough. Residents of new homes at these locations 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).

**6.17** 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. Policies SP4: Garden Settlements, SP4(a): Heathlands Garden Settlement and SP4(b): Lidsing will help to mitigate potential effects of this type. Policy SP4 requires the preparation of a phasing plan for the delivery of infrastructure improvements at the garden settlements alongside new homes and jobs. Furthermore, development at both garden settlements is specifically required by policies SP4(a) and SP4(b), to be supported by requisite infrastructure which is ready to operate upon occupation.

**6.18** 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 four Larger Villages of East Farleigh, 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.

<sup>17</sup> Maidstone Borough Council (August 2021) Local Plan Review: Pre-submission Plan (Regulation 19)

<sup>18</sup> 2011 Census travel to work data

<sup>19</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

<sup>20</sup> Figura for Maidstone Borough Council (July 2021) Maidstone Borough Council Settlement Hierarchy Review 2021

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

#### **Mitigation**

**6.20** Delivering social, health, green and transport infrastructure 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**

**6.21** 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 LPRSS1 focusses the majority of development to Maidstone Urban Area, 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.

**6.22** Given that the approach to development at the smaller villages, in terms its location and timing, is to be influenced by Neighbourhood Plans, policy LPRSS1 is likely to help secure more community input into the planning of development for the borough. This is likely to help promote community engagement as well as helping to deliver development which is integrated to better meet the needs of existing residents.

**6.23** Policy LPRSS1 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, however, a true sense of community cohesion can take a long time to achieve, especially when such developments are only partly completed.

**6.24** 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 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.

**6.25** 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**

**6.26** 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.

**6.27** 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.

**6.28** 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**

**6.29** 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.

**6.30** Maidstone Borough (71.0%) has a higher percentage of adults who consider themselves physically active than nationally (66.4%) and is slightly higher than the Kent average

(68.5%)<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>.

**6.31** 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>.

**6.32** Policy LPRSS1 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.

**6.33** 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.

**6.34** 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 LPRSS1 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. Considering the development planned for across Maidstone, air quality assessment work<sup>24</sup> concluded that effects on human health relating to air quality receptors would not be significant. The potential effects relating to air pollution are discussed further under SA objective 11: Air Quality.

**6.35** There are four waste sites within and near to Maidstone town including Allington Wiped Film Evaporator Plant at 20 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.

**6.36** 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.

**6.37** For the garden settlements, the policy sets out that these will be developed in accordance with garden community principles<sup>25</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.

**6.38** 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.

**6.39** 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

**6.40** 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

<sup>21</sup> Public Health England (2021) Local Authority Health Profiles [online] available at: <https://fingertips.phe.org.uk/profile/health-profiles>

<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)

<sup>24</sup> Jacobs on behalf of Kent County Council (2021) Maidstone Local Plan Air Quality Assessment

<sup>25</sup> <https://www.tcpa.org.uk/garden-city-principles>

those areas is crucial. Providing additional green space and active travel routes alongside the rest of the development would also improve health and wellbeing.

**6.41** 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.

**6.42** 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.

**6.43** 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**

**6.44** The Council has prepared an employment need assessment<sup>26</sup> which identifies that the minimum floorspace required to meet the forecasted need is 101,555 square metres between 2022-2037. Policy LPRSS1 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.

**6.45** The council has undertaken an assessment of expected population growth, combined with analysis of national and local retail trends and Experian forecasts. The analysis of this assessment work has identified an objectively assessed projected retail floorspace requirement (traditional retailing as well as food and beverage uses) of 10,847 square metres up to 2032. In accordance with the NPPF, sufficient land to meet retail need for ten years should be identified in local plans. Policy LPRSS1 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.

**6.46** In terms of spatial distribution, policy LPRSS1 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.

**6.47** In addition, policy LPRSS1 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 is considered that this distribution of economic development is likely to increase employment opportunities throughout the borough, leading to a stronger economy.

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

#### **Mitigation**

**6.49** A diversity of economic development could be encouraged through suitable policies in the Local Plan Review. This could include support for job creation in technology and higher value sectors as well as those which would support the national transition to a green economy. Jobs which support opportunities for education, training and internships could also be supported to help ensure the long term functioning of the economy in Maidstone.

**6.50** 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**

**6.51** 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>27</sup>. Therefore, retaining the vitality and viability of Maidstone town centre is an important sustainability objective for the borough.

**6.52** Policy LPRSS1 includes provisions which result in increased development in the Maidstone urban area, and specifically that this will be the focus of development during

<sup>26</sup> Lichfields for Maidstone Borough Council (April 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](https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/Maidstone-Economic-Development-Needs-Study-Stage-Two.pdf)

<sup>27</sup> Centre for Cities (2020) High Streets [online] Available at: <https://www.centreforcities.org/high-streets/>

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.

**6.53** Policy LPRSS1 also prioritises renewal in the town, which will help to enhance the vibrancy of Maidstone town.

**6.54** 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.

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

#### Mitigation

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

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

**6.57** Maidstone town centre 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, 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>28</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>29</sup>.

**6.58** Policy LPRSS1 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 high quality public transport and active travel network featuring frequent, affordable and reliable bus services and safe, attractive and direct active travel routes.

**6.59** Policy LPRSS1 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. Development at the smaller villages is to be limited to that which supports the viability of local services which will further contribute to the reduced need for residents to have to travel longer distances in the plan area.

**6.60** This said, policy LPRSS1 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 may in future become readily accessible to the motorway network and this may also result in an increase in the use of motorised transport.

**6.61** The provision for small scale opportunities to support the rural economy within the policy may help to reduce the

<sup>28</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>29</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>



distance that those living in the rural area need to travel to access employment.

**6.62** In accordance with the above, the strategy of policy LPRSS1 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

**6.63** 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.

**6.64** 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.

**6.65** 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

**6.66** Around half of the borough is covered by Mineral Safeguarding Areas (MSAs) designated in the Kent Minerals & Waste Local Plan. Economic land-won minerals that are identified for safeguarding in Kent are sharp sand and gravel, soft sand, silica sand, crushed rock, building stone and brickearth.<sup>30</sup>

**6.67** Although policy LPRSS1 focuses the majority of development on Maidstone town, there are some development areas set out in policy LPRSS1 which will conflict with Mineral Safeguarding Areas.

**6.68** Locations in Maidstone, 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.

**6.69** However, of those sites which fall within MSAs the majority are within the Limestone Hythe Formation (Kentish Ragstone). The Kent Minerals and Waste Plan<sup>31</sup> clarifies that there are significant available reserves (in 2019) of the Kentish Ragstone. It is stated that any allocations in local plans for non-mineral development that take in land within these safeguarded minerals are unlikely to be in conflict with the presumption to safeguard these minerals, although it is noted that this will need to be evidenced by a Minerals Assessment.

**6.70** In accordance with the above, minor negative effects (prior to mitigation) are anticipated in relation to this SA objective. Given that further evidence will be required at sites that fall within land that take in safeguarded mineral to determine the potential impact on the safeguarding of mineral resources, the effect is uncertain.

#### Mitigation

**6.71** 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.

**6.72** Recommendations in relation to Heathlands garden settlement are set out in the appraisal of policy SP4(a): Heathlands.

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

**6.73** 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>32</sup>.

**6.74** Policy LPRSS1 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

<sup>30</sup> Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30

<sup>31</sup> Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30

<sup>32</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)

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).

**6.75** However much of the development provided for within policy LPRSS1 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.

**6.76** 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.

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

#### Mitigation

**6.78** 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, a new country park/ wetlands area focused on the River Stour in the south of the Heathlands garden settlement site coincides with grade 2 agricultural land.

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

**6.79** Kent is one of the driest regions in England and Wales<sup>33</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>34</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 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.

**6.80** 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 LPRSS1 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.

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

#### Mitigation

**6.82** 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

**6.83** Maidstone town 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 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

<sup>33</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>34</sup> AECOM (2017) Kent Water for Sustainable Growth Study

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<sup>35</sup> with no discernible downward trend<sup>36</sup>.

**6.84** Policy LPRSS1 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 provided at the additional strategic development location at Invicta Barracks towards the northern edge of the Maidstone urban area, may also result in increased travel through the AQMAs in the town.

**6.85** 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. Indeed, the air quality assessment work for the plan<sup>37</sup> identified that the largest expected increases in air pollutant concentrations as a result of development set out in the plan are associated with the Heathlands and Lidsing developments. Nevertheless, this work concluded that predicted total air pollutant concentrations at all human health receptors other than one (to the north of the M20 at Boxley Road) are likely to be below the air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. The air quality assessment then assessed the significance of the air quality effect in accordance with Highways England guidance and concluded that the air quality effects on human health of the development provided for by the Local Plan Review was not significant. The same conclusions were drawn for both a 'Do-Minimum' scenario that took account of background traffic growth and committed development in the Borough and for a 'Do-Something' scenario that also included the new development provided for by the Local Plan Review. The differences in pollution concentrations at the various receptor locations between these two scenarios, i.e. the effects of the new development provided for by the Local Plan Review alone, were relatively small except on the main routes serving the two proposed garden settlement locations.

**6.86** 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

**6.87** Ensure that through design codes each development will have to incorporate green infrastructure and that in areas of existing or potential poor air quality development 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

**6.88** 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 and its major tributaries, the River Beult and River Teise<sup>38</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. There are a number of surface water flow paths which predominantly follow topographical flow paths along existing watercourses or dry valleys with some isolated ponding located in low lying areas. Groundwater flood events have been recorded across Maidstone, but these have typically been isolated incidents<sup>39</sup>. The risk of flooding is likely to be intensified due to climate change.

**6.89** Policy LPRSS1 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. Many of the locations in the south of the borough contain areas identified as being higher risk flood zones (Flood Zones 2 or 3). Within Maidstone town, areas of higher flood risk are mainly found close to the River Medway. The identified settlements in the south of Maidstone are also close to land identified as having a 1 in 100-year risk of flooding from surface water. There are also substantial areas of land close to Staplehurst and Headcorn at which groundwater levels are either at or very near (within 0.025m

<sup>35</sup> Air pollution limits set by the EU remain in UK law after Brexit having been enshrined through the Air Quality Standards Regulation

<sup>36</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>37</sup> Jacobs on behalf of Kent County Council (2021) Maidstone Local Plan Air Quality Assessment

<sup>38</sup> Maidstone Borough Council and JBA Consulting (2020) Maidstone Borough Council Level 1 SFRA update and Level 2 SFRA [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>39</sup> Ibid

of) the ground surface. Furthermore, much of the south of Maidstone lies within a flood warning area and a flood alert area. These areas cover the land at the western edge of Marden, land to the north and north west of Staplehurst and land at the southern edge of Headcorn<sup>40</sup>. Development at these settlements may result in development being located in these higher risk flood zones.

**6.90** 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.

**6.91** 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.

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

#### **Mitigation**

**6.93** 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**

**6.94** 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.

**6.95** 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 LPRSS1 will lead to an increase in greenhouse gas emissions.

**6.96** 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 LPRSS1 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.

**6.97** In summary of the above, policy LPRSS1 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**

**6.98** 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**

**6.99** 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.

<sup>40</sup> Ibid

**6.100** 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 LPRSS1 is likely to lead to some negative effects.

**6.101** 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 LPRSS1 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.

**6.102** The findings of the HRA screening<sup>41</sup> for the Local Plan determined that impacts from air pollution, recreation and water quantity and quality could result in a likely significant effect in relation to North Downs Woodland SAC, Medway Estuary and Marshes SPA/Ramsar, the Swale SPA/Ramsar, Queendown Warren SAC, Thames Estuary and Marshes SPA/Ramsar and Stodmarsh SAC & SPA/Ramsar. The Appropriate Assessment concluded no adverse effect on integrity as a result of increased air pollution, increased recreational pressure or pressure on water abstraction and treatment in relation to any of the European sites identified provided that mitigation measures recommended by the HRA are required by the plan and successfully implemented. For effects relating to air pollution, and water quality and quantity the mitigation measures will need to be agreed with Natural England before the Local Plan Review is adopted, which could be verified during the Examination process and confirmed in an HRA Addendum and/or Adoption Statement.

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

**6.104** 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. There is also potential for impacts on areas of ancient woodland and/or local wildlife sites at the rural service centres, given the close proximity of these settlements to these types of designations.

**6.105** 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

**6.106** 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.

**6.107** In relation to the nutrient enrichment issue in the Upper Stour catchment which the HRA has identified in relation to potential effects on the Stodmarsh SAC, SPA and Ramsar, 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 the requirement in policy LPRSP14(a): Natural Environment to protect ground and surface waters and meet all requirements of both the permitting regulations and the Habitats Regulations, for example in relation to nutrient neutrality at the Stodmarsh SAC, SPA and Ramsar site.

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

**6.108** 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>42</sup>.

**6.109** Policy LPRSS1 sets out that Maidstone town will remain the focus of development. Maidstone town includes numerous heritage designations including listed buildings, conservation

<sup>41</sup> LUC on behalf of Maidstone Borough Council (2021) Maidstone Local Plan Review Habitats Regulations Assessment Reg 19 HRA Report

<sup>42</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)

areas, scheduled monuments and areas of archaeological potential and Mote Park registered Park and Garden.

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

**6.111** 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

**6.112** Avoidance of development in close proximity to heritage assets that could result in harm to those assets significance, including their setting, would provide the best mitigation. However, design codes with heritage assets and local character at the forefront could also be implemented. Site-specific allocation policies should have regard to the risks to heritage assets identified in the heritage assessment carried out by Council officers.

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

**6.113** 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 out in the Council's landscape capacity study<sup>43</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).

**6.114** Policy LPRSS1 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.

**6.115** 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 Landscapes of Local Value or the Kent Downs AONB. The exception to this is Marden and Yalding. As a result of the development distribution set out in policy LPRSS1, 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

**6.116** 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. This could include the requirement for the incorporation of appropriate green infrastructure and landscaping to deliver development which is sensitive to the existing landscape character and setting.

#### 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.

<sup>43</sup> Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

## **Chapter 7**

### **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**

**7.1** The Maidstone Town Centre 2050 Vision is set out below.

**7.2 Table 7.1** 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 infrastructure, 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 and heritage features, including the riverside, historic buildings 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;
- Improving infrastructure connectivity to other areas through improved rail services and stations and embracing technology;
- Providing a pattern of both accessibility and service provision/activity which encourages all of the borough and beyond to identify with the Town Centre;

- Tackling congestion and air quality issues through improvements in provision for vehicles, pedestrians and cyclists, including public transport; and
- Enhancing the built and historic environment of the town so that it has a stronger character for new build to reference in design and materials.

Table 7.1: SA findings for Maidstone Town Centre 2050 Vision

SA objective	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	++
SA16: Landscape	+

7.3 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. Improved connectivity to other areas through rail services and stations and the embracing of technology is also included in the vision. However, this positive 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.
  - SA objective 15: Historic Environment, because the enhancement of the built and historic environment of the town is included as a key component of realising the vision.
- 7.4** 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.
  - SA objective 16: Landscape, because the vision seeks to enhance the built and historic environment of the town which will provide a stronger character for new development to reference in terms of its design and materials. This is likely to benefit local character and setting.
  - Given that there is no direct or indirect reference to any topics of relevance or measures which could influence the achievement of the following SA objectives, the vision's contribution to these is likely to be negligible: SA objective 8: Minerals and SA objective 9: Soils.

## Maidstone Town Centre

### Reasonable alternatives tested

**7.5** 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.

**7.6** 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 were set out in detail in an SA of Options report<sup>44</sup> that was published alongside the SA report for the Regulation 18 Preferred Approaches Local Plan document. For ease of reference, summaries of the SA findings for the residential and employment sites identified at Reg18b stage and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4** of this SA report. The detailed findings are reproduced in **Appendix C**.

### Policy LPRSP1: Maidstone Town Centre and site allocation policies for this location

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

- LPRSP1: Maidstone Town Centre
- LPRSA144: Medway/ High St
- LPRSA145: Len House
- LPRSA146: Maidstone East
- LPRSA147: Gala Bingo & Granada House
- LPRSA148: Maidstone Riverside
- LPRSA149: Maidstone West
- LPRSA151: Mote Road Car Park

**7.8** Policy LPRSP1: 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.

**7.9** 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.

**7.10** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.2** following the scoring scheme set out in **Chapter 2**.

<sup>44</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

SA of Maidstone Local Plan Review

Table 7.2: SA findings for policy LPRSP1: Maidstone Town Centre and site allocation policies for this location

SA objective	LPRSP1: Maidstone Town Centre	LPRSA144: Medway/ High St	LPRSA145: Len House	LPRSA146: Maidstone East	LPRSA147: Gala Bingo & Granada House	LPRSA148: Maidstone Riverside	LPRSA149: Maidstone West	LPRSA151: Mote Road Car Park
SA1: Housing	+	0	0	0	0	0	0	0
SA2: Services & Facilities	0	+	+	+	+	+	+	+
SA3: Community	0	+	+	+	+	+	+	+?
SA4: Health	+	+	0	+?	+?	+?	+?	+?
SA5: Economy	+	0	+	+	+	+	+	+
SA6: Town Centre	++	++	++	++	++	++	++	0?
SA7: Sustainable Travel	+?	++	++	++	+	++	++	+
SA8: Minerals	0	0	0	0	0			0
SA9: Soils	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
SA12: Flooding	0							0
SA13: Climate Change	+	+	+	++	+	++	++	+
SA14: Biodiversity	0							
SA15: Historic Environment	+	?	?	?	?	?	?	?
SA16: Landscape	+	0	0	0	0	?	0	0

### Explanation of SA findings for policy LPRSP1: Maidstone Town Centre and site allocation policies for this location

**7.11** In relation to SA objective 1: Housing, minor positive effects are expected from the strategic policy LPRSP1: 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 the individual sites themselves, because the site-specific policies make no mention of the type or quality of housing to be delivered on the site.

**7.12** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP1: 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.

**7.13** In relation to SA objective 3: Community, negligible effects are expected from the strategic policy LPRSP1: Maidstone Town Centre. All of the site-specific allocation policies contain provisions requiring consideration of the amenity of neighbours 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.

**7.14** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP1: 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 sites ) 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 and

air quality measures , 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.

**7.15** In relation to SA objective 5: Economy, minor positive effects have been identified for the strategic policy LPRSP1: Maidstone Town Centre, given the requirements for a focus on a renewed retail environment, the introduction of new workspaces, measures to increase local employment levels and the focus on using town centre floorspace to maximise the post-Covid economic recovery. All the site options in the town centre, with the exception of site 144 (Medway/ High St), 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.

**7.16** Significant positive effects have been identified in relation to SA objective 6: Town Centre for both strategic policy LPRSP1: Maidstone Town Centre and almost all site allocations within the town centre. This is because there is a clearly stated priority within policy LPRSP1 to create a strong service offering that increases footfall, with positive effects on vibrancy and viability in the town centre and the post-Covid economic recovery, delivered through a Town Centre Development Plan Document. The mixed uses envisaged in the site allocation policies also contribute to this goal. Only in the case of site 151 (Mote Road Car Park) 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.

**7.17** In relation to SA objective 7: Sustainable Travel, minor positive effects are expected from the strategic policy LPRSP1: 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.

**7.18** Negligible effects have been identified in relation to SA objective 8: Minerals for policy LPRSP1: 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.

**7.19** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP1: 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.

**7.20** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP1: 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.

**7.21** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP1: 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.

**7.22** In relation to SA objective 13: Climate Change, minor positive effects have been identified for the strategic policy LPRSP1: 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.

**7.23** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic LPRSP1: 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.

**7.24** In relation to SA objective 15: Historic Environment, minor positive effects have been identified for the strategic policy LPRSP1: 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, along with stated requirements for tall buildings in the town centre. 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. Impacts of sites 144, 145, 146, 148 and 149, were also highlighted in the MBC officer heritage assessment. However, in several cases (including sites 144, 145 and 147), 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.

**7.25** In relation to SA objective 16: Landscape, minor positive effects have been identified for the strategic policy LPRSP1: 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

**7.26** 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 145, 147 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.
- An earlier draft of this SA Report recommended that heritage protection/improvement measures identified by the officer heritage assessment be integrated into policy requirements. This has been addressed by the Council in relation to sites 144, 145 and 146, by amendments to the corresponding allocation policies. It has also been addressed to an extent in relation to site 148, however this site-specific policy would benefit from a specific requirement to enhance the setting of St Peter's Church, as recommended by the officer heritage assessment. The issues raised by the officer assessment have not yet been addressed in the case of site 147.

## Maidstone Urban Area

### Reasonable alternatives tested

**7.27** 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.

**7.28** 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 were set out in detail in an SA of Options report<sup>45</sup> that was published alongside the SA report for the Regulation 18 Preferred Approaches Local Plan document. For ease of reference, summaries of the SA findings for the residential and employment sites identified at Reg18b stage and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4** of this SA report. The detailed findings are reproduced in **Appendix C**.

### Policy LPRSP2: Maidstone Urban Area and site allocation policies for this location

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

- LPRSP2: Maidstone Urban Area
- LPRSA152: Former Royal British Legion Social Club
- LPRSA303: EIS Oxford Rd
- LPRSA366: Springfield Tower, Royal Engineers Road

**7.30** Policy LPRSP2: 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 LPRSP2 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 LPRSP2 also lists the existing

employment sites that are designated as Economic Development Areas by Policy LPRSP11(a) to maintain employment opportunities in the urban area. The sustainability effects of this designation are separately presented under the SA of Policy LPRSP11(a) and not repeated here.

**7.31** 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.

**7.32** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.3** following the scoring scheme set out in **Chapter 2**.

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<sup>45</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

SA of Maidstone Local Plan Review

Table 7.3: SA findings for policy LPRSP2: Maidstone Urban Area and site allocation policies for this location

SA objective	LPRSP2: Maidstone Urban Area	LPRSA152: Former Royal British Legion Social Club	LPRSA303: EIS Oxford Rd	LPRSA366: Springfield Tower, Royal Engineers Road
SA1: Housing	0	0	0	0
SA2: Services & Facilities	+	0		+
SA3: Community	+	+	0	+
SA4: Health	+	0	+	+
SA5: Economy	+			0
SA6: Town Centre	0	+	+	+
SA7: Sustainable Travel	0			++
SA8: Minerals	0	0	0	0
SA9: Soils	0	0	0	0
SA10: Water	0			
SA11: Air Quality	N/A	N/A	N/A	N/A
SA12: Flooding	0	0		
SA13: Climate Change	0			+
SA14: Biodiversity	+	?	0	0
SA15: Historic Environment	0	0?	0?	?
SA16: Landscape	0		0	0



### Explanation of SA findings for policy LPRSP2: Maidstone Urban Area and site allocation policies for this location

**7.33** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP2: 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.

**7.34** In relation to SA objective 2: Services & Facilities, minor positive effects are expected from the strategic policy LPRSP2: 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.

**7.35** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP2: 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.

**7.36** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP2: 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.

**7.37** In relation to SA objective 5: Economy, minor positive effects have been identified for the strategic policy LPRSP2: 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 and 303 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.

**7.38** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP2: 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.

**7.39** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP2: 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. Negligible effects have been identified in relation to SA objective 8: Minerals for policy LPRSP2: Maidstone Urban Area. Negligible effects have been identified in relation to this SA objective for all site-specific policies.

**7.40** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP2: 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.

**7.41** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP2: 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.

**7.42** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP2:

Maidstone Urban Area. The GIS-based site options work identified significant negative effects for sites 303 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.

**7.43** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP2: 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.

**7.44** In relation to SA objective 14: Biodiversity, minor positive effects have been identified for the strategic policy LPRSP2: Maidstone Urban Area, given the requirement to ensure that development positively contributes to the biodiversity value of green spaces. The GIS-based site options work identified minor negative effects for site 152 and negligible effects for all other sites in relation to this SA objective. In the case of site 152, the risk to biodiversity comes from nearby ancient woodland, and the site-specific allocation policy requires a Phase 1 Habitat survey to be carried out. This may help to reduce the impact on nearby biodiversity assets if, for example, it leads to buffering of or increased connectivity with off-site habitats. As a result, it contributes uncertainty to the previously identified minor negative effect in this case.

**7.45** In relation to SA objective 15: Historic Environment, minor positive effects have been identified for the strategic policy LPRSP2: Maidstone Urban Area. The GIS-based site options work identified negligible effects with uncertainty in relation to this SA objective for all but one of the sites. In the case of site 366, significant negative effects with uncertainty were identified, largely given its 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.

**7.46** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP2: 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. However given that there is only a very limited intersection with this LCA, only minor

negative effects are identified for site 152 in relation to this SA objective.

### Mitigation

**7.47** 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 order to minimise the risk of surface water flooding at sites 303 and 366, SuDS features should be integrated into proposed development schemes, and development should avoid those limited areas where flood risk has been identified.

## Edge of Maidstone

### Reasonable alternatives tested

**7.48** 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.

**7.49** 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 were set out in detail in an SA of Options report<sup>46</sup> that was published alongside the SA report for the Regulation 18 Preferred Approaches Local Plan document. For ease of reference, summaries of the SA findings for the residential and employment sites identified at Reg18b stage and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4** of this SA report. The detailed findings are reproduced in **Appendix C**.

### Policy LPRSP3: Edge of the Maidstone Urban Area and site allocation policies for this location

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

- LPRSP3 – Edge of the Maidstone Urban Area
- LPRSA266 - Land at Ware Street, Maidstone
- LPRSA265 - Land at Abbey Gate Farm, South West of Maidstone
- LPRSA270 - Land South West of Police HQ, South of Maidstone
- LPRSA172 - Land at Sutton Road, South East of Maidstone
- LPRSA362: Maidstone Police HQ, Sutton Rd

**7.51** Policy LPRSP3: Edge of the Maidstone Urban Area 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 LPRSP3 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 LPRSP2 also lists the existing employment sites that are designated as Economic Development Areas by Policy LPRSP11(a) to maintain employment opportunities in the urban area. The sustainability effects of this designation are separately presented under the SA of Policy LPRSP11(a) and not repeated here.

**7.52** 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.

**7.53** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.4**, following the scoring scheme set out in **Chapter 2**.

<sup>46</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

Table 7.4: SA findings for policy LPRSP3: Edge of the Maidstone Urban Area and site allocation policies for this location

SA objective	LPRSP3 Edge of the Maidstone Urban Area	LPRSA266 Land at Ware Street, Maidstone	LPRSA265 Land at Abbey Gate Farm, South West of Maidstone	LPRSA270 Land South West of Police HQ, South of Maidstone	LPRSA172 Land at Sutton Road, South East of Maidstone	LPRSA362: Maidstone Police HQ, Sutton Rd
SA1: Housing	0	0	0	0	0	0
SA2: Services & Facilities	+					
SA3: Community	+	+	+	+	+	+
SA4: Health	+	+	+	+	+	+
SA5: Economy	0	0	0	0	0	
SA6: Town Centre	0	+	+	+	+	+
SA7: Sustainable Travel	0	+				
SA8: Minerals	0					
SA9: Soils	0					0
SA10: Water	0					
SA11: Air Quality	N/A	N/A	N/A	N/A	N/A	N/A
SA12: Flooding	0				0	
SA13: Climate Change	0					
SA14: Biodiversity	0	0		0		0
SA15: Historic Environment	0	?	?	?	?	?
SA16: Landscape	0		?			

### Explanation of SA findings for policy LPRSP3: Edge of the Maidstone Urban Area and site allocation policies for this location

**7.54** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP3: Edge of the 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.

**7.55** In relation to SA objective 2: Services & Facilities, minor positive effects are expected from the strategic policy LPRSP3: Edge of the Maidstone Urban Area, given the requirements for new primary schools and local shopping facilities to serve new development. The GIS-based site options work identified minor 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.

**7.56** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP3: Edge of the Maidstone Urban Area, 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.

**7.57** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP3: Edge of the Maidstone Urban Area, given the requirement for improvements to health infrastructure and for publicly accessible open space. The initial GIS-based scores generally identified minor positive effects in relation to this SA objective for site-specific allocation policies. All sites have strong access to the public rights of way (PROW) network. 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.

**7.58** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP3: Edge of the Maidstone Urban Area and for all but one of the site-specific allocation policies, given that none of them would lead to the loss of an existing employment site. Residential development at site 362 would result in the loss of existing

employment space, and as such a significant negative effect has been identified.

**7.59** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP3: Edge of 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.

**7.60** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP3: Edge of Maidstone Urban Area. 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 other than for site 266, which has some access to Bearsted rail station. Access to bus services is generally better, however access to existing cycle routes is poor across all sites. Requirements for public transport improvements at sites 265 and 270 are noted but do not affect the overall SA scores, given residual poor access to rail services and cycle routes.

**7.61** Negligible effects have been identified in relation to SA objective 8: Minerals for policy LPRSP3: Edge of Maidstone Urban Area. Minor negative effects have been identified in relation to this SA objective for all site-specific policies as they intersect with a minerals safeguarding area (MSA).

**7.62** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP3: Edge of the Maidstone Urban Area. Significant negative effects have been identified for all site-specific allocation policies in relation to this SA objective, given that all would lead to the loss of greenfield land and most are on high quality agricultural land. These SA scores are unaffected by site-specific policies.

**7.63** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP3: Edge of the Maidstone Urban Area. 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.

**7.64** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP3: Edge of the Maidstone Urban Area. 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.

**7.65** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP3: Edge of the Maidstone Urban Area. 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.

**7.66** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP3: Edge of the Maidstone Urban Area. 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 (sites 266, 172 and 270), Phase 1 habitat surveys and other measures are required by site-specific policies (including respecting ancient woodland). These requirements were judged to reduce the significance of the previously identified negative effects.

**7.67** In relation to SA objective 15: Historic Environment, negligible effects have been identified for strategic policy LPRSP3: Edge of the Maidstone Urban Area. 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. The MBC officer assessment highlighted potential impacts on assets at sites 265 and 270, due to listed farmsteads and archaeological assets. Likewise, site 362 is located within close proximity of listed buildings and development could affect their setting. However at site 265, the provisions within the site-specific policy to preserve and enhance listed buildings and assess archaeological potential reduce this negative effect to minor negative. 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.

**7.68** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP3: Edge of the Maidstone Urban Area. For several 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. 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, or having regard to the presence of the AONB or local landscape value – this is the case for sites 266, 265 and 270. The SA score for site 362

remains the same. However, given there is only partial overlap, there is scope for mitigation.

### Mitigation

**7.69** 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.
- 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.
- Parts of sites which lie in a mineral safeguarding area (MSA) should be avoided, or minerals extracted prior to development.
- 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.
- In the case of site 362, development should be directed towards those parts of the site with lower identified landscape sensitivity.
- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the allocation policy for site 266 to conserve and enhance the historic environment.
- Landscape and visual impact assessment should be required for site 172, 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

**7.70** 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

**7.71** 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 deliverable in principle.

**7.72** The process followed for identifying the garden settlement options to be subject to SA and the results of the SA of those options were described in detail in an SA of Options report<sup>47</sup> that was published alongside the SA report for the Regulation 18b plan document. For ease of reference, summaries of the SA findings for the garden settlement options and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4** of this SA report. The detailed findings are reproduced in **Appendix C**.

### Site allocation policies LPRSP4(a) and LPRSP4(b)

**7.73** 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 Heathlands (policy LPRSP4(a)) and Lidsing (policy LPRSP4(b)).

**7.74** Assessment findings for both of these policies are summarised in below and follow the scoring scheme set out in **Chapter 2**.

Table 7.5: SA findings for site allocation policies LPRSP4(a) and LPRSP4(b)

SA Objective	Policy LPRSP4(a): Heathlands	Policy LPRSP4(b): Lidsing
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		

<sup>47</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

SA of Maidstone Local Plan Review

SA Objective	Policy LPRSP4(a): Heathlands	Policy LPRSP4(b): Lidsing
SA12: Flooding		0
SA13: Climate Change		
SA14: Biodiversity	+?	+?
SA15: Historic Environment		
SA16: Landscape		



### Explanation of SA findings for site allocation Policies LPRSP4(a) and LPRSP4(b)

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

**7.75** The provision of Garden communities as set out in policies 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.

**7.76** Policy LPRSP4(a) sets out a requirement for 40% of the total 5,000 homes to be delivered, to be affordable and for homes to be of a mix of types and tenures, including generational living. The mix of housing should reflect evidence in the Council's latest Strategic Housing Market Assessment. This will help some members of the community who would otherwise be unable to access housing, to do so. This requirement will also help to ensure that the housing at the site meets the needs of range of residents. Significant positive effects are anticipated in relation to this SA objective.

**7.77** Policy LPRSP4(b): Lidsing, similarly, to policy LPRSP4(a) requires that of the total 2,000 new homes to be delivered, 40% should be affordable. The site should also incorporate a mix of types and tenures in line with the Council's latest Strategic Housing Market Assessment. This should include housing for generational living. Significant positive effects are anticipated in relation to this SA objective.

#### Mitigation

**7.78** The positive effects could be further enhanced by including reference to design standards such as Lifetime Homes. This 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

**7.79** The introductory text to policies LPRSP4(a) and SP(b) sets out that garden settlements will be required to deliver a mix of uses including retail, leisure and other local services. New service provision is to take account of local levels of service provision as well as local and surrounding populations. 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.

**7.80** Policy LPRSP4(a) sets out that Heathlands garden community will 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. Two new local centres will be provided within the site, one at the north east of the site in the early phases of development and one at the west of the site as part of a later phase. 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 short distances to services and facilities 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, three new primary schools are required by policy LPRSP4(a) as well as sufficient open space in accordance with policy INF1. Policy LPRSP4(a) also requires contributions towards the 2FE expansion of Lenham Secondary school, and wider secondary provision across the borough. 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. The policy seeks to address the likely need for residents to access this facility by requiring the delivery of a bespoke shuttle bus service to Lenham secondary school. 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 (providing a target 5,000 jobs) is required by the policy, which is likely to help the resident population gain employment within their local area.

**7.81** In spite of the policy requirements for these types of provisions at the site, it is likely that residents will need to travel outside of the garden settlement to access some essential services and facilities. This includes the 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, new bus routes, and new footway and cycleway linking Lenham and Charing will help to ensure that occupants of Heathlands can access the higher order services and facilities and additional employment opportunities in other settlements while reducing dependence on the private car. A 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.

**7.82** Policy LPRSP4(b): Lidsing sets out that a new local centre of not less than 1,500 square metres of retail, leisure and services will be provided within Lidsing garden settlement on a new orbital bus route with good access to employment (including at the Medway town centres), Hempstead, and Lordswood. The requirement in the policy for the local centre to have good access to Hempstead and Lordswood suggests that the local centre and services and facilities there will be accessible to a large number of residents. The policy sets out that a new primary school and open space (to meet the area requirements of policy INF1) will be provided within the settlement. Contributions towards the creation of a new secondary school in the Capstone Valley area will also be required. Considering these requirements for education provision alongside the requirement for a new local centre it is likely that occupants of Lidsing will be able to access day to day services and facilities.

**7.83** In addition, a significant amount of employment (exceeding 2,000 new jobs ) 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. In accordance with the above, the effects of the policy in relation to this SA objective are anticipated to be significant positive.

### **Mitigation**

**7.84** Providing further clarity on the location of the local centre within Lidsing could help to ensure good accessibility for residents to services and facilities.

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

**7.85** 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 existing local communities in relation to construction impacts, increased traffic and increased demand for local services that may not have sufficient capacity to accommodate this.

**7.86** Introductory text to policies LPRSP4(a) SP(b) requires evidence of engagement with and future roles identified for local communities within the development. The framework masterplan for the site is to be prepared in consultation with local communities, and agreed by the Council, Kent County Council, and local service providers. It also includes support for opportunities for local food growing, which if undertaken through community growing schemes may help to form a sense of community. The introductory text also requires appropriate local retail and services, taking into account the local and surrounding populations and levels of service provision.

**7.87** Policy LPRSP4(a): Heathlands sets out that mitigation and requisite infrastructure should be ready to operate upon occupation of the garden settlement. 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, nearby settlement of Lenham Heath and would therefore be likely to change the identity of this. Lenham, being larger and separated from the closest part of Heathlands by the railway line would be likely to experience a lesser change to its identity, although its role in the retail hierarchy could change as a result of the alternative offering at Heathlands. 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 (although it is noted that this would be offset in part by the requirement for the development to contribute to expansion of Lenham Secondary school, and wider secondary provision across the borough) 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 LPRSP4(a) in relation to this SA objective. All effects are uncertain as different members of the community may perceive this garden settlement differently.

**7.88** Policy LPRSP4(b): Lidsing sets out that mitigation and requisite infrastructure should be ready to operate upon

occupation of the garden settlement. 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 from occupants of the development. The proposed new arm to Junction 4 of the M2 (which is an element of the transport package associated with this settlement option) should help to ensure that this traffic is directed to main routes rather than local roads, which should help to avoid potential friction with the existing communities. The enhanced access to the M2 may be seen as a positive change by these communities. 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. The adverse 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 LPRSP4(b) in relation to this SA objective. All effects are uncertain as different members of the community may perceive this garden settlement differently.

### Mitigation

**7.89** 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(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. Introductory text already requires engagement with local communities and the future local governance arrangements for the site to be identified. However, more positive effects could result if the policy was 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.

**7.90** Notwithstanding the generic text included in the introduction to policies LPRSP4(a) and LPRSP4(b) to provide appropriate local services, given the planned capacity of Heathlands garden settlement (5,000 units), the essential nature of primary healthcare facilities, and the stated desire for

Heathlands to provide sustainable growth as a stand-alone garden settlement, policy LPRSP4(a) would benefit from a requirement to provide new primary healthcare facilities on-site.

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

**7.91** Health and wellbeing are affected by a number of factors, 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, overheating during hotter summers or increased flood risk as a result of more severe weather events.

**7.92** Introductory text to policies LPRSP4(a) and LPRSP4(b) 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. Provisions relating to climate change adaptation in relation to both new garden settlement sites are addressed by the specific policy text of policies LPRSP4(a) and LPRSP4(b).

**7.93** In relation to policy LPRSP4(a): Heathlands, there is an existing 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 LPRSP4(a) requires that noise mitigation measures are integrated within the design of the development which is likely to help reduce the potential for noise from nearby road infrastructure to adversely affect residents. However, it does not include any specific mitigation for potential odour effects relating to the wastewater treatment works and inert landfill within the site. The policy requires that climate change adaptations and a mitigation strategy based on national and local guidelines are incorporated into the design of the site. As such, the development of the garden settlement is considered less likely to result in adverse effects in relation to health and wellbeing when considering the implications of climate change. Policy LPRSP4(a) also re-iterates the significant provision of open space and cycling and walking links. In conclusion, policy LPRSP4(a) is considered likely to give rise to mixed significant positive and minor 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.

**7.94** A significant portion 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 LPRSP4(b) requires that noise and drainage and light pollution mitigation measures should be incorporated into the design of the site. This should help to limit the potential for adverse effects relating to noise and light pollution from the nearby motorway, although there is some potential for residual effects to result. Furthermore, similar to policy LPRSP4(a), LPRSP4(b) includes a provision that climate change adaptations and a mitigation strategy based on national and local guidelines should be incorporated into the design of the site. Similar to policy LPRSP4(a), this policy also re-iterates the significant provision of open space and cycling and walking links. In conclusion, policy LPRSP4(b) is considered likely to give rise to mixed significant positive and minor negative effects in relation to this SA objective.

#### Mitigation

**7.95** In order to mitigate potential negative effects from air quality and odour, development should seek to specifically address these issues. In this regard, it should be noted that air 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 reduce them by using trees and shrubs as a natural barrier to air pollution.

**7.96** 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, as would on-site provision of primary healthcare facilities at Heathlands, as noted under SA objective 3.

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

**7.97** The introductory text included for policies LPRSP4(a) and LPRSP4(b) sets a benchmark target of 1 new job for each new home delivered, with jobs across a range of types. Should this be achieved, it will have significant benefits for the local community in terms of supporting economic growth and providing access to nearby employment opportunities.

**7.98** Policy LPRSP4(a): Heathlands re-iterates the requirement of 1 job to 1 home (with a total of 5,000 jobs to be created) 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.

**7.99** Policy LPRSP4(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

**7.100** No negative effects identified therefore no mitigation is required. The positive effects of the site allocation policies could be strengthened further by including reference to support for different types of business e.g. a Start-Up Hub, home working and Co-Working Hubs within the District Centre.

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

**7.101** The garden communities that are to be provided for under policies LPRSP4(a) and LPRSP4(b) 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 14km miles; Lidsing approximately 7km), 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 LPRSP4 is likely to result in increased use of Maidstone town centre and minor positive effects are anticipated.

**7.102** Policy LPRSP4(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 centre, which subsequently will increase expenditure and vibrancy. As such, minor positive effects are anticipated from policy LPRSP4(a) in relation to this SA objective.

**7.103** Policy LPRSP4(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. The policy requires the creation of walking and cycling routes to this area from the site. However as set out above, it is approximately 7km from Lidsing to Maidstone town centre. The relatively short distance from the site to Maidstone town centre is likely to result in some Lidsing residents being able to readily access the town centre. The improvements to junction 4 of the M2 set out in the policy will further enhance ease of travel between the two settlements. Similar to the discussion in relation to policy LPRSP4(a) above, the development of Lidsing is likely to result in increased people in Maidstone town centre, which will increase expenditure and vibrancy. As such, minor positive effects are anticipated from policy LPRSP4(b) in relation to this SA objective.

#### Mitigation

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

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

**7.105** 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 travel by sustainable modes and reducing dependency on private vehicles.

**7.106** 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. The introductory text of policies LPRSP4(a) and LPRSP4(b) sets out that the garden settlements will be required to enable and encourage the adoption of sustainable and active travel habits within the site and connections to the local area through design. Low emissions technologies are to be prioritised and integration of different sustainable active transport services and infrastructure is to be promoted. Superfast broadband is also to be incorporated at new garden settlements and this will help to reduce the need to travel. Furthermore, 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.

**7.107** Policy LPRSP4(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 a district centre and two local centres;
- New and improved bus routes, including a shuttle bus service to Lenham secondary school;
- Cycling and walking links within the settlement and a footway and cycleway along the A20 between Lenham and Charing;
- Formation of a Transport Review Group to monitor the suitability of the public transport service provision for the site; and
- Measures to prevent rat-running and to prioritise vulnerable road users and active travel modes, which will help to improve the safety of site users making use of active modes of transport.

**7.108** 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, 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 there is potential for localised congestion, although the delivery of these road improvements is likely to direct this to main routes and help avoid this to some degree.

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 significant positive and minor negative effects are anticipated in relation to this SA objective as a result of policy LPRSP4(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.

**7.109** Policy LPRSP4(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 and Hempstead, as well as the Medway town centres;

- A new half-hourly bus service between the site and Chatham, although it is questionable whether this is sufficiently frequent to encourage a significant shift from use of private vehicles;
- New walking and cycling links within the site and to the Medway urban area through the Capstone Valley.
- Measures to prevent rat-running and to prioritise vulnerable road users and active travel modes, which will help to improve the safety of site users making use of active modes of transport.

**7.110** These design and infrastructure provisions should help to ensure that dependency upon and use of private vehicles is reduced. 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 although the delivery of these road improvements is likely to help offset this to some degree. Overall, uncertain mixed, minor positive and minor negative effects are anticipated in relation to this SA objective as a result of policy LPRSP4(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

**7.111** 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 LPRSP4(a) and LPRSP4(b) state that requisite infrastructure is ready to operate upon occupation of the site which is expected to include new transport infrastructure.

**7.112** Policy LPRSP4(a) includes the requirement for the formation of a Transport Review Group who will be responsible for monitoring the suitability of the public transport service provision for the Heathlands site. 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 would provide further benefits. The plan or strategy could also state who will be responsible for achieving the aims of the plan or strategy. Benefits are likely to be achieved in relation to 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.

**7.113** Both site policies could require the incorporation of infrastructure for electric car and bike charging and bike storage. The site specific policy requirement for "Priority, through design, throughout the site for vulnerable road users and active travel modes" might be strengthened to seek to minimise car use through the provision of a limited but appropriate level of car parking and the incorporation of measures such as car sharing schemes.

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

**7.114** 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.

**7.115** In relation to policy LPRSP4(a): Heathlands, 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, a substantial area of the Heathlands site is within a Mineral Safeguarding Area, designated 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. Policy LPRSP4(a) states that the site will begin to deliver development in approximately 2030 and requires that phasing and delivery accommodates the extraction, backfilling and remediation of minerals allocations within its boundaries. As such the policy mitigates potential adverse effects in relation to currently allocated mineral extraction sites. While the site may contain unallocated mineral resources associated with the Mineral Safeguarding Area, the Minerals Safeguarding Assessments<sup>48</sup> undertaken to support the preparation of the plan demonstrate that the site satisfies the requirement of DM7 of the Kent Minerals and Waste Local Plan (2020). This means that the mineral reserve within the Mineral Safeguarding Area is not of economic value, that extraction of the mineral would not be viable or practicable or that extraction can occur prior to the non-

<sup>48</sup> Maidstone Borough Council (2021) Draft Minerals Safeguarding Assessments Supplementary Paper

minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development. Therefore, negligible effects are expected for policy LPRSP4(a) in relation to this SA objective.

**7.116** The Lidsing site does not intersect with any Mineral Safeguarding Area or Safeguarded Mineral Site and therefore negligible effects are anticipated from policy LPRSP4(b) in relation to this SA objective.

### Mitigation

**7.117** No mitigation suggested.

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

**7.118** 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, areas of grade 2 land lie within the southern and northern parts of the site (the remainder and majority of the site is grade 3);
- Lidsing sits entirely within grade 3 agricultural land.

**7.119** Policies LPRSP4(a) and LPRSP4(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.

**7.120** 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. As such, significant negative effects are anticipated in relation to this SA objective for policies LPRSP4(a) and LPRSP4(b).

### Mitigation

**7.121** 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 development layout within the boundary could be 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 a new country park/wetlands area focused on the Stour River taking in much of the grade 2 agricultural land within the site boundaries. While

the provision of new wetland to act as nutrient interceptors for nitrates and phosphates is of importance to ensure the protection of biodiversity (as identified through the appraisal of SA objective 14: Biodiversity for the Heathlands site) this approach is recognised as likely to result in loss of a large area of higher value agricultural soils.

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

**7.122** Kent is one of the driest regions in England and Wales<sup>49</sup>. Water use in the borough is high by both national and international standards, and most water bodies have an overall classification of between 'moderate' and 'fail'<sup>50</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 LPRSP4(a) or LPRSP4(b) refer to water efficiency and therefore it is considered possible that the development of the garden settlements will result in inefficient water use, resulting adverse impacts on water availability.

**7.123** 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.

**7.124** 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:

<sup>49</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>50</sup> Environment Agency (Accessed July 2021) River Basin Districts [online] at: <https://environment.data.gov.uk/catchment-planning/>

- The south western part 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.

**7.125** Neither of policies LPRSP4(a) or LPRSP4(b) include provisions in relation to safeguarding water quality, other than the nutrient issue dealt with under SA objective 14.

**7.126** In accordance with the above, given the lack of protection for water resources or water quality, each of policies LPRSP4(a) and LPRSP4(b) are assessed as potentially giving rise to significant negative effects in relation to this SA objective.

#### **Mitigation**

**7.127** 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. The garden settlements allocated within the source protection zones should be developed to incorporate appropriate requirements to avoid adversely affecting the achieving of drinking water protection objectives. The development should also utilise water efficient design and fixtures.

**7.128** Sustainable drainage systems might be incorporated to ensure water is not contaminated.

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

**7.129** This SA objective considers the potential for development to affect air quality in those areas which are identified as having poor air quality at present, which are identified as air quality management areas (AQMAs).

**7.130** None of policies LPRSP4(a), or LPRSP4(b) include specific provisions in relation to air quality. 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 and higher order services. The policy includes provisions which will potentially reduce the use of petrol / diesel fuelled road vehicles, 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 LPRSP4(a).

**7.131** The Lidsing garden settlement is approximately 7km 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 LPRSP4(b).

#### **Mitigation**

**7.132** In order to help prevent on-site air quality effects from petrol/diesel vehicle use, it is recommended that policies LPRSP4(a) and LPRSP4(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**

**7.133** 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.

**7.134** 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 southern part of centre parcel of the site, 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 LPRSP4(a): Heathlands sets out that a flood risk assessment will be required. Furthermore, sustainable drainage methods are to be implemented to manage surface water flooding issues and to ensure that flood risk is not exacerbated elsewhere. Climate change adaptations and a related mitigation strategy are also required for the site which is likely to help address the potential for increased flood risk associated with climate change. However, it is understood that engineering solutions to mitigate groundwater flooding are generally 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 and the incorporation of sustainable drainage measures at the site. In accordance with the above, minor negative effects are anticipated in relation to this SA objective. Uncertainty is attached to the effect identified given the potential but unknown nature of how mitigation might be achieved.

**7.135** 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. The site falls entirely within flood zone 1. Policy LPRSP4(b): Lidsing sets out that a flood risk assessment will be required. Furthermore, sustainable drainage methods are to be implemented to manage surface water flooding issues and to ensure that flood risk is not exacerbated elsewhere. Climate change adaptations and a related mitigation strategy are also required for the site which is likely to help address the potential for increased flood risk associated with climate change. The current low level of flood risk on the site is likely to reduce the potential for issues to result. 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

**7.136** None identified.

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

**7.137** 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.

**7.138** 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.

**7.139** The introductory text to policies LPRSP4(a) and LPRSP4(b) includes the specific provision that buildings and places will be designed with a strong emphasis focus on energy efficiency, reduced carbon emissions and climate change mitigation. This clear provision is considered likely to result in the garden settlements significantly reducing their potential greenhouse gas emissions.

**7.140** In addition to this, the introductory text 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 which is likely to include the promotion of active travel over travel by private vehicle;
- 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;
- Enabling and encouraging the adoption of sustainable and active travel habits and the use of low emissions technologies for travel;
- Superfast broadband;
- Appropriate local retail and services; and
- A good local employment offer with a target of 1 job to 1 home.

**7.141** 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

**7.142** Policy LPRSP4(a): Heathlands expands on the provisions of policy LPRSP4 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, two new local centres, new bus routes and cycling and walking links and primary school provision. Priority is to be given to active travel users through the site's design. 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 introductory text to policies LPRSP4(a) and LPRSP4(b) as well as the specific requirements included in policy LPRSP4(a), minor negative effects are anticipated in relation to this SA objective.

**7.143** Policy LPRSP4(b): Lidsing expands on the provision of policy LPRSP4 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. Priority is to be given to active travel users through the site's design. 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 introductory text to policies LPRSP4(a) and LPRSP4(b) as well as the specific requirements included in policy LPRSP4(b), minor negative effects are anticipated in relation to this SA objective.

### Mitigation

**7.144** The proposals for development of the garden settlements should consider the specific ways in which climate change mitigation measures can be incorporated and the likely success of these. For example, requiring appropriate technical modelling of a range of emissions reduction solutions and selecting those likely to have the greatest and most cost effective benefits. Support could also be provided for sustainable waste management to help reduce emissions associated with resource use, waste collection, and waste processing.

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

**7.145** 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.

**7.146** There are several local wildlife sites within or directly adjacent to 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 Shaw, Round Wood, East Lenham Roughett and Wheatgratten Wood. Areas of various types of priority habitat also exist within the site.

**7.147** 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. Northern parts of the site are also within an Impact Risk Zone for rural residential development associated with the Medway Estuary and Marshes SSSI.

**7.148** The introductory text to policies LPRSP4(a) and LPRSP4(b) includes provisions that each garden settlement will include generous amounts of green space which are to support the achievement of biodiversity net gain. This clear policy provision is considered likely to result in benefits for biodiversity. Having said this, there is uncertainty attached to these potential benefits until further assessment is undertaken and ecological mitigation designed.

**7.149** Policy LPRSP4(a): Heathlands re-iterates and clarifies the biodiversity net gain requirements, citing that a minimum biodiversity net gain of 20% must be achieved. It also requires provision of a new east-west ecological corridor through the site, along or parallel to the River Stour. 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 LPRSP4(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.

**7.150** 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 LPRSP4(a) in relation to this SA objective. Having said this, until further assessment is undertaken and ecological mitigation designed, the potential effects in relation to this SA objective is uncertain.

**7.151** Policy LPRSP4(b): Lidsing 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 LPRSP4(b) in relation to this SA objective. Having said this, until further assessment is undertaken and ecological mitigation designed, the potential effects in relation to this SA objective is uncertain.

### Mitigation

**7.152** Further positive effects could be achieved if proposals for the development of the garden settlements were to set out a level of protection for the important habitats and species (described above) which are already present within and near to the boundaries of the proposed garden settlements. The policies would also benefit from a requirement for ecological enhancement on these two sites to connect with the wider ecological networks around them.

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

**7.153** 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.

**7.154** At Heathlands, there is one listed building within the site (Grade II listed Mount Castle Farm Cottage). Ten additional listed buildings lie between the northern and southern parcels of the site. This includes Royton Manor Grade II\* listed building. There are also Grade II listed buildings within 250m of the most northerly and southerly boundaries of the site. In addition, the Chilston Park Registered Park and Garden lies adjacent to the southwestern boundary of this site. MBC officer assessment as part of the SLAA notes that the rural setting of the listed historic farmsteads generally contributes to their significance and therefore development is very likely to cause harm. A high potential for harm to Chilston Park's extensive setting and rural outlook is identified, as is potential harm to Lenham village listed buildings and conservation area due to loss of rural outlook at its south-east edge. A high potential for extensive multiperiod buried archaeology, visible archaeological landscape features and pattern, historic buildings including buried and upstanding is also noted across the site. In response, the officer assessment recommends removal of the field to the east of Chapel Farm from development; pre-allocation archaeological desk-based assessment; archaeological landscape assessment including field survey; and targeted evaluation fieldwork, including geophysical survey and targeted trial trenches

**7.155** Policy LPRSP4(a) requires the garden settlement to be masterplanned in a manner that interfaces with existing buildings which will be retained. It also notes the presence of areas of archaeological potential which should be surveyed and development should respond to their significance. Development is also required to respond positively to heritage at the site, including the assets described above. This policy requirement is judged to reduce the potential for harm to the historic environment, resulting in a minor negative residual effect.

**7.156** There are no designated heritage assets within the Lidsing garden settlement site allocation 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. MBC officer assessment as part of the SLAA notes Abbots Court and Kelmsley Street farmsteads (listed, curtilage listed and non-designated assets) appear highly vulnerable to impact from potential motorway spur and access to the site and that development within their curtilage and setting would likely result in harm. Potential impact on the setting and significance of other listed buildings in Bredhurst, particularly St Peter's Church is also noted. In relation to archaeology, the MBC officer assessment notes a general potential for Prehistoric and later activity, especially as Lidsing settlement is focused on a dry valley through the North Downs. There is a historic routeway which links St Mary Magdalene Chapel with

Lidsing and the historic farm complexes are located along this routeway, including Abbey Court Farm. This site may also contain remnants of a 20th century military defence balloon site, which it would be preferable to preserve in situ.

**7.157** Policy LPRSP4(b) requires the garden settlement to be masterplanned in a manner that interfaces with existing buildings which will be retained. It also requires that the Lidsing site is developed to survey and respond to areas of potential archaeological sensitivity. While the policy does not make reference to the need to ensure that the settings of the nearby listed buildings are protected, it states that the heritage of the site should be responded to, including the site's importance as a 20th century military balloon installation. These policy requirements are judged to reduce the potential for harm to the historic environment, resulting in a minor negative residual effect.

#### Mitigation

**7.158** Avoidance of development that results in harm to the significance of heritage assets, including their setting, would provide the best mitigation. The design codes required for both sites should be prepared with heritage assets and local character at the forefront.

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

**7.159** 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 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>51</sup>. This has been used to inform the appraisal in relation to this SA objective.

**7.160** 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.

**7.161** 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.

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

**7.163** The Lidsing site falls almost entirely 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 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.

**7.164** The introductory text to policies 4(a) and 4(b) 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.

**7.165** As set out above, Heathlands is located in an area that has high landscape sensitivity. Policy LPRSP4(a): Heathlands requires a landscape study to inform the design parameters of the masterplan including views into / from the AONB to be undertaken. Development of the site is to be landscape-led to minimise impact upon, and where possible enhancements to, the AONB. The policy also includes requirements to protect the character of Lenham, Lenham Heath and Charing, including establishing strategic gaps to avoid coalescence between these settlements. These requirements, combined with the requirements in introductory text are considered likely to reduce the potential for adverse landscape effects, although some residual negative effect is still expected, given the close proximity of the AONB and the high landscape sensitivity of much of the site. Minor negative effects are therefore anticipated in relation to this SA objective from policy LPRSP4(a).

**7.166** 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 LPRSP4(b) includes a

<sup>51</sup> Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

provision that a landscape-led approach should be taken for the development to ensure that there are positive enhancements to the Capstone Valley and Kent Downs AONB. The development should also create a positive outfacing edge when viewed from Lordswood, Hempstead and the AONB and the settlement shape should be configured with regards its relationship to the Medway urban area, as well as the AONB and Bredhurst. As a result of this and the significant mitigation proposed in relation to the new link to M2 junction 4, residual minor negative effects are anticipated as a result of policy LPRSP4(b) in relation to this SA objective.

### Mitigation

**7.167** The proposals for the development and mitigation relating to landscape character at both sites should be informed by a landscape study and input from the Kent Downs AONB unit.

## Strategic Development Locations

### Reasonable alternatives tested

**7.168** Policy LPRSP5(a) was included in the Local Plan Review to maintain flexibility and policies LPRSP5(b) and LPRSP5(c) simply carry over policies from the adopted Local Plan. As such, no reasonable alternatives existed to the LPRSP5 suite of policies.

### Policy LPRSP5 Strategic Development Locations and site allocation policies LPRSP5(a) to LPRSP5(c)

**7.169** Policy LPRSP5 is an overarching policy which sets out the principle for the development of three 'broad locations' for growth that were originally included in the current Local Plan 2017. 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 LPRSP5(a): Development in the Leeds-Langley Corridor; LPRSP5(b): Invicta Barracks Strategic Development Location; and LPRSP5(c): Lenham Broad Location For Housing Growth. The approach to the appraisal of these policies is discussed below.

### Policy LPRSP5 Potential Strategic Development Locations

**7.170** Given that 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 (LPRSP5(a), LPRSp5(b) and LPRSP5(c)) and

does not separately appraise policy LPRSP5. The approach to the appraisal of the sub policies is set out below.

### Policy LPRSP5(a): Development in the Leeds-Langley Corridor

**7.171** Policy LPRSP5(a) is appraised below and the SA scores are set out in **Table 7.6**.

### Policy LPRSP5(b): Invicta Barracks Strategic Development Location

**7.172** The identification of the Invicta Barracks as a strategic development site includes broadly 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>52</sup>. The only change to the policy relates to the requirement to provide a new through school at the site, whereas adopted policy H2(2) requires the provision of a new primary school at the site. This change to the policy is not expected to result in material difference to the sustainability merits of the site.

**7.173** The change would help support improved access to services and facilities for residents at the site and in the surrounding area and limit the potential for overburdening of existing school facilities which could help protect community cohesion. The provision of a new through school may also reduce the need for residents of the site to have to travel longer distances on a regular basis which could have benefits in terms of carbon emissions and air pollution.

**7.174** Policy LPRSP5(b) retains an existing policy in an extant local plan with the majority of policy requirements remaining unchanged. This policy has already been subject to SA and has been adopted as part of the current Maidstone Borough Local Plan and therefore it is not considered necessary to re-appraise this policy.

### Policy LPRSP5(c): Lenham Broad Location For Housing Growth

**7.175** 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 considered necessary to re-appraise this policy for the same reasons as set out for policy LPRSP5(b).

<sup>52</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)

Table 7.6: SA findings for policy LPRSP5(a): Development in the Leeds-Langley Corridor.

SA objective	LPRSP5(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	?

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 uses other than the relief road that might otherwise be permitted in the defined corridor. However, the nature, scale and 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.

**Explanation of SA findings for policy LPRSP5: (Potential) Strategic Development Locations and site allocation policies LPRSP5(a) to LPRSP5(c)**

**7.176** For the reasons set out above, only policy LPRSP5(a) has been appraised. Policy LPRSP5(a): Development in the Leeds-Langley Corridor does not propose any development at this time but rather safeguards land for a potential future link

## Rural Service Centres

### Reasonable alternatives tested

**7.177** 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.

**7.178** 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 were set out in detail in an SA of Options report<sup>53</sup> that was published alongside the SA report for the Regulation 18 Preferred Approaches Local Plan document. For ease of reference, summaries of the SA findings for the residential and employment sites identified at Reg18b stage and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4** of this SA report. The detailed findings are reproduced in **Appendix C**.

### Policy LPRSP6: Rural Service Centres

**7.179** This section presents the appraisals of Policy LPRSP6: 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.

**7.180** Policy LPRSP6 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.

**7.181** 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.

**7.182** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.7**, following the scoring scheme set out in **Chapter 2**.

Table 7.7: SA findings for policy LPRSP6: Rural Service Centres

SA objective	LPRSP6: Rural Service Centres
SA1: Housing	0
SA2: Services & Facilities	+
SA3: Community	+
SA4: Health	+
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	+
SA16: Landscape	0

### Explanation of SA findings for policy LPRSP6: Rural Service Centres

**7.183** Minor positive effects have been identified for Policy LPRSP6: 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). Minor positive effects have also been identified for SA objective 15, given the requirement to protect, conserve and enhance the historic environment in these settlements and identify relevant opportunities.

<sup>53</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

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

### **Mitigation**

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

- None identified.



## Coxheath

### Policy LPRSP6(a): Coxheath and site allocation policies for this location

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

- Policy LPRSP6(a): Coxheath
- LPRSA251 – Land at Heath Road, Coxheath
- LPRSA364 – Kent Ambulance HQ, Coxheath
- LPRSA312 – Land North of Heath Road, Coxheath

**7.187** Policy LPRSP6(a): 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 LPRSP6(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.

**7.188** 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.

**7.189** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.8**, following the scoring scheme set out in **Chapter 2**.

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Table 7.8: SA findings for policy LPRSP6(a): Coxheath and site allocation policies for this location

SA objective	LPRSP6(a) Coxheath	LPRSA251 Land at Heath Road, Coxheath	LPRSA364 Kent Ambulance HQ, Coxheath	LPRSA312 Land North of Heath Road, Coxheath
SA1: Housing	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	0	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	?
SA15: Historic Environment	0	?	?	?
SA16: Landscape	0	0?	0?	0?

### Explanation of SA findings for policy LPRSP6(a): Coxheath and site allocation policies for this location

**7.190** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP6(a): 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.

**7.191** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP6(a): 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 Coxheath, 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 (however site 312 has slightly better access to secondary schools). Access to employment sites is also relatively poor from all sites. Sites 251 and 364 have slightly good access to GP surgeries and primary schools but poor access to secondary schools. None of the site-specific policies require provision of additional key services, and as such these SA scores remain unaffected.

**7.192** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP6(a): 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 251 and 364, given the requirements within site-specific allocation policies to protect the amenity of neighbouring residents through the design of development. In the case of site 312, negligible effects are expected.

**7.193** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP6(a): 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 other than site 312 lie within 300m of existing publicly accessible open space and all are free of concerns regarding air, noise and odour pollution. Site 364 has weaker access to public rights of way (PROW) All site-specific policies also require provision of open

space, however this would not alter the previously identified minor positive overall SA scores.

**7.194** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP6(a): Coxheath and for all allocated sites, given that none would require the conversion of an existing employment site.

**7.195** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP6(a): 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.

**7.196** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP6(a): Coxheath. For all allocated sites within Coxheath, minor negative 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. The site-specific policy for site 312 requires pedestrian routes to local services, however this does not change the SA scores. .

**7.197** In relation to SA objective 8: Minerals, negligible effects are expected from the strategic policy LPRSP6(a): Coxheath. Minor negative effects have been identified for site 312 in relation to this SA objective, given that it lies within a Minerals Safeguarding Area (MSA). However the other sites do not, and as such negligible effects were identified.

**7.198** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP6(a): Coxheath. Sites 251 and 364 lie within Grade 3 classified agricultural land, and as such minor negative effects are identified in relation to this SA objective. Site 312 is classified as a greenfield site, 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.

**7.199** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP6(a): 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.

**7.200** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP6(a): Coxheath and for all site-specific allocation

policies. This is because all sites lie outside the relevant flood risk zones.

**7.201** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP6(a): Coxheath. The GIS-based site options work identified minor negative effects for all sites in relation to this SA objective, 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.

**7.202** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP6(a): Coxheath. The GIS-based site options work identified significant negative effects for site 312 in relation to SA objective 14: Biodiversity due to intersection with an area of ancient woodland, albeit a very small area of overlap. However, the site-specific policy for 312 requires a Phase 1 Habitat survey to be carried out, which reduces this effect to minor negative with uncertainty, given the actions taken based on such a survey are as yet undefined.

**7.203** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP6(a): Coxheath. The GIS-based site options work identified significant negative effects with uncertainty for sites 364 and 312 in relation to this SA objective, given their proximity to nearby heritage assets. In the case of site 364, this relates to nearby listed buildings within the settlement, and in the case of 312 it relates both to the presence of listed buildings and the nearby archaeological assets and Linton Conservation Area lying to the east. However the site-specific allocation policies require a historic environment sensitivity study to be carried out, reducing the effect to minor negative with uncertainty.

**7.204** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP6(a): Coxheath. The GIS-based site options work identified minor negative effects all allocated sites in Coxheath, given that they lie in the Coxheath Plateau LCA, which is assessed as moderately sensitive. Site-specific policies for all sites require an LVIA to be carried out and the results to be taken into account in design, however, which reduces these effects to negligible with uncertainty.

### Mitigation

**7.205** 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 LPRSP6(a): 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 site 312 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.
- An earlier version of this report recommended a historic environment sensitivity study or similar to inform appropriate requirements at these sites to conserve and enhance the historic environment. However this has now been addressed (at relevant sites 312 and 364) and the residual effect is now minor negative with uncertainty.

## Harrietsham

### Policy LPRSP6(b): Harrietsham and site allocation policies for this location

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

- LPRSP6(b): Harrietsham
- LPRSA071: Land Adjacent Keilen Manor, Harrietsham
- LPRSA101: Land south of A20, Harrietsham

**7.207** Policy LPRSP6(b): 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 LPRSP6(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.

**7.208** 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.

**7.209** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.9**, following the scoring scheme set out in **Chapter 2**.

Table 7.9: SA findings for policy LPRSP6(b): Harrietsham and site allocation policies for this location

SA objective	LPRSP6(b): Harrietsham	LPRSA071: Land Adjacent Keilen Manor, 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 LPRSP6(b): Harrietsham and site allocation policies for this location

**7.210** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP6(b): 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.

**7.211** In relation to SA objective 2: Services & Facilities, minor positive effects are expected from the strategic policy LPRSP6(b): 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 for both sites 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.

**7.212** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP6(b): 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.

**7.213** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP6(b): Harrietsham due to the provision of health infrastructure and addressing recognised open space deficits. 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 136 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.

**7.214** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP6(b): Harrietsham and for both site allocation policies. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy LPRSP6(b) is separately assessed under policy LPRSP11(a) and the site allocation policies would not lead to loss of existing employment sites or provide new employment space.

**7.215** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP6(b): 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.

**7.216** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP6(b): 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.

**7.217** In relation to SA objective 8: Minerals, negligible effects have been identified for the strategic policy SP6(c): Headcorn. Negligible effects have also been identified for both sites in relation to this SA objective, given that they does not lie in a mineral safeguarding area.

**7.218** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP6(b): 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.

**7.219** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP6(b): 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.

**7.220** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP6(b): 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. For LPRSA071, the GIS-based assessment did not identify flood risk, resulting in a negligible effect.

**7.221** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP6(b): Harrietsham. The GIS-based site options work identified minor negative effects in relation to SA objective 13: Climate Change for both sites, 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.

**7.222** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP6(b): 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.

**7.223** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP6(b): 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. However the site-specific allocation policies require a historic environment sensitivity study to be carried out, reducing the effect to minor negative with uncertainty.

**7.224** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP6(b): 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 are judged to reduce the effects to minor negative.

## Mitigation

**7.225** 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.
- 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.
- An earlier version of this report recommended a historic environment sensitivity study or similar to inform appropriate requirements at these sites to conserve and enhance the historic environment. However, this has now been addressed and the residual effect is now minor negative with uncertainty.



## Headcorn

### Policy LPRSP6(c): Headcorn and site allocation policies for this location

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

- LPRSP6(c): Headcorn
- LPRSA310 – Mote Road Headcorn

**7.227** LPRSP6(c): 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 LPRSP6(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.

**7.228** 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.

**7.229** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.10**, following the scoring scheme set out in **Chapter 2**.

*Table 7.10: SA findings for policy LPRSP6(c): Headcorn and site allocation policies for this location*

SA objective	LPRSP6(c): 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	LPRSP6(c): 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	

### Explanation of SA findings for policy LPRSP6(c): Headcorn and site allocation policies for this location

**7.230** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP6(c): 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.

**7.231** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP6(c): 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 LPRSP11(a). 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,

**7.232** 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.

**7.233** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP6(c): 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.

**7.234** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP6(c): 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.

**7.235** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP6(c): Headcorn and for site 310. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy LPRSP6(c) is separately assessed under policy LPRSP11(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.

**7.236** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP6(c): 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.

**7.237** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP6(c): 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 Moat Road, and the related weakness in non-car permeability by providing pedestrian access via the north of the site. While this will help to support walking, the overall SA scores for the site is unaffected.

**7.238** In relation to SA objective 8: Minerals, negligible effects have been identified for the strategic policy LPRSP6(c): 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.

**7.239** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP6(c): 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.

**7.240** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP6(c): 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.

**7.241** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP6(c): 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 being agreed with the EA and that development does not worsen local flood risk on Moat Road, 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.

**7.242** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP6(c): 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.

**7.243** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP6(c): 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. However the site-specific policy requires a Phase 1 habitat survey to be carried out and appropriate mitigation, which results in a residual mixed minor positive and minor negative effect in

relation to this SA objective, given that on-site habitats are likely to be protected, but off-site habitats (at the SSSI) may still be affected.

**7.244** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP6(c): 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. However the site-specific allocation policy requires a historic environment sensitivity study to be carried out, reducing the effect to minor negative with uncertainty.

**7.245** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP6(c): 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 a landscape and visual impact assessment and landscaping which reflects the setting adjacent to open countryside, these effects are reduced to minor negative.

### Mitigation

**7.246** 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.
- An earlier version of this report recommended a historic environment sensitivity study or similar to inform appropriate requirements at this site to conserve and enhance the historic environment. However, this has now been addressed and the residual effect is now minor negative with uncertainty.

- Provision of appropriate habitats and land uses within the 'multi-functional amenity space' which would support nearby designated biodiversity assets.

## Lenham

### Policy LPRSP6(d): Lenham and site allocation policies for this location

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

- LPRSP6(d): Lenham
- LPRSA260 – Ashford Road Lenham

**7.248** Policy LPRSP6(d): 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 LPRSP6(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.

**7.249** 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 7.11**, following the scoring scheme set out in **Chapter 2**.

*Table 7.11: SA findings for policy LPRSP6(d): Lenham and site allocation policies for this location*

SA objective	LPRSP6(d): Lenham	LPRSA260 Ashford Road Lenham
SA1: Housing	0	0
SA2: Services & Facilities	0	
SA3: Community	+	+
SA4: Health	0	0
SA5: Economy	0	+
SA6: Town Centre	0	0
SA7: Sustainable Travel	0	0

SA objective	LPRSP6(d): Lenham	LPRSA260 Ashford Road Lenham
SA8: Minerals	0	0
SA9: Soils	0	
SA10: Water	0	0
SA11: Air Quality	N/A	N/A
SA12: Flooding	0	
SA13: Climate Change	0	
SA14: Biodiversity	0	0
SA15: Historic Environment	0	?
SA16: Landscape	0	?

### Explanation of SA findings for policy LPRSP6(d): Lenham and site allocation policies for this location

**7.250** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP6(d): Lenham, 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 LPRSA260 itself, because the site-specific policy makes no mention of the type or quality of housing to be delivered on the site.

**7.251** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP6(d): Lenham. This is because none of the requirements within it will provide for additional key services for workers at the employment sites. For site 260, the GIS-based site options work identified a minor negative effect in relation to SA objective 2: Services & Facilities. The site is located a significant distance from Maidstone town centre, This SA score is unaffected by the provisions of the site-specific allocation policies.

**7.252** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP6(d): Lenham, 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 LPRSA260 because of the requirement for design of the site to ensure neighbouring residents' amenity is protected.

**7.253** In relation to SA objective 4: Health, negligible effects are expected from the strategic policy LPRSP6(d): Lenham, although it is noted that the loss of existing green spaces will be resisted. For site 260, the GIS-based site options work identified a negligible effect in relation to this SA objective. This reflects the negative effects of its location adjacent to a waste site and with exposure to air and noise pollution (due to the A20 Ashford Road). However this is offset by the benefits of its close proximity to both open space and the public rights of way network. 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.

**7.254** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP6(d): Lenham. As site allocations with the potential to deliver employment opportunities, site 260 has the potential for positive effects in relation to SA objective 5: Economy.

**7.255** Negligible effects have been identified in relation to SA objective 6: Town Centre for both strategic policy LPRSP6(d): Lenham and site 260, because these sites are not in Maidstone town centre.

**7.256** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP6(d): Lenham. For site 260, the GIS-based site options work identified minor negative effects 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. The site is also 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.

**7.257** 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.

**7.258** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP6(d): Lenham. For site 260, the GIS-based appraisal of site options identified significant negative effects in relation to SA objective 9: Soils, as digital data indicate that site overlaps with Grade 2 agricultural land. In addition, site 260 is greenfield. Mitigation of the significant negative effect for this site is unlikely to be possible, given that all of it is within Grade 2 classified land.

**7.259** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy SP6(d): Lenham. Negligible effects have been identified for site 260 in relation to SA objective 10: Water, which does not lie within a drinking water safeguarding zone (surface water),

**7.260** 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.

**7.261** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP6(d): Lenham. The GIS-based site options work identified minor negative effects for site 260 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.

**7.262** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP6(d): Lenham and for site 260. .

**7.263** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP6(d): 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, the site-specific allocation policy requires a historic environment sensitivity study to be carried out, reducing the effect to minor negative with uncertainty.

**7.264** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP6(d): Lenham. The GIS-based site options work identified significant negative effects for site 260 in relation to SA objective 16: Landscape, given that the site lies within the Harrietsham to Lenham Vale Landscape Character Area (LCA), which has been assessed as highly sensitive. 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

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

- Provide mitigation for potential dust, noise and odour impacts at site 260 from the adjacent materials recycling site.
- Provide mitigation against the impact of air and noise pollution from the A20 at site 260, through the use of buffering vegetation or through sensitive site layout.

- 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.
- An earlier version of this report recommended a historic environment sensitivity study or similar to inform appropriate requirements at these sites to conserve and enhance the historic environment. However, this has now been addressed for site 260 and the residual effect is now minor negative with uncertainty.

## Marden

### Policy LPRSP6(e): Marden and site allocation policies for this location

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

- LPRSP6(e): Marden
- LPRSA295 & 314 – Land at Copper Lane & Albion Rd, Marden

**7.267** Policy LPRSP6(e): 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 LPRSP6(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.

**7.268** 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.

**7.269** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.12**, following the scoring scheme set out in **Chapter 2**.

*Table 7.12: SA findings for policy LPRSP6(e): Marden and site allocation policies for this location*

SA objective	LPRSP6(e) Marden	LPRSA295 & 314 Land at Copper Lane & Albion Rd, Marden
SA1: Housing	0	0
SA2: Services & Facilities	0	
SA3: Community	+	+
SA4: Health	+	+
SA5: Economy	0	0
SA6: Town Centre	0	+
SA7: Sustainable Travel	0	+

SA objective	LPRSP6(e) Marden	LPRSA295 & 314 Land at Copper Lane & Albion Rd, Marden
SA8: Minerals	0	
SA9: Soils	0	
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		?

### Explanation of SA findings for policy LPRSP6(e): Marden and site allocation policies for this location

**7.270** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP6(e): 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 site 295 & 314, because the site-specific policies make no mention of the type or quality of housing to be delivered on the site.

**7.271** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP6(e): Marden. For site 295 & 314, 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. This SA score is unaffected by the provisions of the site-specific allocation policy.

**7.272** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP6(e): 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 the site-specific allocation policy for site 295 & 314 because of

the requirement to integrate with surrounding development, protect the amenity of residents and for landscaping to soften views from surrounding areas.

**7.273** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP6(e): Marden due to the provision of health infrastructure and the requirement to address identified open space deficits. For site 295 & 314, the GIS-based site options work identified a minor positive effect 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.

**7.274** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP6(e): Marden and for site 295 & 314. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy SP6(b) is separately assessed under policy LPRSP11(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.

**7.275** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP6(e): Marden. However, minor positive effects have been identified site 295 & 314 in relation to this SA objective, as residents of these development are likely to travel to access higher order services in Maidstone town centre.

**7.276** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP6(e): 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 site 295 & 314, the GIS-based site options work identified minor positive effects in relation to SA objective 7: Sustainable Travel. This reflects 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 policy requires improvements to local bus services and pedestrian connectivity, however the overall SA score for this objective is unaffected by these requirements.

**7.277** In relation to SA objective 8: Minerals, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. For site 295 & 314, the GIS-based site options work identified minor negative effects in relation to SA objective 8: Minerals, because part of the site lies in a Mineral Safeguarding Area (MSA). This scores is unaffected by the site-specific policies.

**7.278** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. For site 295 & 314, significant negative effects have

been identified in relation to SA objective 9: Soils, given that the development would result in the loss of greenfield land and of Grade 3 agricultural land. Given that loss of greenfield land at this site is inevitable, this effect is impossible to mitigate and the score is unaffected by the site-specific policy.

**7.279** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. Minor negative effects have been identified for site 295 & 314 in relation to SA objective 10: Water because 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.

**7.280** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. The GIS-based site options work identified a significant negative effect for site 295 & 314, given that the site contains 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.

**7.281** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. The GIS-based site options work identified minor negative effects for site 295 & 314 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.

**7.282** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. The GIS-based site options work identified minor negative effects for site 295 & 314 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.

**7.283** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. The GIS-based site options work identified a significant negative effect with uncertainty site 295 & 314 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.



The site allocation policy requires site design and layout to be informed by a historic environment sensitivity study, reducing this effect to minor negative with uncertainty.

**7.284** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. The GIS-based site options work identified significant negative effects for site 295 & 314 in relation to SA objective 16: Landscape. The entirety of Marden, including this site, lies in the Staplehurst Low Weald Landscape Character Area (LCA), which has been assessed as highly sensitive. The site-specific policy for site 295 & 314 requires structural landscaping to soften the impact of development on the wider landscape requires the development to be integrated into the slope of the land and requires the design to take into account the High Weald AONB - these provisions reduce this effect to minor negative with uncertainty.

### Mitigation

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

- Greater clarity 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 site 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.
- An earlier version of this report recommended a historic environment sensitivity study or similar to inform appropriate requirements at site 295 to conserve and enhance the historic environment. However this has now been addressed and the residual effect is now minor negative with uncertainty.

## Staplehurst

### Policy LPRSP6(f): Staplehurst and site allocation policies for this location

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

- LPRSP6(f): Staplehurst
- LPRSA066 – Land east of Lodge Rd, Staplehurst
- LPRSA114 – Land at Home Farm, Staplehurst

**7.287** Policy LPRSP6(f): 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 LPRSP6(f) 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.

**7.288** 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.

**7.289** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.13** following the scoring scheme set out in **Chapter 2**.

SA of Maidstone Local Plan Review

Table 7.13: SA findings for policy LPRSP6(f): Staplehurst and site allocation policies for this location

SA objective	LPRSP6(f) Staplehurst	LPRSA066 Land east of Lodge Rd, 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
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		
SA15: Historic Environment	0	0?	?
SA16: Landscape	0		

### Explanation of SA findings for policy LPRSP6(f): Staplehurst and site allocation policies for this location

**7.290** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP6(f): 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.

**7.291** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP6(f): 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.

**7.292** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP6(f): 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.

**7.293** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP6(f): 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.

**7.294** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP6(f): Staplehurst and for allocated site 66. This is because the effects of designation of Economic Development Areas mentioned in clause 2 of policy LPRLPRSP6(b) is separately assessed under policy LPRSP11(a). Negligible effects were identified in relation to site 114 in relation to this SA objective, given that development here would not necessitate the loss of an existing employment site. Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP6(f): 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.

**7.295** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP6(f): 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.

**7.296** 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.

**7.297** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP6(f): 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.

**7.298** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP6(f): 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.

**7.299** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP6(f): 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 114, a very limited part of the north of the site lies within Flood Zone 2. The site-specific policy for site 114 requires development to avoid any development within Flood Zone 2 however, given the lack of mitigation within this group of policies for surface water flood risk, this does not affect the previously identified negative scores. The site-specific policy for site 114 requires a Flood Risk Assessment to be carried out alongside any planning application - given that no specific mitigation is outlined, this does not affect the SA score in this case but results in uncertainty as to whether an effect will occur.

**7.300** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP6(f): 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.

**7.301** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP6(f): Staplehurst. The GIS-based site options work identified significant negative effects for both sites 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 to minor negative.

**7.302** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP6(f): 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. However, the site-specific allocation policy for site 114 requires a historic environment sensitivity study to be carried out, reducing the effect to minor negative with

uncertainty. Negligible effects with uncertainty were identified in the case of site 66, which is more distant from these assets.

**7.303** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP6(f): 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. However the requirement within both site-specific policies for a landscape and visual impact appraisals is judged to reduce the effect in both cases to minor negative.

### Mitigation

**7.304** 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 sensitivity landscape in which both sites lies, an earlier draft of this SA Report recommended that an LVIA should be a site-specific requirement for site 66, similar to that required for site 114. This has now been addressed by the Council via an amendment to the site allocation policy.
- An earlier version of this report recommended a historic environment sensitivity study or similar to inform appropriate requirements at site 114 to conserve and enhance the historic environment. However, this has

now been addressed and the residual effect is now minor negative with uncertainty.

## Larger Villages

### Reasonable alternatives tested

**7.305** 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.

**7.306** 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 were set out in detail in an SA of Options report<sup>54</sup> that was published alongside the SA report for the Regulation 18 Preferred Approaches Local Plan document. For ease of reference, summaries of the SA findings for the residential and employment sites identified at Reg18b stage and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4** of this SA report. The detailed findings are reproduced in **Appendix C**.

### Policy LPRSP7: Larger Villages

**7.307** This section presents the appraisals of Policy LPRSP7: Larger Villages, which identifies four villages that can be designated as larger villages:

- East Farleigh;
- Eyhorne Street (Hollinbourne);
- Sutton Valence; and
- Yalding.

**7.308** Policy LPRSP7: Larger Villages considers all four 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.

**7.309** 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.

**7.310** 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.

**7.311** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.14**, following the scoring scheme set out in **Chapter 2**.

Table 7.14: SA findings for policy LPRSP7: Larger Villages

SA objective	LPRSP7: 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	+
SA16: Landscape	0

### Explanation of SA findings for policy LPRSP7: Larger Villages

**7.312** Minor positive effects have been identified for Policy LPRSP7: Larger Villages 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. Minor positive effects have also been identified in relation to SA objective 15, given the emphasis in the policy

<sup>54</sup> LUC for Maidstone Borough Council (Nov 2020) Sustainability Appraisal: Options for Spatial Strategy, Site Allocations and Garden Settlements

on the protection, conserving and enhancement of historic environment features.

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

#### **Mitigation**

**7.314** No measures to limit the potential for negative effects and strengthen the positive effects identified for this policy were identified.

## East Farleigh

### Policy LPRSP7(a) East Farleigh

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

- Policy LPRSP7(a): East Farleigh

**7.317** Policy LPRSP7(a): East Farleigh provides for the development of approximately 50 new dwellings at the larger village of East Farleigh but does not allocate specific sites for these.

**7.318** In addition, the policy provides for the retention of existing key services, identified as local shops, community facilities, and green spaces, and supports the provision of new ones.

**7.319** The likely effects of the policy in relation to each sustainability objective are shown in **Table 7.14**, following the scoring scheme set out in **Chapter 2**.

Table 7.15: SA findings for policy LPRSP7(a): East Farleigh

SA objective	LPRSP7(a): East Farleigh
SA1: Housing	0
SA2: Services & Facilities	?
SA3: Community	+
SA4: Health	+?
SA5: Economy	0
SA6: Town Centre	+
SA7: Sustainable Travel	+?
SA8: Minerals	?
SA9: Soils	?
SA10: Water	?
SA11: Air Quality	N/A
SA12: Flooding	?
SA13: Climate Change	0?
SA14: Biodiversity	?
SA15: Historic Environment	?
SA16: Landscape	?

### Explanation of SA findings for policy LPRSP7: Larger Villages

**7.320** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP7(a): East Farleigh, 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.

**7.321** Minor negative effects have been identified for Policy LPRSP7(a): East Farleigh in relation to SA objectives 2: Services & Facilities. Most development sites in and around the settlement would be likely to be beyond walking distance from key services and facilities, including a GP surgery, secondary school, or rural service centre. However, the potentially significant negative effects are judged to be mitigated to minor negative ones by the fact that the broad location has relatively short average commuting distances for the borough, there is a primary school in the southern part of the village, and the policy resists the loss of existing (albeit limited) services and supports the provision of new ones. These effects are judged to be uncertain as they will depend on the particular locations of sites that come forward within the broad location and their relationship to those services that are present, including whether the River Medway, which bisects the settlement, acts as a barrier.

**7.322** Minor positive effects have been identified in relation to SA objective 3: Community because the policy seeks to resist the loss of community facilities and green spaces while supporting new ones.

**7.323** In relation to SA objective 4: Health, residential development at the broad location of East Farleigh would not be located in an AQMA or an area identified as subject to significant road or rail noise, although the settlement is located on the Medway Valley railway line with approximately half hourly peak services. Development in the location would also be unlikely to suffer from odour from waste facilities. Some parts of the broad location benefit from being within walking distance of open space and it is reasonably well connected to the public rights of way network. These locational factors and the fact that the policy resists the loss of existing open spaces and supports the provision of new ones is judged to result in minor positive effects overall, with uncertainty relating to the particular sites to be developed and their proximity to these factors.

**7.324** In relation to SA objective 5: Economy, negligible effects have been identified for policy LPRSP7(a): East Farleigh. This is because residential development in this broad location would not necessitate the loss of an existing employment site (none are identified in the vicinity of the settlement) and the policy does not provide for new employment space.



**7.325** Minor positive effects have been identified in relation to SA objective 6: Town Centre for policy LPRSP7(a): East Farleigh, given that residents of developments in this broad location are likely to travel to access higher order services in Maidstone town centre.

**7.326** In relation to SA objective 7: Sustainable Travel, minor positive effects with uncertainty are expected from policy LPRSP7(a): East Farleigh. Given the presence of a railway station within the settlement, it is likely that residential sites will lie within 1 kilometre of the station. There are also a number of bus stops within the settlement. Finally, the National Cycle Network does not pass through East Farleigh. The effects are judged to be uncertain as they will depend on the particular locations of sites that come forward within the broad location and their relationship to those sustainable transport services that are present, including whether the River Medway, which bisects the settlement, acts as a barrier.

**7.327** Minor negative effects with uncertainty have been identified in relation to SA objective 8: Minerals for policy LPRSP7(a): East Farleigh. The majority of the land surrounding the settlement edge of East Farleigh intersects with a mineral safeguarding areas (MSA) and is not close to a safeguarded mineral site. The uncertainty in the score, however, reflects that some areas within East Farleigh do not intersect with the MSA, and it is not currently known where development will come forward within the broad location.

**7.328** In relation to SA objective 9: Soils, significant negative effects with uncertainty have been identified for the policy LPRSP7(a): East Farleigh. This is because the entirety of the open land surrounding East Farleigh is classified as Grade 1 or Grade 2 agricultural land. However, some uncertainty remains given that the location for new development has not yet been defined and it is possible that this could be on a brownfield site.

**7.329** In relation to SA objective 10: Water, minor negative effects have been identified for the policy LPRSP7(a): East Farleigh since all of the broad location 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.

**7.330** In relation to SA objective 12: Flooding, uncertain effects have been identified for policy LPRSP7(a): East Farleigh. There are relevant flood risk areas lying within this broad location, particularly along the River Medway corridor. However without knowing the specific location of development, the effects cannot be reliably assessed.

**7.331** In relation to SA objective 13: Climate Change, negligible effects with uncertainty have been identified for the

strategic for policy LPRSP7(a): East Farleigh. While access to public transport in this broad area is relatively good given the presence of the railway station and bus services, this is offset by the relatively poor accessibility to many 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. These effects are judged to be uncertain as they will depend on the particular locations of sites that come forward and their relationship to both key services and sustainable transport facilities.

**7.332** In relation to SA objective 14: Biodiversity, minor negative effects with uncertainty have been identified for policy LPRSP7(a): East Farleigh. There are no designated sites (locally or internationally) or ancient woodland intersecting with this broader area and the area also lies outside the relevant IRZs for nearby SSSIs. However, there are limited areas of priority habitat (deciduous woodland) within the broader area. The uncertainty reflects uncertainty over the precise location of development and whether it would intersect with those areas of priority habitat.

**7.333** In relation to SA objective 15: Historic Environment, significant negative effects with uncertainty have been identified for policy LPRSP7(a): East Farleigh. There are a number of heritage assets lying within the broader area of East Farleigh, including the East Farleigh Conservation Area, a number of listed buildings and several Areas of Archaeological Importance (AAP). Without knowing the precise location of development or how it would relate to nearby heritage assets, significant negative effects cannot be ruled out. However, uncertainty remains given that there are some parts of the broader area in less close proximity to the assets in question.

**7.334** In relation to SA objective 16: Landscape, significant negative effects with uncertainty have been identified for the policy LPRSP7(a): East Farleigh. This broader area straddles three Landscape Character Areas (the Medway Valley – Maidstone to Watlington, the Farleigh Greensand Fruit Belt, and East Barming Orchards), all of which have been assessed as being highly sensitive. The uncertainty in the score reflects uncertainty over how development in this location might relate to its landscape context and how it may be required to mitigate any landscape impact.

### Mitigation

**7.335** 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.

- Carry out a historic environment sensitivity study or similar to inform appropriate requirements in the suite of Local Plan Review policies for sites in this location which are in proximity to East Farleigh's heritage assets.
- Require a landscape and visual impact assessment (LVIA) for any sites identified within this broad area.

## Eyhorne Street (Hollingbourne)

### Policy LPRSP7(b): Eyhorne Street (Hollingbourne) and site allocation policies for this location

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

- Policy LPRSP7(b): Eyhorne Street (Hollingbourne)
- LPRSA204 - Land south east of Eyhorne Street, Eyehorne St (Hollingbourne)

**7.337** Policy LPRSP7(b): 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 LPRSP7(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.

**7.338** 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.

**7.339** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.16**, following the scoring scheme set out in **Chapter 2**.

Table 7.16: SA findings for policy LPRSP7(b): Eyhorne Street (Hollingbourne) and site allocation policies for this location

SA objective	LPRSP7(b) 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	LPRSP7(b) 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 LPRSP7(b): Eyhorne Street (Hollingbourne) and site allocation policies for this location

**7.340** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP7(b): 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.

**7.341** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP7(b): 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.

**7.342** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP7(b): 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.

**7.343** In relation to SA objective 4: Health, negligible effects are expected from the strategic policy LPRSP7(b): 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.

**7.344** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP7(b): 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.

**7.345** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic policy LPRSP7(b): 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.

**7.346** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP7(b): 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.

**7.347** Negligible effects have been identified in relation to SA objective 8: Minerals for strategic policy LPRSP7(b): Eyhorne Street (Hollingbourne). 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.

**7.348** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP7(b): 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.

**7.349** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP7(b): 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.

**7.350** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP7(b): 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.

**7.351** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP7(b): 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.

**7.352** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP7(b): 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.

**7.353** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP7(b): 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.

**7.354** In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP7(b): 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

**7.355** 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.

## Sutton Valence

### Policy LPRSP7(c): Sutton Valence and site allocation policies for this location

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

- Policy LPRSP7(c): Sutton Valence
- LPRSA078 - Haven Farm and land at Southways, Sutton Valence

**7.357** Policy LPRSP7(c): Sutton Valence 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 LPRSP7(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.

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

**7.359** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.17**, following the scoring scheme set out in **Chapter 2**.

Table 7.17: SA findings for policy LPRSP7(c): Sutton Valence and site allocation policies for this location

SA objective	LPRSP7(c) Sutton Valence	LPRSA078 Haven Farm, Sutton Valence
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	
SA11: Air Quality	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 LPRSP7(c): Sutton Valence and site allocation policies for this location

**7.360** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP7(c): 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 the site-specific policy for site 78 because there are no provisions related to the design or quality of housing to be provided.

**7.361** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP7(c): 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 site 78 the GIS-based site options work identified minor negative effects in relation to SA objective 2: Services & Facilities. This reflects poor accessibility 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. The site-specific policy does not require provision of additional key services, and as such the SA scores remains unaffected.

**7.362** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP7(c): 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 site 78, given the requirements within the site-specific allocation policy to protect the amenity of neighbouring residents through the design of development.

**7.363** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP7(c): Sutton Valence, given the requirement for development to overcome deficits in open space and play space. For site 78, the GIS-based site options work identified minor positive effects in relation to SA objective 4: Health. Despite some concerns regarding noise exposure as a result of the adjacent A274, these are offset by strong access to open space and the public rights of way (PROW) network. This SA scores is unaffected by the site-specific policy.

**7.364** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence and for site 78, given that it would not require the loss of an existing employment site.

**7.365** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic LPRSP7(c): Sutton

Valence. However, minor positive effects have been identified for site 78 in relation to this SA objective, as residents of this development are likely to travel to access higher order services in Maidstone town centre.

**7.366** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP7(c): Sutton Valence. For site 78, 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 and new bus stops are required to be provided on North Street.

**7.367** In relation to SA objective 8: Minerals, negligible effects are expected from the strategic policy LPRSP7(c): Sutton Valence. Minor negative effects have been identified for site 78 in relation to this SA objective, given that it lies within a Minerals Safeguarding Area (MSA).

**7.368** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence. Significant negative effects have been identified in relation to this SA objective for site 78, because it is a greenfield site.

**7.369** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence. Minor negative effects have been identified for site 78 in relation to SA objective 10: Water, given that it 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.

**7.370** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence and for site 78, which lies outside the relevant flood risk zones.

**7.371** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence. The GIS-based site options work identified minor negative effects for site 78 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.

**7.372** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence. The GIS-based site options work identified minor negative effects for site 78 as there are areas of Priority Habitat (traditional orchard) within the site boundaries. However provisions within the site-specific policy to carry out a Phase 1 habitat survey and provide mitigation for any impacts reduces the residual effect to negligible.



**7.373** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence. The GIS-based site options work identified significant negative effects with uncertainty for site 78 in relation to this SA objective, given its proximity to the cluster of heritage assets and area of archaeological interest in Sutton Valence. The MBC officer's heritage assessment notes very high potential for prehistoric and Romano-British remains in view of known archaeology to the south, east and west. However, the site-specific allocation policy for site 078 requires a historic environment sensitivity study to be carried out, reducing the effect to minor negative with uncertainty. In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP7(c): Sutton Valence. The GIS-based site options work identified significant negative effects for site 78, given that it the southern part of the site lies in the Sutton Valence Greensand Ridge landscape character area (LCA), which is judged as being highly sensitive to development. However the site-specific policy for the site requires a landscape and visual impact assessment (LVIA) to inform development, which reduces the effect to minor negative in relation to this SA objective.

has now been addressed by the Council via a requirement in the site allocation policy to this effect.

### Mitigation

**7.374** 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 potential effect of noise pollution from the A274 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.
- An earlier version of this report recommended further protection for the historic environment within allocation policy LPRSA078. This allocation policy now requires a historic environment sensitivity study, and the residual effect is now minor negative with uncertainty.
- An earlier draft of this SA Report recommended a landscape and visual impact assessment (LVIA) at site 78, with the results to inform site layout and design. This

## Yalding

### Policy LPRSP7(d): Yalding and site allocation policies for this location

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

- LPRSP7(d): Yalding
- LPRSA248 - Land North of Kenward Road, Yalding

**7.376** Policy LPRSP7(d): 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 LPRSP7(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.

**7.377** 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.

**7.378** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.18**, following the scoring scheme set out in **Chapter 2**.

*Table 7.18: SA findings for policy LPRSP7(e): Yalding and site allocation policies for this location*

SA objective	LPRSP7(d) 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	LPRSP7(d) 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 LPRSP7(c): Yalding and site allocation policies for this location

**7.379** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP7(d): 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.

**7.380** In relation to SA objective 2: Services & Facilities, negligible effects are expected from the strategic policy LPRSP7(d): 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.

**7.381** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP7(d): 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.

**7.382** In relation to SA objective 4: Health, minor positive effects are expected from the strategic policy LPRSP7(d): Yalding, given the requirement to address deficits in sports, play and open space provision. 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.

**7.383** In relation to SA objective 5: Economy, negligible effects have been identified for the strategic policy LPRSP7(d): 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.

**7.384** Negligible effects have been identified in relation to SA objective 6: Town Centre for strategic LPRSP7(d): 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.

**7.385** In relation to SA objective 7: Sustainable Travel, negligible effects are expected from the strategic policy LPRSP7(d): 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.

**7.386** 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).

**7.387** In relation to SA objective 9: Soils, negligible effects have been identified for the strategic policy LPRSP7(d): 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.

**7.388** In relation to SA objective 10: Water, negligible effects have been identified for the strategic policy LPRSP7(d): 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.

**7.389** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP7(d): 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.

**7.390** In relation to SA objective 13: Climate Change, negligible effects have been identified for the strategic policy LPRSP7(d): 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

**7.391** In relation to SA objective 14: Biodiversity, negligible effects have been identified for the strategic policy LPRSP7(d): 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.

**7.392** In relation to SA objective 15: Historic Environment, negligible effects have been identified for the strategic policy LPRSP7(d): 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. However, the site-specific allocation policy for site 248 requires a historic environment sensitivity study to be carried out, reducing the effect to minor negative with uncertainty. In relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSP7(d): 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. However, the site-specific allocation policy requires the development proposal to take into account a Landscape and Visual Impact Assessment (LVIA) and to incorporate boundary landscaping, which

reduces the effect to minor negative in relation to this SA objective.

### 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.
- An earlier draft of this SA Report recommended that a landscape and visual impact assessment (LVIA) be required for site 248, given identified landscape sensitivities. This has now been addressed by the Council.
- 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.
- An earlier version of this report recommended a historic environment sensitivity study or similar to inform appropriate requirements at site 248 to conserve and enhance the historic environment. However, this has now been addressed and the residual effect is now minor negative with uncertainty.

## Smaller Villages

### Reasonable alternatives tested

**7.393** No reasonable alternatives to this policy were identified by the Council.

### Policy LPRSP8: Smaller Villages and site allocation policies for this location

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

- Policy LPRSP8: Smaller Villages
- LPRSA360: Campfield Farm, Boughton Monchelsea

**7.395** Policy LPRSP8: 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.

**7.396** The likely effects of the policies in relation to each sustainability objective are shown in **Table 7.19**, following the scoring scheme set out in **Chapter 2**.

*Table 7.19: SA findings for policy LPRSP8: Smaller Villages and site allocation policies for this location*

SA objective	LPRSP8 Smaller Villages	LPRSA360 Campfield Farm, Boughton Monchelsea
SA10: Water	0	
SA11: Air Quality	N/A	N/A
SA12: Flooding	?	0
SA13: Climate Change		
SA14: Biodiversity	?	0
SA15: Historic Environment	?	?
SA16: Landscape	?	?

SA objective	LPRSP8 Smaller Villages	LPRSA360 Campfield Farm, Boughton Monchelsea
SA1: Housing	0	+
SA2: Services & Facilities	+/?	
SA3: Community	+	0
SA4: Health	+?	+
SA5: Economy	?	0
SA6: Town Centre	0	+
SA7: Sustainable Travel	?	
SA8: Minerals	?	0
SA9: Soils	0	

### Explanation of SA findings for policy LPRSP8: Smaller Villages and site allocation policies for this location

**7.397** In relation to SA objective 1: Housing, negligible effects are expected from the strategic policy LPRSP8: 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. In relation to this SA objective, 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.

**7.398** In relation to SA objective 2: Services & Facilities, mixed minor positive and minor negative effects are expected from the strategic policy LPRSP8: 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. In relation to this SA objective GIS-based site options work for both sites identified minor negative effects. 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 policy.

**7.399** In relation to SA objective 3: Community, minor positive effects are expected from the strategic policy LPRSP8: Smaller Villages. The policy states that development will only be acceptable where it has community support, either through a Neighbourhood Plan or other Parish endorsement. In relation to this SA objective, negligible effects are identified in the case of site 360. In relation to SA objective 4: Health, minor positive effects with uncertainty are expected from the strategic policy LPRSP8: Smaller Villages. In general terms, there are no air quality management areas (AQMAs) 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. For the allocated site, the GIS-based site options work identified minor positive effects 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, this SA score is not affected by the site-specific policy.

**7.400** In relation to SA objective 5: Economy, uncertain effects have been identified for the strategic policy LPRSP8: 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. Negligible effects have been identified for allocated site 360.

**7.401** Minor positive effects have been identified in relation to SA objective 6: Town Centre for the site-specific allocation policy, as residents of this development are likely to travel to access higher order services in Maidstone town centre.

**7.402** In relation to SA objective 7: Sustainable Travel, minor negative effects with uncertainty are expected from the strategic policy LPRSP8: 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. Minor negative effects were identified for this SA objective for the site. It has good access to bus stops but no access to either rail services or cycle routes. This SA score is unaffected by the site-specific policy.

**7.403** Uncertain effects have been identified for strategic policy LPRSP8: 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. Negligible effects have been identified in relation to SA objective 8: Minerals for site 360, given that the mineral safeguarding areas (MSAs) within Boughton Monchelsea do not intersect with this site.

**7.404** In relation to SA objective 9: Soils, negligible effects with uncertainty have been identified for the strategic policy LPRSP8: Smaller Villages. Significant negative effects were identified in relation to this SA objective for the allocated site given that it necessitates the loss of a greenfield sites and lies within Grade 2 classified agricultural land. This SA score is unaffected by the site-specific allocation policy.

**7.405** In relation to SA objective 10: Water, negligible effects with uncertainty have been identified for the strategic policy LPRSP8: Smaller Villages. Minor negative effects have been identified for the site allocation policy 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.

**7.406** In relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP8: 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. Negligible effects have been identified for the allocated site given that it lies outside the relevant flood risk zones.

**7.407** In relation to SA objective 13: Climate Change, minor negative effects have been identified for the strategic policy LPRSP8: 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. The GIS-based site options work also identified minor negative effects for the site in relation to this SA objective 13, principally because of relatively poor accessibility to some key services and employment. This is considered likely to result in travel-related carbon emissions.

**7.408** In relation to SA objective 14: Biodiversity, uncertain effects have been identified for the strategic policy LPRSP8: Smaller Villages, given that impacts would have to be assessed on a site-by-site basis. Negligible effects have been identified for the allocated site, given that it does not contain areas of Priority Habitat and is not 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.

**7.409** Similarly, in relation to SA objective 15: Historic Environment, uncertain effects have been identified for the

strategic policy LPRSP8: Smaller Villages. Impacts would have to be assessed on a site-by-site basis. The GIS-based site options work identified significant negative effects with uncertainty for both sites, given the proximity of both to the cluster of archaeological and heritage assets in the village. The MBC officer report also highlights the potential harm to heritage assets if site 360 was developed in full due to nearby scheduled monuments and a Conservation Area. In the case of site 360, it is noted that 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.

**7.410** . In relation to SA objective 16: Landscape, minor negative effects with uncertainty have been identified for the strategic policy LPRSP8: 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. The GIS-based site options work identified significant negative effects for the allocated site. This is because it lies in the Farleigh Greensand Fruit Belt Landscape Character Area (LCA), which has been assessed as highly sensitive. The site-specific allocation policy requires the layout and lighting design to minimise impact on the landscape and. In the case of site 360, a landscape and visual impact assessment (LVIA) is required. As a result, the expected effects for the site are reduced to minor negative with uncertainty. The residual uncertainty reflects uncertainty over how successfully these landscape impacts can be mitigated.

### Mitigation

**7.411** 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.
- Address all recommendations/ potential impacts identified by the MBC officer assessment of heritage impact in allocation policy LPRSA360.

## The Countryside

### Reasonable alternatives tested

**7.412** No reasonable alternatives to this policy were identified by the Council.

### Policy LPRSP9: Development in the Countryside and site allocation policies for this location

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

- Policy LPRSP9: Development in the Countryside

**7.414** Policy LPRSP9: 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 LPRSP9 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.

**7.415** The likely effects of the policy in relation to each sustainability objective are shown in **Table 7.20**, following the scoring scheme set out in **Chapter 2**.

*Table 7.20: SA findings for policy LPRSP9: Development in the Countryside and site allocation policies for this location*

SA objective	LPRSP9: Development in the Countryside
SA1: Housing	0
SA2: Services & Facilities	0
SA3: Community	0
SA4: Health	0
SA5: Economy	0
SA6: Town Centre	0

SA objective	LPRSP9: Development in the Countryside
SA7: Sustainable Travel	0
SA8: Minerals	0
SA9: Soils	+
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 LPRSP9:  
Development in the Countryside and site allocation  
policies for this location**

**7.416** Negligible effects have been identified for strategic policy LPRSP9: Development in the Countryside in relation to the majority of SA objectives, generally because the policy is silent on these issues, with other reasons noted below for SA objectives 1 and 6. The only exception is for SA objective 9: Soils because the policy supports the efficient use of the borough's agricultural land and soil resource.

**7.417** In relation to SA objective 1: Housing, negligible effects are expected, 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.

**7.418** Negligible effects were identified in relation to SA objective 6: Town Centre due to the distance of most countryside locations from Maidstone town centre.

**Mitigation**

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

## Chapter 8

### 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

**8.1** The SA effects are summarised in tables throughout this section using the colour-coded symbols described in **Chapter 2 (Table 2.1)**. 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 effects.

#### Housing

##### Reasonable alternatives tested

**8.2** 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 LPRSP10(a): Housing Mix and LPRSP10(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.

##### Policies HOU9: Custom & Self-Build Housing and HOU10: Build to Rent Proposals

**8.3** Three reasonable alternatives were considered:

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.

**8.4** 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.

#### Affordable housing

**8.5** Three alternative policy approaches to affordable housing provision were outlined in the Housing Strategy Topic Paper (June 2020):

- RA1: Keep the Local Plan 2017 affordable housing policy
- RA2: Seek to maximise affordable housing
- RA3: Apply a more localised approach to affordable housing

**8.6** These alternatives are more fully described in **Appendix C**, alongside an appraisal of their reasonableness and likely sustainability implications.

#### Housing typologies

**8.7** Two alternative policy approaches to housing typologies were outlined in the Housing Strategy Topic Paper (June 2020):

- RA1: Keep the Local Plan 2017 housing mix policy and add detail about typologies as set out in the NPPF
- RA2: Apply a neighbourhood-level housing type and mix policy

**8.8** These alternatives are more fully described in **Appendix C**, alongside an appraisal of their reasonableness and likely sustainability implications.

#### Strategic policies LPRSP10(a): Housing Mix to LPRSP10(c): Gypsy & Traveller Site Allocations and non-strategic policies housing policies HOU1 to HOU11

**8.9** This section presents the appraisals of the following policies:

- LPRSP10(a): Housing Mix
- LPRSP10(b): Affordable Housing
- LPRSP10(c): Gypsy & Traveller Site Allocations
- LPRHOU1: Development on Brownfield Land

- LPRHOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the Built-up Area
- LPRHOU3: Residential Premises Above Shops & Businesses
- LPRHOU4: Residential Garden Land
- LPRHOU5: Density of Residential Development
- LPRHOU6: Affordable Local Housing Need on Rural Exception Sites
- LPRHOU7: Specialist Residential Accommodation
- LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation
- LPRHOU9: Custom & Self-Build Housing
- LPRHOU10: Build to Rent Proposals
- LPRHOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside

**8.10** Policy LPRSP10(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 LPRSP10(b): Affordable Housing sets out percentage affordable housing targets for different areas of the Borough, including for different tenures, whilst policy LPRSP10(c): Gypsy & Traveller Site Allocations carries forward site allocations from the 2017 Local Plan to help meet accommodation needs for Gypsies, Travellers and Travelling Showpeople. The site-specific allocations have already been subject to SA in the process of developing the adopted Local Plan and they are not reassessed here.

**8.11** Non-strategic policies LPRHOU1: Development on Brownfield Land to LPRHOU11: 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 LPRHOU1: Development on Brownfield Land promotes the development of previously developed land and sets out in what circumstances development will be permitted. Policy LPRHOU2: 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 LPRHOU3: 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 and village shops, as well as setting out criteria for the conversion of residential accommodation above shops and businesses to other uses.

**8.12** Policy LPRHOU4: 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 LPRHOU5: Density of Residential Development lists the minimum density requirements at locations across Maidstone Borough. Policy LPRHOU6: Affordable Local Housing Need on Rural Exception Sites including First Homes sets out the circumstances in which affordable housing can be delivered on rural exception sites, whilst policy LPRHOU7: 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 LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation also sets out the circumstances in which permission for Gypsy, Traveller and Travelling Showpeople accommodation will be permitted.

**8.13** Policy LPRHOU9: Custom & Self-Build Housing supports self and custom build development, subject to certain criteria. Policy LPRHOU10: Build to Rent Proposals encourages the development of rental accommodation, whilst policy LPRHOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside supports the replacement of dwellings in the countryside, in addition to their extension.

**8.14 Table 8.1** 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 8.1: SA findings for strategic policies LPRSP10(a): Housing Mix to LPRSP10(c): Gypsy & Traveller Site Allocations and non-strategic housing policies LPRHOU1 to LPRHOU11

Policy	LPRSP10(a): Housing Mix	LPRSP10(b): Affordable Housing	LPRSP10(c): Gypsy & Traveller Site Allocations	LPRHOU1: Development on Brownfield Land	LPRHOU2: Residential Extensions, Conversions, Annexes...	LPRHOU3: Residential Premises above Shops & Businesses	LPRHOU4: Residential Garden Land	LPRHOU5: Density of Residential Development	LPRHOU6: Affordable Local Housing Need on Rural Exception Sites	LPRHOU7: Specialist Residential Accommodation	LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation	LPRHOU9: Custom & Self Build Housing	LPRHOU10: Build to Rent Proposals	LPRHOU11: Rebuilding, Extending and Subdivision of Dwellings in the...
SA1: Housing	++	++	++	+	+	++	+	+	++	++	++	+	++	+
SA2: Services & Facilities	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
SA8: Minerals	0	0	0	0	0	0	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	0	0	0	0	0	0	0
SA11: Air Quality	0	0	0	++	0	++	+	++	++	0	0	++	++	0

Chapter 8  
SA findings for thematic strategic policies and non-strategic policies

SA of Maidstone Local Plan Review  
September 2021

Policy	LPRSP10(a): Housing Mix	LPRSP10(b): Affordable Housing	LPRSP10(c): Gypsy & Traveller Site Allocations	LPRHOU1: Development on Brownfield Land	LPRHOU2: Residential Extensions, Conversions, Annexes...	LPRHOU3: Residential Premises above Shops & Businesses	LPRHOU4: Residential Garden Land	LPRHOU5: Density of Residential Development	LPRHOU6: Affordable Local Housing Need on Rural Exception Sites	LPRHOU7: Specialist Residential Accommodation	LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation	LPRHOU9: Custom & Self Build Housing	LPRHOU10: Build to Rent Proposals	LPRHOU11: Rebuilding, Extending and Subdivision of Dwellings in the...
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	0
SA15: Historic Environment	0	0	0	0	0	0	0	0	+?	0	0	0	0	0
SA16: Landscape	0	0	0	+	+	0	+	+	+	+	+	+	0	+

**Explanation of SA findings for strategic policies  
LPRSP10(a): Housing Mix to LPRSP10(c): Gypsy &  
Traveller Site Allocations and non-strategic policies  
housing policies LPRHOU1 to LPRHOU11**

**8.15** 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.

**8.16** Policies LPRHOU3: Residential Premises above Shops & Businesses, LPRHOU5: Density of Residential Development, LPRHOU6: Affordable Local Housing Need on Rural Exception Sites, LPRHOU7: Specialist Residential Accommodation and LPRHOU10: 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 LPRHOU5: 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 LPRHOU7: Specialist Residential Accommodation supports proposals on land within or on the edge of the boundaries of Maidstone urban area, Rural Service Centres and main villages, policy LPRHOU10: Build to Rent Proposals also promotes residential accommodation in the town centre, whilst LPRHOU3: Residential Premises above Shops & Business permits residential accommodation above shops and businesses. Policy LPRHOU6: 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.

**8.17** Policies LPRHOU1: Development on Brownfield Land, LPRHOU4: Residential Garden Land, LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation and LPRHOU9: Custom & Self-Build Housing are expected to have a minor positive effect in relation to SA objective 2: Services and Facilities. Policy LPRHOU9: 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 LPRHOU4: Residential Garden Land promotes the development of domestic garden land in areas outside of smaller villages and the countryside, whilst policy LPRHOU1: Development on Brownfield Land promotes the

development of previously developed land also in areas outside of smaller villages and the countryside. These areas will tend to be larger, more urban areas, where more amenities are likely to be available. However, the proximity of such development to the services in these settlements is unknown and as such, the positive effects for SA objective 2 have been recorded as uncertain. Policy LPRHOU8: 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.

**8.18** Policy LPRSP10(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.

**8.19** Policies LPRSP10(b): Affordable Housing and LPRHOU6: 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.

**8.20** All policies with the exception of LPRSP10(b): Affordable Housing, LPRSP10(c): Gypsy & Traveller Site Allocations and LPRHOU1: 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.

**8.21** 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 avoid 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.

**8.22** 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 LPRHOU5: Density of Residential Development and LPRHOU10: Build to Rent Proposals, are expected to increase footfall in the town centre, with positive effects on the economy. Policies LPRHOU6: Affordable Local Housing Need on Rural Exception Sites and LPRHOU11: 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, larger villages and rural service centres.

**8.23** Policies LPRHOU3: Residential Premises above Shops & Businesses, LPRHOU5: Density of Residential Development and LPRHOU10: 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 LPRHOU10: 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, while also increasing footfall.

**8.24** Policies LPRHOU1: Development on Brownfield Land and LPRHOU4: Residential Garden Land are expected to have minor positive but uncertain effects in relation to SA objective 6: Town Centre because LPRHOU4 promotes the development of domestic garden land in areas outside of smaller villages and the countryside, whilst LPRHOU1 promotes the development of previously developed land also in areas outside of smaller villages and the countryside. These areas will be larger, more urban areas, such as Maidstone Town Centre, although the policy also applies to other service centres. Consequently, there is potential for both policies to increase footfall in the town centre, enhancing its vitality and vibrancy. However, policy LPRHOU1 also promotes the provision of bespoke working from home space, which may act to reduce footfall in the town centres. Therefore, a mixed uncertain minor positive and minor negative effect is expected against SA objective 6: Town Centre in relation to this policy.

**8.25** Policy LPRHOU6: 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 LPRHOU1: 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. The policy also promotes the provision of bespoke working from home space, which may reduce the need to travel and the use of private vehicles. Therefore, this policy is also expected to have a significant positive effect in relation to SA objective 7: Sustainable Travel. Policies LPRHOU3: Residential Premises above Shops & Businesses, LPRHOU5: Density of Residential Development, LPRHOU9: Custom & Self-Build Housing and LPRHOU10: 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 close 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.

**8.26** Policy LPRHOU4: Residential Garden Land is expected to have a minor positive but uncertain effect in relation to SA objective 7: Sustainable Travel because it promotes 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. In addition, policy LPRHOU7: Specialist Residential Accommodation supports proposals that are sustainably located with accessibility by public transport. As such, a minor positive effect is expected against SA objective 7: Sustainable Travel in relation to this policy.

**8.27** All of the policies are expected to have a negligible effect in relation to SA objective 8: Minerals.

**8.28** Policy LPRSP10(b): Affordable Housing is expected to have a mixed minor positive and minor negative effect in relation to SA objective 9: Soils, because it supports the provision of residential housing on greenfield and brownfield sites in the rural and outer urban areas. Therefore, the policy may make an efficient use of land or result in development on previously undeveloped land. Policy LPRHOU4: Residential Garden Land is expected to have 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.

**8.29** Policies LPRHOU1: Development on Brownfield Land, LPRHOU3: Residential Premises above Shops & Businesses and LPRHOU5: Density of Residential Development are



expected to have a significant positive effect for SA objective 9: Soils. This is because policy LPRHOU1: Development on Brownfield Land promotes the development of previously developed land that may be under-utilised. Policy LPRHOU5: 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 LPRHOU3: Residential Premises above Shops & Businesses promotes residential premises on above ground floor levels, which may have been used previously for other uses.

**8.30** Policy LPRHOU6: 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.

**8.31** None of the policies is expected to have an effect in relation to SA objective 10: Water.

**8.32** Policies LPRHOU1: Development on Brownfield Land, LPRHOU3: Residential Premises above Shops & Businesses, LPRHOU5: Density of Residential Development, LPRHOU6: Affordable Local Housing Need on Rural Exception Sites, LPRHOU9: Custom & Self-Build Housing and LPRHOU10: 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 LPRHOU4: 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. 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.

**8.33** Policies LPRHOU1: Development on Brownfield Land and LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation are expected to have a minor positive effect in relation to SA objective 14: Biodiversity. Policy LPRHOU1: 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 meets the Council standards as set out in other policies in the plan. The policy does not provide detail on what is considered a significant environmental improvement, and therefore uncertainty is added against the effect. Policy LPRHOU8: 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.

**8.34** Policy LPRHOU6: 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.

**8.35** Policy LPRHOU4: Residential Garden Land promotes residential development in gardens, which will cause the loss of these gardens and any associated biodiversity, which would result in a potential minor negative effect. However, the policy requires any loss of biodiversity to be offset elsewhere. Therefore, this policy is expected to have a negligible residual effect in relation to SA objective 14: Biodiversity.

**8.36** Only one policy, LPRHOU6: 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 as well as areas of higher heritage value. 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.

**8.37** Policies LPRHOU1: Development on Brownfield Land, LPRHOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the Built-up Area, LPRHOU4: Residential Garden Land, LPRHOU5: Density of Residential Development, LPRHOU6: Affordable Local Housing Need on Rural Exception Sites, LPRHOU7: Specialist Residential Accommodation, LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation, LPRHOU9: Custom & Self-Build Housing and LPRHOU11: 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 LPRHOU6: Affordable Local Housing Need on Rural Exception Sites is expected to have a minor positive effect because it promotes development for First Homes adjacent to the existing settlement and located outside of the AONB and requires development proposals to have regard to areas of higher landscape sensitivity, while policy LPRHOU9: 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

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

- An earlier draft of this SA Report recommended that policy LPRHOU6: Affordable Local Housing Need on Rural Exception Sites could require any loss of biodiversity to be offset elsewhere. This has been addressed by the Council with reference made to policy LPRSP14(a): Natural Environment. It was also suggested that policy LPRHOU6 could make reference to protecting the areas of higher landscape sensitivity and heritage value. This has been addressed by the Council, however, reference has not been made to policies LPRSP14(a): Natural Environment, LPRSP14(b): Historic Environment and ENV1: Development Affecting Heritage Assets.
- There could be a requirement in policy LPRHOU6: Affordable Local Housing Need on Rural Exception Sites for any minerals to be extracted before development. The policy could also contain wording that seeks to avoid the development of best and most versatile agricultural land.

## Economic development

### Reasonable alternatives tested

**8.39** As outlined in Chapter 6, 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 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 **Chapter 4**.

**8.40** 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 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 **Appendix C**.

### Strategic policies LPRSP11: Economic Development to LPRSP11(c): Employment Allocations and non-strategic commercial development policies LPRCD1 to LPRCD9 and LPRTLR1 to LPRTLR2

**8.41** This section presents the appraisals of the following policies:

- LPRSP11: Economic Development
- LPRSP11(a): Safeguarding Existing Employment Sites and Premises
- LPRSP11(b): Creating New Employment Opportunities
- LPRSP11(c): Town, District and Local Centres
- LPRCD1: Shops, Facilities and Services
- LPRCD2: Primary Shopping Area
- LPRCD3: Accommodation for Rural Workers
- LPRCD4: Live-Work Units
- LPRCD5: New Agricultural Buildings and Structures
- LPRCD6: Expansion of Existing Businesses in Rural Areas
- LPRCD7: Equestrian Development
- LPRTLR1: Mooring Facilities and Boat Yards
- LPRTLR2: Holiday Lets, Caravan and Camp Sites

**8.42** Strategic policy LPRSP11: 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 LPRSP11(a): Safeguarding Existing Employment Sites and Premises seeks to prevent the change of use or redevelopment of designated Economic Development Areas, whilst Policy LPRSP11(b): Creating New Employment Opportunities lists some site allocations and sets out how permission will be granted for employment development on non-allocated sites within Maidstone Urban Area and the Rural Service Centres, in addition to requiring major development schemes to provide employment opportunities for residents. Policy LPRSP11(c): Town, District and Local Centres lists the town, 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. The policy also supports the development of new district and local centres on large new settlements, including Lidsing and Heathlands.

**8.43** Non-strategic commercial development policy LPRCD1 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. Proposals for retail sales of fresh produce at the point of production (or originating from the farm holding) are also supported, provided they do not damage the viability of district centres and village shops. Policy LPRCD2: Primary Shopping Area sets out what development will be permitted in Maidstone Town Centre to maintain the Primary Shopping Area and the area's reputation as a shopping destination.

**8.44** Policy LPRCD3: Accommodation for Rural Workers supports proposals for housing accommodation for a rural worker. Policy LPRCD4: 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 LPRCD5: New Agricultural Buildings and Structures permits development of new agricultural buildings or structures provided a set of criteria are met. Policy LPRCD6: Expansion of Existing Businesses in Rural Areas grants planning permissions for rural businesses provided they meet the criteria listed. Policy LPRCD7: Equestrian Development sets out in what circumstances permission for equestrian development will be granted.

**8.45** Non-strategic policy LPRTL1: 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 LPRTL2: 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.

**8.46** Table 8.2 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 8.2: SA findings for strategic policies LPRSP11: Economic Development to LPRSP11(c): Town, District and Local Centres and non-strategic commercial development policies LPRCD1 to LPRCD7 and LPRTL1 to LPRTL2

Policy	LPRSP11: Economic Development	LPRSP11(a): Safeguarding Existing Employment Sites	LPRSP11(b): Creating New Employment Opportunities	LPRSP11(c): Town, District and Local Centres	LPRCD1: Shops, Facilities and Services	LPRCD2: Primary Shopping Area	LPRCD3: Accommodation for Rural Workers	LPRCD4: Live Work Units	LPRCD5: New Agricultural Buildings and Structures	LPRCD6: Expansion of Existing Businesses in Rural Area	LPRCD7: Equestrian Development	LPRTL1: Mooring Facilities and Boat Yards	LPRTL2: Holiday Lets, Caravan and Camp Sites
SA1: Housing	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
SA4: Health	0	+	+	+	+	0	0	+	+	+	0	0	+
SA5: Economy	++	++	++	++	++	++	+	+	+	++	+	0	+
SA6: Town Centre	++	0	0	+	++	++	0	0	0	0	0	0	0
SA7: Sustainable Travel	0	+	+	+	++/	0	0	+	0	0	0	0	0
SA8: Minerals	0	0	0	0	0	0	0	0	0	0	0	0	0
SA9: Soils	++/	++	?	?	0	0	?	?	?	?	?	?	?
SA10: Water	0	0	0	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	0	+	0	+	+	0

Chapter 8  
SA findings for thematic strategic policies and non-strategic policies

SA of Maidstone Local Plan Review  
September 2021

Policy	LPRSP11: Economic Development	LPRSP11(a): Safeguarding Existing Employment Sites	LPRSP11(b): Creating New Employment Opportunities	LPRSP11(c): Town, District and Local Centres	LPRCD1: Shops, Facilities and Services	LPRCD2: Primary Shopping Area	LPRCD3: Accommodation for Rural Workers	LPRCD4: Live Work Units	LPRCD5: New Agricultural Buildings and Structures	LPRCD6: Expansion of Existing Businesses in Rural Area	LPRCD7: Equestrian Development	LPRTL1: Mooring Facilities and Boat Yards	LPRTL2: Holiday Lets, Caravan and Camp Sites
SA13: Climate Change	0	+	+	+	++/	0	0	+	0	0	0	0	0
SA14: Biodiversity	?	0	?	?	0	0	?	?	+/?	?	?	+/?	?
SA15: Historic Environment	+/?	0	+/?	?	0	0	?	+/?	+/?	+/?	+/?	+/?	+/?
SA16: Landscape	+/?	+	+/?	?	0	+	?	+/?	+/?	+/?	+/?	+/?	+/?

**Explanation of SA findings for strategic policies****LPRSP11: Economic Development to LPRSP11(c): Employment Allocations and non-strategic commercial development policies LPRCD1 to LPRCD7 and LPRTL1 to LPRTL2**

**8.47** Policies LPRCD3: Accommodation for Rural Workers and LPRTL1: 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 LPRTL2: Holiday Lets, Caravan and Camp Sites is expected to have a mixed minor positive and minor negative effect in relation to 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.

**8.48** Policies LPRSP11(c): Town, District and Local Centres, LPRCD1: Shops, Facilities and Services and LPRCD2: Primary Shopping Area are expected to have a significant positive effect in relation to SA objective 2: Services & Facilities. Policies LPRSP11(c): Town, District and Local Centres and LPRCD1: Shops, Facilities and Services support the retention and enhancement of the retail function of town, district and local centres, in addition to leisure and community uses. Policy LPRSP11(c): Town, District and Local Centres specifically makes provision for a new local centre as part of the new residential scheme at Langley Park. Additionally, new district and/or local centres will be established on large new settlements, including Lidsing and Heathlands. Policy LPRCD1: Shops, Facilities and Services supports proposals for retail and main town centre leisure and culture uses in Maidstone Town Centre, followed by the district and local centres. The policy requires an impact assessment to be undertaken where a proposal for retail, leisure and other town centre uses is located outside of a defined centre. Small-scale ancillary uses within employment sites outside of the defined network of centres will be supported, in addition to small shops within residential areas to serve the local area and retail sales of fresh produce, providing residents with a range of goods that may not otherwise be accessible. Proposals involving the loss of existing post offices, pharmacies, banks, public houses or class F2 shops selling mainly convenience goods will only be supported under certain circumstances. Policy LPRCD2: Primary Shopping Area seeks to ensure that retail and leisure remain the predominant uses in Maidstone Town Centre by resisting their loss within the Primary Shopping Area.

**8.49** Policies LPRSP11: Economic Development and LPRCD4: Live-Work Units are expected to have a minor positive effect in relation to SA objective 2: Services & Facilities. Policy LPRSP11: 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 LPRCD4: Live-Work Units restricts the construction of new-build live-work units within the boundaries of the urban area, rural service centres and main 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.

**8.50** Policy LPRCD1: Shops, Facilities and Services 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 and fear of crime.

**8.51** Policies LPRSP11(a): Safeguarding Existing Employment Sites and Premises, LPRSP11(b): Creating New Employment Opportunities, LPRSP11(c): Town, District and Local Centres, LPRCD1: Shops, Facilities and Services, LPRCD4: Live-Work Units, LPRCD5: New Agricultural Buildings and Structures, LPRCD6: Expansion of Existing Businesses in Rural Areas and LPRTL2: 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.

**8.52** 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 LPRSP11: Economic Development, LPRSP11(a): Safeguarding Existing Employment Sites and Premises, LPRSP11(b): Creating New Employment Opportunities, LPRSP11(c): Town, District and Local Centres, LPRCD1: Shops, Facilities and Services, LPRCD2: Primary Shopping Area and LPRCD6: Expansion of Existing Businesses in Rural Areas is 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 LPRSP11: Economic Development also seeks to improve skills in the workforce by supporting further and higher education provision, in addition to supporting improvements in digital technology and communications, to facilitate more flexible working practices. Similarly, policy LPRSP11(b): Creating New Employment Opportunities requires major development schemes to provide employment opportunities for Maidstone Borough residents, particularly in more deprived communities so as to ensure inclusive growth. For this reason, policy LPRSP11(b) is expected to have a minor positive effect in relation to SA objective 3: Community. Policy LPRCD2: Primary Shopping Area focuses more specifically on the Primary Shopping Area in Maidstone Town Centre and providing a mix of uses (class E). Similarly, policies LPRSP11(c): Town, District and Local Centres and LPRCD1: Shops, Facilities and Services support the retail function and supporting community uses of town, district and local centres.

**8.53** The remaining policies, with the exception of LPRTL1: Mooring Facilities and Boat Yards (which would have a negligible effect) are expected to have a minor positive effect in relation to 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 LPRCD3: Accommodation for Rural Workers, LPRCD5: New Agricultural Buildings and Structures and LPRCD7: Equestrian Development support development in rural areas for existing and new businesses, in addition to accommodation for rural workers. Policy LPRCD4: 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 LPRTL2: Holiday Lets, Caravan and Camp Sites is expected to have a minor positive effect in relation to this objective because it supports the tourism industry through the provision of holiday lets, caravans and/or holiday tents.

**8.54** Policies LPRSP11: Economic Development, LPRCD1: Shops, Facilities and Services and LPRCD2: Primary Shopping Area are expected to have a significant positive effect in relation to SA objective 6: Town Centre. This is because policy LPRSP11: 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 LPRCD1: Shops, Facilities and Services supports proposals for retail and main town centre leisure and culture uses in Maidstone Town Centre, followed by the district and then local centres. According to the policy, new non E or F class uses will be resisted in the district and local centres so as to maintain and enhance the existing retail

function and supporting community uses of these centres. Policy LPRCD2: Primary Shopping Area seeks to maintain the Primary Shopping Area in Maidstone Town Centre, so as to retain its reputation as a retail destination.

**8.55** Policy LPRSP11(c): Town, District and Local Centres is expected to have a minor positive effect for SA objective 6: Town Centre because it requires town centre uses to be located according to the retail hierarchy in order to promote choice, competition and innovation, with the policy also seeking to maintain and enhance the retail function and supporting community uses of the town, district and local centres. According to the policy, where new district/local centres are established as part of large new settlements, they must be of a scale that does not undermine the function of other centres within the retail hierarchy.

**8.56** Policy LPRCD1: Shops, Facilities and Services is expected to have a significant positive effect in relation to SA objective 7: Sustainable Travel because it promotes 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. The policy specifically requires proposals located at the edge of an existing centre or an out-of-centre location to ensure the provision of walking and cycling routes, as well as public transport links. Therefore, overall, Policy LPRCD1: Shops, Facilities and Services is expected to encourage use of sustainable travel modes. However, the policy also supports the retail sale of fresh produce at the point of production and is therefore 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. Therefore, the significant positive effect is mixed with a minor negative effect.

**8.57** Policies LPRSP11(c): Town, District and Local Centres and LPRCD4: Live-Work Units are expected to have a minor positive effect for SA objective 7: Sustainable Travel. This is because policy LPRSP11(c): Town, District and Local Centres makes provision for new local centres as part of new settlements and residential development schemes, ensuring all new residents are within walking and cycling distance of local amenities. Policy LPRCD4: 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. Policies LPRSP11(a): Safeguarding Existing Employment Sites and Premises and LPRSP11(b): Creating New Employment Opportunities are expected to have a minor

positive effect in relation to SA objective 7 because outside of designated Economic Development Areas and on non-allocated sites within Maidstone Urban Area or the Rural Service Centres, development proposals are required to be readily accessible by public transport, bicycle and foot, or contribute towards the provision of sustainable transport infrastructure to serve the area.

**8.58** Policy LPRSP11: 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 LPRSP11(a): Safeguarding Existing Employment Sites and Premises is expected to have a significant positive effect for this objective because it supports the retention of existing employment sites within designated Economic Development Areas, which will reduce the need to develop greenfield land elsewhere in order to meet demand. Outside of designated Economic Development Areas, permission will be granted for the intensification of existing industrial and business uses, which is considered an efficient use of previously developed land. The remainder of the economic development policies (except LPRCD1: Shops, Facilities and Services and LPRCD2: Primary Shopping Area) are expected to have a minor negative but uncertain effect in relation to SA objective 9: Soils. This is because these policies could result in development on greenfield land and the loss of best and most versatile agricultural land. However, this is uncertain until development proposals come forward.

**8.59** Policies LPRCD5: New Agricultural Buildings and Structures and LPRCD7: 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 development proposals to address how surface water run-off will be dealt with and controlled within the boundaries of the site. Policy LPRTL1: 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.

**8.60** Policy LPRCD1: Shops, Facilities and Services is expected to have a mixed significant positive and minor negative effect in relation to SA objectives 11: Air Quality and 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. However, the policy supports the sale of fresh produce at the point of production and farm shops tend to be located in rural, isolated areas that are not easily accessible by walking and cycling, or public transport. Policies LPRSP11(a): Safeguarding Existing Employment Sites and Premises, LPRSP11(b): Creating New Employment Opportunities, LPRSP11(c): Town, District and Local Centres and LPRCD4: Live-Work Units are expected to have a minor positive effect in relation to these two objectives for the reasons outlined above under SA objective 7: Sustainable Travel.

**8.61** All of the economic development policies (except LPRCD2: Primary Shopping Area) are expected to have a minor negative but uncertain effect in relation to SA objective 14: Biodiversity. This is because the policies could result in some economic development on greenfield land, which could potentially have an adverse effect on any biodiversity present within the area. However, policy LPRTL1: Mooring Facilities and Boat Yards may also have a minor positive effect 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 to avoid any adverse effects on biodiversity. Similarly, policy LPRCD5: New Agricultural Buildings and Structures requires developments for structures such as polytunnels or Cravo greenhouses to address the inclusion of a programme for the maintenance and enhancement of existing field margins in the interests of encouraging biodiversity. Therefore, this policy also has a mixed minor positive and minor negative effect.

**8.62** Most of the economic development policies (except LPRSP11(a): Safeguarding Existing Employment Sites and Premises, LPRCD1: Shops, Facilities and Services and LPRCD2: Primary Shopping Area) could have a minor negative but uncertain effect on SA objective 15: Historic Environment because they could result in economic development either within urban areas and town centres, or on greenfield land that could have an impact on the setting of historic environment assets and/or archaeology. However, policy LPRSP11: Economic Development supports proposals for the expansion of heritage related development in the countryside and is therefore also expected to have a minor positive effect. Policies LPRSP11(b): Creating New Employment Opportunities, LPRCD4: Live-Work Units, LPRCD5: New Agricultural Buildings and Structures, LPRCD6: Expansion of Existing Businesses in Rural Areas, LPRCD7: Equestrian Development, LPRTL1: Mooring Facilities and Boat Yards and LPRTL2: Holiday Lets, Caravan and Camp Sites could also have a minor positive effect in relation to SA



objective 15: Historic Environment because they support development that is appropriate in scale and in keeping with the landscape, so as to avoid any adverse visual impact, which could also help to avoid impacts on the setting of heritage assets.

**8.63** While most of the economic development policies (except LPRSP11(a): Safeguarding Existing Employment Sites and Premises, LPRCD1: Shops, Facilities and Services and LPRCD2: Primary Shopping Area) are expected to have a minor negative but uncertain effect in relation to SA objective 16: Landscape because they could all result in some economic development on greenfield land, Policies LPRSP11(a): Safeguarding Existing Employment Sites and Premises, LPRSP11(b): Creating New Employment Opportunities, LPRCD4: Live-Work Units, LPRCD5: New Agricultural Buildings and Structures, LPRCD6: Expansion of Existing Businesses in Rural Areas, LPRCD7: Equestrian Development, LPRTL1: Mooring Facilities and Boat Yards and LPRTL2: Holiday Lets, Caravan and Camp Sites are also 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. Policy LPRCD2: Primary Shopping Area is also expected to have a minor positive effect in relation to this objective because the change of use from class E is acceptable provided it does not undermine the overall town centre character and there is no detrimental effect on the visual or other special character or amenities of the surrounding area.

**8.64** None of the policies are expected to have an effect for SA objective 8: Minerals.

### Recommendations

**8.65** The majority of minor negative effects identified from this group of policies are in relation to in the potential for new or expansions to existing economic development taking place on greenfield land, which is not an efficient use of land and could lead to impacts on biodiversity, landscape and the historic environment. However, it is difficult for the expansion of premises to avoid this and policy LPRSP11 already promotes the retention, intensification and regeneration of existing premises, plus a number of the economic development policies include requirements to address any landscape and visual impacts. There is less reference to mitigating impacts on biodiversity and the historic environment, but it is noted that there are other specific policies in the Local Plan Review that address these issues (policies LPRSP14(a): Natural Environment, LPRSP14(b): The Historic Environment and ENV1: Historic Environment and all economic development proposals will need to be consistent with the other policies in the Local Plan Review.

**8.66** With regard to Policy LPRCD1: Shops, Facilities and Services, supporting the retail sale 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. Given the one-off, isolated nature of these types of development, it would be difficult to impose sustainable travel criteria.

**8.67** Policy LPRTL2 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.

**8.68** 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

**8.69** 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.

**8.70** The appraisal of potential effects in relation to sustainable transport objectives of reasonable alternative spatial strategies and site allocation options is set out in **Chapter 4** and **Appendix C**. As described in paragraph 4.13 of **Chapter 4**, four 'Spatial Approaches' were identified within the Council's topic papers, being high-level, alternative distributions of the housing and economic development needed during the Plan period. A number of these 'Spatial Approaches' were very similar to the three initial spatial strategy options that were subject to SA. Where relevant, the Transport and Air Quality Topic Paper (June 2020) was used to inform assumptions about the sustainable transport approaches that would be likely to be pursued under each initial spatial strategy option.

### Policy LPRSP12: Sustainable Transport and non-strategic sustainable transport policies LPRTRA1 to LPRTRA4

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

- LPRSP12: Sustainable Transport
- LPRTRA1: Air Quality

- LPRTRA2: Assessing the Transport Impacts of Development
- LPRTRA3: Park and Ride Sites
- LPRTRA4: Parking Policy

**8.72** Policy LPRSP12: Sustainable Transport 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 charging infrastructure.

**8.73** Policy LPRTRA1: 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 LPRTRA2: 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 LPRTRA3: Park and Ride Sites supports the retention of two previously designated Park & Ride sites within Maidstone Borough. Policy LPRTRA4: Parking Policy sets out the car parking standards for residential and non-residential development, whilst also making provision for cycle parking facilities and referencing electric vehicle charging infrastructure.

**8.74 Table 8.3** summarises the sustainability effects for all of the above policies in relation to the SA objectives, and the findings are described below the table.

Table 8.3: SA findings for strategic policy LPRSP12: Sustainable Transport and non-strategic sustainable transport policies LPRTRA1 to LPRTRA4

Policy	LPRSP12: Sustainable Transport	LPRTRA1: Air Quality	LPRTRA2: Assessing the Transport Impacts of Development	LPRTRA3: Park and Ride Sites	LPRTRA4: Parking Policy
SA Objective					
SA1: Housing	0	0	0	0	0
SA2: Services & Facilities	+	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	++	+?	++/
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	+?
SA16: Landscape	0	0	0	0	+?

### Explanation of SA findings for strategic policy LPRSP12: Sustainable Transport and non-strategic sustainable transport policies LPRTRA1 to LPRTRA4

**8.75** Policies LPRSP12: Sustainable Transport, LPRTRA3: Park and Ride Sites are likely to have a minor positive effect in relation to SA objective 2: Services & Facilities because they support the provision and use of sustainable transport, including the two existing Park and Ride sites. This should enable residents to access services and facilities within Maidstone Town Centre and other town centres by modes other than private vehicle.

**8.76** Policies LPRSP12: Sustainable Transport, LPRTRA1: Air Quality, and LPRTRA2: 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. In addition, policy LPRTRA1: 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.

**8.77** Policy LPRSP12: Sustainable Transport is expected to have a significant positive effect in relation to SA objectives 5: Economy and 6: Town Centre because it requires an update of the Integrated Transport Strategy (2017) in the context of the Local Plan Review, 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 and in connecting the Garden Settlements. 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.

**8.78** Policies LPRSP12: Sustainable Transport and LPRTRA2: Assessing the transport impacts of development 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 and Ride sites. Policy LPRSP12: 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. Likewise, Policy LPRTRA2 makes

reference to safe and convenient passenger waiting facilities, information systems and signed pedestrian access routes to public transport services. A minor positive but uncertain effect is expected for Policy LPRTRA3: Park and Ride Sites in relation to SA objective 7 because the Council is maintaining its two existing Park and Ride sites.

**8.79** Policy LPRTRA4: Parking Policy 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, which could result in the private car continuing to be the preferred mode of transport, 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 petrol/diesel cars.

**8.80** Policies LPRSP12: Sustainable Transport and LPRTRA2: 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 LPRSP12: Sustainable Travel specifically states that the Council and its partners will address the air quality impact of transport. Policy LPRTRA1: 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.

**8.81** Policy LPRTRA4: Parking Policy 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. The policy makes provision for car parking spaces and may therefore encourage use of the private car which could increase vehicular emissions. However, not providing any car parking spaces would potentially result in people parking in unsuitable places such as on footways, which may obstruct pedestrian movement and endanger vulnerable road users. In the long-term, however, a limited number of car parking spaces would discourage driving and promote car sharing schemes and public transport use.

**8.82** For the reasons outlined above, policies LPRSP12: Sustainable Transport and LPRTRA2: Assessing the transport impacts of development 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.

**8.83** Similarly, policy LPRTRA4: Parking Policy 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. The policy does, however, make provision for a limited number of car parking spaces which could encourage use of the private car and a subsequent increase in CO<sub>2</sub> emissions, although this would be limited.

**8.84** According to Policy LPRTRA4: Parking Policy, the Council can depart from established maximum or minimum standards to take account of the restoration, refurbishment and re-use of listed buildings or buildings affecting the character of a conservation area. Therefore, minor positive but uncertain effects are expected in relation to SA objectives 15: Historic Environment and 16: Landscape.

### Recommendations

**8.85** None identified.

## Infrastructure

### Reasonable alternatives tested

**8.86** 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 not considered 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.

**8.87** One alternative policy approach to infrastructure provision was outlined in the Infrastructure Topic Paper (June 2020):

- Approach RA3: Apply a more localised approach to infrastructure provision

**8.88** This alternative is more fully described in **Appendix C**, alongside an appraisal of its reasonableness and likely sustainability implications.

### Strategic policies LPRSP13: Infrastructure Delivery and non-strategic infrastructure policies LPRINF1 to LPRINF4

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

- LPRSP13: Infrastructure Delivery
- LPRINF1: Publicly Accessible Open Space and Recreation
- LPRINF2: Community Facilities
- LPRINF3: Renewable and Low Carbon Energy Schemes
- LPRINF4: Digital Communications and Connectivity

**8.90** Policy LPRSP13: Infrastructure Delivery specifies that developers will be expected to provide or contribute towards new or improved infrastructure provision, where it is needed. It lists which infrastructure types the Council will prioritise through Section 106 agreements, and which take priority over others. The policy also supports the creation or enhancement of open space, whilst policy LPRINF1: Publicly Accessible Open Space and Recreation sets out the open space quantity and quality standards for new housing or mixed-use development sites. Policy LPRINF2: Community Facilities requires new residential development to have adequate accessibility to community facilities, whilst also preventing the loss of community facilities. Policy LPRINF3: 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 LPRINF4: Digital Communications and Connectivity seeks to improve the digital communications network across Maidstone Borough.

**8.91 Table 8.4** 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 8.4: SA findings for strategic policies LPRSP13: Infrastructure and non-strategic infrastructure policies LPRINF1 to LPRINF4

Policy	LPRSP13: Infrastructure Delivery	LPRINF1: Publicly Accessible Open Space and Recreation	LPRINF2: Community Facilities	LPRINF3: Renewable and Low Carbon Energy Schemes	LPRINF4: Digital Communications and Connectivity
SA1: Housing	++	0	0	0	0
SA2: Services & Facilities	++	++	++	0	0
SA3: Community	++	++	++	0	+
SA4: Health	++	++	+?	+	+
SA5: Economy	++	0	0	+	++
SA6: Town Centre	+?	0	0	0	0
SA7: Sustainable Travel	++	++?	0	0	+
SA8: Minerals	?	0	0	0	0
SA9: Soils	?	0	0	+	0
SA10: Water	+?	+	0	0	0
SA11: Air Quality	++	++	0	0	+
SA12: Flooding	+	+	0	0	0
SA13: Climate Change	++	++	0	++	+
SA14: Biodiversity	+/?	++	0	+/?	0
SA15: Historic Environment	?	+	0	+/?	+/?
SA16: Landscape	+/?	+	0	+/?	+/?

### Explanation of SA findings for strategic policies LPRSP13: Infrastructure and non-strategic infrastructure policies LPRINF1 to LPRINF4

**8.92** Policy LPRSP13: 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.

**8.93** Policies LPRSP13: Infrastructure Delivery, LPRINF1: Publicly Accessible Open Space and Recreation and LPRINF2: Community Facilities are expected to have a significant positive effect in relation to SA objective 2: Services & Facilities and SA objective 3: Community. For Policy LPRSP13: Infrastructure Delivery this is because it requires the delivery of infrastructure, which includes a range of services and facilities, such as new schools, public libraries, community facilities and other similar uses. The policy also makes provision for public open space, with policy LPRINF1 specifically setting out the open space quantity standards for Maidstone Borough. Open space provision is expected to support high levels of pedestrian activity and outdoor interaction. The significant positive effect in relation to SA objective 3: Community is also due to Policy LPRINF1 listing quality standards that all new open spaces should meet, which will ensure they allow for meaningful and safe recreation, overlooked by active building frontages, they are easily found and accessible including by those with disabilities and provide interest and activities for a wide range of users in particular meeting the needs of elderly and less able users as well as children, young people and families. Policy LPRINF2: 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. Policy LPRINF4: Digital Communications and Connectivity is likely to have a minor positive effect in relation to SA objectives 2: Services & Facilities and 3: Community because it acknowledges the importance of providing high-speed communication networks, including broadband and mobile technology, in enhancing the provision of local community facilities and services.

**8.94** Policies LPRSP13: Infrastructure Delivery and LPRINF1: 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 health and mental wellbeing. Policy LPRINF1: 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 inequalities. 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.

**8.95** Policies LPRINF2: Community Facilities, LPRINF3: Renewable and Low Carbon Energy Schemes and LPRINF4: Digital Communications and Connectivity are expected to have minor positive effects in relation to SA objective 4: Health. As mentioned previously, policy LPRINF2: 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 LPRINF3: 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. Policy LPRINF4: Digital Communications and Connectivity is expected to have a minor positive effect for SA objective 4: Health as it requires any new masts and antennae proposals to adhere to current Government advice on the health effects of exposure to radio waves.

**8.96** Policies LPRSP13: Infrastructure Delivery and LPRINF4: Digital Communications and Connectivity are expected to have a significant positive effect in relation to SA objective 5: Economy. With regard to policy LPRSP13, where development creates a requirement for new or improved infrastructure beyond existing provision, there is a requirement for developers to provide or contribute towards this. This will enable the borough to continue to compete economically with places elsewhere. Likewise, policy LPRINF4: Digital Communications and Connectivity 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.

**8.97** Policy LPRINF3: 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.

**8.98** Policy LPRSP13: 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.

**8.99** Policy LPRSP13: Infrastructure Delivery is expected to have a significant positive effect in relation to SA objective 7: Sustainable Travel because the proposed infrastructure delivery (through the Infrastructure Delivery Plan (IDP)) will include better public transport links, in addition to walking and cycling routes. Policy LPRINF1: 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 easily accessible by road, cycleway, footpaths and public transport. This should help to encourage active and sustainable transport modes to reach open spaces, but the significant positive effect for this objective is recorded as uncertain because the policy still refers to open spaces being accessible by road, which will encourage car use.

**8.100** Policy LPRINF4: Digital Communications and Connectivity 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. Therefore, a minor positive effect is expected in relation to SA objective 7: Sustainable Travel because this would result in less commuting to work overall.

**8.101** Minor negative but uncertain effects are recorded for policy LPRSP13: 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.

**8.102** Policy LPRINF3: Renewable and Low Carbon Energy Schemes is expected to have a minor 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.

**8.103** Policies LPRSP13: Infrastructure Delivery and LPRINF1: Publicly Accessible Open Space and Recreation are expected to have minor positive effects in relation to SA objective 10: Water. Policy LPRSP13 does not include utilities (including water supply and waste water treatment schemes)

in the list of infrastructure priorities, because the supporting text notes that utility connections are charged directly to the developer rather than a requirement of developer contributions, however, some wastewater treatment and water supply schemes are listed in the IDP. Therefore, the effect for SA objective 10 is recorded as uncertain. Policy LPRINF1: Publicly Accessible Open Space and Recreation is expected to have a minor positive effect in relation to 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.

**8.104** Policies LPRSP13: Infrastructure Delivery and LPRINF1: 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. Providing more public transport infrastructure and services, in addition to walking and cycling routes, is expected to reduce reliance on the private car, whilst also reducing vehicular emissions and making the air cleaner. However, the effect for policy LPRSP13: Infrastructure Delivery has been recorded as uncertain because the policy does not state whether infrastructure delivery includes promoting sustainable transport modes. Similarly, improving the digital communications network under policy LPRINF4 would have a minor positive effect on SA objective 11: Air Quality due to the number of car journeys to work it would help to avoid.

**8.105** Policy LPRINF1: Publicly Accessible Open Space and Recreation is expected to have a minor positive effect 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 LPRINF1. Policy LPRSP13: Infrastructure Delivery is also expected to have a minor positive effect for SA objective 12, because it continues to secure developer contributions to the Community Infrastructure Levy, which will help to fund infrastructure delivery set out in the IDP, which includes flood management schemes.

**8.106** Policies LPRSP13: Infrastructure Delivery and LPRINF1: Publicly Accessible Open Space and Recreation are expected to have significant positive effects in relation to SA objective 13: Climate Change for the reasons outlined above under SA objectives 7: Sustainable Travel and 11: Air Quality. Promoting sustainable transport links is expected to reduce reliance on the private car and associated CO<sub>2</sub> emissions. Similarly, improving the digital communications network under policy LPRINF4 is expected to have a minor positive effect on SA objective 13: Climate Change due to the number of car journeys to work it would help to avoid.



**8.107** Policy LPRINF3: 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.

**8.108** Policy LPRINF1: 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.

**8.109** Policies LPRSP13: Infrastructure Delivery and LPRINF3: Renewable and Low Carbon Energy Schemes are expected to have a mixed minor positive and minor negative but uncertain effect in relation to SA objective 14: Biodiversity because depending on the infrastructure being delivered and where, its development could have an adverse effect on biodiversity. However, open space provision under policy LPRSP13 is expected to improve the existing green infrastructure network, whilst also enhancing biodiversity through design and landscaping. Policy LPRINF3: 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.

**8.110** Policies LPRSP13: Infrastructure Delivery, LPRINF3: Renewable and Low Carbon Energy Schemes and LPRINF4: Digital Communications and Connectivity are expected to have a mixed minor positive and minor negative but uncertain effect for 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 or, alternatively, a positive effect because it makes provision for open space and/or an assessment of the visual impacts. Policy LPRSP13: Infrastructure Delivery supports open space development, including the enhancement of existing open spaces, which could indirectly help protect the setting of heritage assets from obtrusive development. In addition, Policy LPRINF3: Renewable and Low Carbon Energy Schemes 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. Policy LPRINF1: Publicly Accessible Open Space and Recreation requires all new open spaces to contribute to local landscape character and therefore may have an indirect minor positive but uncertain effect as heritage assets and their settings can be components of local landscape character.

**8.111** Policies LPRSP13: Infrastructure Delivery, LPRINF3: Renewable and Low Carbon Energy Schemes and LPRINF4: Digital Communications and Connectivity are expected to have a mixed minor positive and minor negative but uncertain effect for SA objective 16: Landscape for the same reasons as noted above under SA objective 15. Policy LPRSP13 supports open space development, including the enhancement of existing open spaces, which is expected to indirectly help protect the landscape from obtrusive development. Policy LPRINF3: Renewable and Low Carbon Energy Schemes only permits development when consideration has been given to the landscape and visual impact of development, while policy LPRINF4: Digital Communications and Connectivity only permits proposals for new masts and antennae when every effort has been made to minimise the visual impact of the proposal.

**8.112** Policy LPRINF1: Publicly Accessible Open Space and Recreation is expected to have a minor positive effect in relation to SA objective 16: Landscape because it requires all new open spaces to contribute to local landscape character.

### Recommendations

**8.113** The majority of minor negative effects identified from this group of policies are in relation to in the potential for new infrastructure development to lead to impacts on biodiversity, landscape and the historic environment. However, a number of the infrastructure policies include requirements to address landscape and visual impacts, as well as biodiversity impacts. In addition, open space provision which is allowed for under policy LPRSP13: Infrastructure Delivery and LPRINF1: Publicly Accessible Open Space and Recreation includes requirements for open spaces to form part of the green infrastructure network by connecting green corridors together and benefiting wildlife. There is less reference to mitigating impacts on the historic environment within these policies, but reducing the visual impact and contributing to/retaining local landscape character should indirectly help to avoid or mitigate effects on heritage assets. It is also noted that there are other specific policies in the Local Plan Review that address these issues (policies LPRSP14(a): Natural Environment, LPRSP14(b): The Historic Environment and ENV1: Historic Environment and all infrastructure development proposals will need to be consistent with the other policies in the Local Plan Review.

## The environment

### Reasonable alternatives tested

**8.114** Two broad alternative policy approaches to the natural environment were outlined in the Environment Topic Paper (June 2020):

- Approach C: Go above and beyond LP17 measures
- Approach D: Relax the current LP17 measures

**8.115** These alternatives are more fully described in **Appendix C**, alongside an appraisal of their reasonableness and likely sustainability implications in relation to climate change, biodiversity, landscape and heritage conservation, and flood risk.

### Strategic policies LPRSP14(a): Natural Environment to LPRSP14(c): Climate Change and non-strategic environment policies LPRENV1 to LPRENV3

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

- LPRSP14(a): Natural Environment;
- LPRSP14(b): The Historic Environment;
- LPRSP14(c): Climate Change;
- LPRENV1: Development Affecting Heritage Assets;
- LPRENV2: Change of Use of Agricultural Land to Domestic Garden Land; and
- LPRENV3: Caravan Storage in the Countryside.

**8.117** Policies LPRSP14(a): Natural Environment, LPRSP14(b): The Historic Environment and LPRSP14(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 2036/37.

**8.118** Policy LPRSP14(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.

**8.119** Policy LPRSP14(b): The Historic Environment ensures a proactive approach is taken in protecting and enhancing the borough's characteristics, distinctiveness, diversity and quality of heritage assets.

**8.120** The requirements set out in policy LPRSP14(c): Climate Change seek to ensure that development brought forward by the Local Plan Review will mitigate and adapt to climate change.

**8.121** As the title of policy LPRENV1: Development Affecting Heritage Assets suggests, this policy sets out requirements for the assessment and evaluation of developments that may affect heritage assets.

**8.122** Responding to the selling of individual agricultural plots, policy LPRENV2: 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.

**8.123** For planning permission to be granted, development relating to caravan storage will need to meet the criteria outlined in policy LPRENV3: Caravan Storage in the Countryside. This policy seeks to prevent open storage of caravans in the countryside.

**8.124 Table 8.5** 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 8.5: SA findings for strategic policies LPRSP14(a): Natural Environment to LPRSP14(c): Climate Change and non-strategic environment policies LPRENV1 to LPRENV3

Policy	LPRSP14(a): Natural Environment	LPRSP14(b): The Historic Environment	LPRSP14(c): Climate Change	LPRENV1: Development Affecting Heritage Assets	LPRENV2: Change of Use of Agricultural Land to Domestic Garden Land	LPRENV3: 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	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	0	0
SA14: Biodiversity	++	0	+	0	0	0
SA15: Historic Environment	+?	++	+?	++	0	0
SA16: Landscape	+	+	+	+	+/?	+/?

### Explanation of SA findings for strategic policies

#### LPRSP14(a): Natural Environment to LPRSP14(c): Climate Change and non-strategic environment policies LPRENV1 to LPRENV3

**8.125** Policy LPRSP14(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 LPRSP14(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 and should help to reduce living costs for residents.

**8.126** Minor positive effects are expected in relation to SA objective 2: Services and Facilities, SA objective 3: Community, and SA objective 4: Health for Policies LPRSP14(a): Natural Environment and LPRSP14(c): Climate Change. Policy LPRSP14(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 LPRSP14(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 to the minor positive effects in relation to SA objective 2: Services and Facilities and 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.

**8.127** Policy LPRSP14(b): The Historic Environment is expected to have a minor positive effect in relation to SA objective 5: Economy because it seeks to ensure the continued contribution of heritage assets to the economy by supporting the sensitive restoration, reuse, enjoyment, conservation and enhancement of heritage assets. The policy also acknowledges the role heritage assets can play as drivers for local regeneration.

**8.128** Policies LPRSP14(b): The Historic Environment and LPRENV1: 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.

**8.129** A significant positive effect is identified for policy LPRSP14(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 LPRSP14(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.

**8.130** Policy LPRSP14(a): Natural Environment seeks to protect features of geological interest and so a minor positive effect is recorded for SA objective 8: Minerals.

**8.131** Policy LPRSP14(b): The 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, enjoyment and conservation/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.

**8.132** A minor positive effect is also identified in relation to SA objective 9: Soils from Policy LPRENV2: Change of Use of Agricultural Land to Domestic Garden Land as this policy resists changing the use of vacant agricultural land to domestic garden land if it would result in a loss of best and most versatile agricultural land.

**8.133** Both policy LPRSP14(a): Natural Environment and policy LPRSP14(c): Climate Change are likely to have minor positive effects in relation to SA objective 10: Water. Policy LPRSP14(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. Major developments will not be permitted unless they can demonstrate that new or existing water supply, sewage and wastewater treatment facilities can accommodate the new development. This policy further requires applicants to demonstrate that Nutrient Neutrality requirements, set out by Natural England, have been met 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. Policy LPRSP14(c): Climate Change requires blue-green infrastructure to be integrated into qualifying new development and this is to integrate into SuDS networks. Additionally, this policy also requires new development to operate high levels of water efficiency at 110 litres per person per day, thereby supporting sustainable water management.

**8.134** Policy LPRSP14(c): Climate Change is expected to have a minor positive effect in relation to SA objective 11: Air Quality because it supports a 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. 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. Policy LPRSP14(a): Natural Environment is expected to have a minor positive but uncertain effect in relation to this objective because the Council will work with Natural England to assess, monitor and if necessary mitigate any air pollution effects at European sites.

**8.135** Policies LPRSP14(a): Natural Environment and LPRSP14(c): Climate Change are both expected to have 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 LPRSP14(c): Climate Change also requires new development to plan for and respond to climate change, which is likely to consider flood risk, where appropriate.

**8.136** LPRSP14(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. The policy encourages the delivery of sustainable buildings and a reduction of CO<sub>2</sub> emissions in new development, in addition to the delivery of low carbon energy and low carbon heat networks. Further to this, the policy supports the provision of renewable energy infrastructure within new development.

**8.137** Although policy 14(a): Natural Environment states that it will 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.

**8.138** 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 seek to conserve, connect and enhance the borough's ecological assets. Measures in the policy include requiring a minimum of 20% on site biodiversity net gain in new

development, the creation of links in the blue-green infrastructure network and requirements to avoid adverse effects on internationally, nationally and locally designated sites of importance for biodiversity and Local Biodiversity Action Plan priority habitats .

**8.139** Criterion 4 in policy LPRSP14(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.

**8.140** Two significant positive effects are expected for SA objective 15: Historic Environment as both policy LPRSP14(b): The Historic Environment and policy LPRENV1: Development Affecting Heritage Assets seek to conserve, and where possible enhance heritage assets and their setting. Policy LPRSP14(b): Historic Environment includes active measures such as collaboration between local groups and preparing specific heritage initiatives including proposals for conservation and appropriate re-use of historic assets (especially as drivers for local regeneration) and bids for funding. This policy also supports measures that secure the sensitive restoration, reuse, enjoyment and conservation/enhancements of heritage assets.

**8.141** Minor positive effects are expected for policies LPRSP14(a): Natural Environment and LPRSP14(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.

**8.142** Four minor positive effects are expected in relation to SA objective 16: Landscape as policies LPRSP14(a): Natural Environment and LPRSP14(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 LPRSP14(b): The Historic Environment and LPRENV1: Development Affecting Heritage Assets are likely to contribute to protecting the borough's sensitive landscape character and the distinctive characters of settlements. According to policy LPRENV1, applicants must submit a desk-based landscape assessment to inform development and identify opportunities for enhancement.

**8.143** Policies LPRENV2: Change of Use of Agricultural Land to Domestic Garden Land and LPRENV3: 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 countryside (policy LPRENV2) and screening requirements (policy LPRENV3), thus a mixed minor positive and minor negative but uncertain effect is identified.

### Recommendations

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

- An earlier draft of this SA Report recommended that Policy LPRSP14(c) supported the provision of renewable energy infrastructure within new developments. This has been addressed by the Council by amendments to the policy.

## Quality & design

### Reasonable alternatives tested

**8.145** Three alternatives were described in the Regulation 18b Preferred Approaches document for Policy Q&D6: Technical Standards has :

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.

**8.146** 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 second alternative, 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. Alternative 3 was the preferred approach and taken forward as Policy LPRQ&D6, which is appraised below.

**8.147** No reasonable alternatives were identified by the Council for the remaining policies in this section.

### Strategic policy LPRSP15: Design and non-strategic quality & design policies LPRQ&D1 to LPRQ&D7

**8.148** This section presents the appraisals of the following policies:

- LPRSP15: Design
- LPRQ&D1: Sustainable Design

- LPRQ&D2: External Lighting
- LPRQ&D3: Signage and Building Frontages
- LPRQ&D4: Design Principles in the Countryside
- LPRQ&D5: Conversion of Rural Buildings
- LPRQ&D6: Technical Standards
- LPRQ&D7: Private Amenity Space Standards

**8.149** Policy LPRSP15: 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.

**8.150** Policy LPRQ&D1: Sustainable Design sets out how the sustainability aspirations set out in Policy LPRSP15 will be achieved at the building level and through development layouts. The policy provides support for energy efficiency measures and incorporation of renewable energy.

**8.151** Policy LPRQ&D2: External Lighting sets out criteria under which proposals for external lighting schemes will be permitted.

**8.152** Policy LPRQ&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.

**8.153** Policy LPRQ&D4: Design Principles in the Countryside sets out requirements for development proposals outside of settlement boundaries and Policy LPRQ&D5: Conversion of Rural Buildings sets out requirements to be met to prevent inappropriate change of uses in the borough's rural building stock.

**8.154** Policy LPRQ&D6: Technical Standards sets out the specific internal space standards and water efficient rates that are required in new development and Policy LPRQ&D7: Private Amenity Space Standards ensures that there is a minimum level of outdoor space provided with new residential development.

**8.155** Table 8.6 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 8.6: SA findings for strategic policy LPRSP15: Design and non-strategic quality & design policies LPRQ&D1 to LPRQ&D7

Policy	LPRSP15: Principles of Good Design	LPRQ&D1: Sustainable Design	LPRQ&D2: External Lighting	LPRQ&D3: Signage and Building Frontages	LPRQ&D4: Design Principles in the Countryside	LPRQ&D5: Conversion of Rural Buildings	LPRQ&D6: Technical Standards	LPRQ&D7: Private Amenity Space Standards
SA Objective								
SA1: Housing	++	+	0	0	+	+	+	+
SA2: Services & Facilities	+	0	0	0	0	0	0	0
SA3: Community	++	0	+	0	0	0	0	+
SA4: Health	++	0	+	0	0	0	+	+
SA5: Economy	+	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
SA11: Air Quality	+	0	0	0	+	0	0	0
SA12: Flooding	+	0	0	0	0	0	0	0
SA13: Climate Change	+	++	0	0	+	0	0	0
SA14: Biodiversity	+	+	+	0	+	0	0	0
SA15: Historic Environment	++	+	+	0	+	+	0	0
SA16: Landscape	++	+	+	0	+	+	0	0

### Explanation of SA findings for strategic policy LPRSP15: Principles of Good Design and non-strategic quality & design policies LPRQ&D1 to LPRQ&D7

**8.156** 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 LPRSP15: Principles of Good 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 LPRSP15: Principles of Good Design due to the provision it makes towards ensuring that design layouts maximise opportunities for links to local services.

**8.157** Policies LPRSP15: Principles of Good Design, LPRQ&D2: External Lighting and LPRQ&D 7: Private Open Space Standards are likely to have positive effects in relation to SA objective 3: Community. In the case of Policy LPRQ&D2: External Lighting, well-designed external lighting may have potential to reduce the incidence of crime and anti-social behaviour in communities. Policy LPRQ&D 7: Private Open Space Standards requires that where flats cannot incorporate a balcony or terrace large enough for two persons to use, a quality private communal space should instead be incorporated. This is likely to support interactions between residents and may assist social integration. For Policy LPRSP15: Principles of Good Design, the positive effect is expected to be significant given that 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.

**8.158** Delivering high quality design could improve the health and well-being of residents in Maidstone Borough. Policy LPRSP15: Principles of Good 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 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 LPRQ&D6: Technical Standards and LPRQ&D7: Private Open

Space Standards will contribute to a high quality of life through residential space standards inside and outside. Policy LPRQ&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.

**8.159** As well as delivering high quality residential development, the design standards set out in Policy LPRSP15 may also deliver attractive new locations for employment. Furthermore, policy LPRQ&D3: Signage and Building Frontages will help to create attractive areas of retail and other commercial properties which could encourage consumer footfall and expenditure. A minor positive effect is therefore expected for these policies in relation to SA objective 5: Economy due to their potential to attract new businesses and workers to Maidstone town centre as well as their potential to support the local economy. Policy LPRQ&D5: Conversion of Rural Buildings is also likely to have a minor positive effect in relation to SA objective 5. This policy sets out that conversions of existing rural buildings to residential use should only be permitted where a business use cannot be found for an existing building. This is likely to help support the rural economy of the borough.

**8.160** Policies LPRSP15: Principles of Good Design and LPRQ&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 frontages of shops, pubs and other commercial buildings are appropriate and do not harm the existing character of the buildings in question or the character of the neighbouring properties.

**8.161** As previously mentioned, Policy LPRSP15 promotes the inclusion of sustainable travel links as part of design. Policy LPRQ&D4: Design Principles in the Countryside suggests that proposals will not be permitted where they may give rise to unacceptable traffic levels on nearby. 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.

**8.162** Policy LPRSP15: Principles of Good Design is likely to have a minor positive effect in relation to SA objective 10: Water, given that it requires development proposals to sensitively incorporate natural features such as natural watercourses. This could help to prevent watercourses in Maidstone being adversely affected by pollution sources from



new developments or run off. It will also help maintain the natural flow of watercourses and limit any pollution load. Policy LPRQ&D1: Sustainable Design and policy LPRQ&D6: Technical Standards are also expected to have a minor positive effect in relation to this SA objective. This is due to the requirement in policy LPRQ&D1 that non-residential development should aspire to meet BREEAM Technical Standard (2018) Very Good rating, which includes water efficiency. New residential development is also required by this policy to meet the Building Regulations optional requirement for tighter water efficiency of 110l per person, per day. The technical standards for new development are set out through policy LPRQ&D6: Technical Standards and also include the requirement for water efficiency rates of 110l per person, per day to be achieved.

**8.163** Policy LPRSP15: Principles of Good Design is expected to have a minor positive effect in relation to SA objective 12: Flooding. The policy requires development proposals to sensitively incorporate natural features such as natural watercourses which is likely to help maintain the natural flow of watercourses and promote natural flood management.

**8.164** As well as orientating development layouts to maximise access to sustainable transport, Policy LPRSP15: Principles of Good 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 LPRSP15: Principles of Good Design in relation to SA objective 13: Climate Change. Policy LPRQ&D1: Sustainable Design expands on the above by requiring that new development to incorporate 10% on-site renewable or low carbon energy production where appropriate and be designed and orientated so that it can respond or be adapted to the impacts of climate change. A significant positive effect is therefore expected for policy LPRQ&D1: Sustainable Design in relation to SA objective 13: Climate Change. Policy LPRQ&D4: Design Principles in the Countryside requires that development in the countryside is designed and laid out and incorporates landscaping to respond and adapt to climate change. The policy also requires, where possible, the incorporation of renewable energy generation methods at developments in the countryside. A minor positive effect is therefore expected for policy LPRQ&D4 in relation to SA objective 13: Climate Change.

**8.165** Policy LPRSP15: Principles of Good Design will support development proposals that protect and enhance any on-site biodiversity and geodiversity features, which includes providing mitigation measures if needed. Policy LPRQ&D1: Sustainable Design requires that proposals should incorporate

habitats improvements where appropriate. Furthermore, policy LPRQ&D2: External Lighting includes minimising ecological impacts as a key consideration in criteria for permitting external lighting schemes. Through policy LPRQ&D4: Design Principles in the Countryside, there is a requirement for development outside of settlements to avoid unsympathetic change to the character of rural lanes which are important to nature conservation. As such, a minor positive effect is expected for the above policies in relation to SA objective 14: Biodiversity.

**8.166** Policies LPRSP15: Principles of Good Design, LPRQ&D4: Design Principles in the Countryside and LPRQ&D5: Conversion of Rural Buildings are expected to have a 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. For Policy LPRSP15: Principles of Good Design, the positive effect is expected to be significant given that it includes a direct requirement for development to respond positively to and to enhance local, natural or historic character as well as landscape value. The policy also requires that a high proportion of housing schemes make use of vernacular materials particularly where they are in key/prominent locations. This approach is to be informed by separate design guidance. Through Policy LPRQ&D1: Sustainable Design there is a requirement for proposals to incorporate the planting of native tree and shrub species where appropriate, which is likely to enhance the landscape setting of the development. This requirement is also expected to benefit the setting of heritage assets in Maidstone and a minor positive effect is expected in relation to both SA objective 15: Historic Environment and SA objective 16: Landscape. Policy LPRQ&D2: External Lighting is also likely to have a minor positive effect in relation to these SA objectives as it requires that lighting schemes are not detrimental to intrinsically dark landscapes, which may also provide key historic environment settings. The policy also makes specific reference to lighting proposals that are within or have potential to affect areas of importance for landscape. Schemes of this nature are only to be permitted in exceptional circumstance and where they are informed by specific guidance on lighting relating to the landscape in question.

### Recommendations

- No further recommendations are identified at this stage.

## Chapter 9

### Cumulative effects

## This chapter presents the appraisal of cumulative effects

### Introduction

**9.1** 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

**9.2** 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.

**9.3** All of the SA effects for all of the preferred Local Plan Review policies that were subject to appraisal are presented together in **Table 9.2** 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 and shows the SA effects identified in relation to all of the SA objectives. Broadly this is:

- The spatial vision and objectives;
- The spatial strategy (policy LPRSS1);
- The spatial strategic policies (LPRSP1 to LPRSP9) with the detailed, site specific allocation policies for the corresponding growth locations; and

- The thematic strategic policies (LPRSP10 to LPRSP15) and corresponding non-strategic development management policies.

9.4 Summarising the expected sustainability effects for all policies in the Plan it is possible to describe the total effects of the Plan as a whole as presented in **Table 9.1**.

Table 9.1: Summary of likely total effects for the Regulation 19 Pre-submission Draft Local Plan

SA Objective	Cumulative effects of Regulation 19 Pre submission Plan Local Plan
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	/+

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

9.5 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 housing quantum of 18,223 dwellings between 2022-2037 identified in the plan is based on the objectively assessed housing need following the

Standard Method as set out in the Planning Practice Guidance. The Local Plan Review intends to deliver the required number of homes to the total objectively assessed housing need and, as such, significant positive effects are anticipated.

9.6 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 sizes, types and tenures, including self-build and specialist housing and generational living.

9.7 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**

9.8 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. At the garden settlements the delivery of infrastructure improvements alongside new homes and jobs is to be achieved in line with a phasing plan. 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.

9.9 Despite this spatial approach, there are numerous 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.

9.10 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**

9.11 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.

**9.12** 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.

**9.13** 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. The requirement for new garden settlements to be delivered to incorporate infrastructure improvements from their occupation is likely to help mitigate these types of impacts. The garden settlements are also to be developed to be supported by evidence of engagement with and future roles identified for local communities. This approach is likely to help the development achieve a degree transparency with local people and generally support its integration with the existing community.

**9.14** 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**

**9.15** 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.

**9.16** 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.

**9.17** 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.

**9.18** 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.

**9.19** 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.

**9.20** 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**

**9.21** 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.

**9.22** The Council has identified that the minimum floorspace required to meet the forecasted need is 101,555 square metres between 2022-2037 through the preparation of an employment need assessment<sup>55</sup>. The council has also undertaken an assessment of expected population growth, combined with analysis of national and local retail trends and Experian forecasts. The analysis of this assessment work has identified an objectively assessed projected retail floorspace requirement (traditional retailing as well as food and beverage uses) of 10,847 square metres up to 2032. In accordance with the NPPF, sufficient land to meet retail need for ten years should be identified in local plans. The level of employment growth and retail floorspace planned for through the plan

<sup>55</sup> Lichfields for Maidstone Borough Council (April 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>

meets the identified need and national policy requirements and it is anticipated to aid in the development of a stronger economy in the borough resulting in significant positive effects. 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, 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 is considered that this distribution of economic development is likely to increase employment opportunities throughout the borough, leading to a stronger economy.

**9.23** Some significant negative effects were identified in relation to a relatively small number of 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**

**9.24** 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.

**9.25** 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 given the potential increased footfall to the area 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.

**9.26** 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.

**9.27** 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**

**9.28** 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.

**9.29** 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 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. Development set out in the plan which would do little to help achieve modal shift includes employment at Junction 8 of the M20, development of the Leeds-Langley corridor to support new highways links and the establishment of the two new garden settlements close to the motorway network.

**9.30** 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.

**9.31** 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**

**9.32** 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.

**9.33** 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.

**9.34** 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. However, of those sites which fall within MSAs the majority

are within the Limestone Hythe Formation (Kentish Ragstone). The Kent Minerals and Waste Plan<sup>56</sup> clarifies that there are significant available reserves (in 2019) of the Kentish Ragstone. It is stated that any allocations in local plans for non-mineral development that take in land within these safeguarded minerals are unlikely to be in conflict with the presumption to safeguard these minerals, although it is noted that this will need to be evidenced by a Minerals Assessment.

**9.35** Minor positive effects were identified from the Local Plan Review from policy protection for features of geological interest.

**9.36** Overall, it is considered that the Local Plan Review will have a minor negative effect in relation to SA objective 8: Minerals. Given that further evidence will be required at sites that fall within land that take in safeguarded mineral to determine the potential impact on the safeguarding of mineral resources, the effect is uncertain.

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

**9.37** 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.

**9.38** 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.

**9.39** 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.

**9.40** 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**

**9.41** 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.

**9.42** 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 the south western part of the Heathlands site is within SPZ 3.

**9.43** 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. There are also requirements in the plan for new residential development to meet the Building Regulations optional requirement for tighter water efficiency of 110l per person, per day.

**9.44** 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**

**9.45** Minor negative effects were identified for the spatial strategy and garden settlement policies, the negative effect recorded for the spatial strategy 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.

**9.46** While the garden settlements in particular have the potential to be developed in a manner which prioritises and

<sup>56</sup> Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30

facilitates active travel, the likelihood of no or very limited movement by motorised vehicle is highly unlikely.

**9.47** 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,

**9.48** 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 from various sources including electric vehicles.

**9.49** The air quality assessment work for the plan<sup>57</sup> identified that the increases in air pollution attributable to the new development provided for by the Local Plan Review alone were relatively small. The largest expected increases in air pollutant concentrations as a result of development set out in the plan were associated with the Heathlands and Lidsing garden settlement developments. When background traffic growth and committed developments in the Borough were taken into account (the 'Do-Minimum' scenario examined by the air quality assessment), total air pollutant concentrations at all human health receptors other than one (to the north of the M20 at Boxley Road) were predicted to be below the air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. The same finding was made for the 'Do-Something' scenario that also included the new development provided for by the Local Plan Review. The significance of the air quality effects on human health was assessed in accordance with Highways England guidance and the air quality effects on human health of the development provided for by the Local Plan Review were found to be not significant.

**9.50** 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**

**9.51** 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.

**9.52** 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). Within Maidstone town, areas of higher flood risk are mainly found close to the River Medway. The identified settlements in the south of Maidstone are also close to land identified as having a 1 in 100-year risk of flooding from surface water. There are also substantial areas of land close to Staplehurst and Headcorn at which groundwater levels are either at or very near (within 0.025m of) the ground surface. Furthermore, much of the south of Maidstone lies within a flood warning area and a flood alert area. These areas cover the land at the western edge of Marden, land to the north and north west of Staplehurst and land at the southern edge of Headcorn<sup>58</sup>. Development at these settlements may result in development being located in these higher risk flood zones.

**9.53** 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.

**9.54** 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.

**9.55** 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.

**9.56** 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**

**9.57** The effects of the Local Plan Review were mixed in relation to this SA objective.

**9.58** 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

<sup>57</sup> Jacobs on behalf of Kent County Council (2021) Maidstone Local Plan Air Quality Assessment

<sup>58</sup> Maidstone Borough Council and JBA Consulting (2020) Maidstone Borough Council Level 1 SFRA update and Level 2 SFRA [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>

materials, and also when operational (e.g. for heating and lighting) as well as through traffic generation.

**9.59** 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.

**9.60** 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.

**9.61** 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. In addition to promoting development that minimises the need to travel, this policy supports the delivery of sustainable buildings as well as low carbon energy and low carbon heat networks.

**9.62** 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**

**9.63** The effects of the Local Plan Review were mixed in relation to this SA objective.

**9.64** 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.

**9.65** 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. This reflected their potential to affect nearby locally designated wildlife sites or ancient woodland and contain areas of priority habitat. A number of sites at Maidstone also scored negatively given that they lie within the 'air pollution' impact risk zone (IRZ) for nearby SSSIs. The development of these sites has the potential to adversely affect the wider ecological resource which needs to be in a healthy condition for the designated sites to thrive.

**9.66** 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.

**9.67** 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 and blue infrastructure network by connecting green corridors together.

**9.68** The findings of the HRA screening<sup>59</sup> for the Local Plan determined that impacts from air pollution, recreation and water quantity and quality could result in a likely significant effect in relation to North Downs Woodland SAC, Medway Estuary and Marshes SPA/Ramsar, the Swale SPA/Ramsar, Queendown Warren SAC, Thames Estuary and Marshes SPA/Ramsar and Stodmarsh SAC & SPA/Ramsar. The Appropriate Assessment concluded no adverse effect on integrity as a result of increased air pollution, increased recreational pressure or pressure on water abstraction and treatment in relation to any of the European sites identified provided that mitigation measures are required by the plan and successfully implemented. For effects relating to air pollution, and water quality and quantity the mitigation measures will need to be agreed with Natural England before the Local Plan Review is adopted, which could be verified during the Examination process and confirmed in an HRA

<sup>59</sup> LUC on behalf of Maidstone Borough Council (2021) Maidstone Local Plan Review Habitats Regulations Assessment Reg 19 HRA Report



Addendum and/or Adoption Statement. Further information is provided in relation to the HRA in **Chapter 10**

**9.69** In light 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 minor negative with uncertainty in relation to SA objective 14: Biodiversity.

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

**9.70** The effects of the Local Plan Review were mainly significant negative with uncertainty in relation to this SA objective.

**9.71** 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.

**9.72** 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 negative effects with uncertainty identified for many of the site allocations, indicating their proximity to heritage assets. For many of these sites the allocation policy requires that development is delivered in a manner that would mitigate adverse effects in relation to nearby heritage assets. For some sites, the allocation policy does not address potential effects relating to nearby heritage assets meaning that some residual potential adverse effect remains. However, some uncertainty around these potential effects exists as effects will be influenced by the form and design of new development.

**9.73** 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. While these policies are strongly worded, it is considered that mitigation would be strengthened if site-specific policy requirements were included in the Local Plan Review for sites where potential significant negative effects have been identified by the SA unless such effects can be ruled out by a more fully documented heritage impact

assessment than that provided by the officer assessment that informed the SA.

**9.74** 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 uncertainty.

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

**9.75** The effects of the Local Plan Review in relation to this SA objective were mainly negative, with some being significant negative.

**9.76** 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 would result in a road link which travels into 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.

**9.77** 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. Many of the sites' potential significant negative effects are reduced to minor ones by provisions to reduce the potential for landscape impacts in the allocation policies.

**9.78** 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, conserve and enhance the AONB and landscapes of local value.

**9.79** 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 9.2: Summary of SA effects for the Local Plan Review

Local Plan Review policies	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
Spatial Vision	+?	+?	+?	+?	+?	0	+?	0	0	+?	+?	+?	+?	+?	+?	0
Spatial Objective 1	+	+	0	0	++	++	0	0	0	0	0	0	0	0	0	0
Spatial Objective 2	+	+	0	0	++	0	+?	0	+/	+?	+?	+?	+?	0	0	++
Spatial Objective 3	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	++
Spatial Objective 4	0	0	0	0	0	0	0	0	0	++	0	++	++	+	0	0
Spatial Objective 5	0	0	0	0	0	0	0	0	0	+	0	+	0	++	0	+
Spatial Objective 6	0	+	0	0	+	0	++	+	0	+	+	+	+	0	0	0
Spatial Objective 7	0	0	0	+	0	0	0	0	0	0	++	0	0	0	0	0
Spatial Objective 8	+	++	+	+	++	++	0	0	0	0	0	0	0	+	0	0
Spatial Objective 9	0	0	0	0	++	+	0	0	0	0	0	0	0	0	0	0
Spatial Objective 10	++	+	0	+	0	0	0	0	0	0	0	0	0	0	0	++
Spatial Objective 11	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+
LPRSS1: Spatial Strategy	++	++	++/ ?	++/	++	++	++/?	?			?		/+		?	?

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Local Plan Review policies	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
Maidstone Town Centre 2050 Vision	+	++	++	++	++	++	++/	0	0	+	++/	+	++/	+	++	+
LPRSP1: Maidstone Town Centre	+	0	0	+	+	++	+?	0	0	0	N/A	0	+	0	+	+
LPRSA144: Medway/ High St	0	+	+	+	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
LPRSA151: Mote Road	0	+	+?	+?	+	0?	+	0	0		N/A	0	+		?	0
LPRSP2: Maidstone Urban Area	0	+	+	+	+	0	0	0	0	0	N/A	0	0	+	0	0
LPRSA152: Former Royal British Legion Social Club	0	0	+	0		+		0	0		N/A	0		?	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

Local Plan Review policies	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
LPRSP3: Edge of the Maidstone Urban Area	0	+	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA266 - Land at Ware Street, Maidstone	0		+	+	0	+	+				N/A			0	?	
LPRSA265 - Land at Abbey Gate Farm, South West of Maidstone	0		+	+	0	+					N/A				?	?
LPRSA270 - Land South West of Police HQ, South of Maidstone	0		+	+	0	+					N/A			0	?	
LPRSA172 - Land at Sutton Road, South East of Maidstone	0		+	+	0	+					N/A	0			?	
LPRSA362: Maidstone Police HQ, Sutton Rd	0		+	+		+			0		N/A			0	?	
LPRSP4(a): Heathlands	++	++	?/+?	++/	++	+	++? / ?	0						++?		
LPRSP4(b): Lidsing	++	++	+?/ ?	++/	++	+	+?/ ?	0				0		++?		
LPRSP5(a): Development in the Leeds-Langley Corridor	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
LPRSP6: Rural Service Centres	0	+	+	+	+	0	0	0	0	0	N/A	0	0	0	+	0
LPRSP6(a) - Coxheath	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0

Local Plan Review policies	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
LPRSA251 – Land at Heath Road, Coxheath	+		+	+	0	+		0			N/A	0		0	?	0?
LPRSA364 – Kent Ambulance HQ, Coxheath	+		+	+	0	+		0			N/A	0		0	?	0?
LPRSA312 – Land North of Heath Road	+		0	+	0	+					N/A	0		?	?	0?
LPRSP6(b): Harrietsham	0	+	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA071: Land Adjacent Keilen Manor, Harrietsham	+		+	+	0	+	+	0			N/A	0			?	
LPRSA101: Land south of A20, Harrietsham	+		+		0	+	+	0			N/A				?	
LPRSP6(c): Headcorn	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA310 – Mote Road Headcorn	0		+	+	0	+	+				N/A			+/	?	
LPRSP6(d): Lenham	0	0	+	0	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA260 – Ashford Road Lenham	0		+	0	+	0	0	0		0	N/A			0	?	?
LPRSP6(e) - Marden	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	

Local Plan Review policies	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
LPRSA295 & 314 – Land at Copper Lane & Albion Rd, Marden	0		+	+	0	+	+				N/A				?	?
LPRSP6(f) - Staplehurst	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA066 – Land east of Lodge Rd, Staplehurst	0		+	+	0	+	+	0			N/A				0?	
LPRSA114 – Land at Home Farm, Staplehurst	0		+	+		+	+	0			N/A	?			?	
LPRSP7: Larger Villages	0	+	+	+	0	0	0	0	0	0	N/A	0	0	0	+	0
LPRSP7(a) East Farleigh	0	?	+	+	0	+	+	?	?		N/A	?	0?	?	?	?
LPRSP7(b) - 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		+	?	?
LPRSP7(c) Sutton Valence	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0
LPRSA078 - Haven Farm, Sutton Valence	0		+	+	0	+					N/A	0		0	?	
LPRSP7(d) Yalding	0	0	+	+	0	0	0	0	0	0	N/A	0	0	0	0	0

Local Plan Review policies	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
LPRSA248 - Land North of Kenward Road, Yalding	0		?	+	0	+	+				N/A		0	?	?	
LPRSP8 – Smaller Villages	0	+/?	+	+?	?	0	?	?	0	0	N/A	?		?	?	?
LPRSA360 – Campfield Farm, Boughton Monchelsea	+		0	+	0	+		0			N/A	0		0	?	?
LPRSP9: Development in the Countryside	0	0	0	0	0	0	0	0	+	0	N/A	0	0	0	0	0
LPRSP10(a): Housing Mix	++	0	++	+	+	0	0	0	0	0	0	0	0	0	0	0
LPRSP10(b): Affordable Housing	++	0	+	0	+	0	0	0	+/?	0	0	0	0	0	0	0
LPRSP10(c): Gypsy & Traveller Site Allocations	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LPRHOU1: Development on Brownfield Land	+	+?	0	0	0	+?/	++	0	++	0	++	0	++	+?	0	+
LPRHOU2: Residential Extensions, Conversions, Annexes, and Redevelopment Within the Built-up Area	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+

Local Plan Review policies	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
LPRHOU3: Residential Premises above Shops & Businesses	++	++	0	+	+	++	++	0	++	0	++	0	++	0	0	0
LPRHOU4: Residential Garden Land	+	+?	0	+	+	+?	+?	0	+/-	0	+?	0	+?	0	0	+
LPRHOU5: Density of Residential Development	+	++	0	+	+	++	++	0	++	0	++	0	++	0	0	+
LPRHOU6: Affordable Local Housing Need on Rural Exception Sites	++	++	+	+	+	0	++	0	?	0	++	0	++	+?/	+?	+
LPRHOU7: Specialist Residential Accommodation	++	+	0	+	0	0	+	0	0	0	0	0	0	0	0	+
LPRHOU8: Gypsy, Traveller and Travelling Showpeople Accommodation	++	+	0	+	0	0	0	0	0	0	0	0	0	+	0	+
LPRHOU9: Custom & Self-Build Housing	+	+	0	+?	0	0	++	0	0	0	++	0	++	0	0	+
LPRHOU10: Build to Rent Proposals	++	++	0	+?	+	++	++	0	0	0	++	0	++	0	0	0
LPRHOU11: Rebuilding, Extending and Subdivision of Dwellings in the Countryside	+	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+



Local Plan Review policies	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
LPRSP11: Economic Development	0	+	0	0	++	++	0	0	++/	0	0	0	0	?	+/?	+/?
LPRSP11(a): Safeguarding Existing Employment Sites and Premises	0	0	0	+	++	0	+	0	++	0	+	0	+	0	0	+
LPRSP11(b): Creating New Employment Opportunities	0	0	+	+	++	0	+	0	?	0	+	0	+	?	+/?	+/?
LPRSP11(c): Town, District and Local Centres	0	++	0	+	++	+	+	0	?	0	+	0	+	?	?	?
LPRCD1: Shops, Facilities and Services	0	++	++	+	++	++	++/	0	0	0	++/	0	++/	0	0	0
LPRCD2: Primary Shopping Area	0	++	0	0	++	++	0	0	0	0	0	0	0	0	0	+
LPRCD4: Accommodation for Rural Workers	+	0	0	0	+	0	0	0	?	0	0	0	0	?	?	?
LPRCD5: Live-Work Units	0	+	0	+	+	0	+	0	?	0	+	0	+	?	+/?	+/?
LPRCD6: New Agricultural Buildings and Structures	0	0	0	+	+	0	0	0	?	+	0	+	0	+/?	+/?	+/?
LPRCD7: Expansion of Existing Businesses in Rural Areas	0	0	0	+	++	0	0	0	?	0	0	0	0	?	+/?	+/?
LPRCD8: Equestrian Development	0	0	0	0	+	0	0	0	?	+	0	+	0	?	+/?	+/?

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Local Plan Review policies	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
LPRTL1: Mooring Facilities and Boat Yards	+	0	0	0	0	0	0	0	?	+	0	+	0	+/?	+/?	+/?
LPRTL2: Holiday Lets, Caravan and Camp Sites	+/	0	0	+	+	0	0	0	?	0	0	0	0	?	+/?	+/?
LPRSP12: Sustainable Transport	0	+	0	+	++	++	++	0	0	0	++	0	++	0	0	0
LPRTA1: Air Quality	0	0	0	+	0	0	0	0	0	0	++	0	0	0	0	0
LPRTA2: Assessing the Transport Impacts of Development	0	0	0	+	0	0	++	0	0	0	++	0	++	0	0	0
LPRTA3: Park and Ride Sites	0	+	0	0	0	0	+?	0	0	0	0	0	0	0	0	0
LPRTA4: Parking Policy	0	0	0	0	0	0	++/	0	0	0	++/	0	++/	0	+?	+?
LPRSP13: Infrastructure Delivery	++	++	++	++	++	+?	++	?	?	+?	++	+	++	+/?	?	+/?
LPRINF1: Publicly Accessible Open Space and Recreation	0	++	++	++	0	0	+++?	0	0	+	++	+	++	++	+	+
LPRINF2: Community Facilities	0	++	++	+?	0	0	0	0	0	0	0	0	0	0	0	0
LPRINF3: Renewable and Low Carbon Energy Schemes	0	0	0	+	+	0	0	0	+	0	0	0	++	+/?	+/?	+/?

Local Plan Review policies	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
LPRINF4: Digital Communications and Connectivity	0	0	+	+	++	0	+	0	0	0	+	0	+	0	+/?	+/?
LPRSP14(a): Natural Environment	0	+?	+?	+	0	0	+	+	0	+	+?	+	0	++	+?	+
LPRSP14(b): The Historic Environment	0	0	0	0	+	+	0	0	+	0	0	0	0	0	++	+
LPRSP14(c): Climate Change	+	+?	+?	+	0	0	++	0	0	+	+	+	++	+	+?	+
LPRENV1: Development Affecting Heritage Assets	0	0	0	0	0	+	0	0	0	0	0	0	0	0	++	+
LPRENV2: Change of Use of Agricultural Land to Domestic Garden Land	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	+/?
LPRENV3: Caravan Storage in the Countryside	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+/?
LPRSP15: Principles of Good Design	++	+	++	++	+	+	+	0	0	+	+	+	+	+	++	++
LPRQ&D1: Sustainable Design	+	0	0	0	0	0	0	0	0	+	0	0	++	+	+	+
LPRQ&D2: External Lighting	0	0	+	+	0	0	0	0	0	0	0	0	0	+	+	+
LPRQ&D3: Signage and Building Frontages	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0

Local Plan Review policies	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
LPRQ&D4: Design Principles in the Countryside	+	0	0	0	0	0	+	0	0	0	+	0	+	+	+	+
LPRQ&D5: Conversion of Rural Buildings	+	0	0	0	+	0	0	0	0	0	0	0	0	0	+	+
LPRQ&D6: Technical Standards	+	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0
LPRQ&D7: Private Amenity Space Standards	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0

## Cumulative effects with development proposed by other relevant plans and projects

**9.80** 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

**9.81** The following nationally significant infrastructure projects are identified within Maidstone Borough on the National Infrastructure Planning website<sup>60</sup>:

#### Extension to Allington Energy from Waste Facility

**9.82** 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 later in 2021 therefore no environmental impact assessment (EIA) is available yet. The EIA Scoping Report<sup>61</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.

**9.83** The Inspectorate's Scoping Opinion<sup>62</sup> additionally recommended that Risk of Major Accident Events should be included in the EIA.

### Potential for cumulative effects with Nationally significant infrastructure projects

**9.84** 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 negative effects could include changes in water quality in the River Medway; changes in 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

**9.85** At the county level, the main planning responsibilities are with respect to minerals and waste, and transport.

#### Kent Minerals and Waste Local Plan

**9.86** The Kent Minerals and Waste Local Plan 2013-30<sup>63</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>60</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/>

<sup>61</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/wp-content/ipc/uploads/projects/EN010108/EN010108-000007-ALTN%20-%20Scoping%20Report.pdf>

<sup>62</sup> The Planning Inspectorate (2019) Scoping Opinion: Proposed Extension to the Existing Allington Energy from Waste Generating Station [online] <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010108/EN010108-000010-ALTN%20Scoping%20Opinion.pdf>

<sup>63</sup> Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30 [online] Available at: [https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0004/112585/Kent-Minerals-and-Waste-Local-Plan-2013-2030.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0004/112585/Kent-Minerals-and-Waste-Local-Plan-2013-2030.pdf)

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

**9.87** Kent County Council's Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031<sup>64</sup> sets out Kent County Council's Strategy and Implementation Plans for local transport investment for the period 2016-31. 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

**9.88** The Maidstone Local Plan Review has the potential to combine with proposals in the Kent Minerals and Waste Local Plan (2020) 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.

**9.89** The SA of the Minerals and Waste Local Plan<sup>65</sup> 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.

**9.90** The SA of the Local Plan Review has taken the location of MSAs into account in the appraisal of the site options and allocation policies (see **Chapters 4 and 6**). Given that many of the development growth areas delivered through the Maidstone Local Plan Review fall within 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, of those sites which fall within MSAs the majority are within the Limestone Hythe Formation (Kentish Ragstone). The Minerals and Waste Plan clarifies that there are significant available reserves (in 2019) of the Kentish Ragstone. It is stated that any allocations in local plans for non-mineral development that take in land within these safeguarded minerals are unlikely to be in conflict with the presumption to safeguard these minerals, although it is noted that this will need to be evidenced by a Minerals Assessment. Furthermore, 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.

**9.91** 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.

**9.92** Many of these enhancements are already described in the Local Plan Review policies and reflected in assumptions about what would be provided under different spatial strategy options that have been appraised by the SA (see **Chapters 4 and 8**).

### Neighbouring authorities' Local Plans

**9.93** Maidstone Borough is adjoined by the neighbouring local authorities of Medway, Swale, Ashford, Tunbridge Wells, and

<sup>64</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>65</sup> Kent County Council (2020) SA of the draft Early Partial Review of the Kent Minerals and Waste Plan 2013-30 [online] Available at: <https://consult.kent.gov.uk/file/5659126>

Tonbridge and Malling. The main development proposed by their respective Local Plans is summarised below.

### Medway Local Plan

**9.94** The Medway Local Plan was adopted in 2003<sup>66</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.

**9.95** 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.

**9.96** The Medway Local Plan identifies a target of creating 11,000 jobs in four main sectors: financial and business services, high technology manufacturing, transport and distribution and other key sectors including retail, education and construction.

**9.97** The main development opportunities have been identified at the following locations:

- Chatham;
- Maritime;
- Rochester Riverside;
- Gillingham Business Park; and
- Frindsbury Peninsula

### Swale Local Plan

**9.98** Swale Borough Council adopted its Local Plan in 2017<sup>67</sup>.

**9.99** 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).

**9.100** Key locations proposed for development are:

- Sittingbourne;
- West Sheppey; and
- Faversham

**9.101** 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.

**9.102** In rural areas, growth within the borough will be focused at the Rural Local Service Centres, with development providing for local housing or employment needs for their home and surrounding communities, while supporting existing and new services.

**9.103** 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

**9.104** Ashford Borough Council adopted its Local Plan in 2019<sup>68</sup>.

**9.105** 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.

**9.106** 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.

**9.107** 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.

**9.108** 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

**9.109** Tunbridge Wells Borough Council adopted its Local Plan Core Strategy in 2010<sup>69</sup>.

**9.110** The adopted Local Plan sets out to deliver 6,000 dwellings in the borough between 2006 and 2026, with at least

<sup>66</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)

<sup>67</sup> 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>68</sup> Ashford Borough Council (2019) Ashford Local Plan 2030 [online] Available from: <https://www.ashford.gov.uk/planning-and-development/planning-policy/adopted-development-plan-documents/adopted-local-plan-to-2030/>

<sup>69</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>

65% of all housing development within this period to be delivered on previously developed land.

**9.111** It is anticipated that 70% of new housing will be delivered in Royal Tunbridge Wells. Other key locations proposed for development are:

**9.112** Southborough;

**9.113** Paddock Wood;

**9.114** Cranbrook; and

**9.115** Hawkhurst.

**9.116** 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.

**9.117** 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.

**9.118** The Pre-Submission version of the Tunbridge Wells Local Plan<sup>70</sup> sets out to deliver a minimum of 12,204 dwellings and 14 hectares of employment land over the period 2020 to 2038.

**9.119** The plan seeks to focus new development within the Limits to Built Development of settlements. Two strategic sites

are included for development: a major, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions; and the creation of a new garden settlement: Tudeley Village between Paddock Wood and Tonbridge. A prestigious new business park is to be provided to the north of North Farm/Kingstanding Way, Royal Tunbridge Wells. Some reductions in the area of the Green Belt are included in the plan, notably for the strategic sites and around Royal Tunbridge Wells and Pembury.

### Tonbridge and Malling Local Plan

**9.120** Tonbridge and Malling Borough Council submitted its Local Plan for Examination in 2019<sup>71</sup>. However, following hearing sessions held in October 2020, planning inspectors decided that the Tonbridge and Malling Borough Council Local Plan should not be adopted<sup>72</sup>. It was the inspectors' view that the Council did not fulfil a duty to co-operate with Sevenoaks District Council. A meeting of the full council in July 2021 agreed to withdraw the current plan.

**9.121** The development plan for Tonbridge and Malling comprises the Core Strategy<sup>73</sup>, Development Land Allocations Development Plan Document<sup>74</sup>, Tonbridge Central Area Action Plan<sup>75</sup>, Managing Development and the Environment Development Plan Document<sup>76</sup> and Saved Policies from the Tonbridge and Malling Borough Local Plan. The strategy set out for Tonbridge and Malling is influenced greatly by the designation of much of its land as Green Belt or as part of the Kent Downs and High Weald New AONBs. The strategy for development in the plan area up to 2021, is therefore concentration at the main urban areas of the Medway Gap (including Kings Hill and Snodland), Tonbridge and the Walderslade part of the Medway Towns urban area and at those larger rural settlements that have a range of services or reasonable access to them.

<sup>70</sup> Tunbridge Wells Borough Council (2021) Pre-Submission Tunbridge Wells Borough Local Plan Available from:

<https://tunbridgewells.gov.uk/planning/planning-policy/local-plan/pre-submission-local-plan>

<sup>71</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-development/planning/planning-local-plans/local-plan-reg-19-consultation>

<sup>72</sup> Planning Inspectorate (2021) Report on the Examination of the Tonbridge and Malling Borough Council Local Plan [online] Available from: <https://www.tmbc.gov.uk/downloads/file/1455/ed83-inspectors-final-report-june-2021>

<sup>73</sup> Tonbridge and Malling Borough Council (2007) Core Strategy [online] Available from: <https://www.tmbc.gov.uk/downloads/file/276/core-strategy>

<sup>74</sup> Tonbridge and Malling Borough Council (2008) Development Land Allocations [online] Available from:

<https://www.tmbc.gov.uk/downloads/file/1358/development-land-allocations-dpd>

<sup>75</sup> Tonbridge and Malling Borough Council (2008) Tonbridge Central Area Action Plan [online] Available from:

<https://www.tmbc.gov.uk/downloads/file/1148/tcaap-adopted-april-2008>

<sup>76</sup> Tonbridge and Malling Borough Council (2010) Managing Development and the Environment Development Plan Document [online] Available from: <https://www.tmbc.gov.uk/downloads/file/1273/managing-development-and-the-environment>



### Potential for cumulative effects with Neighbouring authorities' Local Plans

**9.122** 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.

**9.123** 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 SA9: Soils, SA14: Biodiversity, SA15: Historic Environment, and SA16: Landscape.

**9.124** 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. As noted in the preceding section in relation to the total effects of the Local Plan Review, the air quality assessment<sup>77</sup> predicted total air pollutant concentrations at all human health receptors other than one (to the north of the M20 at Boxley Road) to be below the air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. These results were for a 'Do Something' scenario that included background growth within neighbouring districts, committed development in Maidstone Borough, and new development being provided for by the Local Plan Review. As such, the findings represent the cumulative effects and are judged to be minor negative effects in relation to SA11: Air Quality and SA13: Climate Change.

**9.125** To a certain extent traffic growth and associated emissions 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 objectives 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 given that residents are likely to have a reduced need to travel.

**9.126** 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 potentially having their character and sense of identity adversely affected. However, it is assumed that the relevant SA Reports for each neighbouring authorities' Local Plan will have highlighted this potential and recommended mitigation to avoid these adverse effects occurring.

**9.127** 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.

**9.128** 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 Resource Management Plans, and through policies designed to avoid and reduce the risk of flooding

**9.129** 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 Chatham and Gillingham Business Park in Medway, Sittingbourne in Swale, and Paddock Wood in Tunbridge Wells.

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<sup>77</sup> Jacobs on behalf of Kent County Council (2021) Maidstone Local Plan Air Quality Assessment

## Chapter 10

### Other SEA reporting requirements

This chapter reports on the HRA, the Council's reasons for choosing the plan, and monitoring arrangements

#### Habitats Regulations Assessment

**10.1** The Local Plan Review was subject to a Habitats Regulations Assessment, the detailed method and findings of which are set out in a separate report.

**10.2** 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 LPRSS1: The Borough Spatial Strategy
- Policy LPRSP1: Maidstone Town Centre
- Policy LPRSP2: Maidstone Urban Area
- Policy LPRSP3: Edge of the Maidstone Urban Area
- Policy LPRSP4(a): Heathlands Garden Settlement
- Policy LPRSP4(b): Development North of M2/Lidsing
- Policy LPRSP5(b): Development at Invicta Barracks
- Policy LPRSP5(c): Lenham Broad Location for Housing Growth
- Policy LPRSP6(a): Coxheath
- Policy LPRSP6(b): Harrietsham
- Policy LPRSP6(c): Headcorn
- Policy LPRSP6(d): Lenham
- Policy LPRSP6(e): Marden
- Policy LPRSP6(f): Staplehurst
- 
- Policy LPRSP7(a): Boughton Monchelsea
- Policy LPRSP7c: Eyhome Street (Hollingbourne)
- Policy LPRSP7d: Sutton Valence

- Policy LPRSP7e: Yalding

**10.3** 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 site and The Swale SPA and Ramsar site.
- **Recreation:** North Downs Woodlands SAC, Queendown Warren SAC, Medway Estuary and Marshes SPA and Ramsar site.
- **Water Quantity and/or Quality:** Medway Estuary and Marshes SPA and Ramsar site, Thames Estuary SPA and Ramsar site and Stodmarsh SPA and Ramsar site.

**10.4** The Appropriate Assessment concluded no adverse effect on integrity as a result of increased air pollution, increased recreational pressure or pressure on water

abstraction and treatment in relation to any of the European sites identified provided that mitigation measures are required by the plan and successfully implemented. For effects relating to air pollution, and water quality and quantity the mitigation measures will need to be agreed with Natural England before the Local Plan Review is adopted, which could be verified during the Examination process and confirmed in an HRA Addendum and/or Adoption Statement.

## Reasons for choosing the plan

**10.5** 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 Strategic Environment Assessment Regulations (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 includes 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 **Chapter 4** and **Appendix C** and in the SA findings chapters (**5 to 8**) 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 9**).

### How the results of consultation have been taken into account

The SEA Regulations require 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 has been consulted upon at each stage of consultation on the Local Plan Review, including Regulation 18b in December 2020 and the current Regulation 19 consultation.

### **The reasons for choosing the Local Plan Review (Regulation 19 Pre-submission 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 and E use classes 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 has continued to be reviewed as the Plan progressed 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 **Chapter 4** and **Appendix C**. 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 considered to be sustainable locations in the short term. This is because they did 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<sup>78</sup>, 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 reasons for selecting the garden settlements and the interaction of that process with the reasons for selecting the non-garden settlement site allocations is further discussed under the 'site selection' heading below.

The Council's 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

Through the Council's Call for Sites exercise and subsequent consultations Maidstone MBC received a very significant response (over 350 sites), which included 7 Garden Community proposals and a sufficient number of sites to meet the Borough's housing need requirement on a dispersed basis, including without the need for Garden Settlement scale interventions. As a result of concerns over the ability of a dispersed development pattern to meet infrastructure needs in a coherent manner over the entire plan period, the Council's preference was to meet its early year requirements through managed and sustainable dispersal, with Garden Community scale developments delivering complementary growth in the latter stages of the Plan.

The seven Garden Community scale submissions were subjected to a two-stage assessment for suitability (stage 1), and viability/deliverability (stage 2), which was conducted by independent consultants. This work confirmed that four of the seven submissions were suitable, viable and deliverable, and would therefore be capable of contributing to the Councils required housing number within the plan period. This was later reduced to three as a result of the Leeds-Langley area having insufficient progress for inclusion as an allocation in this Plan. The three schemes considered to be deliverable within the Plan period were Lidsing, North of Marden and Heathlands. The Council's decision was that it would only seek to allocate two Garden Community proposals at this time, to avoid an over-dependence upon large schemes.

The two Garden Community proposals selected for allocation are Lidsing and Heathlands. The Lidsing scheme delivers 1,200 units within the plan period and a further 800 beyond 2037 and provides major green infrastructure in the form of an improved country park serving both Maidstone residents and those in the adjacent urban areas of Lordswood and Hempstead in Medway. It also brings with it a new strategic connection to Junction 4 of the M2 and a very high quality regionally significant employment site at the same Motorway junction. The scheme is able to meet TCPA Garden Community guidelines of 1 new job per dwelling. The Heathlands scheme comprises c5,000 new dwellings, 1,500 of which will be delivered in the current plan period. This means that Heathlands also delivers c3,500 units into the next plan period along with the potential to 'scale up' beyond this figure in the future. In addition, the Heathlands project will provide new infrastructure in the form of a very significant new country park, a new railway station on the classic line as the basis for its principal village centre but with scope to serve a much wider area and two new connections linking to the A20. The Heathlands proposal can also meet the TCPA guidelines on the ratio of new jobs to residential units.

As a result of two garden community projects delivering Maidstone's housing need in the latter part of the plan period, there is excess availability of smaller sites which meet the sustainability assessment criteria and this provides the scope for some local preference to inform site allocations at this level.

#### Other key policy objectives and issues

<sup>78</sup> Stantec (2020) Maidstone Garden Communities Deliverability and Viability Assessment

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

**10.6** This section recommends indicators for the Council to monitor the sustainability effects of implementing the Local Plan Review.

**10.7** 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.

**10.8** 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.

**10.9 Table 10.1** 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 10.1: 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>■ 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>■ Services available at each settlement that is a focus for growth</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>■ Open space provision vs quantity, quality and accessibility standards</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> <li>■ Access to doctors surgeries and average wait times for appointments</li> </ul>

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Open space provision vs quantity, quality and accessibility standards</li> <li>■ Life expectancy</li> </ul>
SA 5: To facilitate a sustainable and growing economy.	<ul style="list-style-type: none"> <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 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 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> </ul>



SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <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> </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>■ 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>■ 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>■ 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> <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>
SA 15: To conserve and/or enhance the borough's historic environment.	<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> </ul>

SA Objectives	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <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 of landscape enhancement schemes secured</li> <li>■ Amount of new development in AONB with commentary on likely impact</li> </ul>

## **Chapter 11**

### **Next steps**

## **This chapter sets out the next steps for the Local Plan Review and SA**

### **Next steps**

**11.1** This SA Report will be available for consultation alongside the Regulation 19 Pre-submission version of the Local Plan Review from 29 October to 12 December 2021. .

**11.2** Following this consultation, the Local Plan Review will be submitted to the Secretary of State for independent examination by a Government-appointed Planning Inspector, who will consider and challenge its content and any objections to it and reach a decision on its overall 'soundness'.

**11.3** Throughout the examination, the Inspector will explore the potential for Main Modifications to the plan to resolve any soundness and legal compliance issues he or she has identified. The Inspector will recommend such Main Modifications if asked to do so by the Council, provided that the modifications are necessary to make the plan sound and legally compliant.

**11.4** If the Main Modifications are significant, and were not previously subject to SA, then further SA may be required and the SA report would be amended accordingly by way of an update or addendum. The SA addendum would then be subject to consultation alongside the Main Modifications.

**LUC**

**September 2021**

# Appendix A

## Consultation comments

**A.1** This appendix summarises the consultation comments received in relation to the SA Scoping Report (consulted upon from February to March 2019) in **Table A.1** and in relation to the Regulation 18b SA Report (consulted upon in December 2020) in **Table A.2**. A response to each comment and where it has been addressed in this SA Report (if appropriate) is included in each table.

## Consultation comments on the SA Scoping Report

Table A.1 Summary of comments received in response to the SA Scoping Report and responses to these

Summary of comments	LUC response
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	LUC response
<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	LUC response
<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	LUC response
<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	LUC response
<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	LUC response
<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	LUC response
<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.	

Table A.2: Summary of comments received in response to the Regulation 18b consultation relating to SA and responses to these

Summary of comments	LUC response
Natural England	
<p>Considers that the SA provides a good framework for assessing the impacts resulting from the Local Plan. However, raises concerns that the SA makes a number of mitigation recommendations to minimise the negative effects of the Local Plan, which have not been incorporated into policy wording. For example:</p> <ul style="list-style-type: none"> <li>• Paragraph 6.291 recommends that Policy SP6(e), allocations in Staplehurst, should include a requirement for multi-functional SuDS. However, this is not mentioned in policy SP6(e) of the local plan.</li> <li>• Paragraph 6.380 recommends that Policy LPRSP7(d), allocations in Sutton Valance, should carry out an LVIA to inform site layout and design which again is not included in policy wording for LPRSP7(d) in the local plan.</li> </ul> <p>The consultee is of the opinion, that all recommendations in the SA should be incorporated into the policy wording to ensure the soundness of the Local Plan. It is stated that all the recommendations in the SA should be included in the next revision on the local plan.</p>	<p>The findings and recommendations of the SA were considered alongside all other evidence base documents prepared as part of the Local Plan making process and the drafting of the policies included. SuDS is now a requirement included in Policy SP14C - this applies across the whole plan. The Council has also included a range of other changes where these are not repetition of other policies in the plan. For example, SA recommendations for LVIA have been added as a requirement for site specific policies. Recommendations sections of the policy appraisal chapters of the SA record where recommendations made in an earlier draft of the Regulation 19 SA have now been adopted.</p>
Environment Agency	
<p>Consultee highlights that the SA states (Table B.5: Key sustainability issues) "Currently, there is no policy within the current Local Plan that addresses use of water resources." The implication is that without the Local Plan Review the Council does not address the water stress of the borough, and the first deletion referred to above will mean that new houses are built to no better than the national standard.</p> <p>Also quotes paragraph 5.77 on p49: "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."</p>	<p>Comment relating to the key sustainability issues noted – no action for the SA Report required.</p> <p>The findings and recommendations of the SA were considered alongside all other evidence base documents prepared as part of the Local Plan making process and the drafting of the policies included. Recommendations sections of the policy appraisal chapters of the SA record where recommendations made in an earlier draft of the Regulation 19 SA have now been adopted. Policy LPRSP14(c): Climate Change now requires new development to operate high levels of water efficiency at 110 litres per person per day - this applies across the whole plan.</p>

Summary of comments	LUC response
<p>Also paragraph 6.125: "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."</p> <p>The consultee highlights further omissions of water efficiency requirements for residential development by paragraphs 7.154 and 8.43, which mention only non-residential developments. Seeks to draw attention to the fact that the area is one of serious water stress and it is appropriate to make the optional higher standard mandatory.</p>	
<p>Barton Wilmore on behalf of Gleeson Strategic Land</p>	
<p>Considers that the SA spatial options run the risk of being perceived as overly focused on the provision of Garden Settlements.</p> <p>Para 5.42 of the Reg 18B consultation document and Chapter 9 of the Interim SA set out the "political desires" for Garden Communities to be included in the Local Plan Review and that "there is a clear political desire for growth to be limited both in Maidstone and in rural settlements". As presently drafted, it may be perceived by some that the SA process is being retrofitted to meet the "political desires" of MBC, and failing to fully assess the potential for "reasonable alternatives" including suitable development options available elsewhere, including greater levels of growth at the urban edge of Maidstone and at rural service centres.</p>	<p>The SA tested three initial spatial strategy options:</p> <ul style="list-style-type: none"> <li>■ 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.</li> <li>■ 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.</li> <li>■ 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.</li> </ul> <p>These options were deliberately distinctive to highlight the sustainability differences of the elements of a spatial strategy that were considered reasonable. The first of these options clearly explores the likely sustainability effects of directing most growth to Maidstone and higher tier service centres rather than garden settlements. The findings indicated that Maidstone town was the most sustainable location for more development, with the Rural Service Centres and Larger Villages being relatively sustainable due to their existing</p>

Summary of comments	LUC response
	<p>infrastructure assets. The Garden Settlements were not considered to be the most sustainable locations in the short term. 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, i.e. further into the plan period.</p> <p>Making use the SA findings for these options, the initial options were refined based on the allocation of amounts of development to different areas considering site availability. The risk profile of garden settlements meant that it was decided that the Local Plan Review should only include two such projects and work from the Garden Settlements Deliverability Assessment highlighted that three proposals are deliverable during the plan period. The refined options tested comprised:</p> <ul style="list-style-type: none"> <li>■ Higher or lower development in Maidstone</li> <li>■ Zero, one, or two garden settlements</li> <li>■ Higher or lower in rural service centres/ larger villages/ smaller villages &amp; hamlets/ the countryside</li> </ul> <p>From this refinement of the spatial strategy options, a total of seven refined spatial strategy options were appraised, including one without any garden settlement and three with only one garden settlement. The range of options appraised is therefore considered appropriate to the need to test reasonable alternatives for the spatial strategy.</p>
<p>States that the SA scoring is unsubstantiated without further evidence and it is not apparent to us as to how the scoring was arrived at.</p>	<p>All policy and site options, as well as the options for the spatial strategy, were appraised against the SA objectives in the SA framework. This was set out in Table 2.2 of the SA Report for the Regulation 18b Consultation (and repeated in Table 2.2 of this current SA Report). The appraisal questions for the SA objectives were used to help guide decision making with regards to whether a positive or negative effect should be recorded and whether the effect would be minor or significant. The explanation of SA findings for each option was provided below each individual summary of effects table (see Chapters 4, 5, 6,7 and 8 of the SA Report for the Regulation 18b Consultation).</p> <p>In order to provide 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</p>

Summary of comments	LUC response
	<p>were developed for each of the SA objectives in the SA framework. The site appraisal criteria were set out in Appendix A of the SA for the Options for Spatial Strategy, Site Allocations and Garden Settlements report (November 2020) and are repeated in <b>Appendix C</b> of this report (see <b>Table C2</b> (residential sites) and <b>Table C4</b> (employment sites)). 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 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), were used to carry out an initial, 'policy-off' appraisal of all site options. This work for the site options formed the starting point for the more qualitative appraisal of the site allocation policies in <b>Chapter 7</b> of this SA report.</p>
<b>DHA - Various</b>	
<p>The consultee states that Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified, and transparent.</p> <p>We are concerned that the site selection process has not included a like-for-like analysis of the strategic sites that are available for potential allocation.</p> <p>Marden is the most sustainable location for a Garden Community in the District in terms of its location close to a train station, employment, facilities, and services. Its position also offers significant opportunities towards supporting the case for infrastructure investment and should therefore form a fundamental element of the future strategy for growth from 2022 to 2037.</p>	<p>The Council's reasons for choosing the plan were set out in Chapter 9 of SA Report for the Regulation 18b Consultation and are reiterated in <b>Chapter 10</b> of this Regulation 19 SA Report. The factors influencing the decisions made included the availability of and ability to deliver the required infrastructure, creating a coherent strategy and balanced growth pattern, and the availability, deliverability and distribution of sites that came forward in the SLAA.</p> <p>The Marden site was appraised alongside the other garden settlement site options in the SA for the Options for Spatial Strategy, Site Allocations and Garden Settlements (November 2020) (see Chapter 5 of that report), using the same methodology for all three options. In order to provide consistency and transparency in the appraisal of all 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. The site appraisal criteria were set out in Appendix A of the SA for the Options for Spatial Strategy, Site Allocations and Garden Settlements report and are repeated in <b>Appendix C</b> of this report (see <b>Table C2</b> (residential sites) and <b>Table C4</b> (employment sites)). 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 environmental features such as designated biodiversity sites or from key services and facilities such as service centres and public transport links. The</p>

Summary of comments	LUC response
	<p>criteria, many of which were applied through the analysis of spatial data using a Geographical Information System (GIS), were used to carry out an initial, 'policy-off' appraisal of all site options. This work formed the starting point for a more qualitative appraisal of the garden settlement options, based on the assumptions set out in Table 5.1 of SA of Options report, following the methodology described at paragraphs 5.7-5.17 of that report and repeated in <b>Chapter 4</b> of this Regulation 19 SA report.</p> <p>The conclusions of SA for the Options for Spatial Strategy, Site Allocations and Garden Settlements report included commentary on the garden settlement options, stating that the garden settlement option that performed most strongly in sustainability terms was Lidsing, followed by North of Marden; Heathlands performed least well across the range of sustainability objectives. However, the differences between the garden settlement options considered were marginal with the same effects recorded in relation to many of the SA objectives. Furthermore, the SA concluded that many of the SA findings at this stage were subject to considerable uncertainty. Many aspects of the actual sustainability performance of any garden settlements that are taken forward in the Local Plan will depend on the extent to which garden community principles such as sustainable access to jobs, education, and services and delivery of environmental net gains can be delivered in practice.</p>
<p>States that the Council had not received the full SA before the completion of the Draft Local Plan. During discussions with the Council on the 2 November (after the Draft Local Plan was published) they confirmed that it was still awaited and would be uploaded once received. This is confirmed within the cover of the document with the last draft being provided on the 2 November 2020. The Draft Local Plan makes little reference to the SA and its findings as a result.</p> <p>From the detail above the consultee states that it raises questions regarding how much weight was afforded to the SA in terms of the emerging Strategy.</p>	<p>The SA is an iterative process and was carried out alongside the plan development process. As explained in the SA Report for the Options for Spatial Strategy, Site Allocations and Garden Settlements document (November 2020) (see paragraph 3.7), the three initial spatial strategy options were subject to appraisal and the results provided to the Council to help inform further options development. Additionally, LUC undertook an SA of emerging Topic Papers to help inform plan policies. These early documents form part of the Sustainability Appraisal. As the document control sheet of the options report confirmed, the first draft was provided on 18 September 2020 and a second draft on 24 October 2020, prior to the Regulation Preferred Approaches plan document being finalised. As noted by the respondent, the final draft was provided on 2 November 2020, which was in advance of the 9 November Strategic Planning and Infrastructure Committee meeting that approved the Preferred Approaches plan. As such, the SA helped to inform the development of the spatial strategy for the plan.</p>



Summary of comments	LUC response
	<p>The findings of the SA are not the only factor to be considered when deciding on the strategy. As explained in Chapter 9 of the SA Report for the Regulation 18b Consultation and reiterated in this Regulation 19 SA Report (see <b>Chapter 10</b>), the refined spatial strategy 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 thus 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.</p>
<p>States that the SA concludes that ‘the scenarios that performed most strongly were Scenarios 3a-c. This also concludes that Scenarios 2 a-c which is for two garden communities, performs ‘least well’. This is the option that Maidstone are now pursuing within the Local Plan, and as such fails to align with the findings of this appraisal.</p> <p>The SA concludes that the garden settlement option that performed most strongly in sustainability terms was Lidsing, followed by North of Marden. Heathlands performed least well across the range of sustainability objectives. The consultee considers that the Council have failed to consider the outcomes of this assessment in formulating their strategy. The evidence available does not demonstrate that the Council are seeking to deliver the most appropriate strategy. Neither the Stantec report nor the Sustainability Appraisal direct the Council towards allocating their own proposal at Heathlands in combination with development at Lidsing. It is also stated that the Council have provided no clarity as to why they have chosen this strategy.</p>	<p>It is correct that the SA highlighted that Scenarios 3a-c performed most strongly through the appraisal work and that Scenarios 2 a-c performed least well. Of the garden settlement options tested Lidsing performed most strongly, followed by North of Marden; Heathlands performed least well across the range of sustainability objectives. However, the differences in sustainability between the garden settlement options were not that great, with the effects recorded in relation to many of the SA objectives the same. When viewing the effects of the refined spatial strategy options it can be seen that there is relatively little difference between the expected sustainability effects for different combinations of settlements as part of an overall spatial strategy (see Scenarios 2a to 2c in Table 4.3 of the SA of Options for Spatial Strategy, Site Allocations and Garden Settlements). Furthermore, the SA concludes many of the SA findings at this stage are subject to considerable uncertainty. Many aspects of the actual sustainability performance of any garden settlements that are taken forward in the Local Plan will depend on the extent to which garden community principles such as sustainable access to jobs, education, and services and delivery of environmental net gains can be delivered in practice. The SA has also highlighted that the Garden Settlement options</p>

Summary of comments	LUC response
<p>In conclusion the consultee states that Heathlands cannot be considered to be in a 'sustainable location'. It lies within the open countryside, away from any meaningful infrastructure or services. For this reason, it is not considered that Maidstone are seeking the most appropriate strategy.</p>	<p>do not presently have allocated infrastructure and services; however, it is expected that they would become more sustainable when properly planned with supporting infrastructure.</p> <p>It should also be noted that the findings and recommendations of the SA have been considered alongside all other evidence base documents prepared as part of the Local Plan making process and the drafting of the policies included. The Council's reasons for choosing the plan have been set out in <b>Chapter 10</b> of this SA Report for the Regulation 19 Consultation.</p>
<p>ECE Planning - Bricklands</p>	
<p>Highlights that the SA of Spatial Strategy Garden Settlement and Site Options document sets out the disadvantages of Garden Settlements at para 8.4 as follows:</p> <ul style="list-style-type: none"> <li>■ Often car-dependent</li> <li>■ Often have long lead-in times which means that they can take a long-time to develop a critical mass capable of supporting the range of jobs, services and facilities characteristic of a sustainable community</li> <li>■ Often divert homes and investment from elsewhere in the Borough</li> </ul> <p>Of the refined spatial strategy scenarios considered in the Sustainability Appraisal, it is noted that Scenario 1 (Local Plan 2017 Continued) which maximises growth in Maidstone town and allocates the residual housing to Rural Service Centres and larger villages, scores positively in the SA. The consultee highlights that paragraph 8.6 of the SA specifically states:</p> <p>'Scenario 1 (Local Plan 2017 Continued) also performs relatively well because development would be distributed based on the settlement hierarchy with the focus on Maidstone urban area then to the Rural Service Centres and then Countryside. Therefore, it would also concentrate development where there is the greatest number and range of jobs, services and facilities, where there are the best opportunities to use sustainable modes of transport, including walking, cycling and bus, thereby also helping to reduce air pollution and greenhouse gas emissions. However, the remaining development would be focused within the</p>	<p>The issues relating to Garden Settlements and the benefits of Scenario 1 which the consultee has highlighted through the work of the SA are noted. The findings and recommendations of the SA were considered alongside all other evidence base documents prepared as part of the Local Plan making process. The Council's reasons for choosing the plan were set out in Chapter 9 of SA Report for the Regulation 18b Consultation and are repeated in <b>Chapter 10</b> of this Regulation 19 SA Report. The factors influencing the decisions made 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. The preferred strategy was arrived at following consultation with borough councillors, as well as engagement on potential site allocations with parishes. Political preferences that influenced the selection of the strategy (including the taking forward of two Garden Settlements) included:</p> <ul style="list-style-type: none"> <li>■ Desire for garden settlements to be included within the Local Plan, and linked to this;</li> <li>■ Desire for growth to be limited, both in Maidstone and in rural settlements;</li> <li>■ Preference for development in Maidstone town centre to focus on improving the local employment and infrastructure offer in preference to housing.</li> </ul> <p>In relation to the selection of Heathlands garden settlement, the SA identified that of the options tested Heathlands performed least well across the range of sustainability objectives. However, the differences in sustainability between the garden settlement options considered</p>

Summary of comments	LUC response
<p>rural areas of the Borough which are more likely to lie within areas of higher landscape and biodiversity value.'</p> <p>It is very difficult to understand why the Local Plan housing delivery strategy has not been based on this scenario, given the conclusions of the SA. We know that there are sufficient sites available to deliver the Borough's housing requirement via Scenario 1 so the delivery of substantial amounts of housing via Garden Settlements seems entirely unnecessary and unsustainable.</p> <p>The consultee also highlights the conclusions of the SA at Paragraph 8.6:</p> <p>'Scenarios 2a-c (Two garden settlement approaches) performed least well. They are expected to have similar effects to those described above for Scenarios 3a-c with regard to garden settlements. However, these options would provide two garden settlements instead of one, therefore the negative effects associated with the garden settlements are intensified for these options.'</p> <p>The Council's preferred strategy includes the allocation of two garden settlements with greater potential for the negative effects often associated with garden settlements (listed above). The SA then goes on to review the Garden Settlement options – Heathlands, North of Marden and Lidsing. Paragraph 8.9 states the following:</p> <p>'The SA found that the garden settlement option that performed most strongly in sustainability terms was Lidsing, followed by North of Marden; Heathlands performed least well across the range of sustainability objectives.'</p> <p>It is stated by the consultee, that in relation to the garden settlement options, the Council have selected the least sustainable option – Heathlands.</p> <p>The consultee requests that the Council reconsiders its housing delivery strategy in line with the conclusions of the SA and continues the pattern of housing delivery associated with their previous 'sound' 2017 Plan.</p>	<p>were not that great, with the same effects recorded in relation to many of the SA objectives. When viewing the effects of the refined spatial options it can be seen that there is relatively little difference between the expected effects for different combinations of settlements as part of an overall spatial strategy (see Scenarios 2a to 2c in Table 4.3 of the SA of Options for Spatial Strategy, Site Allocations and Garden Settlements). Furthermore, the SA concluded many of the SA findings at this stage are subject to considerable uncertainty. Many aspects of the actual sustainability performance of any garden settlements that are taken forward in the Local Plan will depend on the extent to which garden community principles such as sustainable access to jobs, education, and services and delivery of environmental net gains can be delivered in practice. The SA has also highlighted that the Garden Settlement options do not presently have allocated infrastructure and services; however, it is expected that they would become more sustainable when properly planned with supporting infrastructure.</p>
Savills	

Summary of comments	LUC response
<p>The consultee contests the negligible effect recorded for site 310 in relation to SA objective 1: housing. Paragraph 6.218 of the SA (SA findings for spatial strategic policies and detailed site allocation policies) explains that the site has a negligible impact on this objective because the policy does not specify the type or quality of housing. Whilst there are no specific housing requirements set out in Policy LPRSA310, any development coming forward on the site will need to meet the specific policy requirements of the Local Plan Review including Draft Policies:</p> <ul style="list-style-type: none"> <li>• LPRSP10(a) - housing mix;</li> <li>• LPRSP10(b) – affordable housing;</li> <li>• LPRSP15 – Design;</li> <li>• Q&amp;D 1 – Sustainable design;</li> <li>• Q&amp;D 6 – technical standards; and</li> <li>• Q&amp;D 7 – private open space.</li> </ul> <p>Consequently, the consultee states that any residential development on the Land at Moat Road will deliver well designed, sustainable and affordable housing. Furthermore, Catesby has a track record for working closely with councils, local residents and community groups to design high quality developments which deliver significant and lasting benefits. It is therefore considered that the land at Moat Road will have positive effects on SA objective 1.</p> <p>The consultee agrees with the SA findings in relating to SA objective 3: community, stating that any development coming forward on the site will provide a positive effect on community cohesion.</p> <p>In relation to SA objective 4: health it is stated that instead of the minor positive effect recorded, a significant positive effect is appropriate given the policy requirements for SA310 in relation to design, layout, landscape and public open space</p> <p>The consultee states that there are no major comments relating to SA objective 5: economy but it should be noted that the development of the Land at Moat Road will provide employment</p>	<p>In order to provide 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 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), were presented in Appendix A of the SA Report for the Options for Spatial Strategy, Site Allocations and Garden Settlements document (November 2020) and are repeated in <b>Appendix C</b> of this SA Report. This work for the site options formed the basis of the appraisal of the site allocation policies in Chapter 6 of the November 2020 SA and Chapter 7 of this SA Report.</p> <p>It is noted that housing delivery in the Borough will have to comply with the requirements set out in the policies highlighted by the consultee. However, the approach to appraisal that the consultee is suggesting would result in all sites being judged to have a positive effect in relation to this SA objective 1 whereas the site appraisal criteria are primarily designed to differentiate between the sustainability performance of alternative locations for development. The appraisal criteria for sites (<b>Appendix C</b> of this SA Report) explain that housing was scoped out of the appraisal of residential site options since performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver the right types and tenures of housing at prices that people can afford, as well as addressing the needs of specialist groups. These factors were taken into account by the SA through appraisal of any Local Plan policies such as the total quantum of housing to be provided, the mix of housing types and tenures, affordable housing requirements, and design. As the site allocation policy for site 310 does not address these issues, a negligible effect was recorded in relation to this SA objective.</p> <p>The minor positive effect recorded in relation to SA objective 4 for the site reflected the site's proximity to open space and the public rights of way network. The November 2020 SA explains (paragraph 6.222) that 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</p>

Summary of comments	LUC response
<p>opportunities during the construction stage of the proposal. The consultee also agrees with the positive effect recorded in relation to SA objective 7: sustainable transport given its sustainable location, near to public transport nodes. The minor negative effect identified in relation to SA objective 8: minerals is also not contested given that the northern half of the site lies within a Minerals Safeguarding Area. The consultee has stated that the development of the site would result in a small percentage of loss to the safeguarded area.</p> <p>The consultee makes the point that development of the Land at Moat Road will be on small percentage of Grade 3 land in relation to SA objective 9: soils. It is also stated that Headcorn is significantly constraint by flooding and this site is located mainly outside of this. In relation to SA objective 12: flooding, flood modelling assessments will be undertaken on the site and SUDS will be incorporated into any development proposal. In accordance with Policy LPRSA310, the flood safety measures will be agreed with the Environment Agency and no inappropriate development (i.e. residential) will take place in the areas of flood zone. It is stated that the effects of the flood zone are considered to be very minor if not negligible.</p> <p>In relation to SA objective 13: climate change the minor negative effect recorded is contested given that the SA also identifies that the site to have a positive effect in terms of sustainable transport. Therefore, whilst some services may not be located directly in Headcorn, it is considered that they are reachable with sustainable transport options. It is also stated that the development coming forward will need to be sustainable construction criteria listed at draft policy LPRSP14(c). An overall negligible effect is suggested by the consultee to be appropriate. The consultee states that while the minor negative effect recorded in relation to SA objective 14: biodiversity relates to its proximity to SSSIs the development will come forward in line with NPPF paragraph 170 which would limit the potential for adverse effects.</p> <p>The consultee highlights the uncertain significant negative effect recorded in relation to SA objective 15: historic environment, stating that the proposed development will take into account the historic environment through careful masterplanning and design detailing. It is also stated that a Heritage Assessment will be undertaken to establish any impact any proposal. The consultee contests that there is sufficient separation between the site and any heritage asset to avoid any harmful impact.</p>	<p>SA score for the site is unaffected by the provisions of the site-specific allocation policy. The SA effect recorded has been based on professional judgment and is considered appropriate.</p> <p>Th consultees comments relating to provision of employment opportunities during the construction stage of the proposal are noted but benefits of this nature would not be limited to the development of site 310 and would be created as if the decision was taken to allocate other residential site options for development. As noted above, the site appraisal criteria are primarily designed to differentiate between the sustainability performance of alternative development locations. The comments relating to SA objectives 7 and 8 are noted with no further implications for the SA.</p> <p>While the site may take up a small percentage of the total Grade 3 agricultural land within the Borough, all land within its boundaries comprise soils of this value. The site was recorded as having a significant negative effect in relation to SA objective 12: flooding in line with the appraisal criteria given that part of the site contains land within Flood Zone 3, including access to the site. As the site-specific policy requires acceptable flood safety measures being agreed with the EA, the negative effect is reduced to minor in the SA.</p> <p>The minor negative effect recorded for the site in relation to SA objective 13 reflects the relatively poor accessibility from the site to some key services and employment. The appraisal of individual sites has not considered the mitigation which might be achieved as a result of the requirements set out in policies beyond those that specifically allocate a site. This type of mitigation is taken into account when considering the total effects of the plan. Similarly, with regards to the minor negative effect contested by the consultee in relation to SA objective 14, the appraisal of individual sites has not considered the requirements of sites to be developed in line with the NPPF. If the approach suggested by the consultee was taken, the appraisal of each individual site allocation policy would require an appraisal of the requirements other all other policies in the plan as well as the policies of the NPPF. The approach taken in the SA allows for the presentation of the expected effects of individual sites and policies in the plan as well as a separate presentation of the cumulative effects of the plan (see Chapter 8 of the SA for the Regulation 18b Consultation, which considers the total effects of all sites and policies in the plan).</p>

Summary of comments	LUC response
<p>The consultee has no significant comments in relation to SA objective 16: landscape, acknowledging that the site is within a sensitive landscape area and stating that the proposal will seek to contribute positively to the enhancement and conservation of protected landscape.</p>	<p>In relation to SA objective 16, the significant negative effect reflects the close proximity of the site to listed buildings (the closest being Grade II Listed The Moat within 50m) and an area of archaeological potential along Moat Road. The site specific policy does not require development to address these issues. Furthermore, any proposals for the site in relation to masterplanning or design have not been taken into consideration as part of the SA given that this level detail is unlikely to be available for all other sites appraised and would therefore result in inconsistency being introduced to the appraisal work.</p> <p>The consultee's comment in relation to SA objective 17 is noted. A significant negative effect was initially identified for the site given its location within 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, the effect was adjusted to minor negative.</p>
<p>Roger Hurst</p>	
<p>States that the pressure to deliver housing means that such developments must be suitable for all age groups and types to occupants. There have been many developers keen to ensure maximum units on land and this has recently meant that single story homes have failed to be built, creating a shortage for those who wish to downsize and release family homes into the market. There is also a problem with smaller areas of land being abandoned and unmaintained. This is not allayed by the benefits to nature and wildlife, but often results in unsightly and broken areas of decayed trees, bushes, undergrowth etc.</p> <p>Argues that Garden Village developments creates romantic images, but high density development with front doors opening directly, or almost directly onto public footpaths, does not achieve this. In summary, garden developments should be created and maintained to achieve the specified goals.</p>	<p>This comment relates largely to the options for the Maidstone Local Plan Review itself, rather than the SA. The comment will be considered as part of the preparation of the Local Plan.</p>
<p>Mary Patricia Tremain and Jeff Tremain</p>	

Summary of comments	LUC response
<p>Concerned about proposals in relation to the effect that could result on the village of Marden. Is supportive of the decision not to include site 309 as a preferred option.</p> <p>States that at Marden development is currently in year 6/7 of building almost 700 new houses. The infrastructure, of transport, both roads and rail are struggling to cope as is the local primary school and medical centre. Any further major developments in Marden will potentially lead to habitat fragmentation and have a serious impact on UK red listed birds such as the Turtle Dove.</p> <p>Suggests that before any new builds are proposed on greenfield sites, or grade 2/3 agricultural land; housing should be delivered on existing brownfield sites in the Borough and not in Marden. Future development at Marden would be in situ to a flood plain. Also highlights congestion issues relating to Maidstone as well as the occupation of properties by commuters to London and the impacts of this on train capacity.</p> <p>Comments are also included in relation to sites allocated in the Land North of Copper Lane LPRSA295 and Land East of Albion Road LPRSA314. It is highlighted that access from Albion Road is potentially dangerous as there are no footpaths. The site comprises good quality farmland and there may be flood risk issues.</p>	<p>Comment noted in relation to site 309, which has not been allocated. The reasons for taking forward the preferred site allocations are not limited to the findings and recommendations of the SA. Instead, the SA was considered alongside all other evidence base documents prepared as part of the Local Plan making process; the reasons for choosing the plan were set out in Chapter 9 of SA Report for the Regulation 18b Consultation and in <b>Chapter 10</b> of this SA Report.</p> <p>In order to provide 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 (see <b>Table C.2</b> and <b>C.4</b> in <b>Appendix C</b>). 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 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), were presented in Appendix A of the SA Report for the Options for Spatial Strategy, Site Allocations and Garden Settlements document. This work for the site options formed the basis of the appraisal of the site allocation policies in Chapter 6 of the Regulation 18 Preferred Approaches SA and in Chapter 7 of this SA Report.</p> <p>The appraisal of sites LPRSA295 and LPRSA314 considered the potential congestion and traffic implications through SA objective 7: sustainable transport. Both sites are expected to have minor positive effects in relation to SA objective 7: sustainable transport given their 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 loss of greenfield land and Grade 3 agricultural soils as a result of development is also recognised through the SA and a significant negative effect has been recorded in relation to SA objective 9: soils.</p> <p>Through the appraisal of effects in relation to SA objective 12: flooding, the SA highlighted that both sites contain areas of 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 the significant negative effect to a minor negative, given that the risk applies to only a limited area of the site. As the</p>

Summary of comments	LUC response
	<p>site specific policy for site 314 does not address flood risk, the significant negative effect remains.</p>
<p>Brian James Morris</p>	
<p>Contests the development of the Lidsing garden settlement site as well as the 'linking up' to the Medway development at Gibraltar Farm. Highlights the potential for hospital, school, doctor and policing infrastructure to be put under increasing pressure by the new development. Also states that there will be increasing levels of pollution and congestion associated with the additional 2,500 homes and cars used by residents. There is potential for the development to link Bredhurst, Lordswood, Capstone and Gillingham to form an overcrowded and disconnected community.</p>	<p>The SA considered the potential for the capacity of existing services to be exceeded as garden settlement sites are developed. However, through the appraisal in relation to SA objective 2: services and facilities, it was concluded that the garden settlement policies will require appropriate local retail and services, taking account of local levels of service provision which will help to ensure that occupants of the new garden settlements have access to essential services and facilities. This requirement will also help to address issues of existing services becoming overcapacity. Furthermore, Policy SP4(b) (which allocated the Lidsing garden settlement) requires a new primary school and new local centre to be provided within Lidsing garden settlement on the alignment of a bus route linking to wider destinations. Overall an uncertain significant positive effect was recorded in relation to SA objective 2: services and facilities for Policy SP4(b): Lidsing Garden Settlement.</p> <p>Effects relating to transport and air pollution were considered through SA objectives 7: sustainable transport and 11: air quality. For Policy 4(b) the requirements to reduce dependency upon, and use of, private vehicles are highlighted in combination with 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 could lead to increased traffic levels and, in some places, localised congestion. The SA also highlighted that it is 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. Further potential for air pollution may arise from increased private vehicle traffic within the garden settlement itself, although the policy requirements which could help limit vehicular travel and promote self-containment could help limit the potential for these effects. Overall uncertain minor negative and minor negative effects were recorded in relation to SA objectives 7: sustainable travel and 11: air quality for Policy SP4(b).</p> <p>The SA considered the potential impacts on surrounding communities through SA objective 3: community. In relation to this issue, the SA identified that the allocation of the garden settlement has more limited potential to erode the identity of the nearby communities given</p>



Summary of comments	LUC response
	<p>that surrounding residents already comprise part of the larger, urban Medway urban area, rather than a discrete rural settlement. The SA recognised the close proximity of Bredhurst, however this settlement is separated from the garden settlement site by the M2 which is likely to reduce the potential for adverse effects. Overall a mixed uncertain minor positive and minor negative effect was recorded in relation to SA objective 3: community for Policy SP4(b).</p>
Christina Sandberg	
<p>The consultee has stated that they pleased to see that site 309 Marden Garden Settlement is not a preferred option. The plan is more sustainable as a result and provides for a longer term strategy for housing. The comment highlights a number of sustainability issues in relation to the site including loss of high quality agricultural land, issues of access and congestion, the sensitivity of the site in landscape terms, flooding issues, impacts on the sewerage system, capacity issues at Marden railway station and the GP surgery potential impacts on heritage assets and ancient woodland and the potential for wildlife habitat destruction.</p> <p>A number of additional comments regarding the potential unsuitability of sites allocated in Land North of Copper Lane LPRSA295 and Land East of Albion Road LPRSA314 are also included:</p> <p>Specific to these sites the consultee highlights the potential loss of greenfield land and the impact of widening roads, causing disruption, loss of parking rights and house frontages. The potential safety implications and congestion from resultant traffic increases are also highlighted. The comment states that the area will be urbanised as a result of the development. The distance from the sites to the nearest primary school is also highlighted.</p>	<p>Comment noted in relation to site 309 which has not been allocated. The reasons for taking forward the preferred site allocations are not limited to the findings and recommendations of the SA. Instead, the SA was considered alongside all other evidence base documents prepared as part of the Local Plan making process. The reasons for choosing the plan were set out in Chapter 9 of SA Report for the Regulation 18b Consultation and are also set out in <b>Chapter 10</b> of this SA Report.</p> <p>In order to provide 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 (see <b>Table C.2</b> and <b>C.4</b> in <b>Appendix C</b>). 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 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), were presented in Appendix A of the SA Report for the Options for Spatial Strategy, Site Allocations and Garden Settlements document. This work for the site options formed the basis of the appraisal of the site allocation policies in Chapter 6 of the Regulation 18 Preferred Approaches SA and <b>Chapter 7</b> of this SA Report.</p> <p>The appraisal of sites LPRSA295 and LPRSA314 recognised the distance of both sites to the nearest primary school through SA objective 2: services and facilities. A minor negative effect was recorded for both sites given that although a GP surgery and Marden's retail centre are available within a reasonable distance, the sites lie more than 800m from the nearest primary school, are distant from the nearest secondary school and average commuting distances from</p>

Summary of comments	LUC response
	<p>this location are high. The SA considered the potential congestion and traffic implications through SA objective 7: sustainable transport. Both sites were expected to have minor positive effects in relation to SA objective 7: sustainable transport given their 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 loss of greenfield land and Grade 3 agricultural soils as a result of development was also recognised through the SA and a significant negative effect was recorded in relation to SA objective 9: soils for both sites.</p> <p>The other points highlighted by the consultee were not considered as part of the appraisal of site options, given its high level, strategic nature. An appropriate level of detail has been applied through the SA work. The level of detail required to undertake consistent appraisal of sites to the level of detail suggested by the consultee is not available across all sites.</p>
Georgie Dunstone	
<p>The consultee states that they are supportive of the exclusion of the site 309 Land North of Marden from the plan. The comment highlights a number of sustainability issues in relation to the site including disruption on the natural beauty of the open landscape, proximity to ancient woodland and wildlife species, impacts on local character, transport issues including congestion, demands on water resource and impacts on nearby water bodies.</p> <p>The consultee also objects to the development of sites Land North of Copper Lane LPRSA295 and Land East of Albion Road LPRSA314. Issues highlighted include:</p> <p>Flooding problem relating to poor surface water drainage, increase in car use given the more limited access to some services and facilities from the sites, issues of access to railway station and impacts on the landscape, historic environment and local character.</p>	<p>Comment noted in relation to site 309 which has not been allocated. The reasons for taking forward the preferred site allocations are not limited to the findings and recommendations of the SA. Instead, these were considered alongside all other evidence base documents prepared as part of the Local Plan making process. The reasons for choosing the plan were set out in Chapter 9 of SA Report for the Regulation 18b Consultation and in <b>Chapter 10</b> of this SA report.</p> <p>In order to provide 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 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), were presented in Appendix A of the SA Report for the Options for Spatial Strategy, Site Allocations and Garden Settlements document. This work for the site options formed the basis of the appraisal of the site allocation</p>

Summary of comments	LUC response
	<p>policies in Chapter 6 of the Regulation 18 Preferred Approaches SA and now updated in <b>Chapter 7</b> of this SA Report.</p> <p>The appraisal of sites LPRSA295 and LPRSA314 recognised the distance of both sites to the nearest primary school through SA objective 2: services and facilities. A minor negative effect was recorded for both sites given that although a GP surgery and Marden's retail centre are available within a reasonable distance, the sites lie more than 800m from the nearest primary school, are distant from the nearest secondary school and average commuting distances from this location are high. The SA considered the potential congestion and traffic implications through SA objective 7: sustainable transport. Both sites were expected to have minor positive effects in relation to SA objective 7: sustainable transport given their 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. Given the proximity of both sites to nearby heritage assets, including a cluster of listed buildings in the Marden Conservation Area, an uncertain significant negative effect was recorded for both sites in relation to SA objective 15: historic environment. The SA recognised that the entirety of Marden, including the sites, lies in the highly sensitive Staplehurst Low Weald Landscape Character Area (LCA). The site specific policy for site 295 requires structural landscaping to soften the impact of development on the wider landscape and therefore the significant negative effect recorded for this site in relation to SA objective 16: landscape was reduced to minor negative. The effect recorded for site 314 was significant negative given that the site-specific allocation policies do not address this issue.</p>
Stuart Jeffery	
<p>The consultee states that the SA focuses on the ability of the local plan to meet MBC's aims rather than providing an objective view of the impact of the plans on environment in the long term, which is stated to be flawed.</p> <p>A number of additional points set out in the SA are also challenged:</p> <ul style="list-style-type: none"> <li>■ States that the commentary included in the SA about the potential for water resources and flood risk to get worse due to climate change is understated.</li> </ul>	<p>It is not accurate to state that the SA appraises the Local Plan in relation to its ability to meet the Council's aims. The SA appraised site and policy options against the SA objectives in the SA framework (see Table 2.2 in the SA Report). These objectives were established through an analysis of the policy context and baseline evidence relevant to the plan area (Appendix B of the SA Report), which allowed the key sustainability issues for the Borough to be identified.</p> <p>It is accepted that the commentary and appraisal work included in the SA Report is high level and strategic in nature. However, the level of detail included is considered to be appropriate to</p>

Summary of comments	LUC response
<ul style="list-style-type: none"> <li>■ States that SA assertion that the Local Plan Review offers the opportunity to facilitate and expedite the delivery of affordable housing is not evidenced and does not consider whether the low level of affordable housing in the plan (30-40%) is correct level based on need. The SA also does not examine whether the overall housing target is based on need or is simply driven by the desire for economic growth.</li> <li>■ States that the SA does not consider the expected increase in CO2 emission resulting from the Local Plan in the light of the legally binding Paris Agreement or the scientifically agreed levels of CO2 reduction required. Specifically, the SA makes no mention of the proportion of the carbon budget available to the Borough in order for the UK to comply with the Paris Agreement (5.4m tCO2e) or that the carbon emissions of construction alone will result in 1.8m tCO2e.</li> <li>■ States that the uncertain negative effects anticipated in relation to air pollution are understated.</li> <li>■ States that the SA does not consider the impact of the loss of farm land on the long term viability of local food supplies or the impact of the loss of carbon sinks as well as biodiversity.</li> <li>■ States that the SA does not assess MBC's objectives in relation to the environment, i.e. whether the objectives meet the needs of future generations without compromising the needs of the present. In particular, economic growth is not critiqued, failing to consider the continued desire for economic growth in the long term.</li> </ul>	<p>the level of detail required for a Local Plan. Planning Policy Guidance is clear that the SA should only focus on what is needed to assess the likely significant effects of the plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan. The level of detail that the consultee has suggested is considered to be beyond what is required for the SA.</p> <p>In relation to the statements that the findings of the SA are understated, the language used in the SA has been included to be objective in nature. The methodology for the SA (see <b>Chapter 2</b> of the SA Report) highlights that the dividing line between sustainability scores is often quite small. 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. The identification of these effects was dependent upon professional judgement in many instances and this accounts for the discrepancy between the consultee's statements on the significance of effects and the effects recorded in the SA.</p>
<p>Barbara Baldwin</p>	
<p>The consultee agrees with the exclusion of site 309 Land North of Marden from the plan. The plan is more sustainable as a result and provides for a longer term strategy for housing. Development in proximity to the motorway network makes more sense than building in more rural areas with poorer road connections. Marden is clearly unsustainable and a poor location for large developments.</p>	<p>Comment noted in relation to site 309 which has not been allocated. The reasons for taking forward the preferred site allocations are not limited to the findings and recommendations of the SA. Instead, the SA was considered alongside all other evidence base documents prepared as part of the Local Plan making process. The reasons for choosing the plan were set out in Chapter 9 of SA Report for the Regulation 18b Consultation and in <b>Chapter 10</b> of this SA Report.</p>

Summary of comments	LUC response
<p>The consultee also objects to the development of sites Land North of Copper Lane LPRSA295 and Land East of Albion Road LPRSA314. Issues highlighted include:</p> <ul style="list-style-type: none"> <li>■ The potential for the high number of recent housing development to result in loss of greenfield land and impacts on capacity of services and facilities.</li> <li>■ Walking access to and from the sites 295 and 314 to the village is very poor because of narrow pavements, therefore people will use their cars causing more pollution. The consultee states that commuting from the sites is likely to jobs in Maidstone or London. Increased travel to higher order centres is likely causing congestion and pollution. Marden has extremely poor connectivity, it is isolated from motorways by B roads which surround the developments which are totally unsuitable for the extra amount of car journeys that sites 295 and 314 would generate.</li> <li>■ Continual flooding has resulted in issued of soil erosion.</li> <li>■ Marden is already suffering from very low water pressure, when there is high demand.</li> <li>■ Air quality and higher CO2 emissions will also result given increasing development and travel required in the area.</li> <li>■ Flooding is now not one in 30 years but every winter. Increasing temperatures will increase rainfall and therefore increase flooding.</li> <li>■ Development in Marden cause risk to wildlife and many are close to Marden Meadows SSSI and ancient woodland at Bridgehurst Wood.</li> <li>■ The new building that has occurred in Marden in the last five years has diluted the Historic environment that is the essence of Marden. Marden has the highest number of listed building in the Borough of Maidstone</li> <li>■ Views from the Greensand Ridge is highly sensitive with extensive panoramic views across the Staplehurst Low Weald Landscape Character Area (LCA).</li> </ul>	<p>In order to provide 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 (see <b>Table C.2</b> and <b>C.4</b> in <b>Appendix C</b>). 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 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), were presented in Appendix A of the SA Report for the Options for Spatial Strategy, Site Allocations and Garden Settlements document. This work for the site options formed the basis of the appraisal of the site allocation policies in Chapter 6 of the Regulation 18 Preferred Approaches SA and <b>Chapter 7</b> of this SA Report.</p> <p>The appraisal of sites LPRSA295 and LPRSA314 recognised the distance of both sites to essential services and facilities (including schools, retail and healthcare) through SA objective 2: services and facilities. A minor negative effect was recorded for both sites given that although a GP surgery and Marden's retail centre are available within a reasonable distance, the sites lie more than 800m from the nearest primary school, are distant from the nearest secondary school and average commuting distances from this location are high. The SA of all sites (including 295 and 314) considered the potential congestion and traffic implications through SA objective 7: sustainable transport. Both sites were expected to have minor positive effects in relation to SA objective 7: sustainable transport given their 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.</p> <p>The loss of greenfield land and Grade 3 agricultural soils as a result of development was recognised through the SA and a significant negative effect was recorded in relation to SA objective 9: soils for both sites.</p> <p>The entirety of the County of Kent is extremely dry area as highlighted in the baseline for the SA. This issue is not limited only to the area around Marden. Impacts on water resources have been considered in relation to drinking water safeguarding zone (surface water), within which both sites lie. A minor negative effect was recorded for both sites in relation to SA</p>

Summary of comments	LUC response
	<p>objective 10: water, as per paragraph 6.265 of the Regulation 18b Preferred Approaches SA Report. However, Table 6.11 of the Regulation 18b SA incorrectly reported a significant negative for site 314. Since site 314 is no longer being allocated, no correction is required in the SA report at Regulation 19 stage. The SA highlighted that since almost all of the Borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites.</p> <p>Through the appraisal of SA objective 12: flooding, the SA highlighted that both sites contain areas of 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 the significant negative effect to a minor negative, given that the risk applies to only a limited area of the site. As the site specific policy for site 314 does not address flood risk the significant negative effect remained.</p> <p>The relatively poor access to some services and facilities from both sites meant that a minor negative effect was recorded in relation to SA objective 13: climate change, given the likelihood of travel-related carbon emissions.</p> <p>The appraisal of sites in relation to potential effects on biodiversity was based on the boundaries of biodiversity designations. More detailed assessment of the sites would have to be based fieldwork which is beyond the scope of the SA. Site 295 lies within the impact risk zone for the nearby Marden Meadows SSSI and 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. Therefore, a minor negative effect was recorded for this site in relation to SA objective 14: biodiversity. A negligible effect was identified for site 314, which lies outside the relevant risk zones and is not close to locally designated sites, ancient woodland or priority habitats.</p> <p>Given the proximity of both sites to nearby heritage assets, including a cluster of listed buildings in the Marden Conservation Area, an uncertain significant negative effect was recorded for both sites in relation to SA objective 15: historic environment. The SA recognised that the entirety of Marden, including the sites, lies in the highly sensitive Staplehurst Low Weald Landscape Character Area (LCA). The site specific policy for site 295 requires structural landscaping to soften the impact of development on the wider landscape and</p>

Summary of comments	LUC response
	<p>therefore the significant negative effect recorded for this site in relation to SA objective 16: landscape was reduced to minor negative. The effect recorded for site 314 was significant negative given that the site-specific allocation policies did not address this issue.</p>
<p>Kathy Tully</p>	
<p>The consultee states that they are supportive of the exclusion of the site 309 Land North of Marden from the plan. The comment highlights that the site would lack infrastructure required to support its development, including suitable access to the road network. It is stated that Maidstone town centre is the most sustainable location but that during busy periods traffic issues remain.</p> <p>The consultee also objects to the development of sites Land North of Copper Lane LPRSA295 and Land East of Albion Road LPRSA314. Issues highlighted include:</p> <p>Issues relating to water supply, flooding on surrounding roads, habitat loss, impact on farmland and impacts on a nearby listed building (Marden Church) are highlighted in relation to the development of these sites.</p>	<p>Comment noted in relation to site 309 which has not been allocated. The reasons for taking forward the preferred site allocations are not limited to the findings and recommendations of the SA. Instead, there were considered alongside all other evidence base documents prepared as part of the Local Plan making process. The reasons for choosing the plan were set out in Chapter 9 of SA Report for the Regulation 18b Consultation and in <b>Chapter 10</b> of this SA Report.</p> <p>In order to provide 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 (see <b>Table C.2</b> and <b>C.4</b> in <b>Appendix C</b>). 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 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), were presented in Appendix A of the SA Report for the Options for Spatial Strategy, Site Allocations and Garden Settlements document. This work for the site options formed the basis of the appraisal of the site allocation policies in Chapter 6 of the Regulation 18 Preferred Approaches SA.</p> <p>The SA of all sites (including 295 and 314) considered the potential congestion and traffic implications through SA objective 7: sustainable transport. Both sites were expected to have minor positive effects in relation to SA objective 7: sustainable transport given their 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 loss of greenfield land and Grade 3 agricultural soils as a result of development was recognised through the SA and a significant negative effect was recorded in relation to SA objective 9: soils for both sites. The appraisal of</p>

Summary of comments	LUC response
	<p>sites in relation to potential effects on biodiversity was based on the boundaries of biodiversity designations. More detailed assessment of the sites would have to be based upon on fieldwork which is beyond the scope of the SA. Site 295 lies within the impact risk zone for the nearby Marden Meadows SSSI and 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. Therefore, a minor negative effect was recorded for this site in relation to SA objective 14: biodiversity. Negligible effects were identified for site 314, which lies outside the relevant risk zones and is not close to locally designated sites, ancient woodland or priority habitats. Given the proximity of both sites to nearby heritage assets, including a cluster of listed buildings in the Marden Conservation Area, an uncertain significant negative effect was recorded for both sites in relation to SA objective 15: historic environment.</p>



# 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.

##### National

**B.3 National Planning Policy Framework (NPPF)**<sup>79</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 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

<sup>79</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)

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, beauty and sustainability 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 (including genuine choice of transport modes)*”.

**B.4 National Planning Practice Guidance (PPG)<sup>80</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.5 Select Committee on Public Service and Demographic Change report Ready for Ageing?<sup>81</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.6 National Design Guide<sup>82</sup>**: sets out the Government’s priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

**B.7 Fair Society, Healthy Lives<sup>83</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>84</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>85</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

<sup>80</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>81</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>82</sup> Ministry of Housing, Communities and Local Government (January 2021) *National Design Guide* [online] Available at: <https://www.gov.uk/government/publications/national-design-guide>

<sup>83</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>84</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>85</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)

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 sustainable places and planning for infrastructure and connected places.

**B.10 Homes England Strategic Plan 2018 to 2023<sup>86</sup>:** Sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

**B.11 Planning Policy for Traveller Sites<sup>87</sup>** sets out the Government's planning policy for traveller sites. 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.12 Housing White Paper 2017 (Fixing our broken housing market)<sup>88</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.13 Laying the foundations: a housing strategy for England<sup>89</sup>:** Aims to provide support to deliver new homes and improve social mobility.

**B.14 Public Health England, PHE Strategy 2020-25<sup>90</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.15 Healthy Lives, Healthy People: Our strategy for public health in England<sup>91</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.16 A Green Future: Our 25 Year Plan to Improve the Environment<sup>92</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>86</sup> Homes England (2018) *Strategic Plan 2018 to 2023* [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752686/Homes\\_England\\_Strategic\\_Plan\\_AW\\_REV\\_150dpi\\_REV.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf)

<sup>87</sup> Department for Communities and Local Government (2015) *Planning policy for traveller sites*

<sup>88</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>89</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>90</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>91</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>92</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; 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.
  - ‘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.17 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update<sup>93</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.18 Maidstone Borough Local Plan Infrastructure**

**Delivery Plan (May 2016)<sup>94</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.19 Strategic Plan 2015-2020 Action Plan<sup>95</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.

<sup>93</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>94</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>95</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>

- 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.
- Biodiversity and Environmental sustainability is respected.

**B.20** A complete updated version of the action plan is expected to be released February 2019.

**B.21 Contaminated Land Strategy 2016-2021<sup>96</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.22 Maidstone's Parks & Open Spaces -10 Year Strategic Plan 2017-2027<sup>97</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.23 Green and Blue Infrastructure Strategy<sup>98</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.24 Maidstone Green and Blue Infrastructure Strategy: Action Plan<sup>99</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.

<sup>96</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>97</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>98</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>99</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=%2BdXJsPWWh0dHBzJTnBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdvi51ayUyRmRvY3VtZW50cyUyRnM1OElzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWWh0dHBzJTnBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdvi51ayUyRmRvY3VtZW50cyUyRnM1OElzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x)

**B.25 Homelessness Strategy 2014-2019<sup>100</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.
- 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.26 Housing Strategy 2016-2020<sup>101</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.27 Low Emissions Strategy (December 2017)<sup>102</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.28** The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area<sup>103</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>104</sup>.

**B.29** Maidstone's population in mid-2019 was estimated as 171,850 persons compared to 169,980 in 2018, an estimated rise of 1.1%. 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>105</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>106</sup>.

**B.30** 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>107</sup>.

<sup>100</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)

<sup>101</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>102</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>103</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>104</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>105</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>106</sup> Sourced from ONS 2018-based projections for local authorities available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>107</sup> Office for National Statistics, 2018-based subnational population projections for local authorities and higher administrative areas in England [online] Available at:

**B.31** 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>108</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>109</sup>.

**B.32** 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>110</sup>.

### Housing

**B.33** Since 2011, the base data of Maidstone Borough Local Plan, a total of 7,741 dwellings have been completed which represents a shortfall of 206 against the nine year target of 7,947 dwellings. This shortfall will be delivered over the next six years 2020 to 2027<sup>111</sup>. 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>112</sup>.

**B.34** 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>113</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>114</sup>. Maidstone saw 3,127 property sales during 2017. This was the highest number of sales within a Kent local authority.

**B.35** The average property price in Kent during 2020 was £365,689. This is higher than the national average of £323,868 but lower than the average in the South East which was £411,466. Property prices in Kent in 2020 rose 6.9% compared to the year before. The average price rise across the County varied from 1.3% in Dartford to 10.9% in Ashford. The overall average price paid per property in Maidstone was £351,570<sup>115</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>116</sup>.

**11.5** This trend has continued in 2018, and the ratio has increased from 10.30 in 2017, to 11.20 in 2018<sup>117</sup>.

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>108</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>109</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>110</sup> UK Census Data (2011) [online] available at: <http://www.ukcensusdata.com/maidstone-e07000110#sthash.diAdxxt.dpbs>

<sup>111</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>112</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>

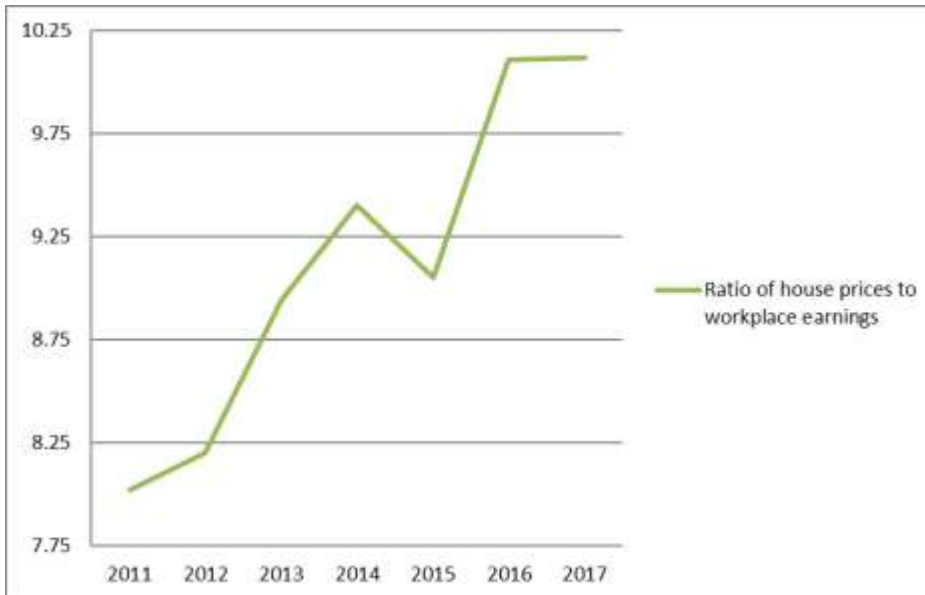
<sup>113</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: [http://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

<sup>114</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>115</sup> Kent County Council (2021) Business Intelligence Statistical Bulletin: Property Prices & Sales in Kent: 2020 [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>116</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>117</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>



**B.36** 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>118</sup>.

**B.37** In Kent, the estimated total of rough sleepers is 101. This number is down by 68 or 39.5% from the autumn 2019 total of 172. Figures across the county range from 24 in Canterbury to 2 in Maidstone<sup>119</sup>.

**B.38** The Council is continuing to meet its objectively assessed needs for housing, and as of 1 April 2020, it has 6.1 years' worth of readily available housing land supply<sup>120</sup>.

**B.39** 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>121</sup>.

**Table B.1: Completed dwellings on allocated sites measured against Local Plan trajectory<sup>122</sup>**

Year	Local Plan Target	Actual	% Target
2018/19	883	1,146	129%
2017/18	939	767	82%
2016/17	470	473	101%

<sup>118</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>119</sup> Kent County Council (2021) Estimated rough sleepers in Kent: Autumn 2020. [online] Available at: [https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0020/91361/Rough-sleepers-in-Kent-report.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0020/91361/Rough-sleepers-in-Kent-report.pdf)

<sup>120</sup> Maidstone Borough Council (2020) Authority Monitoring Report [online] available at: [https://localplan.maidstone.gov.uk/home/documents/authority-](https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf)

[monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf](https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf)

<sup>121</sup> Housing land supply update, Analysis paper (1 April 2019) [online] Available at: [https://maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0004/144967/Housing-Land-Supply-Paper-1-April-](https://maidstone.gov.uk/__data/assets/pdf_file/0004/144967/Housing-Land-Supply-Paper-1-April-)

<sup>122</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.40** 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.41** 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.

**Table B.2: 20 Year Housing Land Supply 1 April 2011 to 31 March 2031<sup>123</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.42** 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>124</sup>.

**B.43** 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>125</sup>. In 2019/2020 54% of affordable dwellings were completed<sup>126</sup>. The delivery of affordable housing is on target and does not significantly deviate from the policy target.

#### Gypsy, Traveller and Travelling Showpeople

**B.44** Between 1 April 2019 and 31 March 2020 there has been permission for:

- 46 Permanent non-personal pitches.
- 3 Permanent personal pitches.
- 0 Temporary non-personal pitches.
- 2 Temporary personal pitches<sup>127</sup>.

**B.45** Between 2011 and 2020 some 226 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.46** The Ministry of Housing, Communities and Local Government's 'Planning policy for traveller sites' requires

<sup>123</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>124</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>125</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>126</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at:

<https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>127</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at:

<https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

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>128</sup>. A new Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) has been commissioned and, whilst the GTTSAA has been delayed by Covid 19, discussions with the consultants undertaking the GTTSAA have indicated that there will be a significant need for new pitches in Maidstone Borough over the plan period. During the Call for Sites exercise in 2019, only a small number of gypsy, traveller and travelling showpeople sites were put forward for inclusion in the plan. Given that the GTTSAA has not been completed, the likely high level of need and the significant shortfall in sites that will not be met by Call for Sites submissions, the Council intends to produce a separate Gypsy, Traveller and Travelling Showpeople DPD.

**B.47 .**

### Education

**B.48** 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>129</sup>.

**B.49** In 2011 there were 3,463 school children and full-time students in the borough, and 3,356 students aged 18 and over<sup>130</sup>.

**B.50** The birth rate in Maidstone dropped significantly in 2019, in line with the County, and National trend, to 6.6 points lower than the previous year<sup>131</sup>. 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>132</sup>.

**B.51** 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.52** 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.53** 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>133</sup>.

### Deprivation

**B.54** 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.55** As of 2019, the Maidstone urban wards of Park Wood contain the highest levels of deprivation in the borough and

<sup>128</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>129</sup> NOMIS – Local Area Report (2011) – Maidstone [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=1946157316>

<sup>130</sup> NOMIS – Local Area Report (2011) – Maidstone [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=1946157316>

<sup>131</sup> Kent County Council (2020) Commissioning Plan for Education Provision in Kent [online] Available at: [https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0005/104675/Commissioning-Plan-for-Education-Provision-in-Kent-2021-to-2025.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0005/104675/Commissioning-Plan-for-Education-Provision-in-Kent-2021-to-2025.pdf)

<sup>132</sup> Kent County Council (2020) Commissioning Plan for Education Provision in Kent [online] Available at: [https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0005/104675/Commissioning-Plan-for-Education-Provision-in-Kent-2021-to-2025.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0005/104675/Commissioning-Plan-for-Education-Provision-in-Kent-2021-to-2025.pdf)

<sup>133</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)

rank in the top 10% in Kent. The ward is ranked as 2914 in 2019 and 1979 in 2015, a change of 935 rankings.<sup>134</sup>.

### Health

**B.56** Maidstone Borough (71.0%) has a higher percentage of adults who consider themselves physically active than nationally (66.4%) and is slightly higher than the Kent average (68.5%)<sup>135</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>136</sup>.

**B.57** Average life expectancy in Maidstone is slightly above the national average, being 80.4 for males and 83.7 for females<sup>137</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.58** Estimated levels of adult excess weight in the borough are just below the national average, with an average of 64.5%, compared to the England average of 62.8%<sup>138</sup>.

### Open spaces, sports and recreation

**B.59** 27% of the borough forms part of the Kent Downs Area of Outstanding Natural Beauty (AONB), which is an important informal recreational resource<sup>139</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>140</sup>.

**B.60** 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.61** 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

<sup>134</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>135</sup> Public Health England (2021) Local Authority Health Profiles [online] available at: <https://fingertips.phe.org.uk/profile/health-profiles>

<sup>136</sup> NOMIS – Local Area Report (2011) – Maidstone [online] Available at:

<https://www.nomisweb.co.uk/reports/localarea?compare=1946157316>

<sup>137</sup> Life Expectancy at birth by Sex, UK 2017-2019 [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>138</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>139</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>140</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)

were scored to be in Poor condition, 62 as Fair, 57 as Good and 1 as Very Good<sup>141</sup>.

**B.62** 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 2019/20<sup>142</sup>.

### Crime

**B.63** Between 2011 and 2017 Maidstone did not follow County trends in crime statistics and reported a lower increase in all reported crime. However, there has been a general increase in all reported crime both within Maidstone and county wide between 2017/18 and 2019/20. For the Borough as a whole, crime rate per 1,000 people has risen from 90 in 2017/18 to 95 in 2019/20, an increase of 6%<sup>143</sup>. Within Kent, violence and

sexual offences and anti-social behaviour crimes are two principal contributors of crime together accounting for over half of all crimes committed<sup>144</sup>.

**B.64** There has been a general increase in all reported crime both within Maidstone and Kent between 2017/18 and 2019/20. For the borough, crime rate per 1,000 population has risen from 90 in 2017/18 to 95 in 2019/20 an increase of 5%<sup>145</sup>.

### Air and noise pollution

**B.65** 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,

<sup>141</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>142</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>143</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at:

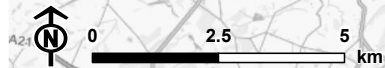
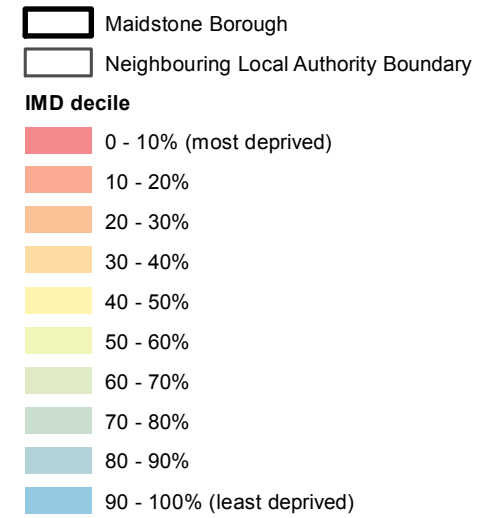
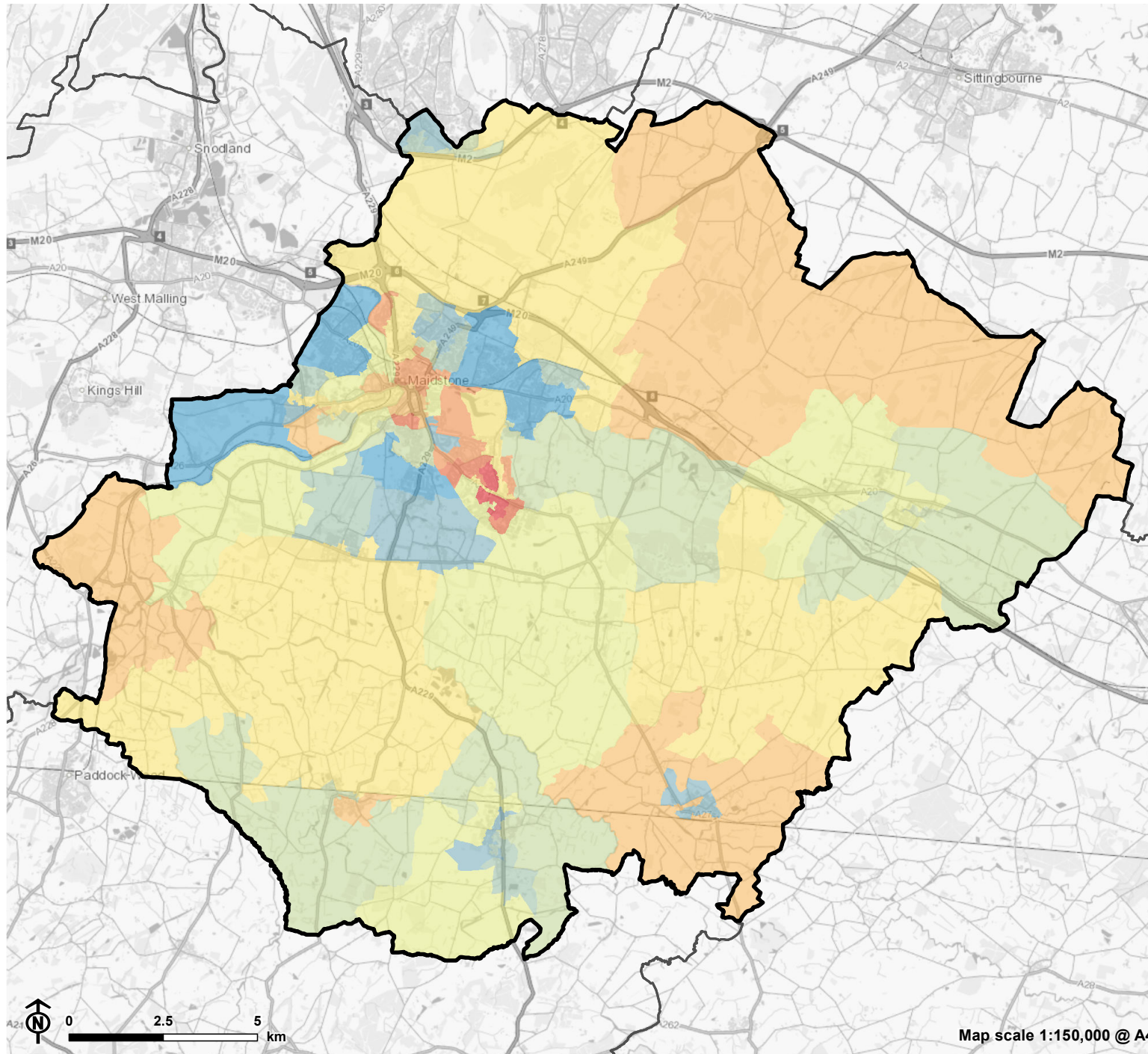
<https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>144</sup> UK Crime Stats (2021) Kent Police <https://www.police.uk/pu/your-area/kent-police/>

<sup>145</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
	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 reduce crime by incorporating good design principles that should address the functioning of an area.

**Figure B1: Index of Multiple Deprivation (IMD) 2019**



Map scale 1:150,000 @ A4

## Economy

### Policy context

#### International

**B.66** There are no specific international 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.67** National Planning Policy Framework (NPPF)<sup>146</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.68 National Planning Practice Guidance (PPG)<sup>147</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.69 Build Back Better: Our Plan for Growth<sup>148</sup>:** Sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

**B.70 The Local Growth White Paper (2010)<sup>149</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.71 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)<sup>150</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.

<sup>146</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)

<sup>147</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>148</sup> HM Treasury (2021) Build Back Better: Our Plan for Growth [online] available at: <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>

<sup>149</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>150</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>

**B.72 National Infrastructure Delivery Plan (2016-2021)** sets out the government's plans for economic infrastructure over a five year period with those to support delivery of housing and social infrastructure.

**B.73 UK Industrial Strategy: building a Britain fit for the future** (2018) lays down a vision and foundations for a transformed economy. Areas including: artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four 'Grand Challenges' of the future.

### Sub-national

**B.74 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**<sup>151</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 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.75 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**<sup>152</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.76 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.77 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.78 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.79 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.80** A complete updated version of the action plan is expected to be released February 2019.

**11.6 Maidstone Economic Development Strategy 2015-2031**<sup>154</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.

<sup>151</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)

<sup>152</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>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 (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)



**B.81 The Kent Environment Strategy<sup>155</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.82 Housing Development & Regeneration Investment Plan<sup>156</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.83** Wholesale and retail trade (including the repair of motor vehicles) makes up the largest industry in the borough with 16% of the working population employed in this industry. The next largest industries are human health and social work activities 13.3% and administrative and support service activities with 10.7%<sup>157</sup>.

**B.84** 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>158</sup>.

**B.85** 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>159</sup>.

**B.86** 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>160</sup>. In 2019 Kent had 69,750 active enterprises, 2,210 higher than the previous year. Maidstone had the highest number of enterprises in the county (8,275)<sup>161</sup>.

**B.87** In 2017, there were 371,000 staying visits to Maidstone Borough, which was a small decrease of 0.5% from 2015 when there were 373,000 staying trips<sup>162</sup>.

**B.88** 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>163</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>164</sup>.

<sup>155</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>156</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>

<sup>157</sup> NOMIS – Labour Market Profile (2019) – Maidstone [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157316/report.aspx?own=maidstonex>

<sup>158</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>159</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>160</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>161</sup> Kent County Council (2021) Business births, deaths and survival rates in 2019 [online] Available at: [https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0007/8179/Business-demography.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0007/8179/Business-demography.pdf)

<sup>162</sup> Maidstone Borough Council (2019-202019) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>163</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>164</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>

**B.89** In regard to unemployment, in 2021 there was an increase in claimants (people claiming benefit principally for the reason of being unemployed) in the borough reflecting the continued rise in Kent, the South East and England. The percentage of people claiming Job Seekers Allowance in Maidstone is 4.5% an increase of 1.2% since 2018<sup>165</sup>. Maidstone's unemployment rate is currently 3.7%, which is better than the regional and national rates, 3.9% and 4.6% respectively<sup>166</sup>.

**B.90** There has been a steady rise in the number of jobs within Maidstone Borough. Between 2011 and 2018 there has been an increase of 10,000 additional jobs created, from 84,000 to 94,000 jobs, however in 2017 the number of jobs

dropped to 86,000<sup>167</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 office-based job growth of 154 recorded for the period 1997 to 2022<sup>168</sup>.

**B.91** 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
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.

## Transport connections and travel habits

### Policy context

#### National

**B.92 National Planning Policy Framework (NPPF)**<sup>169</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.93 National Planning Practice Guidance (PPG)**<sup>170</sup> Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

**B.94 Department for Transport, The Road to Zero (2018)**<sup>171</sup>: Sets out new measures towards cleaner road

<sup>165</sup> Nomis (2021) Labour Market Profile – Maidstone [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157316/report.aspx?town=maidstone#tabempunemp>

<sup>166</sup> Nomis (2021) Labour Market Profile – Maidstone [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157316/report.aspx?town=maidstone#tabempunemp>

<sup>167</sup> Maidstone Borough Council (2019-2020) Authority Monitoring Report [online] available at: <https://localplan.maidstone.gov.uk/home/documents/authority-monitoring-reports/Final-Maidstone-Authority-Monitoring-Report-2019-2020.pdf>

<sup>168</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>169</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)

<sup>170</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>171</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)

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.95 Department for Transport, Decarbonising Transport: Setting the Challenge (2020)**<sup>172</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 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>173</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.

**B.96 Transport Investment Strategy**<sup>174</sup>: Sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

**B.97 Door to Door: A strategy for improving sustainable transport integration**<sup>175</sup>: Focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options.
- Convenient and affordable tickets.
- Regular and straightforward connections at all stages of the journey and between different modes of transport.
- Safe and comfortable transport facilities.

**B.98** The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

### Sub-national

**B.99 Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031**<sup>176</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.

<sup>172</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)

<sup>173</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>174</sup> Department for Transport (2017) *Transport Investment Strategy* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/918490/Transport\\_investment\\_strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf)

<sup>175</sup> Department for Transport (2013) *Door to Door: A strategy for improving sustainable transport integration* [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/142539/door-to-door-strategy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf)

<sup>176</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)

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

**B.100 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update**<sup>177</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.101** 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.102 The Kent Design Guide**<sup>178</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.103 Network Rail South East Route: Kent Area Route Study (May 2018)**<sup>179</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 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.104 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**<sup>180</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.105 Maidstone Borough Council Integrated Transport Strategy 2011-2031**<sup>181</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.106 Maidstone Walking and Cycling Strategy 2011-2031**<sup>182</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.

<sup>177</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>178</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>179</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>180</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>181</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>182</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)

**B.107 Strategic Plan 2015-2020 Action Plan<sup>183</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.108 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.109** A complete updated version of the action plan is expected to be released February 2019.

**B.110 Low Emission Strategy (December 2017)<sup>184</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.111 Air Quality Annual Status Report (2018)<sup>185</sup>:** Contains an action plan for the borough of Maidstone that outlines many projects varying in topic and timeframe. Some include: transport, planning, carbon management and public health, with timeframes ranging from 1-3 years to 5+ years.

**B.112 Kent and Medway Air Quality Planning Guidance (2015)<sup>186</sup>:**

**B.113** 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.114 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 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.115 Maidstone Green and Blue Infrastructure Strategy: Action Plan<sup>188</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.116** 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

<sup>183</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>184</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>185</sup> Maidstone Borough Council (2018) Air Quality Annual Status Report, [online] Available at: <http://www.kentair.org.uk/Pagesfiles/Maidstone%20ASR%202018.pdf>

<sup>186</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>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)

<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=%2BdXJsPWh0dHBzJTnBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODlzMlUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmFOZWd5QWN0aW9uUGxbjWMTcucGRmJmFsbD0x](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTnBJTJGJTJGbWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODlzMlUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmFOZWd5QWN0aW9uUGxbjWMTcucGRmJmFsbD0x)

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>189</sup>.

**B.117** 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>190</sup>.

**B.118** Figure B2 shows the major transport links in the borough.

**B.119** 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>191</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.120** 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 delivered schemes to promote the use of alternative modes of transport to the private car including Maidstone East Station improvements as well as other station improvements within the area<sup>192</sup>.

**B.121** 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>193</sup>.

**B.122** 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>194</sup>.

**B.123** 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>195</sup>.

**B.124** 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.

<sup>189</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>190</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>191</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>192</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>193</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)

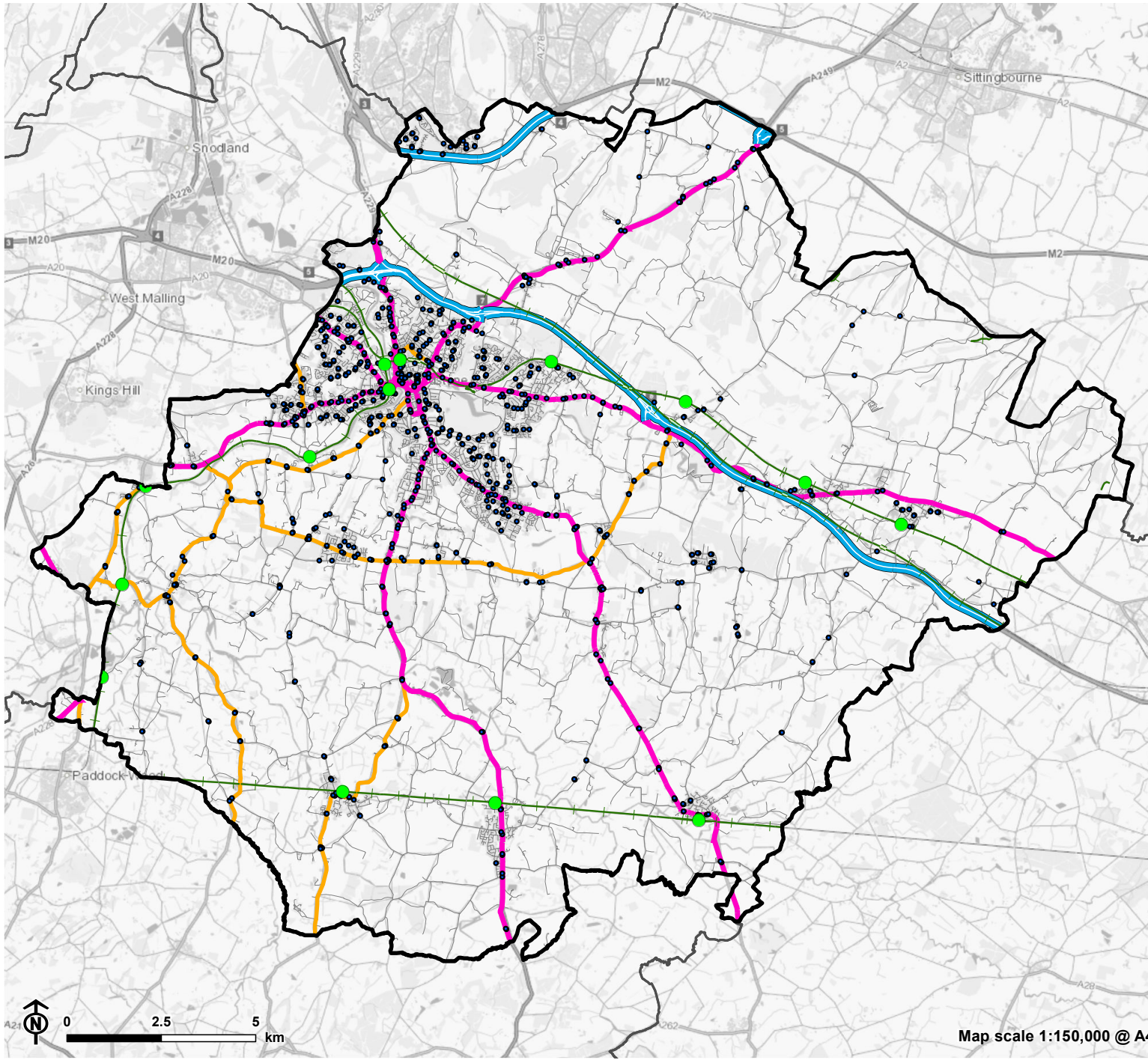
<sup>194</sup> Network Rail (2018) South East Route: Kent Area Route Study [online] Available at: <https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf>

<sup>195</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)

**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
<p>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).</p>	<p>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.</p>
<p>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).</p>	<p>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.</p>

Figure B2: Transport



- Maidstone Borough
- Neighbouring Local Authority Boundary
- Railway Line
- Railway Tunnel
- Railway Station
- Bus Stop
- A Road
- B Road
- Motorway
- Local Road

Map scale 1:150,000 @ A4



## Air, land and water quality

### Policy context

#### B.125

#### National

**B.126 National Planning Policy Framework (NPPF)<sup>196</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 effective use of land by reusing of previously developed land where suitable opportunities exist.

**B.127 National Planning Practice Guidance (PPG)<sup>197</sup>:** Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development were it has been demonstrated that significant development is required on agricultural land.

**B.128 Environmental Protection Act 1990<sup>198</sup>:** makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

**B.129 Building Regulations<sup>199</sup>:** requires that reasonable precautions are taken to avoid risks to health and safety cause by contaminants in ground to be covered by building and associated ground.

**B.130 Waste management plan for England<sup>200</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.131 National Planning Policy for Waste (NPPW)<sup>201</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.

**B.132 The Nitrate Pollution Prevention Regulations<sup>202</sup>** provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

**B.133 The Urban Waste Water Treatment Regulations<sup>203</sup>** protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

<sup>196</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)

<sup>197</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>198</sup> HM Government (1990) *Environmental Protection Act 1990* [online] Available at: <https://www.legislation.gov.uk/ukpga/1990/43/contents>

<sup>199</sup> HM Government (2010) *Building Regulations* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/431943/BR\\_PDF\\_AD\\_C\\_2013.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/431943/BR_PDF_AD_C_2013.pdf)

<sup>200</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>201</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)

<sup>202</sup> HM Government (2016) *The Nitrate Pollution Prevention Regulations*

<sup>203</sup> HM Government (2003) *The Urban Waste Water Treatment Regulations*

**B.134 The Water Environment (Water Framework Directive) Regulations<sup>204</sup>** protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process.

**B.135 The Water Supply (Water Quality) Regulations<sup>205</sup>** focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

**B.136 The Environmental Permitting Regulations<sup>206</sup>** streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how 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 and human health.

**B.137 The Air Quality Standards Regulations<sup>207</sup>** set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO<sub>2</sub>). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

**B.138 The Environmental Noise Regulations<sup>208</sup>** apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at work places; inside means of transport; or military activities in military areas.

**B.139 The Waste (Circular Economy) (Amendment) Regulations<sup>209</sup>** amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

**B.140 Safeguarding our Soils – A Strategy for England<sup>210</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.141 Water White Paper<sup>211</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.142 National Policy Statement for Waste Water<sup>212</sup>:** sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

**B.143 Water for Life White Paper<sup>213</sup>:** Sets out how to build resilience in the water sector. Objectives of the White Paper are to:

<sup>204</sup> HM Government (2017) *The Water Environment (Water Framework Directive) (England and Wales) Regulations*

<sup>205</sup> HM Government (2016) *The Water Supply (Water Quality) Regulations*

<sup>206</sup> HM Government (2016) *The Environmental Permitting Regulations*

<sup>207</sup> HM Government (2016) *The Air Quality Standards Regulations*

<sup>208</sup> HM Government (2018) *The Environmental Noise (England) Regulations*

<sup>209</sup> HM Government (2020) *The Waste (Circular Economy) Regulations*

<sup>210</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>211</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>212</sup> HM Government (2012) *National Policy Statement for Waste Water* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69505/pb13709-waste-water-nps.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)

<sup>213</sup> Department for Environment, Food and Rural Affairs (2011) *Water for life* [online] Available at:

- 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.144 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland<sup>214</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.145 The Road to Zero<sup>215</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.146 Future Water: The Government's Water Strategy for England<sup>216</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.147 A Green Future: Our 25 Year Plan to Improve the Environment<sup>217</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; 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.

[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>214</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>215</sup> HM Government (2018) *The Road to Zero*

<sup>216</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>217</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)

- 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.148 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations<sup>218</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.149 Clean Air Strategy 2019<sup>219</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.150 Our Waste, Our Resources: A strategy for England (2018)** aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

**B.151 Department for Transport, The Road to Zero (2018)<sup>220</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.152 Draft South East Marine Management Plan (2020)<sup>221</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.153 Kent Environment Strategy<sup>222</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.154 Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update<sup>223</sup>:** Sets out the fundamental infrastructure needed to support growth planned to 2031 across Kent and Medway. The document identifies water and waste water challenges across the region arising from new housing, jobs and associated infrastructure. These include the need to provide additional clean water supplies and the management of increased amounts of waste water. Additional demand will need to be met from the abstraction of existing ground or surface water resources or through the development of new resources. Kent and Medway is already an area of serious water stress.

<sup>218</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>219</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>220</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>221</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>222</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>223</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.155 Kent Minerals and Waste Local Plan 2013-30<sup>224</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.156 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)<sup>225</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.157 Strategic Plan 2015-2020 Action Plan<sup>226</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.158 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.159 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.160 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.161** A complete updated version of the action plan is expected to be released February 2019.

**B.162 Low Emission Strategy (December 2017)<sup>227</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.163 Green and Blue Infrastructure Strategy<sup>228</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:

- Maintaining and enhancing biodiversity, water and air quality.
- Retaining and enhancing a quality environment for investment and through development.

<sup>224</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>225</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>226</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>227</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>228</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)

### B.164 Maidstone Green and Blue Infrastructure Strategy:

**Action Plan**<sup>229</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.165 Contaminated Land Strategy 2016-2021**<sup>230</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.166 Thames River Basin Management Plan 2009

**(Updated December 2015)**<sup>231</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.167** 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>232</sup>.

**B.168** 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>233</sup>.

**B.169** 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>234</sup>. Figure B3 shows the AQMAs that have been designated in Maidstone and the surrounding area.

<sup>229</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=%2BdXJsPWh0dHBzJTnBJTJGJTJGbvWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODlzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTnBJTJGJTJGbvWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1ODlzMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbjlwMTcucGRmJmFsbD0x)

<sup>230</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>231</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>232</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>233</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>234</sup> UK Air, Air Information Resource (2018) AQMA Interactive Map [online] Available at: <https://uk-air.defra.gov.uk/aqma/maps>

**B.170** 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.171** 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>235</sup>.

**B.172** 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>236</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.173** 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>237</sup>.

### Soils

**B.174** 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.175** 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>238</sup>.

**B.176** 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>239</sup>.

### Contaminated land

**B.177** 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>240</sup>.

<sup>235</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>236</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>237</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>238</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>239</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>240</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)

## Water

**B.178** 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>241</sup>. In 2010, water use within Maidstone was high by both national and international standards with approximately 164 litres per person per day<sup>242</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. Revised Water Resources Management Plan 2020 to 2080 sets out estimate of water South East of England will need, and how these needs will be met. Between 2010/11 and 2016/17 South East Water has reduced leakage from 95.3 million litres a day (MI/d) to 88.6 MI/d (7.5%). Further actions will be taken to reduce leakage by additional 15% by 2025, and halve leakage by 2050<sup>243</sup>.

**B.179** 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 44 of the 58 water bodies and all 58 water bodies failed in regards to their chemical status<sup>244</sup>.

**B.180** 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>245</sup>.

**B.181** 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>246</sup>.

**B.182** 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>247</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 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.</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>241</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>242</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>243</sup> South East Water (undated) Revised Water Resources Management Plan 2020 to 2080 [online] Available at:

[https://corporate.southeastwater.co.uk/media/2878/sew-rwrmp-2020-2080\\_final.pdf](https://corporate.southeastwater.co.uk/media/2878/sew-rwrmp-2020-2080_final.pdf)

<sup>244</sup> Environment Agency (2019) <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3055/Summary>

<sup>245</sup> Aecom (2017) Kent Water for Sustainable Growth Study

<sup>246</sup> Aecom (2017) Kent Water for Sustainable Growth Study

<sup>247</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>



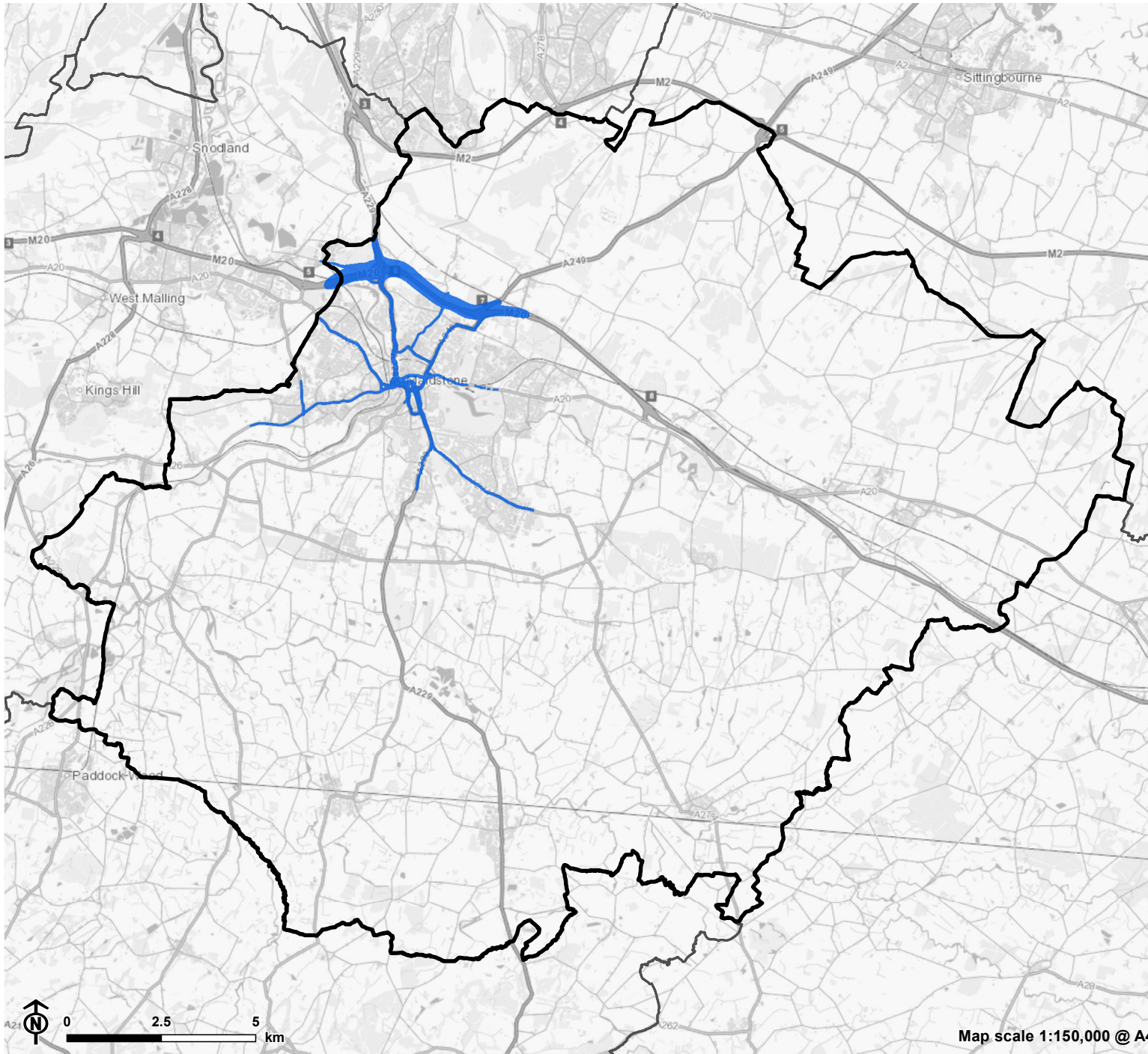
Key sustainability issues for Maidstone	Likely evolution without the Local Plan Review
	alternative travel modes to the motorised vehicle, in line with national policy aspirations. Policy DM6 of the current Local Plan states that the Council will prepare an Air Quality Development Plan Document that 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>248</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>249</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>248</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)

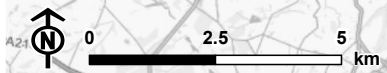
<sup>249</sup> MHCLG (2019), National Planning Policy Framework pg. 35 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

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)**

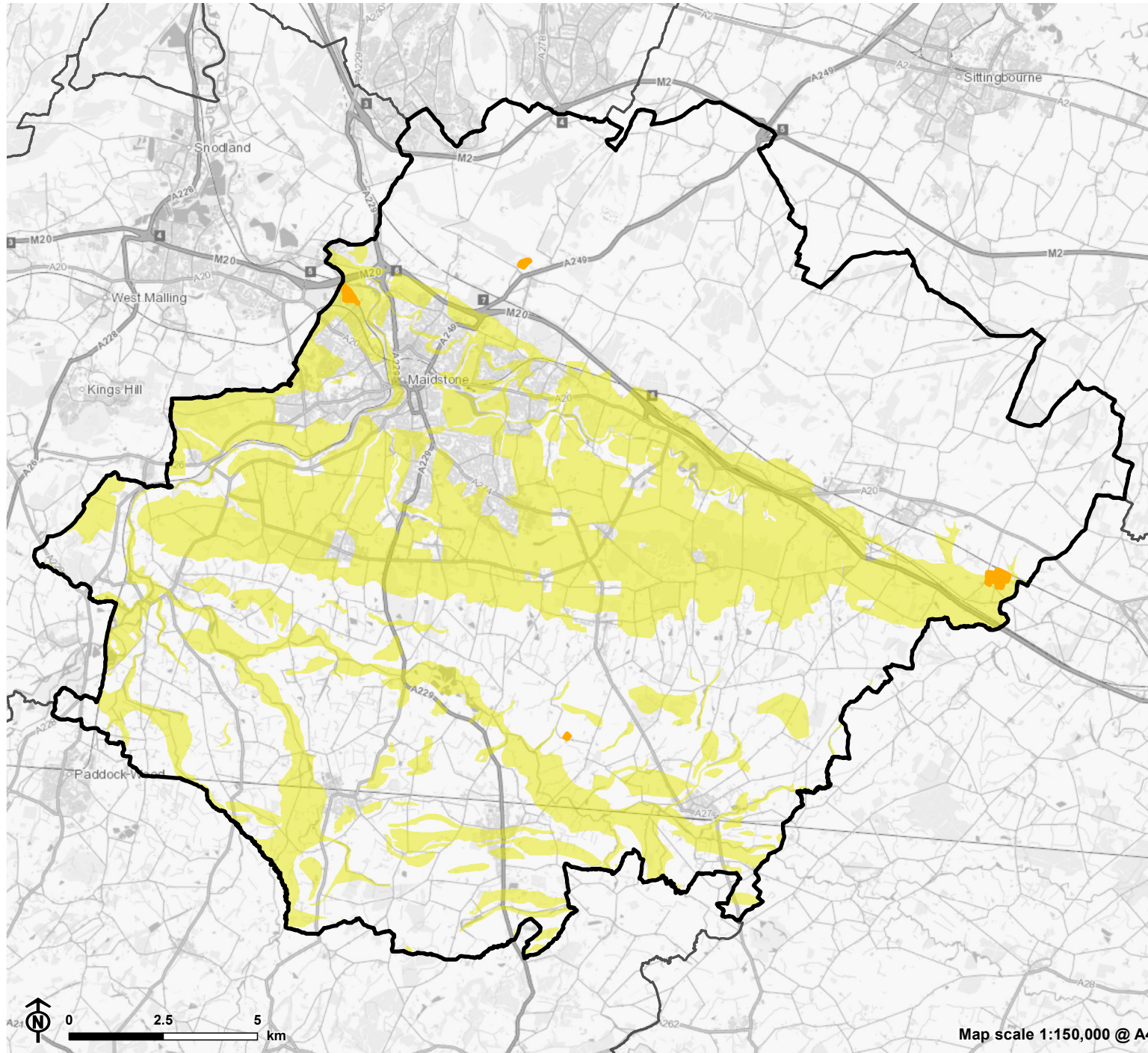






-  Maidstone Borough
-  Neighbouring Local Authority Boundary
-  Air Quality Management Area



Map scale 1:150,000 @ A4

Figure B4: Mineral Resources

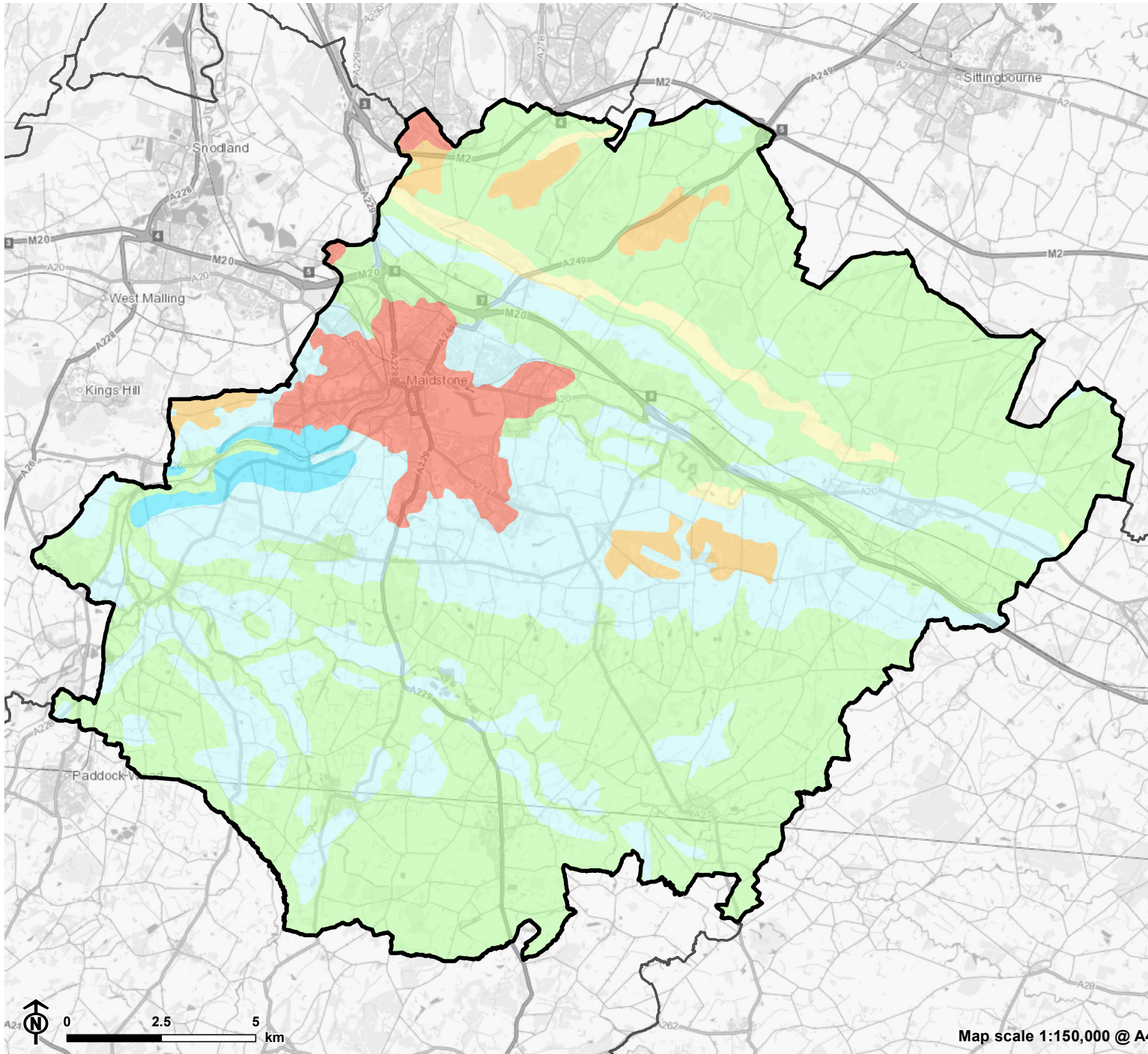


-  Maidstone Borough
-  Neighbouring Local Authority Boundary
-  Safeguarded Minerals Site
-  Minerals Safeguarding Area

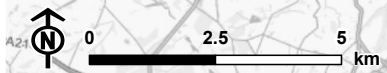
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Map scale 1:150,000 @ A4

**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.183 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.184 National Planning Policy Framework (NPPF)<sup>250</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.185 National Planning Practice Guidance (PPG)<sup>251</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.186 Climate Change Act 2008<sup>252</sup>:** Sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO2 emission reductions of at least 26% by 2015, against a 1990 baseline.

**B.187 Planning and Energy Act (2008)<sup>253</sup>:** enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

**B.188 Flood and Water Management Act (2010)<sup>254</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.189 The Energy Performance of Buildings Regulations<sup>255</sup>** seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

**B.190 The UK Renewable Energy Strategy<sup>256</sup>:** Sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

**B.191 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK<sup>257</sup>:** Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by

<sup>250</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)

<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 (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>253</sup> HM Government (2008) Climate Change Act 2008:

[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>254</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>255</sup> HM Government (2021) *The Energy Performance of Buildings Regulations*

<sup>256</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>257</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)

implementing 21st century energy management initiatives on 19th century homes.

**B.192 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy<sup>258</sup>:** sets out a five point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

**B.193 UK Climate Change Risk Assessment 2017<sup>259</sup>:** sets out six priority areas needing urgent further action over the next five years. These include:

- flooding and coastal change risks to communities, businesses and infrastructure,
- health, well-being and productivity from high temperatures,
- shortages in public water supply, and for agriculture, energy generation and industry with impacts on freshwater ecology,
- natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity,
- domestic and international food production and trade and
- new and emerging pests and diseases and invasive non-native species affecting people, plants and animals.

**B.194 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate<sup>260</sup>:** Sets out visions for the following sectors:

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

address the risks and make the most of the opportunities of a changing climate.”

- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

**B.195 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England<sup>261</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.196 A Green Future: Our 25 Year Plan to Improve the Environment<sup>262</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

<sup>258</sup> HM Government (2009) *The UK Low Carbon Transition Plan* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228752/9780108508394.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228752/9780108508394.pdf)

<sup>259</sup> HM Government (2017) *UK Climate Change Risk Assessment 2017* [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assessment-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assessment-2017.pdf)

<sup>260</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/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)

<sup>261</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>262</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)

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.

**B.197 The Flood and Water Management Act 2010<sup>263</sup> and The Flood and Water Regulations<sup>264</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). **Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England<sup>265</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.

### Sub-national

**B.198 Kent Environment Strategy<sup>266</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.199 Growing the Garden of England: A strategy for environment and economy in Kent<sup>267</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:
  - 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.200 Low Emission Strategy (December 2017)<sup>268</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

<sup>263</sup> HM Government (2010) *Flood and Water Management Act*

<sup>264</sup> HM Government (2019) *The Flood and Water Regulations*

<sup>265</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>266</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>267</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>

<sup>268</sup> Maidstone Borough Council (2017) *Low Emission Strategy* [online] Available at:



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.201 Green and Blue Infrastructure Strategy<sup>269</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.202 Mitigating and adapting to climate change.**

**B.203 Thames River Basin Management Plan 2009 (Updated December 2015)<sup>270</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.204 Maidstone Borough Council Draft Climate Change Strategy/Action Plan (TBC)<sup>271</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.205** 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.206** 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>272</sup>. Specifically

- Under medium emissions, the increase in winter mean temperature is estimated to be 2.2°C; it is unlikely to be less than 1.1°C and is very unlikely to be more than 3.4°C.
- Under medium emissions, the increase in summer mean temperature is estimated to be 2.8°C; it is unlikely to be less than 1.3°C and is very unlikely to be more than 4.6°C.

**B.207** 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.208** 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

[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>269</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>270</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/u>

[ploads/attachment\\_data/file/718342/Thames\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](ploads/attachment_data/file/718342/Thames_RBD_Part_1_river_basin_management_plan.pdf)

<sup>271</sup> Maidstone Borough Council (TBC) Draft Climate Change Strategy/Action Plan

<sup>272</sup> UK Climate Projections (2018) Land Projections Maps: Probabilistic Projections [online] Available at:

<https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>

confluence of these tributaries with the River Medway. The risk of flooding could be intensified due to climate change.

**B.209** 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>273</sup>.

**B.210** 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>274</sup>.

**B.211** 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>275</sup>.

**B.212** Figure B6 shows areas at risk of flooding in the borough, based on current Environment Agency flood zones.

**B.213** 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>276</sup>.

**B.214** 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>277</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>273</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>

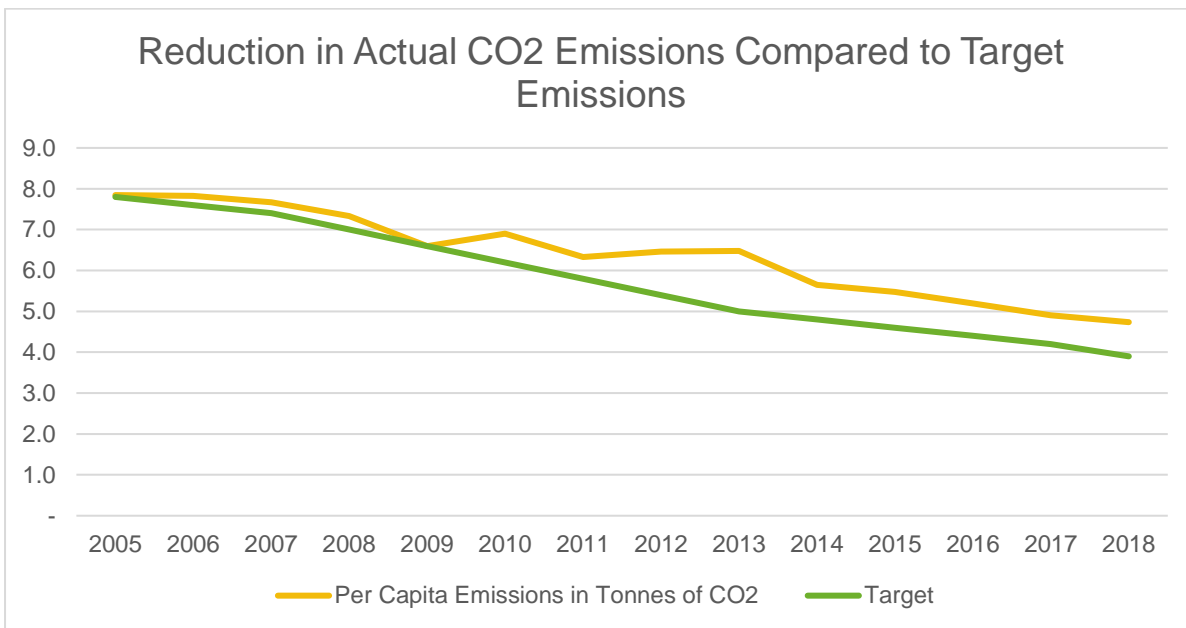
<sup>274</sup> Maidstone Borough Council and JBA Consulting (2020) Level 1 Strategic Flood Risk Assessment update and Level 2 – Final Report [online] Available at: <https://localplan.maidstone.gov.uk/home/documents/local-plan-review-documents/lpr-evidence/7-SFRA-Level-1-update-and-Level-2.pdf>

<sup>275</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>276</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>277</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)



**B.215** For the year 2005 Maidstone had an average rate of 7.8 tonnes of CO2 emissions per capita, however in 2016 the rate decreased to 5.1 tonnes per capita. Table 6.1 shows CO2 (kilotonne) emissions for Maidstone for 2005 and 2018 across

industrial, domestic and transport sectors. As can be seen in Table B.8, there has been a reduction between 2005 and 2018 across all sectors and transport accounts for the largest amount of CO2 emissions<sup>278</sup>.

**Table B.8: CO2 emissions in Maidstone (shown as kt)**

Year	Industrial and Commercial	Domestic	Transport	Total
2005	342.9	359.0	451.2	1,114.2
2016	211.5	250.8	427.2	843.0
2018	190.1	238.1	419.3	804.9

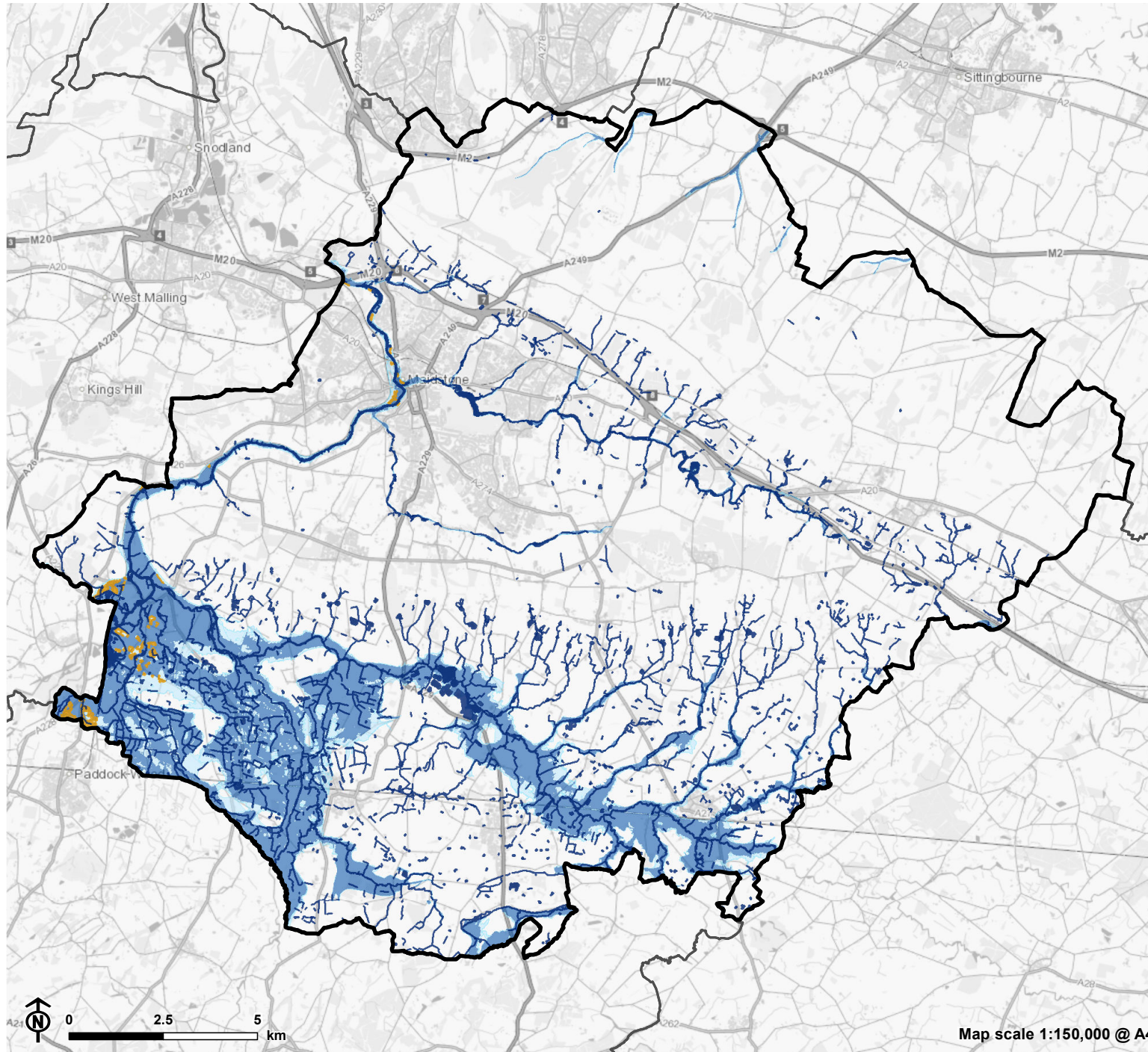
<sup>278</sup> UK Local Authority and Regional Carbon Dioxide Emissions National Statistics: 2005-2018 Available at:

<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

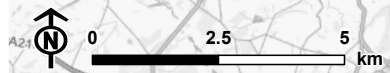
**Table B.10: Key sustainability issues for Maidstone and likely evolution without the Local Plan Review**

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

**B.217 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.218 International Convention on Biological Diversity** (1992): International commitment to biodiversity conservation through national strategies and action plans.

**B.219 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.220 National Planning Policy Framework (NPPF)**<sup>279</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.221 National Planning Practice Guidance (PPG)**<sup>280</sup>: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

**B.222 Wildlife and Countryside Act 1981**<sup>281</sup> provides protection of wildlife, countryside and National Parks.

**B.223 The Conservation of Habitats and Species Regulations**<sup>282</sup> protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

**B.224 England Biodiversity Strategy Climate Change Adaptation Principles**<sup>283</sup>: sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these.

**B.225 Natural Environment and Rural Communities Act 2006**<sup>284</sup>: Places a duty on public bodies to conserve biodiversity.

**B.226 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services**<sup>285</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.227 Biodiversity Offsetting in England Green Paper**<sup>286</sup>: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

<sup>279</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)  
<sup>280</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>281</sup> HM Government (1981) Wildlife and Countryside Act 1981. [online] Available at: <https://www.legislation.gov.uk/ukpga/1981/69>  
<sup>282</sup> HM Government (2019) The Conservation of Habitats and Species Regulations  
<sup>283</sup> Department for Environment, Food and Rural Affairs (2008) *The England Biodiversity Strategy Climate Change Adaptation Principles* [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69270/pb13168-ebs-ccap-081203.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69270/pb13168-ebs-ccap-081203.pdf)  
<sup>284</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>285</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>286</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)

**B.228 A Green Future: Our 25 Year Plan to Improve the Environment**<sup>287</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; 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.229 Kent Biodiversity 2020 and Beyond – a Strategy for the Natural Environment 2015-2025**<sup>288</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 sustainable 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.230 Kent Environment Strategy**<sup>289</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.231 A Living Landscape for the South East**<sup>290</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.232 Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019**<sup>291</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

<sup>287</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>288</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>289</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>290</sup> The South East Wildlife Trusts (2006) A Living Landscape for the South East [online] Available at: <https://assets.sussexwildlifetrust.org.uk/Files/alivinglandscapeforthesoutheast.pdf>

<sup>291</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)





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

**B.239** The Borough also contains a large number of locally designated wildlife sites, including four Local Nature Reserves (LNR) and 59 Local Wildlife Sites (LWS). It also contains 2,828 hectares of woodland (7.19% of the overall area), of which 85% is Ancient Woodland. The South East has approximately 40% of the ancient woodland in England, but this valuable resource is increasingly under threat from development pressures since it is a densely populated region<sup>299</sup>.

**B.240** 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.241** 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>300</sup>

**B.242** Figure B7 shows the biodiversity designations in the borough.

**B.243** 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>301</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>299</sup> Weald and Downs Ancient Woodland Survey (2012) A revision of the Ancient Woodland Inventory for Maidstone borough, Kent [online] Available at:

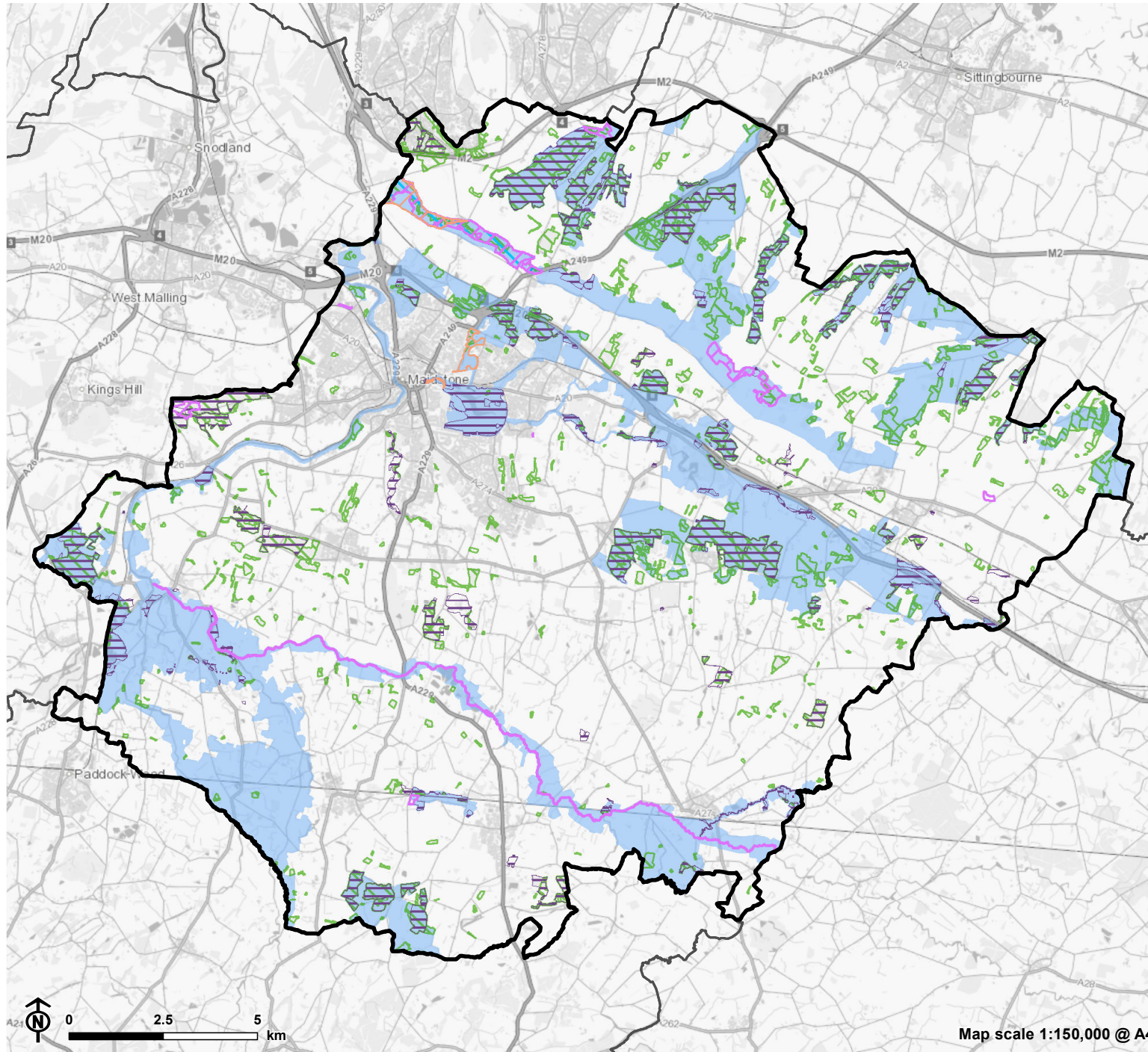
[https://www.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0015/12084/Maidstone-Ancient-Woodland-Inventory-2012.pdf](https://www.maidstone.gov.uk/__data/assets/pdf_file/0015/12084/Maidstone-Ancient-Woodland-Inventory-2012.pdf)

<sup>300</sup> Maidstone Borough Council (2016) Green and Blue Infrastructure Strategy [online] Available at:

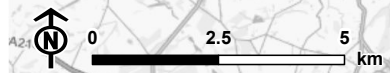
[https://old.maidstone.gov.uk/\\_\\_data/assets/pdf\\_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf](https://old.maidstone.gov.uk/__data/assets/pdf_file/0010/9874/Green-and-Blue-Infrastructure-Strategy-June-2016.pdf)

<sup>301</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



Map scale 1:150,000 @ A4

## Historic environment

### Policy context

#### International

**B.244 United Nations (UNESCO) World Heritage Convention (1972)** promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

**B.245 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.246 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)**<sup>302</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.247 National Planning Policy Framework (NPPF)**<sup>303</sup>: Plans should "set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a. *the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b. *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*

- c. *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d. *opportunities to draw on the contribution made by the historic environment to the character of a place."*

**B.248 National Planning Practice Guidance (PPG)**<sup>304</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.249 Ancient Monuments & Archaeological Areas Act 1979**<sup>305</sup>: a law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

**B.250 Planning (Listed Buildings & Conservation Areas) Act 1990**<sup>306</sup>: An Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

**B.251 Historic Buildings and Ancient Monuments Act 1953**<sup>307</sup>: An Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

**B.252 The Government's Statement on the Historic Environment for England 2010**<sup>308</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

<sup>302</sup> Council of Europe (1992) Valletta Treaty [online] Available at: <https://rm.coe.int/168007bd25>

<sup>303</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)

<sup>304</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>305</sup> HM Government (1979) *Ancient Monuments & Archaeological Areas Act*. [https://consult.environment-](https://consult.environment-agency.gov.uk/engagement/bostonbarriertwo/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf)

[agency.gov.uk/engagement/bostonbarriertwo/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf](https://consult.environment-agency.gov.uk/engagement/bostonbarriertwo/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf).

<sup>306</sup> HM Government (2002) *Planning (Listed Buildings & Conservation Areas) Act (1990)*: [http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga\\_19900009\\_en.pdf](http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf).

<sup>307</sup> HM Government (1953) *Historic Buildings and Ancient Monuments Act 1953* [online] Available at: <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>

<sup>308</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>

response to climate change and the wider sustainable development agenda.

**B.253 The Heritage Statement 2017<sup>309</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.254 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8<sup>310</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.255 The Kent Design Guide<sup>311</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 developments where people really want to live, work and enjoy life.

**B.256 Strategic Plan 2015-2020 Action Plan<sup>312</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.257 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.258 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.259 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.260** A complete updated version of the action plan is expected to be released February 2019.

**B.261 Medway Valley Strategic Landscape Enhancement Plan (2015)<sup>313</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.

<sup>309</sup> Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017 [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/664657/Heritage\\_Statement\\_2017\\_\\_final\\_-\\_web\\_version\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017__final_-_web_version_.pdf)

<sup>310</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>311</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>312</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>313</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>

- 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.262** 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>314</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.263** There are 41 Conservation Areas throughout the borough, mainly focused around traditional settlement centres<sup>315</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>316</sup>

**B.264** 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>317</sup>.

**B.265** Maidstone Borough contains 5 sites included on the national Register of Historic Parks and Gardens<sup>318</sup>:

<sup>314</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>315</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>316</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>317</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>318</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)

- Leeds Castle.
- Linton Park.
- Boughton Monchelsea Place.
- Chilston Park.
- Mote Park.

**B.266** The Borough's designated heritage assets are shown in Figure B8.

**B.267** There are 13 entries for Maidstone on the 'heritage at risk' register; this is an increase of 1 since 2011/12<sup>319</sup>. The 13 entries consist of a mix of Scheduled Monuments, Conservation Areas and Listed Buildings<sup>320</sup>.

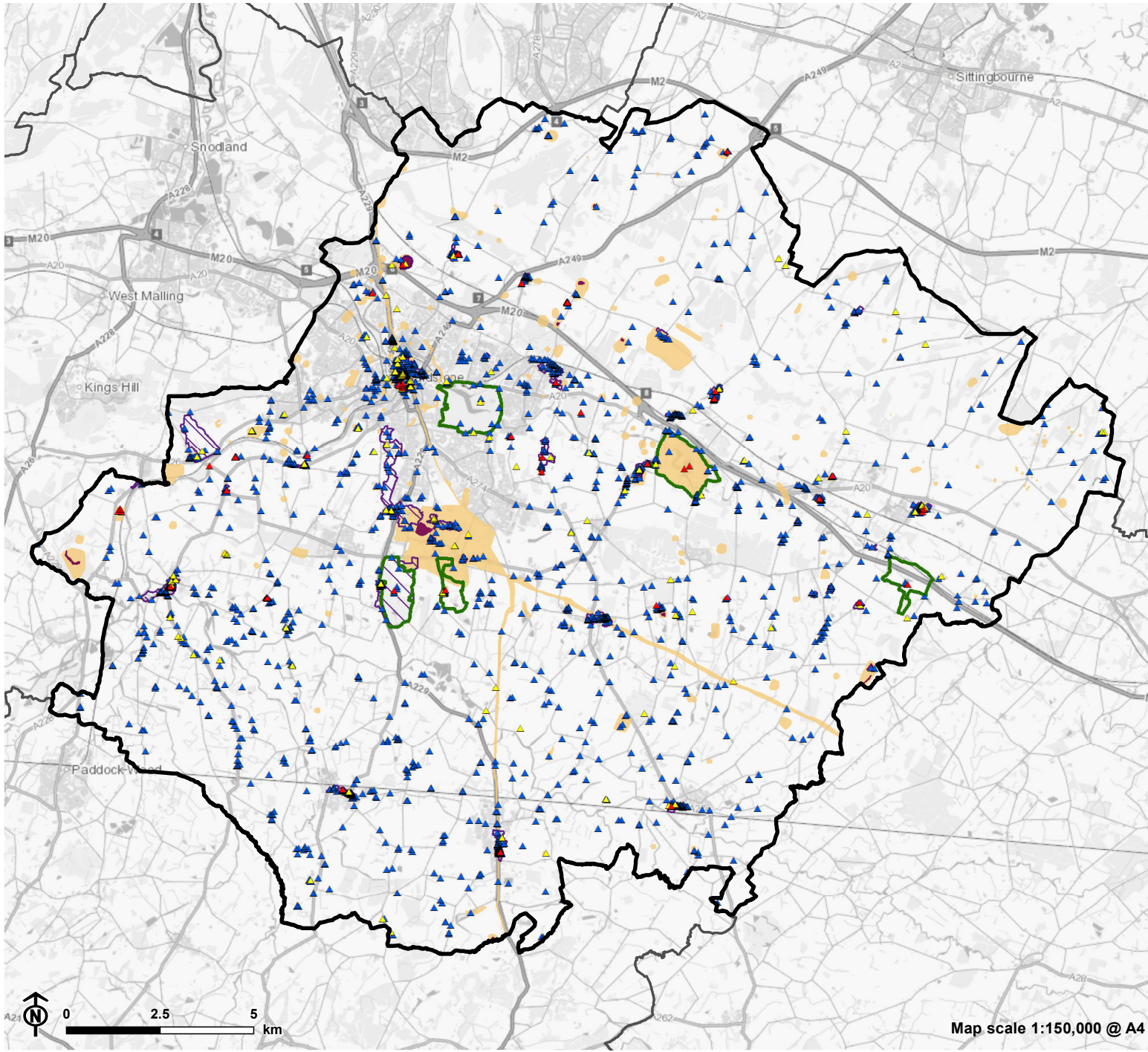
**Table B.12: Key sustainability issues for Maidstone and likely evolution without the Local Plan Review**

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.

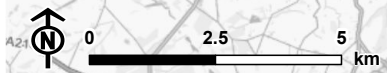
<sup>319</sup> Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: <https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports>

<sup>320</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.268 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.269 National Planning Policy Framework (NPPF)<sup>321</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.270 National Parks and Access to the Countryside Act 1949<sup>322</sup>:** An Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

**B.271 Countryside and Rights of Way Act 2010<sup>323</sup>:** An Act of Parliament to make new provision for public access to the countryside.

**B.272 England National Parks and the Broads: UK Government Vision and Circular 2010<sup>324</sup>:** provides updated policy guidance on the English National Parks and Broads. It also sets out a vision for 2030 and the key outcomes the Government is seeking over the next five years to ensure early progress towards the vision.

**B.273 A Green Future: Our 25 Year Plan to Improve the Environment<sup>325</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.274 Draft South East Marine Management Plan (2020)<sup>326</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.275 Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019<sup>327</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.276 Kent and Medway Growth and Infrastructure Framework (GIF) update 2018<sup>328</sup>:** Provides a view of

<sup>321</sup> Ministry of Housing, Communities and Local Government (February 2021) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004408/NPPF\\_JULY\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004408/NPPF_JULY_2021.pdf)

<sup>322</sup> HM Government (1949) *National Parks and Access to the Countryside Act 1949* [online] Available at: <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>

<sup>323</sup> HM Government (2010) *Countryside and Rights of Way Act 2010* [online] Available at:

<https://www.legislation.gov.uk/ukpga/2000/37/section/85>

<sup>324</sup> Department for Environment, Food and Rural Affairs (2010) *English National Parks and the Broads UK Government Vision and Circular 2010* [online] Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221086/pb13387-vision-circular2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)

<sup>325</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>326</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>327</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>328</sup> Kent County Council (2018) *Kent and Medway Growth and Infrastructure Framework* [online] available at:



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.277 Maidstone Borough Local Plan Infrastructure Delivery Plan (May 2016)**<sup>329</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.278 Green and Blue Infrastructure Strategy**<sup>330</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:

- Promoting a distinctive townscape and landscape.
- Providing opportunities for sport, recreation, quiet enjoyment and health.

**B.279 Maidstone Green and Blue Infrastructure Strategy: Action Plan**<sup>331</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.280 Medway Valley Strategic Landscape Enhancement Plan (2015)**<sup>332</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.281** 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>333</sup>.

**B.282** 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>334</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

[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>329</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>330</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>331</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=%2BdXJsPWh0dHBzJTnBJTJGJTJGbvWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1O](http://www.maidstone.gov.uk/home/primary-services/council-and-democracy/additional-areas/contact-your-parish-council?sq_content_src=%2BdXJsPWh0dHBzJTnBJTJGJTJGbvWVldGluZ3MubWFpZHN0b25lLmdvdi51ayUyRmRvY3VtZW50cyUyRnM1O)

[DizMiUyRkFwcGVuZGI4JTlwMSUyMEdCSVN0cmF0ZWd5QWN0aW9uUGxhbWlMTcucGRmJmFsbD0x](http://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

<sup>332</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/MV-SLEP-Complete-FINAL-Low-Res-27.03.151.pdf>

<sup>333</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>334</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)

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, gill woodlands and streams, hedgerows, heathlands, exposed sand rock faces, parklands and ponds.

**B.283** 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>335</sup>.

**B.284** 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>336</sup>.

**B.285** 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>337</sup>.

**B.286** 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>338</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.287** Maidstone has started the process of applying to change one of the Landscapes of Local Value, the 'Greensands Ridge,' to an AONB<sup>339</sup>.

<sup>335</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>336</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>337</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)

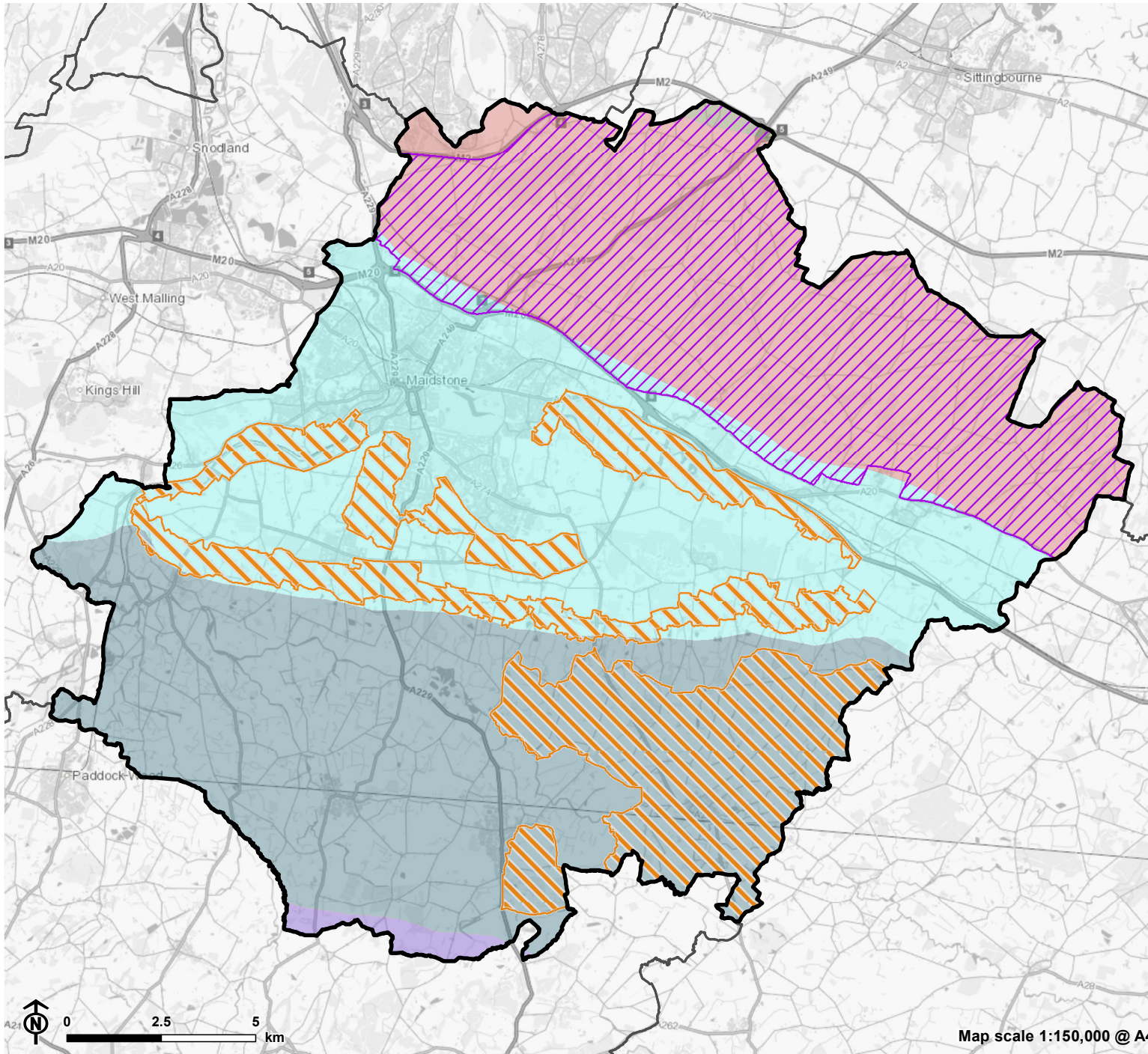
<sup>338</sup> The National Association Areas of Outstanding Natural Beauty, Kent Downs AONB Available at: <http://www.landscapesforlife.org.uk/about-aonbs/visit-aonbs/kent-downs-aonb/>

<sup>339</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>

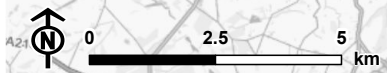
**Table B.13: Key sustainability issues for Maidstone and likely evolution without the Local Plan Review**

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



Map scale 1:150,000 @ A4

## Appendix C

### SA of options – detailed findings

This appendix details the SA findings for the reasonable alternatives to the Local Plan considered by the Council at various stages in the plan making process.

**C.1** Reasonable alternatives (or options) were considered by the Council during the preparation of the Local Plan Review for a number of different elements of the plan. At each stage in the plan preparation process, the reasonable alternatives were subject to SA and the findings presented in earlier SA Reports published alongside consultations on the Local Plan Review. For completeness and to meet the SEA Regulations reporting requirements, the SA findings are re-presented in this Appendix for the options identified in relation to the following Local Plan elements:

- **Total amount of housing development** (assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report, November 2020).
- **Initial spatial strategy options** (assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report, November 2020 drawing on appraisal of Spatial Approaches carried out in summer 2020 and presented in the Topic Paper Options SA Report, August 2020).
- **Refined spatial strategy options** (assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report, November 2020).
- **Garden settlement options** (assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report, November 2020).
- **Site allocation options** (assessed during autumn 2020 and presented in the Options for Spatial Strategy, Site Allocations and Garden Settlements SA Report, November 2020).

- **Additional options from Council topic papers**  
(assessed during summer 2020 and presented in the Topic Paper Options SA Report, August 2020).

**C.2** For each set of options (except the topic paper policy approach options) the SA findings are summarised by SA objective. It should be noted that as these option appraisals were carried out at earlier stages in the plan preparation process, they present the SA findings at the time the options were appraised. As such, references to other evidence documents (e.g. SHMA, SLAA) are to the versions of those documents available at that time and have not been updated.

**C.3** The appraisal criteria used in the appraisal of site options are also presented in **Table C2** (residential sites) and **Table C4** (employment sites).

## Appraisal of the total amount of housing development

**C.4** This section provides a detailed description of the SA findings for the total amount of development. A summary of these findings, including a table of the sustainability scores, and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4**.

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

**C.5** The housing quantum identified has been objectively calculated using the Standard Method as set out in the Planning Practice Guidance. 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, result in significant positive effects in relation to this SA objective.

**C.6** The policies for the quantum of affordable housing and tenure mixes are not yet known. Similarly, policies relating to the design of new homes have not been prepared at this stage. It is possible that when these are submitted for SA that there may be a change to this assessment.

#### Mitigation

**C.7** No negative effects identified therefore no mitigation required.

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

**C.8** Matters relating to access arise in general from the distribution of homes and design of development rather than the overall quantum proposed. This section of the SA relates solely to the total housing quantum and therefore it was not considered appropriate to appraise this against this SA objective.

#### Mitigation

**C.9** Not applicable.

### SA Objective 3: To strengthen community cohesion

**C.10** The provision of the full objectively assessed need in accordance with the Standard Method as set out in the Planning Practice Guidance is intended to result in increased delivery of homes and an overall improvement in the affordability of housing. It is considered that should these objectives be achieved, there will be significant positive effects

in relation to community cohesion, as the delivery of new homes will enable families and communities to grow.

**C.11** Having said this, there may be some who hold negative views about new development, as it is likely to increase in localised traffic increases and demand on services and facilities, resulting in reduced community cohesion and subsequently minor negative effects are also identified. As such, mixed effects are anticipated overall.

**C.12** It should be noted that once policies relating to the dwelling size mix and tenures are available, this may result in changes to this assessment.

#### Mitigation

**C.13** Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that existing services and facilities do not feel additional pressure in the short term.

**C.14** 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. In this regard, it is notable that current Community Infrastructure Levy (CIL) arrangements in the Borough allow 15% or 25% of CIL receipts from liable development in a local area to be spent on non-strategic infrastructure in the local community.

**C.15** Large new communities should be planned and design-in community cohesion principles from the outset.

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

**C.16** Matters relating to health and wellbeing are related to the location of homes in terms of access to opportunities to live healthier lifestyles and receive medical attention. This section of the SA relates solely to the total housing quantum and therefore it is not considered appropriate to appraise this against this SA objective.

#### Mitigation

**C.17** Not applicable.

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

**C.18** The SHMA sets out that the provision of the housing requirement calculated is projected to result in approximately 48,000 new residents in Maidstone and increase in the available workforce of 25,000 persons. This increase in the labour source is likely to lead to very positive economic benefits and as such significant positive effects are anticipated in relation to this SA objective.

### Mitigation

**C.19** No negative effects identified therefore no mitigation required.

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

**C.20** Maidstone town centre is the main centre in the Borough and provides the most significant concentration of facilities, services and employment opportunities. The provision of additional homes in Maidstone Borough, regardless of their location, is likely to lead to an increase in the number of people accessing Maidstone town centre and therefore minor positive effects are anticipated in relation to this SA objective.

### Mitigation

**C.21** No negative effects identified therefore no mitigation required.

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

**C.22** Matters relating to the need to travel and use of more sustainable forms of transport arise in general from the distribution of homes rather than the overall quantum proposed. This section of the SA relates solely to the total housing quantum and therefore it is not considered appropriate to appraise this against this SA objective.

### Mitigation

**C.23** Not applicable.

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

**C.24** Approximately half of the Borough is designated as Mineral Safeguarding Areas (MSAs) in the Kent Minerals and Waste Local Plan. Economic land-won minerals that are identified for safeguarding in Kent are sharp sand and gravel, soft sand, silica sand, crushed rock, building stone and brickearth.<sup>340</sup>

**C.25** Although potential conflicts between housing sites and mineral resources will be determined by the distribution of housing, high incidence of mineral resources considered appropriate for safeguarding suggests that there is likely to be a degree of conflict between mineral resources and housing sites, albeit the extent of this is not known at this time. This is considered likely to result in the potential sterilisation of some

mineral resources. As such, minor negative effects are anticipated in relation to this SA objective.

### Mitigation

**C.26** Consideration should be given to preparing Local Plan Review policies which seek to safeguard mineral resources through methods such as prior extraction and development phasing, and avoidance of developing on land with mineral resources. Such policies would reduce the potential for negative effects.

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

**C.27** Maidstone Borough contains a mix of different soils. 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 .

**C.28** The coverage of soils identified as Grade 1, 2 or 3 is significant, and appears to be over 75% on visual inspection of the relevant GIS data.

**C.29** Although potential conflicts between housing sites and good quality soil will be determined by the distribution of housing, high coverage of good quality soils suggests that there is likely to be a degree of conflict between these and housing sites. This is considered likely to result in the potential loss of these good quality soils. As such, minor negative effects are anticipated in relation to this SA objective. The likely effects on soils of different spatial distributions of development are separately considered in the appraisals of spatial strategy and site allocation options.

### Mitigation

**C.30** Consideration should be given to preparing Local Plan Review policies which seek to safeguard high quality soils through methods such as giving preference to brownfield sites and poorer quality agricultural land. Such policies would reduce the potential for negative effects.

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

**C.31** The Medway Catchment, which becomes a tidal estuary in Maidstone, has an extensive network of tributaries including the Beult, Eden, Len, and Teise. 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>340</sup> Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30



**C.32** Pressures related to the provision of water supply and wastewater treatment are key contributors to the current status and future status of water bodies in Kent.

**C.33** The Kent Environment Strategy (2016) identifies Kent as one of the driest regions in England and Wales, and the household water use is above the national average. This is also the case for Maidstone, where water use is on average 164 litres per person per day (compared to the national average of 154). The Environment Agency classifies areas of England and Wales according to their water stress and Maidstone Borough falls within the South East Water supply area, which is classified as an area of 'serious water stress'.

**C.34** 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. In reflection of this, source protection zones (SPZs), which are areas designated to protect groundwater sources used for public drinking water supply, have been designated primarily in a band running along the north-eastern boundary of Maidstone Borough Council area. Drinking Water Safeguard Zones have also been defined and cover almost all of the council area (apart from, in general, the area covered by the source protection zones). These 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 protection and safeguarding zones demonstrate that whole borough is under pressure in relation to water quality.

**C.35** Negative effects to available water resources and to water quality may arise if abstraction is increased to serve new development. As water quality is currently considered to be moderate in relation to ecology for most water courses in the catchment, there is potential for these effects to be significant, however it is possible that mitigation measures proposed in future iterations of the Local Plan Review may amend this appraisal outcome.

#### Mitigation

**C.36** An updated water cycle study to assess the likely implications of growth proposed in the Local Plan Review and its likely implications for water demand and quality may allow the most significant effects to be identified and mitigated.

**C.37** A rationalisation of current abstraction may be able to reduce the amount of water utilised.

**C.38** Consideration should be given to waste water treatment distribution and capacity as improvements to this may help to reduce negative effects.

**C.39** Water saving measures such as water efficient fittings and rainwater / grey water harvesting have the potential to reduce negative effects.

**C.40** The inclusion of green and blue infrastructure and sustainable drainage systems in development to help prevent pollution of natural water sources and increase infiltration is recommended.

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

**C.41** . 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.

**C.42** The provision of new housing is, given existing travel patterns in Maidstone, likely to result in increased road traffic. This is likely to result in localised reductions in air quality as traffic levels increase and congestion increases. It is possible that there may also be increases in traffic within the AQMAs themselves given the attractiveness of Maidstone as a destination for borough residents and as such, negative effects are anticipated. These are subject to uncertainty this as it is not known how people will choose to travel or the route / form of transport that they will take .

#### Mitigation

**C.43** Identification of allocations, development layouts and provision of sustainable travel opportunities to discourage use of the private car, especially petrol/diesel vehicles, and support a shift to zero/low pollution transport modes (e.g. walking, cycling, electric vehicles). Provision of green infrastructure alongside roads to help to reduce air quality issues associated with traffic from new development.

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

**C.44** 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.

**C.45** Large areas of the borough are designated as Flood Zone 2 or 3, and as having a 1:30 year risk of surface water flooding. There are also large areas of the borough which are identified as being at risk of ground water flooding.

**C.46** Although the potential conflicts between areas which are identified as being at risk of flooding and housing will be affected by the distribution of housing rather than the overall quantum, and therefore cannot be assessed a total housing figure. There are some general principles which can be considered. Specifically, that there will be increased hardstanding as a result of new development which may result in increased localised flood risk. In addition, there may be increased provision of homes within Flood Zone 2, which although acceptable in accordance with the NPPF and planning practice guidance, still results in a greater risk of flooding to the general public.

**C.47** As such, minor negative effects are anticipated from housing provision in relation to this SA objective.

#### Mitigation

**C.48** Avoid development within Flood Zones 2 and 3, where appropriate and in accordance with the sequential and exception tests. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could be achieved through various mechanisms, such as S106 agreements.

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

**C.49** Aspects to consider in relation to this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors depend on development management policies and cannot be assessed as part of the appraisal of a housing total.

**C.50** Having said this, there are some general principles which arise from housing development which are relevant. These are considered below.

**C.51** The process of development, including matters such as sourcing of construction materials, site clearance, construction activity, utility provision, waste transportation, employee transportation results in increased greenhouse gas emissions. Once that development is occupied, natural resources are utilised to generate electricity and heat, and products are

made to make the homes liveable, which also, in turn, result in increased greenhouse gas emissions.

**C.52** Furthermore, there will inevitably be an increase in the use of motorised vehicles to access the new homes provided, also resulting in increased greenhouse gas emissions.

**C.53** It is therefore inevitable that delivery of new housing will result in increased carbon emissions and a potential for significant negative effects in relation to this SA objective.

#### Mitigation

**C.54** Local plan review policies seeking to reduce greenhouse gas emissions from new development using design, energy efficiency and renewable energy are likely to help reduce negative effects.

**C.55** In addition, the provision of a development distribution, development layout and public transport network that seeks to reduce greenhouse gas emissions by promoting use of sustainable forms of travel in accordance with the travel hierarchy published by the Energy Saving Trust would help to reduce negative effects.

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

**C.56** 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. Furthermore, outside 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.

**C.57** Whilst the key effects relating to wildlife, habitats and species will arise from the specific distribution of housing development, there are some general principles which arise from housing development which are relevant. These are considered below.

**C.58** The delivery of new homes can result in the loss of localised habitat and habitat fragmentation. Although a net gain in biodiversity is required by the NPPF, this is limited to the impacts on site, and there are wider impacts such as pet predation, increased traffic, increased pollution and demand for resources which are likely to have negative effects in relation to biodiversity.

**C.59** The extent of the effects is not known at present however in recognition that MBC declared a biodiversity emergency in April 2019, it is considered that these have the potential to be significant negative.

#### Mitigation

**C.60** Local Plan Review development management policies seeking to ensure that new development is undertaken in a manner that safeguards and strengthens existing priority habitats and all species would help to reduce negative effects.

**C.61** In addition, the distribution, layout and design of development to integrate habitat and development in a manner which provides benefits to wildlife and opportunities for people to interact with it, for example, through the provision of green infrastructure are likely to reduce negative effects.

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

**C.62** 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 .

**C.63** Whilst the key effects relating to the Boroughs historic environment will arise from the specific distribution of housing development, there are some general principles which arise from housing development which are relevant. These are considered below.

**C.64** Given that there is a large coverage of historic environment assets in the borough, including in and around existing urban areas which are likely to be attractive housing sites (given the other sustainability benefits that these may bring in terms of access to facilities and services) the delivery of housing is likely to affect heritage impacts as a result of development within them (this is most relevant for an area designation such as a conservation area) or within the setting of a heritage asset. Although less than substantial harm may be achieved in the significant majority (if not all) of cases, there is still the potential for some harm to occur. There may also be instances where substantial harm is considered appropriate.

**C.65** As such negative effects are considered possible. The extent of these effects is unknown however given that designated historic environment assets are strongly protected by the NPPF and planning legislation, it is considered likely that these effects will be minor negative as a result of housing development in general. Although there is the potential to

affect non-designated assets, the fact that these are not designated is not considered likely to result in a more significant effect.

#### Mitigation

**C.66** Local Plan Policies which protect designated and non-designated heritage assets, including their setting would help to reduce potential negative effects.

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

**C.67** Just over a quarter of the Borough (the northern part) 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 out in the Council's landscape capacity study. 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).

**C.68** Whilst the key effects relating to landscape impacts will arise from the specific distribution of housing development, there are some general principles which arise from housing development which are relevant. These are considered below.

**C.69** The development of greenfield areas for new housing can result in a significant change in the interpretation and aesthetic of the immediate landscape. Given that the majority of the borough is identified as being high or very high sensitivity to landscape change, it is considered likely that negative effects will occur. The extent of these effects is unknown and therefore in accordance with the precautionary principle, significant negative effects are identified. However there is uncertainty about this as effects will be informed by the location, design, form and landscaping of new development.

#### Mitigation

**C.70** Local Plan Review development management policies seeking to ensure that new development is undertaken in a manner that safeguards landscape character would help to reduce negative effects, for example avoiding the most sensitive areas.

## Appraisal of initial spatial strategy options

**C.71** This section provides a detailed description of the SA findings for the initial spatial strategy options. A summary of these findings, including a table of the sustainability scores, and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4**.

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

**C.72** 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>341</sup>. The SHMA (December 2019) calculated that the standard method would result in a need for 1,214 dwellings per annum from 2022. Over the Plan period, the population of the Borough is expected to grow by 28% with the strongest growth expected in those aged over 65. Overall, the total affordable housing need for the Borough equates to 38% of the total housing need and there is a need for different types of homes in both the market and affordable sectors. According to the SHMA, 52% of residents living in the rural areas of the Borough and 48% of residents within the urban areas of Maidstone are unable to afford market housing (without subsidy).

**C.73** New development would be more widely distributed under option RA1 (Local Plan Review Continued) than under the other spatial strategy options as it is expected to be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, significant positive effects are expected as there is the potential for more people across the Borough to have the opportunity to live in a decent and affordable home compared to the other options. However, if these developments are of a smaller scale, they may not be as well placed to deliver affordable housing as part of the development mix, resulting in a minor negative effect as well.

**C.74** Option RA1a (No Maidstone) is expected to provide sufficient housing primarily through the development of four garden settlements, with residual development at Rural Service Centres and Larger Villages. As such it is likely that most development will be within the rural areas of the Borough. Therefore, this option could result in one or more

garden settlements and extensions to Rural Service Centres and Larger Villages providing affordable housing within these rural areas. However, garden settlements would entail the creation of relatively large settlements compared to smaller rural villages, and this option would not deliver housing at Maidstone. In addition, the creation of a garden settlement will require significant investment in new infrastructure, which may reduce the funds available to cross-subsidise the delivery of affordable homes from the sale of market housing and may divert investment from other parts of the Borough. Garden settlements can also take a long time to deliver, which means that homes, including affordable homes, would not be provided for in the early years of the plan period. However, housing attached to Rural Service Centres and Larger Villages could be delivered at a quicker pace than garden settlements. As a result, mixed significant positive and significant negative effects are considered likely for this option.

**C.75** Since option RA2a (Maidstone + 4 Garden Settlements) is focused primarily on the town centre, urban extensions of Maidstone and four garden settlements, the rest of the Borough would not benefit from significant amounts of additional housing thereby creating minor negative effects for these existing communities, and continuing to exacerbate the current higher rural housing price pattern. Given that Maidstone is the primary focus in the Borough of existing infrastructure, services and facilities, there may be less need to cross-subsidise further investment, allowing for greater funding for affordable housing provision resulting in significant positive effects. However, the standard of infrastructure and service provision in Maidstone town centre is currently relatively poor, therefore a decision may need to be made about the extent to which market housing delivery is used to support improvement of this offer rather than delivering affordable housing. Town centre sites are likely to be brownfield and these can be relatively costly to develop compared to greenfield sites, if demolition of existing structure and hard standing is required, and even more so if remediation of contaminated land is needed. The development of four garden settlements will require significant investment in new infrastructure, which may reduce the funds available to cross-subsidise the delivery of affordable homes from the sale of market housing and may divert investment from other parts of the Borough. Garden settlements can also take a long time to deliver, which means that homes, including affordable homes, would not be provided for in the early years of the plan period. Therefore, uncertainty is attached to these potential significant positive effects.

<sup>341</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)

## Mitigation

**C.76** The quality of homes provided under any of the options could be ensured through suitable policies in the Local Plan Review relating to, for example, room sizes, sustainable design and construction, lifetime homes standards, and energy efficiency. In addition, for larger developments, it may be possible to introduce design codes for developers to adhere to, ensuring not only the resource efficiency of homes, but also space and access requirements, lighting, and their style and character to complement the local vernacular.

**C.77** The provision of affordable housing can be achieved through various mechanisms, such as S106 agreements. Larger developments are generally more likely to be able to deliver affordable homes on site.

## Conclusion

**C.78** Option RA1 (Local Plan Review Continued) performs most strongly against this SA objective, primarily it would be delivering most development where services and facilities already exist, thereby ensuring that there is the greatest potential for delivering affordable homes alongside market housing. In addition, it would allow the additional affordable housing to be delivered where the greatest need for it exists – the rural area. However, options RA1a and RA2a offer considerable potential in the longer term assuming that investment in new infrastructure, services and facilities would allow enough headroom to also cross-subsidise the provision of affordable homes.

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

**C.79** The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area<sup>342</sup>. As the County town and the dominant settlement in the Borough, Maidstone itself has a much wider range and number of services and facilities than elsewhere in the Borough. For example, outside of Maidstone, Lenham is the only Rural Service Centre or Larger Village that has a secondary school.

**C.80** 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>343</sup>.

**C.81** The villages of Boughton Monchelsea (a Larger Village), Coxheath (a Larger Village), Eyhorne Street (Hollingbourne) (a Main Village), Sutton Valence (a Main Village) and Yalding (a Main Village) have fewer services than Rural Service Centres but can still provide for the day-to-day needs of local communities and the wider hinterland. All villages provide a nursery and primary school; a shop (including a post office); at least one place of worship, public house and community hall as well as open space<sup>344</sup>.

**C.82** In 2017, Maidstone Borough saw the biggest net inward migration of pre-school age children of all the districts in Kent, with the equivalent of a new primary school required to serve these children. 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 Reception 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<sup>345</sup>.

**C.83** New development would be more widely distributed under option RA1 (Local Plan Review Continued) as it would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, a significant proportion of new development would be focused on Maidstone town, where there is good access to existing higher order services. Development at the Rural Service Centres and Larger Villages would also help to support the viability of services in these settlements, although residents living in these settlements would not have the range of services and facilities provided by the town of Maidstone. This option is therefore expected to have mixed significant positive effects and minor negative effects on this SA objective. According to the Council's Transport and Air Quality Topic Paper (June 2020), this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>346</sup>, all of which will improve the accessibility of more residents to key services and facilities through the expansion of different modes of transport.

<sup>342</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>343</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

<sup>344</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

<sup>345</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>

<sup>346</sup> Maidstone Borough Council, Transport and Air Quality Topic Paper

**C.84** Option RA1a (No Maidstone) is expected to provide additional social infrastructure alongside housing within the garden settlements and to a lesser extent in the Rural Service Centres and Larger Villages. The garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, it aims to minimise the transport impact on the existing network by creating high quality large developments with high levels of sustainable travel and trip internalisation.<sup>347</sup> Garden settlements provide the potential to create more self-sustaining communities, thereby ensuring access to essential services and facilities to all residents of the garden settlement, although evidence elsewhere suggests that this can be difficult to achieve<sup>348</sup>. If successful, this would have positive implications for residents of the garden settlements, and any communities in surrounding areas that are in need of these services and facilities. However, the additional social infrastructure that will be provided by garden settlements may not provide easy access for existing residents of the Borough as the four potentially suitable locations for garden settlements may not be in areas that are in need of additional social infrastructure. In addition, garden settlements can take a long time to deliver, which means that additional social infrastructure may not be provided in the early years of the plan period but only once the garden settlement reaches a size large enough to support them. Furthermore, concentrating investment in services and facilities at garden settlements may mean that existing services and facilities, particularly in the Rural Service Centres and Larger Villages, may attract less investment and support from new development. However, as this option would also provide residual development within the Rural Service Centres and Larger Villages, some investment would still be available. Therefore, mixed significant positive and significant negative effects with uncertainty are expected for this option.

**C.85** Option RA2a (Maidstone + 4 Garden Settlements) would have a similar effect as option RA1 (Local Plan Review Continued) as it would have the same transport infrastructure

improvements. In addition, development under this scenario would likely include major new public transport infrastructure investment as part of the plan to revitalise the town centre.<sup>349</sup> This would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. On the other hand, this option also aims to provide four garden settlements, all of which would be relatively remote from Maidstone urban area. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, the garden settlements would aim to minimise the transport impact on the existing network by creating high quality large developments with high levels of sustainable travel and trip internalisation.<sup>350</sup> Garden settlements provide the potential to create more self-sustaining communities, thereby ensuring access to essential services and facilities to all residents of the garden settlement, although evidence elsewhere suggests that this can be difficult to achieve<sup>351</sup>. If successful, this would have positive implications for residents of the garden settlements, and any communities in surrounding areas that are in need of these services and facilities. However, the additional social infrastructure that will be provided by garden settlements may not provide easy access for existing residents of the Borough as the four potentially suitable locations for garden settlements and these locations may not be in areas that are in need of additional social infrastructure. In addition, garden settlements can take a long time to deliver, which means that additional social infrastructure may not be provided in the early years of the plan period but only once the garden settlement reaches a size large enough to support them. Furthermore, concentrating investment in services and facilities at one or more garden settlements may mean that existing services and facilities, particularly in the rural service centres and larger villages, may attract less investment and support from new development. Overall, mixed significant positive and minor negative effects with uncertainty are expected.

<sup>347</sup> Maidstone Borough Council, Transport Infrastructure Topic Paper

<sup>348</sup> Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, and ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report

<sup>349</sup> Maidstone Borough Council, Transport Infrastructure Topic Paper

<sup>350</sup> Maidstone Borough Council, Transport Infrastructure Topic Paper

<sup>351</sup> Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, and ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report

### Mitigation

**C.86** 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.

**C.87** In selecting a preferred spatial option, it will be important not only to ensure that new development is well provided with services and facilities, but that existing services and facilities, particularly in the rural service centres and larger villages, receive investment and support to maintain their viability.

### Conclusion

**C.88** Option RA1 (Local Plan Review Continued) performs most strongly against this SA objective, primarily because it would be delivering development where services and facilities already exist, thereby ensuring that there is the greatest potential for easy access to, and support for, key services and facilities. While option RA2a (Maidstone + 4 Garden Settlements) would also deliver development within the town centre, it would provide four garden settlements which would have uncertain effects in the short term but offers considerable potential for positive effects in the longer-term, assuming investment in new infrastructure, services and facilities would be provided. Option RA1a (No Maidstone) performs least well.

### SA Objective 3: To strengthen community cohesion

**C.89** Community cohesion is influenced by the range of jobs, services and facilities available to residents, the integration of different sectors of the community, and between new and existing communities. It has many links with other SA objectives.

**C.90** Option RA1 (Local Plan Review Continued) is expected to strengthen community cohesion across communities in the Borough through support for and potentially increased provision of social infrastructure, green space and related, increased social interaction. However, as this option aims to provide development within the rural areas of the Borough as well as the urban areas there may be opposition to additional development within the smaller villages if this changes the character of the villages and places pressure on services and facilities and increases traffic. Therefore, mixed significant positive and minor negative effects are expected for this option.

**C.91** Option RA1a (No Maidstone) is expected to develop new community cohesion through increased provision of social infrastructure and green space within the garden settlements, and to a lesser extent in the Rural Service Centres and Larger Villages themselves. 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. As this option has the potential to provide up to three large developments and some smaller developments within rural areas of the Borough, there may be opposition to additional development within the smaller villages, particularly those closest to the large new garden settlements. Therefore, mixed significant positive and significant negative effects are expected for this option.

**C.92** Option RA2a (Maidstone + 4 Garden Settlements) is expected to strengthen community cohesion through increased provision of social infrastructure, green space and related, increased social interaction. Also, this option would provide development within the urban area of Maidstone, where existing communities may oppose further densification of the urban area. It may also lead to less investment in, and support for, more rural communities. On the other hand, this option aims to provide four garden settlements, three of which would be located within the rural areas of the Borough. Garden settlements can develop new community cohesion through increased provision of social infrastructure and green space within the garden settlements themselves. 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. As this scenario has the potential to provide three garden settlements within the rural areas of the Borough there may be opposition to additional development within the smaller villages, particularly those in closest proximity. It may also lead to a diversion of investment in communities elsewhere in the Borough, particularly in rural villages, although some residents may welcome less in the way of development and change. As such, it may result in less development in rural communities that do not wish to see the character of their villages change too dramatically. Therefore, mixed effects are expected.

### Mitigation

**C.93** Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that existing services and facilities do not feel additional pressure in the short term.

**C.94** Ensuring that existing communities 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.

**C.95** Large new communities should be planned and design-in community cohesion principles from the outset.

## Conclusion

**C.96** Each of the options is expected to strengthen community cohesion through increased provision of social infrastructure and green space. However, each of them is expected to have mixed effects in relation to this SA objective as it is likely there will be opposition to additional development at rural settlements and the further densification of the urban area.

**C.97** The effect on community cohesion will differ, depending upon whether the focus is on the new or the existing community. Overall, option RA1 (Local Plan Review Continued) performs best because it is most likely to meet the needs of the greatest number of communities.

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

**C.98** 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>352</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>353</sup>.

**C.99** 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>354</sup>.

**C.100** Option RA1 (Local Plan Review Continued) would continue to allocate services to existing settlements, in line with the settlement hierarchy. This would likely provide additional social infrastructure and green space to areas throughout the Borough. However, as previously stated, the urban area includes the most deprived neighbourhoods in the Borough and would be most in need of investment. In addition, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>355</sup>, thereby improving health

and wellbeing of residents by improving active travel options. Overall, minor positive effects are expected.

**C.101** Option RA1a (No Maidstone) is expected to have significant positive implications for this SA objective as garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, as a principle of garden settlements, it is expected that additional green space will be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. At the time of appraisal of the initial spatial strategy options there were four potential locations for garden settlements, all of which are relatively remote from Maidstone urban area, one of the Borough's most deprived areas. Instead, garden settlements would lie in the rural areas, as would the residual development that would be provided within the Rural Service Centres and Larger Villages. Since these development locations would not provide additional social infrastructure and green space for the parts of the Borough in greatest need, this option was judged to have a minor negative effect in relation to SA4: Health but with uncertainty due to the specific locations of the garden settlements being unknown.

**C.102** Option RA2a (Maidstone + 4 Garden Settlements) is expected to have significant positive effects in relation to this SA objective as it aims to revitalise the town centre, which is within the urban area where the highest levels of deprivation are within the Borough. Development within the urban area would provide additional homes, economic opportunities, social infrastructure and green space. In addition, this scenario would seek to deliver modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>356</sup>, thereby improving health and wellbeing of residents by improving active travel options. In addition, this option, like option RA1a (No Maidstone), would provide four garden settlements which could provide greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. In addition, as a principle

<sup>352</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>353</sup> Ibid

<sup>354</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>355</sup> Maidstone Borough Council, Transport Infrastructure Topic Paper

<sup>356</sup> Maidstone Borough Council, Transport Infrastructure Topic Paper



of garden settlements, it is expected that additional green space would be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. The four potential locations for garden settlements, lie in the rural areas and as such would not provide additional infrastructure for the urban area. Therefore, this option also has an uncertain minor negative effect as the specific location of these settlements are unknown.

### Mitigation

**C.103** 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.

### Conclusion

**C.104** Options RA1a (No Maidstone) and RA2a (Maidstone + 4 Settlements) are expected to have significant positive effects on this SA objective as garden settlements create opportunities for new patterns of infrastructure provision and more development within the urban area could reduce the amount of deprivation. Option RA1 (Local Plan 2017 continued) is also expected to have positive effects, however they are minor as the potential development from this scenario is more widely dispersed.

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

**C.105** 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%). Overall, Maidstone has a negative net commuting flow<sup>357</sup>. Maidstone has shown steady growth in the number of businesses from 2011 to 2017 and there has been an increase of 7,000 additional jobs created between 2011 and 2016<sup>358</sup>.

**C.106** Option RA1 (Local Plan Review Continued) would aim to provide extensions to existing successful rural business sites, new business sites at strategic motorway junctions, new office development as part of mixed use residential, retail and office developments within Maidstone town centre and a further allocation at the Kent Medical Campus<sup>359</sup>. As such, significant positive effects are expected against this option as it would provide economic opportunities throughout the Borough, aiding many different communities.

**C.107** Option RA1a (No Maidstone) would provide most employment development as a percentage of any development within the garden settlements with minor positive effects in relation to this SA objective. However, the location of any chosen garden settlement will have implications for the type of B-use considered most appropriate. For example, a settlement close to the strategic road network would be preferable for B8 uses requiring larger vehicular access. Garden settlements in less accessible locations would be more broadly suited towards B2 uses. The lack of locational flexibility of a garden settlement-focussed approach to employment development would have minor negative effects. Additionally, garden settlements would not be expected to come forwards for development immediately after Local Plan Review adoption and experience elsewhere suggests that attracting investment in employment uses can take some time<sup>360</sup>, although it can be achieved<sup>361</sup>. In recognition of this, this option would seek to allocate a range of employment sites outside of the garden settlements to ensure choice in the short to medium term. Overall, mixed positive and negative effects would be expected as this scenario would increase the diversity of economic opportunities but not necessarily in appropriate locations or at the right time.

**C.108** Option RA2a (Maidstone + 4 Garden Settlements) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, this option would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space nearby rail links to and from London would also be encouraged which would attract business to the town centre.<sup>362</sup> These factors would result in significant positive effects in relation to SA5: Economy. This option would, however, require the Council to revisit assumptions on

<sup>357</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>358</sup> Ibid

<sup>359</sup> Maidstone Borough Council, Economic Strategy Topic paper

<sup>360</sup> Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities

programme, also ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report, and Nathaniel Lichfield & Partners (October 2013) Cambourne Retail and Employment Study

<sup>361</sup> See, for example, Cranbrook in Devon

(<https://www.local.gov.uk/local-growth-local-people>)

<sup>362</sup> Maidstone Borough Council, Economic Strategy Topic paper

mixed-use development in the town centre, increasing the percentage of office provision on each site. Like option RA1a (No Maidstone), the economic development at garden settlements under option RA2a (Maidstone + 4 Garden Settlements) would have mixed effects in relation to SA5: Economy for the reasons described under option RA1a (No Maidstone). Overall, mixed significant positive and minor negative effects are expected for this option.

### Mitigation

**C.109** A diversity of economic development could be encouraged under any spatial strategy option through suitable policies in the Local Plan.

**C.110** If garden settlements are preferred, it will be particularly important to provide an attractive planning and financial regime to attract early investment. In addition, a range of other employment allocations are likely to be needed outside of the garden settlements, to ensure choice is available in the short to medium term and to accommodate the varied locational requirements of different industries.

### Conclusion

**C.111** Option RA1 (Local Plan Review Continued) would provide the most balanced economic opportunities for the Borough although Option RA2a (Maidstone + 4 Garden Settlements) would offer much needed economic development near public transport links and therefore also deliver significant positive economic effects. The economic benefits of economic development at garden settlements under options RA1a (No Maidstone) and RA2a (Maidstone + 4 Garden Settlements) are less certain, particularly in the short term.

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

**C.112** 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>363</sup>. Therefore, retaining the vitality and viability of Maidstone town centre is an important sustainability objective for the Borough.

**C.113** Option RA1 (Local Plan Review Continued) would aim to provide new office development as part of mixed use residential, retail and office developments within Maidstone town centre<sup>364</sup>. Allocations rolled forward from the Local Plan

2017 and increased occupation of currently vacant stock would provide more than the required retail floorspace to 2037. Any new allocations, if needed for choice in the market, would use the 'town centre first' approach – in Maidstone town centre, then urban edge, then out of centre, subject to sequential impact assessment<sup>365</sup>. This option would also see maintenance of the existing Local Plan Transport Strategy with various benefits for the town centre, such as increased bus service frequency along radial routes into the town centre, a new bus station, and parking management. Overall, these factors would provide significant positive effects in relation to this SA objective. However, this option could provide development within the rural centres thereby steering footfall away from the town centre, also resulting in minor negative effects.

**C.114** Option RA1a (No Maidstone) would be creating new local centres through the development of garden settlements as they aim to create self-sustaining communities, thereby steering footfall away from the Maidstone town centre. Residual development within the Rural Service Centres and Larger Villages would have the same effect although to a lesser extent. However, Maidstone town centre would still provide a range of higher order jobs, services and facilities not provided for by garden settlements or Rural Service Centres, and some additional demand for these is still likely to be created for these by this option. The ease of accessing these town centre services from the garden settlements would depend on the locations of those new settlements and the quality of their transport links to the town centre. Therefore, mixed minor negative and minor positive effects are expected for this SA objective.

**C.115** Option RA2a (Maidstone + 4 Garden Settlements) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, it would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space near to rail links to and from London would also be encouraged which would help to attract business to the town centre.<sup>366</sup> Therefore, this option would provide significant positive effects against this SA objective. However, as this option would also aim to provide four garden settlements located throughout the Borough it would be creating new local centres through the development of garden settlements as they aim to create self-sustaining communities

<sup>363</sup> Centre for Cities (2020) High Streets [online] Available at: <https://www.centreforcities.org/high-streets/>

<sup>364</sup> Maidstone Borough Council, Economic Strategy Topic paper

<sup>365</sup> Maidstone Borough Council, Retail and Leisure Strategy Topic paper

<sup>366</sup> Maidstone Borough Council, Economic Strategy Topic paper

thereby steering footfall away from the Maidstone town centre. Therefore, minor negative effects are also expected.

### Mitigation

**C.116** Ensure that transport connections to the town centre are made available and attractive so that all residents can readily access the town centre, thereby sustaining the vibrancy and vitality of the area.

### Conclusion

**C.117** Options RA1 (Local Plan Review Continued) and RA2a (Maidstone + 4 Garden Settlements) both have the potential for significant positive effects on Maidstone town centre by directing significant development to that location, particularly option RA2a (Maidstone + 4 Garden Settlements), so that minor negative effects would also occur. Option RA1a (No Maidstone) would perform least well as the garden settlements would create new local centres that would compete with Maidstone 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

**C.118** 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>367</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>368</sup>.

**C.119** New development under option RA1 (Local Plan Review Continued) it would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, it is expected to have significant positive effects for this SA objective as there is a higher probability that existing transport hubs and routes will be accessible from new development. This option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>369</sup>, all of which will improve the existing sustainable modes of transport. However, it is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. Furthermore, currently a high proportion of the Borough's residents drive to work<sup>370</sup> so the uptake of more sustainable travel options may face resistance. Therefore, significant negative effects are also expected.

**C.120** Option RA1a (No Maidstone) aims to minimise transport impact on the existing network through the creation of high-quality large developments with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas<sup>371</sup>. This option presents opportunities for new patterns of infrastructure provision and for the creation of an integrated community. This option would be likely to provide a greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. However, in the short term, garden settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would not be provided for in the early years of the plan period. Furthermore, research of practical experience elsewhere<sup>372</sup> has concluded that garden settlements can become car dependent and create more traffic for the local roads as many residents drive to and from cities to work. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. In addition, as residual development would be provided within Rural Service Centres and Larger Villages

<sup>367</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>368</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>369</sup> Maidstone Borough Council, Transport Infrastructure Topic paper  
<sup>370</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)

<sup>371</sup> Maidstone Borough Council, Transport Infrastructure Topic paper  
<sup>372</sup> Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality

under this option, it is likely that existing public transport options would continue to be overcapacity. Therefore, mixed minor positive and significant negative effects are expected against this option.

**C.121** Maidstone town centre development under Option RA2a (Maidstone + 4 Garden Settlements) would deliver the same beneficial transport infrastructure measures as option RA1 (Local Plan Review Continued). In addition, this option would also include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.<sup>373</sup> The infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. The garden settlement development component of this option would aim to minimise transport impact on the existing network through the creation of high-quality large developments with high levels of sustainability and trip internalisation, as well as improved sustainable transport options for surrounding areas. This presents opportunities for new patterns of infrastructure provision and for the creation of an integrated community. The development of four garden settlements under this option would have similar effects on sustainable travel and congestion as described for option RA1a (No Maidstone) above, therefore, significant negative effects are also expected.

### Mitigation

**C.122** Ensure that public transport and active travel connections are created and enhanced at the same time housing and economic development is being undertaken. This could be done through various mechanisms, such as S106 agreements.

### Conclusion

**C.123** Although options RA1 and RA2a achieved the same SA score, option RA2a is judged to perform slightly more sustainably than RA1, primarily as it is assumed to include major new public transport infrastructure investment as part of the plan to revitalise the town centre. As such is the most sustainable of the three options against this SA objective. Spatial option RA1 (Local Plan Review Continued) and RA1a (No Maidstone) are also expected to improve public transport and active travel but not to the same extent. In addition, it is

likely that additional housing and economic development will continue to stretch roads and rail that are over capacity in locations where the options do not provide enhanced transport infrastructure.

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

**C.124** 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>374</sup>.

**C.125** Option RA1 (Local Plan Review Continued) would have the most dispersed growth for the Borough, therefore it could have the highest probability of developing within an MSA. Each of the growth locations it sets out lies within an MSA. Overall, it is likely that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

**C.126** Option RA1a (No Maidstone) is expected to have negative effects on this SA objective as two of the four potential locations for garden settlements are located within an MSA. Overall, it is possible that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

**C.127** Option RA2a (Maidstone + 4 Garden Settlements) would focus some development within the town centre and urban area of the Borough. There are no MSAs within the town centre of Maidstone, however within the urban area there are small portions in the south-western sections that are designated as MSAs. In addition, the three rural locations for the garden settlements lie within an MSA. As such, significant negative effects with uncertainty are expected as the exact location of development is unknown at this stage.

<sup>373</sup> Maidstone Borough Council, Transport Infrastructure Topic paper  
<sup>374</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-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1>

## Mitigation

**C.128** It is recommended that delivery of housing and economic development in MSAs is phased, such that mineral resources can be recovered prior to construction, where economically viable. All other matters being equal, sites that would not result in the sterilisation of mineral resources should be preferred (e.g. when choosing a location for a new garden settlement).

## Conclusion

**C.129** Each of the options is likely to have significant negative effects as there is a possibility for mineral resources within MSAs to be sterilised by development.

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

**C.130** 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>375</sup>.

**C.131** The dispersed growth under option RA1 (Local Plan Review Continued) could result in development within Grades 1, 2, or 3 agricultural land. However, as this option would provide development according to the existing settlement hierarchy, it is likely that some development under this option will be provided on brownfield sites in Maidstone urban area and to a lesser extent in the Rural Service Centres and Larger Villages, thereby avoiding agricultural land. As such, mixed minor positive and significant negative effects with uncertainty are expected.

**C.132** Option RA1a (No Maidstone) would provide a large proportion of its development at four large new garden settlements. Each of the garden settlement locations lies within Grade 3 agricultural land, with two of the potential locations also partially within Grade 2. 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. Therefore, under the precautionary principle, uncertain significant negative effects are identified.

**C.133** Option RA2a (Maidstone + 4 Garden Settlements) would provide development within the town centre of Maidstone which is almost entirely classified as urban. However, the garden settlement locations for this option lie within Grades 2 and 3. Depending on where the development would take place it could be located within high quality agricultural land. As such, a mixed minor positive and significant negative effect is expected with uncertainty.

## Mitigation

**C.134** All other matters being equal, give preference to sites that would avoid development within Grades 1 to 3a agricultural land.

## Conclusion

**C.135** Option RA1 (Local Plan Review Continues) and Option RA2a (Maidstone + 4 Garden Settlements) perform the best against this SA objective as they would provide development within the town centre and wider urban area of Maidstone which are almost entirely classified as urban rather than agricultural land. However, they both have the potential to have negative effects on this objective as Option RA1 could provide development throughout the rest of the Borough which could result in Grades 1, 2 and 3 agricultural land being lost and the garden settlements of Option RA2a are likely to be within Grades 2 and 3 agricultural land. Option RA1a (No Maidstone) would have negative implications for this SA objective as all development under this option could be within the best and most versatile agricultural land.

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

**C.136** Kent is one of the driest regions in England and Wales<sup>376</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>377</sup>. These issues could 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 status and future status of water bodies in Kent.

<sup>375</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>376</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>377</sup> AECOM (2017) Kent Water for Sustainable Growth Study

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. There is also an increased risk of over-abstraction of water resources.

**C.137** Option RA1 (Local Plan Review Continued) would provide additional housing, economic development and infrastructure which could put the region under additional water stress. It is likely that water resources will become overstretched under this option. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand.

**C.138** Option RA1a (No Maidstone) would provide one or more large settlements that would be in need of large amounts of water and as the Borough is currently having issues with high water uses this scenario would worsen the situation. Therefore, significant negative effects are expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. Garden settlements offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the other options, which means that the option also receives a minor positive effect.

**C.139** Option RA2a (Maidstone + 4 Garden Settlements) would concentrate development within the town centre which is already developed and contains impermeable surfaces. Additional development in this area could increase the amount of pollution in urban runoff, which is already an issue for the catchment the Borough is within. In addition, additional development would intensify the water stress within the region. Therefore, significant negative effects are expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. In addition, with the development of four garden settlements there will be the need for large amounts of water, however, garden settlements offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the other options, which means that the option also receives a minor positive effect.

### Mitigation

**C.140** 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.

### Conclusion

**C.141** Each of the options are expected to have negative effects on this SA objective as water resources in the Borough are already suffering from high levels of water use, therefore any development without water efficiency measures will worsen the situation. Of all the options, option RA1a (No Maidstone) and RA2a (Maidstone + 4 Garden Settlements) probably offer the best opportunity to design-in water efficiency and wastewater management from the outset in an integrated and comprehensive way.

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

**C.142** 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. 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>378</sup>.

**C.143** New development under option RA1 (Local Plan Review Continued) would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, it is expected to have significant negative effects on this SA objective as it would continue travel patterns that have developed over time, including significant car use, particularly in the more rural areas. Currently a high proportion of the Borough's residents drive to work, and the uptake of more sustainable travel options is

<sup>378</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)

limited<sup>379</sup>. It is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. However, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>380</sup>, all of which will improve the existing sustainable modes of transport, and potentially air quality, resulting in a minor positive effect.

**C.144** Option RA1a (No Maidstone) is expected to result in a small increase in traffic congestion within the Rural Service Centres and Larger Villages due to the residual development located at these locations. Most development under this option would be directed to four new garden settlements, which seek to minimise transport impact on the existing network through the creation of high-quality large development with high levels of sustainability and trip internalisation and provide improved sustainable transport options for surrounding areas<sup>381</sup>. This option therefore presents opportunities for new patterns of infrastructure provision and for the creation of a self-sustaining community. A principle of garden settlements is to provide green infrastructure and, particularly where this involves tree planting, this would help to absorb and disperse air pollutants. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. As it is likely that garden settlements will be masterplanned, the incorporation of environmentally, climate and water sensitive planning and reduction of the need to travel by car through good site layout and promotion of walking, cycling and public transport is likely. However, garden settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would be unlikely to be provided in the early years of the plan period. Furthermore, research of practical experience elsewhere has shown that, despite original intentions, garden settlements can become car dependent and create more traffic for the local roads as many residents drive to and from cities to work<sup>382</sup>. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways

and public transport thereby increasing the likelihood of travel by car and traffic congestion. In the case of the garden settlements, car journeys into Maidstone could go through the AQMA. Therefore, mixed minor positive and significant negative effects are expected for this option.

**C.145** Development in the Maidstone urban area under option RA2a (Maidstone + 4 Garden Settlements) would be accompanied by the same transport infrastructure provision as option RA1 (Local Plan Review Continued). It would additionally include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.<sup>383</sup> These transport improvements would benefit a large proportion of the population of the Borough since 70% of the Borough live within the urban area of Maidstone, and there would be greater opportunities to use more sustainable modes of transport including walking and cycling for everyday journeys, reducing the effects on air quality. As such, it would have significant positive effects on this SA objective. The development of four garden settlements under this option would have similar effects on transport and air quality as described for option RA1a (No Maidstone) above, therefore significant negative effects are expected from that component of the option. Overall, significant positive and significant negative effects are expected.

### Mitigation

**C.146** Ensure that through design codes that each development will have to incorporate green infrastructure and that in area 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.

### Conclusion

**C.147** Option RA2a (Maidstone + 4 Garden Settlements) performs best against this SA objective as this option aims to significantly improve public transport and infrastructure in the Maidstone urban area which would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone and currently experience high levels of air pollution. However, for options RA2a

<sup>379</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)

<sup>380</sup> Maidstone Borough Council, Transport Infrastructure Topic paper

<sup>381</sup> Maidstone Borough Council, Transport Infrastructure Topic paper

<sup>382</sup> Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality

<sup>383</sup> Maidstone Borough Council, Transport Infrastructure Topic paper

(Maidstone + 4 Garden Settlements) and RA1a (No Maidstone), while the development of garden settlements offers the opportunity to design-in sustainable modes from the start, experience elsewhere suggests that car use will still dominate. Option RA1 (Local Plan Review Continued) is also expected to improve public transport and active travel, particularly in Maidstone urban area, but not to the same extent as option RA2a.

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

**C.148** 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 the River Medway<sup>384</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>385</sup>. The risk of flooding is likely to be intensified due to climate change.

**C.149** Option RA1 (Local Plan Review Continued) would provide additional housing, economic development and additional infrastructure in line with the existing settlement hierarchy. As such, it is possible development will be located within Flood Zones 2 and 3 although this is unlikely as proposals for development within these areas of higher flood risk would have to satisfy the sequential and exception tests, as relevant. In addition, the creation of more impermeable surfaces creates additional flood risk as it is likely that greenfield land will be developed within the more rural areas of the Borough. Overall, significant negative effects are expected.

**C.150** Option RA1a (No Maidstone) would provide four new large garden settlements and three of the four potential locations are within or within close proximity to Flood Zones 2 and 3. In addition, the creation of more impermeable surfaces create additional flood risk as it is likely that greenfield land will be developed on for each of the large settlements thereby reducing the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems

(SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

**C.151** Option RA2a (Maidstone + 4 Garden Settlements) would direct a significant amount of development to Maidstone town. Although some sites within the urban area would already be developed and hence contain impermeable surfaces, others at the urban edge would be on greenfield sites, effects on surface water infiltration would be mixed. The River Medway runs through Maidstone town centre and has a history of flooding, which could increase due to climate change. Additional development in this area would potentially be exposed to higher levels of fluvial flood risk and could also increase the amount of urban runoff, which is already an issue for the catchment. Options RA2a would also develop four new garden settlements. The effects of these are described under option RA1a above and would be mixed significant negative and minor positive. Overall, this scenario could have mixed significant negative effect and minor positive effects on this SA objective.

### Mitigation

**C.152** Avoid development within Flood Zones 2 and 3, where appropriate and in accordance with the sequential and exception tests. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could be achieved through various mechanisms, such as S106 agreements.

### Conclusion

**C.153** As each option aims to provide additional development throughout the Borough of Maidstone, it is likely that the increased amount of impermeable areas will reduce the infiltration capacity and flood retention provided by greenfield land. However, options RA1a and RA2a would perform the best against this SA objective as the garden settlement/s would be masterplanned to employ SuDS and environmentally, climate and water sensitive planning through the incorporation of design codes. However, garden settlements would result in the development of greenfield land and three of the four potential locations include Flood Zone 2 and 3 land.

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

**C.154** 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

<sup>384</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-](http://www.maidstone.gov.uk/_data/assets/pdf_file/0015/132810/CC-)

[005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf](#)

<sup>385</sup> Ibid



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.

**C.155** Option RA1 (Local Plan Review Continued) would provide additional housing, economic development and additional infrastructure associated with both across the Borough in accordance with the settlement hierarchy. As such, this development could increase greenhouse gas emissions through the higher number of private vehicles on the road and amount of energy generated from new housing and economic development. Therefore, significant negative effects are expected.

**C.156** Option RA1a (No Maidstone) would provide four large new garden settlements that offer the opportunity to create energy efficient development and operations, through the promotion of an integrated network of sustainable modes of transport for internal journeys, and the incorporation of energy efficiency and renewable and low carbon energy into settlement design, for example by incorporation of district heating schemes. However, as has already been described, experience to date indicates that garden settlements tend to generate significant car journeys, despite best intentions at the planning and design stage. In addition, as previously stated, it is likely that residual development within Rural Service Centres and Larger Villages will utilise the existing transport infrastructure which is already overstretched. As such, mixed minor positive and significant negative effects with uncertainty are expected.

**C.157** One element of option RA2a (Maidstone + 4 Garden Settlements) would concentrate development within and adjoining Maidstone town. There is a greater opportunity in the urban area, particularly the town centre, to use sustainable modes of transport for a variety of journeys, given the concentration of a range of jobs, services and facilities. However, car use is currently high, and could increase with additional development, thereby increasing greenhouse gas emissions. There may be less opportunity to incorporate larger scale energy efficiency and renewable energy networks within an already highly developed urban area than at large new masterplanned developments on greenfield sites. In addition, this option would provide four large garden settlements. For the reasons already described above for option RA1a (No Maidstone). Overall, significant mixed negative and significant positive effects with uncertainty are expected from this option.

## Mitigation

**C.158** Implement Local Plan policies and design codes for strategic development that require low carbon construction, energy efficient building design, provision of decentralised, low carbon energy generation (e.g. district heating networks and micro-renewables). In addition, improvements to public transport and introduction of car sharing programs could reduce the Borough's greenhouse gas emissions.

## Conclusion

**C.159** Each of the options are expected to have negative effects on this SA objective as development requires energy use in its construction and occupation. However, option RA2a (Maidstone + 4 Garden Settlements) offers the greatest opportunities to incorporate, from the outset, integrated sustainable transport networks, and energy efficiency and renewable energy networks in large new, planned settlements as well as the considerable opportunity to promote sustainable modes of transport in and close to the concentration of services and facilities available at Maidstone town centre.

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

**C.160** 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.

**C.161** Each option has the potential to adversely affect biodiversity. Option RA1 (Local Plan Review Continued), which would distribute development according to the existing settlement hierarchy represents a more dispersed approach to development than the other options. Much of the development would be likely to be on greenfield land and could be on or within close proximity to biodiversity assets or disrupt the Borough's ecological networks, although this is uncertain until development sites are allocated. Overall, a significant negative effect with uncertainty relating to the location and design of development is expected for this SA objective.

**C.162** Option RA1a (No Maidstone) would provide large new garden settlements at four potential locations, three of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural areas

and it is likely that development will occur on greenfield land therefore this option could have significant negative effects with uncertainty as the exact location for the garden settlements is yet to be determined. The majority of garden settlements to be provided by this option lie within or close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. However, garden settlements are expected to provide additional green space thereby offering the opportunity to create additional wildlife habitat and biodiversity net gain. There is also the opportunity to link up habitats within biodiversity opportunity areas. Therefore, minor positive effects are also expected against this option.

**C.163** Option RA2a (Maidstone + 4 Garden Settlements) is expected to have mixed effects on this SA objective. A Maidstone-focused approach is likely to increase the potential for development on brownfield land rather than greenfield land compared to the other options, particularly option RA1a (No Maidstone), therefore minor positive effects are expected. Although, there are less biodiversity designations within Maidstone urban area, minor negative effects are also expected because sections of the urban area lie within a Biodiversity Opportunity Area, Ancient Woodland and Local Wildlife Sites. These negative effects are subject to uncertainty relating to the location and design of development is expected for this SA objective. In addition, this option would provide four new garden settlements with the effects described under option RA1a (No Maidstone) above. Overall, mixed minor negative (with uncertainty) and minor positive effects are expected.

### Mitigation

**C.164** Avoidance of development in areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan 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.

### Conclusion

**C.165** Option RA2a (Maidstone + 4 Garden Settlements) is expected to be the best performing option as it concentrates development within the town centre of Maidstone which has the least amount of biodiversity designations compared to the potential development locations of the other options. However, each of the other scenarios are expected to perform negatively as they each could adversely affect biodiversity designations and networks. However, options RA2a (Maidstone + 4 Garden Settlements) and Ra1a (No Maidstone) offer opportunities to plan green infrastructure and

biodiversity net gain on a settlement-wide scale, as part of the masterplanning of new garden settlements.

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

**C.166** 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>386</sup>.

**C.167** Option RA1 (Local Plan Review Continued) is a dispersed option and therefore has the potential to adversely affect heritage assets as each existing settlement has an array of historic designations. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

**C.168** Option RA1a (No Maidstone) proposes four locations for potential garden settlements, each of which are close to heritage assets. However, the masterplanning of large new developments such as garden settlements offers the opportunity to mitigate effects on heritage significance through appropriate site layout and design codes could provide mitigation through requirements for appropriate development design. In addition, this option would provide residual new development within Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

**C.169** Option RA2a (Maidstone + 4 Garden Settlements) has the potential to have adverse effects on the Borough's heritage assets as the majority of Listed Buildings and Conservation Areas are within the town centre and urban area of Maidstone. In addition, this option includes development at four garden settlements and more dispersed residual growth, the potential effects of which are described under option RA1a (No Maidstone) above. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

<sup>386</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)

## Mitigation

**C.170** 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.

## Conclusion

**C.171** Each of the options has the potential to have a negative impact on the historic environment, however as no heritage impact assessment has been conducted yet, the effects of each option are uncertain at this stage.

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

**C.172** 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 out in the Council's landscape capacity study<sup>387</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).

**C.173** Option RA1 (Local Plan Review Continued) would distribute development according to the existing settlement hierarchy, therefore most development would be directed in or on the edges of Maidstone town, the Rural Service Centres and the Larger Villages. 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. However, much development under this option could be on greenfield sites at the edge of settlements and a number of areas around the edge of Maidstone town, as well as around many of the Rural Service Centres and the Larger Villages have very high or high landscape sensitivity, creating the potential for significant negative effects. These are uncertain as the exact locations of development are unknown.

**C.174** Option RA1a (No Maidstone) could result in the introduction of large urban developments at four potential locations, two of which are located within areas of valued landscape, one on the edge of the AONB and the other within a Landscape of Local Value. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and Garden Settlements 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 are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely.

**C.175** Option RA2a (Maidstone + 4 Garden Settlements) is more likely to avoid adverse effects on the landscape where development is concentrated within the built-up urban area but the option would also direct development to the edge of Maidstone town. However, even within the urban area some adverse effects on this SA objective could occur as there are three areas of Landscape of Local Value that run across the southern section of the urban area. In addition, two of the potential locations of the four garden settlements that would be developed under this option are located within areas of valued landscape, one on the edge of the AONB and the other within a Landscape of Local Value. While some development would be located within Maidstone urban area, it is possible that the four garden settlements will be developed on greenfield sites, each of which has a very high to moderate landscape sensitivity. Overall, significant negative effects are expected. Again, uncertainty is attached to this SA objective as the exact location of development is currently unknown.

## Mitigation

**C.176** Avoidance of development within the areas of highest landscape sensitivity would provide the best mitigation. However, requirements for development site layouts and development design that seek to reduce adverse effects on the landscape should also be implemented via Local Plan policy and design codes for large scale developments.

<sup>387</sup> Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

## Conclusion

**C.177** Each of the options has the potential to have a significant negative effect on the landscape unless appropriate mitigation (see above) is implemented.

## Appraisal of refined spatial strategy options

**C.178** This section provides a detailed description of the SA findings for the refined spatial strategy options. A summary of these findings, including a table of the sustainability scores, and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4**.

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

**C.179** 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>388</sup>. The SHMA (December 2019) calculated that the standard method would result in a need for 1,214 dwellings per annum from 2022. Over the Plan period, the population of the Borough is expected to grow by 28% with the strongest growth expected in those aged over 65. Overall, the total affordable housing need for the Borough equates to 38% of the total housing need and there is a need for different types of homes in both the market and affordable sectors. According to the SHMA, 52% of residents living in the rural areas of the Borough and 48% of residents within the urban areas of Maidstone are unable to afford market housing (without subsidy).

**C.180** New development would be more widely distributed under Scenario 1 (LP17 Continued) than under the other spatial strategy options as it is expected to be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). Given that Maidstone is the primary focus in the Borough of existing infrastructure, services and facilities, there may be less need to cross-subsidise further investment, allowing for greater funding for affordable housing provision. However, the standard of infrastructure and service provision in Maidstone town centre is currently relatively poor, therefore a decision may need to be made about the extent to which market housing delivery is used to support improvement of this offer rather than delivering affordable housing. Town centre sites are likely to be brownfield and these can be relatively costly to develop compared to greenfield sites, if demolition of existing structure and hard standing is required, and even more so if

remediation of contaminated land is needed. Overall, significant positive effects are expected as there is the potential for more people across the Borough to have the opportunity to live in a decent and affordable home compared to the other options. However, some of these developments are of a smaller scale, such as Boughton Monchelsea and Eythorne St (Hollingbourne) and as such, they may not be as well placed to deliver affordable housing as part of the development mix, resulting in a minor negative effect as well.

**C.181** Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to have similar effects to Scenario 1 as these scenarios would also provide sufficient housing development throughout the Borough (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). However, development in and adjacent to Maidstone town and at some of the Rural Service Centres is reduced as this scenario would also provide two garden settlements at Heathlands, Lidsing and/or North of Marden and substantial development in the Countryside. As such, a substantial proportion of development will be within the rural areas of the Borough, thereby providing affordable housing within these rural areas. However, garden settlements would entail the creation of relatively large settlements compared to smaller rural villages. In addition, the creation of a garden settlement will require significant investment in new infrastructure, which may reduce the funds available to cross-subsidise the delivery of affordable homes from the sale of market housing and may divert investment from other parts of the Borough. Garden settlements can also take a long time to deliver, which means that homes, including affordable homes, would not be provided for in the early years of the plan period. However, this would be offset by quicker housing delivery at other locations under this scenario. As a result, mixed significant positive and significant negative effects are considered likely for this option.

**C.182** Since Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) are focused primarily on the town centre and urban area, urban extensions of Maidstone and one of three garden settlements, the rest of the Borough would be expected to have small amounts of additional housing thereby creating minor negative effects for these existing rural communities, and continuing to exacerbate the current higher rural housing price pattern. Scenarios 1 and 3a, b and c are expected to provide the same amount of housing and employment development in and around Maidstone town therefore, significant positive effects are expected for this scenario as

<sup>388</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)

well. In addition, the potential effects of the garden settlement are described under Scenario 2 above. However, compared to Scenario 2, this option would only develop one garden settlement compared to two, so the negative effects may not be as significant. Also, constraints in construction capacity and market demand may mean that it is possible to develop one new settlement more quickly than two at the same time. Therefore, minor negative effects with uncertainty are also expected.

### Mitigation

**C.183** The quality of homes provided under any of the options could be ensured through suitable policies in the Local Plan Review relating to, for example, room sizes, sustainable design and construction, lifetime homes standards, and energy efficiency. In addition, for larger developments, it may be possible to introduce design codes for developers to adhere to, ensuring not only the resource efficiency of homes, but also space and access requirements, lighting, and their style and character to complement the local vernacular.

**C.184** The provision of affordable housing can be achieved through various mechanisms, such as S106 agreements. Larger developments are generally more likely to be able to deliver affordable homes on site.

### Conclusion

**C.185** Scenario 1 (LP17 Continued) performs most strongly against this SA objective, primarily because it would be delivering most development where services and facilities already exist, thereby ensuring that there is the greatest potential for delivering affordable homes alongside market housing. In addition, it should allow most affordable housing to be delivered where the greatest need for it exists – the rural area. However, scenarios 2a, b and c and 3a, b and c offer considerable potential in the longer term assuming that investment in new infrastructure, services and facilities would allow enough headroom to also fund the provision of affordable homes.

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

**C.186** The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area<sup>389</sup>. As the County town and the dominant settlement in the Borough, Maidstone itself has a much wider range and

number of services and facilities than elsewhere in the Borough. For example, outside of Maidstone, only Lenham 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>390</sup>.

**C.187** 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>391</sup>.

**C.188** The five villages of Boughton Monchelsea (a Larger Village), Coxheath (a Larger Village), Eyhorne Street (Hollingbourne) (a Main Village), Sutton Valence (a Main Village) and Yalding (a Main Village) have fewer services than Rural Service Centres but can still provide for the day-to-day needs of local communities and the wider hinterland. All villages provide a nursery and primary school; a shop (including a post office); at least one place of worship, public house and community hall as well as open space<sup>392</sup>.

**C.189** In 2017, Maidstone Borough saw the biggest net inward migration of pre-school age children of all the districts in Kent, with the equivalent of a new primary school required to serve these children. 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 Reception 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<sup>393</sup>.

**C.190** New development would be more widely distributed under Scenario 1 (LP17 Continued) as it would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages). As such, a significant proportion of new development would be focused on Maidstone town, where there is good access to existing higher order services and to employment. Development at the Rural Service Centres and Larger Villages would also help to support the viability of services in these settlements, although residents living in these settlements would not have the range

<sup>389</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>390</sup> 2011 Census travel to work data

<sup>391</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

<sup>392</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

<sup>393</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>

of services and facilities provided by the town of Maidstone. This option is therefore expected to have mixed significant positive effects and minor negative effects on this SA objective. According to the Council's Transport and Air Quality Topic Paper (June 2020), this scenario aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>394</sup>, all of which will improve the accessibility of more residents to key services and facilities through the expansion of different modes of transport.

**C.191** Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to provide additional social infrastructure alongside housing within the two garden settlements and to a lesser extent in Maidstone town, Rural Service Centres and Larger Villages. The garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, Scenario 2a, 2b, and 2c aim to minimise the transport impact on the existing network by creating high quality large developments with high levels of sustainable travel and trip internalisation.<sup>395</sup> This could partly be achieved by the planned provision of new employment space at the garden settlements (summarised under SA objective 5 below). Garden settlements therefore provide the potential, at least, to create more self-sustaining communities, thereby ensuring access to essential services, facilities and employment to residents of the garden settlement, although evidence elsewhere suggests that this can be difficult to achieve<sup>396</sup>. If successful, this would have positive implications for residents of the garden settlements. However, it is worth noting that all of the garden settlement locations are in areas of the Borough from which average commuting distances are currently relatively long (between 12 and 15km) and there is no guarantee that new residents of garden settlements would take up new jobs that are provided in those locations, creating a risk that some new residents may experience poor access to employment.

**C.192** Service provision at the garden settlements could also benefit any nearby communities in surrounding areas, although the extent to which they are in need of these services and facilities will vary. New services and facilities at North of Marden garden settlement could serve the existing population of the adjacent Rural Service centre of Marden. The south-western part of the site is well related to the centre of Marden and if new services were concentrated there, could help to reinforce the existing service centre, although this layout could leave the northern and eastern parts of the garden settlement less well served. A similar situation exists for the Heathlands garden settlement site although the closest part of the site to Lenham Rural Service Centre is separated from the existing settlement by other site options. Also, service provision in the main part of the Heathlands site would be poorly related to its southern part because the M20 and Maidstone-Ashford railway line bisect the site. The Lidsing garden settlement is least well related to existing service centres in Maidstone Borough, although residential suburbs of Gillingham and Chatham lie to the north-east and west.

**C.193** In addition, garden settlements can take a long time to deliver, which means that additional social infrastructure may not be provided in the early years of the plan period but only once the garden settlements reach a size large enough to support them. Furthermore, concentrating investment in services and facilities at garden settlements may mean that existing services and facilities, particularly in the Rural Service Centres and Larger Villages, may attract less investment and support from new development. However, as these scenarios would also provide residual development within Maidstone town, Rural Service Centres and Larger Villages, some investment would still be available. Overall, mixed significant positive and significant negative effects with uncertainty are expected for scenarios 2a, 2b and 2c.

**C.194** The development at Maidstone town under Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement (Heathlands)) and 3c (One Garden Settlement (Marden)) would have a similar effect as Scenario 1 as it would provide residential development close to the towns higher order services, facilities, and employment opportunities. Transport infrastructure improvements described for Scenario 1 would be enhanced under each Scenario 3 by addition of major new public transport infrastructure investment as part of the plan to revitalise the town centre.<sup>397</sup> This would benefit a large amount of the population of the Borough since 70% of the Borough live

<sup>394</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic Paper

<sup>395</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic Paper

<sup>396</sup> Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities

programme, and ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report

<sup>397</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic Paper

within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. On the other hand, this option also aims to provide a garden settlement in Heathlands and small amounts of development within the Rural Service Centres and Larger Villages. The potential effects of the garden settlement are described under Scenario 2a/b/c above. However, compared to Scenario 2a/b/c, this option would only develop one garden settlement compared to two, so the concentration of investment in services and facilities at garden settlements would be less pronounced compared to Scenario 2a/b/c. Therefore, mixed effects are expected.

### Mitigation

**C.195** 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.

**C.196** In selecting a preferred spatial option, it will be important not only to ensure that new development is well provided with services and facilities, but that existing services and facilities, particularly in the rural service centres and larger villages, receive investment and support to maintain their viability.

### Conclusion

**C.197** Scenario 1 (LP17 Continued) performs most strongly against this SA objective, primarily because it would be delivering development where services and facilities already exist, thereby ensuring that there is the greatest potential for easy access to, and support for, key services and facilities. While scenarios 2a, b and c and particularly 3a, b and c would also deliver development within the town centre, they would also provide garden settlements which would have uncertain effects in the short term but offers considerable potential for positive effects in the longer-term, assuming investment in new infrastructure, services and facilities would be provided.

### SA Objective 3: To strengthen community cohesion

**C.198** Community cohesion is influenced by the range of jobs, services and facilities available to residents, the integration of different sectors of the community, and between new and existing communities. It has many links with other SA objectives.

**C.199** Scenario 1 (LP17 Continued) is expected to strengthen community cohesion across communities in the Borough through support for and potentially increased provision of social infrastructure, green space and related increased social interaction. However, as this option aims to provide development within the rural areas of the Borough as well as

the urban areas there may be opposition to additional development within the smaller villages if this changes the character of the villages and places pressure on services and facilities and increases traffic. Therefore, mixed significant positive and minor negative effects are expected for this option.

**C.200** Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to develop new community cohesion through increased provision of social infrastructure and green space within the garden settlements, and to a lesser extent in Maidstone town, Rural Service Centres and Larger Villages. 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. As these options will provide two large developments and some smaller developments within rural areas of the Borough, there may be opposition to additional development within the smaller villages, particularly those closest to the large new garden settlements. Therefore, mixed significant positive and significant negative effects are expected for these options.

**C.201** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) are expected to strengthen community cohesion through increased provision of social infrastructure, green space and related increased social interaction. Also, this option would provide development within the urban area of Maidstone, where existing communities may oppose further densification of the urban area. It may also lead to less investment in, and support for, more rural communities. On the other hand, Scenarios 3a, b and c aim to provide a garden settlement at Heathlands, Lidsing and Marden, each of which would be located within a rural area of the Borough. The potential effects of the garden settlement are described under Scenario 2 above. However, compared to Scenarios 2a, b and c, this option would only develop one garden settlement compared to two. This scenario may also lead to a diversion of investment in communities elsewhere in the Borough, particularly in rural villages, although some residents may welcome less in the way of development and change. As such, it may result in less development in rural communities that do not wish to see the character of their villages change too dramatically. Therefore, mixed minor positive and minor negative effects are expected.

### Mitigation

**C.202** Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that existing services and facilities do not feel additional pressure in the short term.



**C.203** 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.

**C.204** Large new communities should be planned and designed in community cohesion principles from the outset.

### Conclusion

**C.205** Each of the options is expected to strengthen community cohesion through increased provision of social infrastructure and green space. However, each of them is expected to have mixed effects in relation to this SA objective as it is likely there will be opposition to additional development at rural settlements and the further densification of the urban area.

**C.206** The effect on community cohesion will differ, depending upon whether the focus is on the new or the existing community. Overall, Scenario 1 (LP17 Continued) performs best because it is most likely to meet the needs of the greatest number of communities.

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

**C.207** 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>398</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>399</sup>.

**C.208** 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>400</sup>.

**C.209** Scenario 1 (LP17 Continued) would continue to allocate services to existing settlements, in line with the settlement hierarchy. This would likely provide additional social infrastructure and green space to areas throughout the

Borough. However, as previously stated, the urban area includes the most deprived neighbourhoods in the Borough and would be most in need of investment. In addition, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>401</sup>, thereby improving health and wellbeing of residents by improving active travel options. Overall, minor positive effects are expected.

**C.210** Scenarios 2a (Heathlands + North of Marden), Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to have significant positive implications for this SA objective as garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, as a principle of garden settlements, it is expected that additional green space will be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. These scenarios would provide two garden settlements. As these garden settlements lie within the relatively less deprived rural areas of the Borough, the additional social infrastructure they provide would not be targeted to the parts of the Borough in greatest need, therefore these options were judged to also have a minor negative effect in relation to SA4: Health.

**C.211** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) are expected to have significant positive effects in relation to this SA objective as it aims to revitalise the town centre, which is within the urban area where the highest levels of deprivation are within the Borough. Development within the urban area would provide additional homes, economic opportunities, social infrastructure and green space. In addition, this scenario would seek to deliver modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>402</sup>, thereby improving health and wellbeing of residents by

<sup>398</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>399</sup> Ibid

<sup>400</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>401</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic Paper

<sup>402</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic Paper

improving active travel options. In addition, this option, like Scenarios 2a, b and c, would provide a garden settlement at Heathlands, Lidsing or Marden which could provide greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. In addition, as a principle of garden settlements, it is expected that additional green space would be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. As the garden settlement location is within a rural area it would not provide additional infrastructure for the urban area. Therefore, this option also has a minor negative effect.

### Mitigation

**C.212** 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.

### Conclusion

**C.213** Scenarios 2a, b and c and 3a, b and c are expected to have significant positive effects on this SA objective as garden settlements create opportunities for new patterns of infrastructure provision and more development within the urban area could reduce the amount of deprivation. Scenario 1 is also expected to have positive effects, however they are minor as the potential development from this scenario is more widely dispersed.

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

**C.214** 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%). Overall, Maidstone has a negative net commuting flow<sup>403</sup>. Maidstone has shown steady growth in the number of business from 2011 to 2017 and there has been an

increase of 7,000 additional jobs created between 2011 and 2016<sup>404</sup>.

**C.215** Scenario 1 (LP17 Continued) would aim to provide extensions to existing successful rural business sites, new business sites at strategic motorway junctions, new office development as part of mixed use residential, retail and office developments within Maidstone town centre and a further allocation at the Kent Medical Campus.<sup>405</sup> As such, significant positive effects are expected against this option as it would provide economic opportunities throughout the Borough, aiding many different communities.

**C.216** Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) would provide substantial employment development (121,566m<sup>2</sup> of 'B' space) within the garden settlements as follows:

- Heathlands – The location lies close to the strategic road network, between the M20 and A20, and would therefore be particularly well suited to B8 uses requiring larger vehicular access, although the closest motorway junction is some distance away.
- North of Marden – The location is not close to the strategic road network and would therefore be harder to access by road, although it does benefit from proximity to Marden rail station.
- Lidsing - This location at the junctions of the M2 and A278 is very well placed for access to the strategic road network and like Heathlands, well suited to B8 uses requiring larger vehicular access.

**C.217** More generally, the lack of locational flexibility of a garden settlement-focussed approach to employment development would have negative effects in relation to this SA objective. Additionally, garden settlements would not be expected to come forwards for development immediately after Local Plan Review adoption and experience elsewhere suggests that attracting investment in employment uses can take some time<sup>406</sup>, although it can be achieved<sup>407</sup>. In recognition of this, this option would seek to allocate a range of employment sites outside of the garden settlements to ensure choice in the short to medium term. Overall, mixed minor positive and minor negative effects would be expected as these scenarios would increase the diversity of economic

<sup>403</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>404</sup> Ibid

<sup>405</sup> Maidstone Borough Council (June 2020) Economic Strategy Topic paper

<sup>406</sup> Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, also ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report, and Nathaniel Lichfield & Partners (October 2013) Cambourne Retail and Employment Study  
<sup>407</sup> See, for example, Cranbrook in Devon (<https://www.local.gov.uk/local-growth-local-people>)

opportunities but not necessarily in appropriate locations or at the right time.

**C.218** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, this option would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space nearby rail links to and from London would also be encouraged which would attract business to the town centre.<sup>408</sup> These factors would result in significant positive effects in relation to SA5: Economy. This option would, however, require the Council to revisit assumptions on mixed-use development in the town centre, increasing the percentage of office provision on each site. Like Scenario 2a, b and c, the economic development at Heathlands, Lidsing and Marden garden settlements under this option would have mixed effects in relation to SA5: Economy. Overall, mixed significant positive and minor negative effects are expected for this option.

### Mitigation

**C.219** A diversity of economic development could be encouraged under any spatial strategy option through suitable policies in the Local Plan.

**C.220** If garden settlements are preferred, it will be particularly important to provide an attractive planning and financial regime to attract early investment. In addition, a range of other employment allocations are likely to be needed outside of the garden settlements, to ensure choice is available in the short to medium term and to accommodate the varied locational requirements of different industries.

### Conclusion

**C.221** Scenario 1 would provide the most balanced economic opportunities for the Borough although Scenarios 3a, b and c would offer much needed economic development near public transport links and therefore also deliver significant positive economic effects. The economic benefits of economic development at garden settlements under Scenarios 2a, b and c and 3a, b and c are less certain, particularly in the short term.

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

**C.222** 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>409</sup> Therefore, retaining the vitality and viability of Maidstone town centre is an important sustainability objective for the Borough.

**C.223** Scenario 1 (LP17 Continued) would aim to provide new office development as part of mixed use residential, retail and office developments within Maidstone town centre.<sup>410</sup> Allocations rolled forward from the Local Plan 2017 and increased occupation of currently vacant stock would provide more than the required retail floorspace to 2037. Any new allocations, if needed for choice in the market, would use the 'town centre first' approach – in Maidstone town centre, then urban edge, then out of centre, subject to sequential impact assessment.<sup>411</sup> This option would also see maintenance of the existing Local Plan Transport Strategy with various benefits for the town centre, such as increased bus service frequency along radial routes into the town centre, a new bus station, and parking management. Overall, these factors would provide significant positive effects in relation to this SA objective. However, this option would also provide smaller amounts of residential and retail development at the Rural Service Centres and Larger Villages, thereby steering footfall away from the town centre, also resulting in minor negative effects.

**C.224** Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) would be creating new local centres through the development of new garden settlements that aim to create self-sustaining communities, potentially steering some footfall away from Maidstone town centre. Although residents of a new garden settlement at Lidsing would be more likely to travel to Chatham town centre than Maidstone town centre. Residual residential development under these scenarios within Maidstone urban area, the Rural Service Centres and Larger Villages would have the same effect although to a lesser extent. These scenarios would also provide employment and retail development within Maidstone town centre. Although the total amounts would be less than under Scenario 1 or Scenario 3, it would still enhance Maidstone town centre's range of jobs, services and facilities, helping to ensure that

<sup>408</sup> Maidstone Borough Council (June 2020) Economic Strategy Topic Paper

<sup>409</sup> Centre for Cities (2020) High Streets [online] Available at: <https://www.centreforcities.org/high-streets/>

<sup>410</sup> Maidstone Borough Council (June 2020) Economic Strategy Topic Paper

<sup>411</sup> Maidstone Borough Council (June 2020) Retail and Leisure Strategy Topic Paper

they continue to be of a higher order than those available in garden settlements or Rural Service Centres, with positive effects on this SA objective. Accessing Maidstone town centre services from the three garden settlement locations is not particularly easy as all lie some distance from it. Overall, mixed minor negative and minor positive effects are expected for this SA objective.

**C.225** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, this scenario would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space near to rail links to and from London would also be encouraged which would help to attract business to the town centre.<sup>412</sup> Therefore, this option would provide significant positive effects against this SA objective. However, as this option would also aim to provide a garden settlement at Heathlands, Lidsing or Marden it would be creating a new local centre thereby steering footfall away from the Maidstone town centre. Therefore, minor negative effects are also expected.

### Mitigation

**C.226** Ensure that transport connections to the town centre are made available and attractive so that all residents can readily access the town centre, thereby sustaining the vibrancy and vitality of the area.

### Conclusion

**C.227** Scenario 1 (LP17 Continued) and Scenarios 3a, b and c all have the potential for significant positive effects on Maidstone town centre by directing significant residential, business and retail development to that location. Scenarios 2a, b and c would perform least well as the two garden settlements would create new local centres that would compete with Maidstone town centre, although it would still provide substantial business and employment development at Maidstone 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

**C.228** 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>413</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>414</sup>.

**C.229** New development under Scenario 1 (LP17 Continued) would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages). As such, it is expected to have significant positive effects for this SA objective as there is a higher probability that existing transport hubs and routes will be accessible from new development. This option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>415</sup>, all of which will improve the existing sustainable modes of transport. However, it is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. Furthermore, currently a high proportion of the Borough's residents drive to work<sup>416</sup> so the uptake of more sustainable travel options may face resistance

<sup>412</sup> Maidstone Borough Council (June 2020) Economic Strategy Topic Paper

<sup>413</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>414</sup> Network Rail (2018) South East Route: Kent Area Route Study [online] Available at: [https://cdn.networkrail.co.uk/wp-](https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf)

[content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf](https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf)

<sup>415</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

<sup>416</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)

due to ingrained travel habits. Significant negative effects are therefore also expected.

**C.230** The garden settlements developed under Scenario 2a (Heathlands + North of Marden) would seek to minimise their impact on the existing transport network through the creation of high-quality, large development with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas.<sup>417</sup> This option presents opportunities for new patterns of infrastructure provision and for the creation of an integrated community. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution, including to transport infrastructure, than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. However, the two garden settlements at Heathlands and North of Marden could take a long time to deliver, which means that additional sustainable transport infrastructure would not be provided for in the early years of the plan period. Furthermore, research of practical experience elsewhere<sup>418</sup> has concluded that garden settlements can become car dependent and create more traffic for the local roads as many residents drive to and from cities to work. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. In addition, as residual development would be provided within Maidstone town, Rural Service Centres and Larger Villages under this option, it is likely that existing public transport options would continue to be overcapacity. Therefore, mixed minor positive and significant negative effects are expected for this option.

**C.231** The garden settlements developed under Scenario 2b (Heathlands + Lidsing) would seek to minimise their impact on the existing transport network through the creation of high-quality, large development with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas.<sup>419</sup> However, the potential effects described under Scenario 2a would also be felt here. Therefore, mixed minor positive and significant negative effects are expected for this option.

**C.232** Scenario 2c (North of Marden + Lidsing) would seek to minimise their impact on the existing transport network through the creation of high-quality, large development with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas.<sup>420</sup> However, the potential effects described under Scenario 2a would also be felt here. Therefore, mixed minor positive and significant negative effects are expected for this option.

**C.233** Maidstone town centre development under Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would deliver the same beneficial transport infrastructure measures as Scenario 1. In addition, this option would also include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.<sup>421</sup> The infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. The garden settlement development component of this option would have similar effects on sustainable travel and congestion as described for Scenarios 2a, b and c above, therefore, significant negative effects are also expected.

### Mitigation

**C.234** Ensure that public transport and active travel connections are created and enhanced at the same time housing and economic development is being undertaken. This could be done through various mechanisms, such as S106 agreements.

### Conclusion

**C.235** Each of Scenario 3 performs most sustainably against this SA objective as its planned improvements to existing public transport and infrastructure serving Maidstone town centre would benefit a large proportion of the population of the Borough, since 70% of the Borough live within the urban area of Maidstone. The sustainable transport effects of the garden settlements component of this spatial strategy option and of Scenarios 2a, b and c are more uncertain and potentially negative, particularly in the short term. Scenario 1 and each of

<sup>417</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

<sup>418</sup> Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality

<sup>419</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

<sup>420</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

<sup>421</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

Scenario 2 are also expected to improve public transport and active travel but not to the same extent. Although Scenario 1 has the same SA score as Scenarios 3a, b and c for this SA objective, its positive effects, although significant, are not expected to be as great as those for each of Scenario 3. In addition, it is likely that additional housing and economic development will continue to stretch roads and rail that are over capacity under all scenarios.

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

**11.7** 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>422</sup>.

**C.236** Scenario 1 (LP17 Continued) would have the most dispersed growth for the Borough, therefore it could have the highest probability of developing within an MSA. Each of the growth locations it sets out lies within an MSA. Overall, it is likely that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

**C.237** Scenario 2a (Heathlands + North of Marden) is expected to have negative effects on this SA objective as both of the two potential locations for garden settlements are located within MSAs and Heathlands also contains a safeguarded mineral and waste site. It is likely that this scenario would provide housing and economic development within MSAs, sterilising the mineral deposits. As such, significant negative effects are expected.

**C.238** Scenario 2b (Heathlands + Lidsing) is expected to have negative effects on this SA objective as one of the two potential locations for garden settlements (Heathlands) is located within an MSA and contains a safeguarded mineral site. It is likely that this scenario would provide housing and economic development within MSAs, sterilising the mineral deposits. As such, significant negative effects are expected.

**C.239** Scenario 2c (North of Marden + Lidsing) is expected to have negative effects on this SA objective as North of Marden garden settlement is located within an MSA. It is likely that this scenario would provide housing and economic development

within MSAs, sterilising the mineral deposits. As such, significant negative effects are expected.

**C.240** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would focus some development within the town centre and urban area of the Borough. There are no MSAs within the town centre of Maidstone, however within the urban area there are small portions in the south-western sections that are designated as MSAs. In addition, each scenario would provide a garden settlement, Scenario 3b would provide one at Heathlands which lies within a safeguarded mineral and waste site and MSA. Scenario 3c is also expected to be located within an MSA. As such, significant negative effects are expected for both scenarios. Scenario 3a would provide a garden settlement in Lidsing which is not located within a MSA, therefore negligible effects are expected.

### Mitigation

**C.241** It is recommended that delivery of housing and economic development in MSAs is phased, such that mineral resources can be recovered prior to construction, where economically viable. All other matters being equal, sites that would not result in the sterilisation of mineral resources should be preferred (e.g. when choosing a location for a new garden settlement).

### Conclusion

**C.242** Each of the options is likely to have significant negative effects as there is a possibility for mineral resources within MSAs to be sterilised by development.

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

**C.243** 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

<sup>422</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)

of Grade 3, with small areas of Grade 1, Grade 2 and Grade 4<sup>423</sup>.

**C.244** The dispersed growth under Scenario 1 (LP17 continued) could result in development within Grades 1, 2, or 3 agricultural land and on other greenfield land. However, development will be provided in Maidstone town centre and urban area which would avoid agricultural land. As such, mixed minor positive and significant negative effects with uncertainty are expected, the uncertainty relating to the exact locations that would be developed.

**C.245** Scenario 2a (Heathlands + North of Marden) would provide a large proportion of its development at two large new greenfield garden settlements at Heathlands and North of Marden. The North of Marden garden settlement location lies within Grades 2 and 3 agricultural land and the extent of Grade 2 land is such that it is unlikely that its development could be avoided. The Heathlands garden settlement location lies within 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 in both locations. Residual development would be dispersed across urban extensions to Maidstone town and at Rural Service Centres, Larger Villages and in the Countryside. Overall, significant negative effects are identified. However, some development would also be directed to Maidstone town centre and urban area, which would avoid agricultural land, therefore minor positive effects are also expected.

**C.246** Scenario 2b (Heathlands + Lidsing) would provide a large proportion of its development at two large new greenfield garden settlements at Heathlands and Lidsing. Each of the 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. Residual development would be dispersed across urban extensions to Maidstone town and at Rural Service Centres, Larger Villages and in the Countryside. Therefore, under the precautionary principle, uncertain significant negative effects are identified, the uncertainty relating to the exact locations that would be developed. However, some development would also be directed to Maidstone town centre and urban area, which would avoid agricultural land, therefore minor positive effects are also expected.

**C.247** Scenario 2c (North of Marden + Lidsing) would provide a large proportion of its development at two large new greenfield garden settlements at North of Marden and Lidsing.

The North of Marden garden settlement location lies within Grades 2 and 3 agricultural land and the extent of Grade 2 land is such that it is unlikely that its development could be avoided. The Lidsing location only contains 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. Residual development would be dispersed across urban extensions to Maidstone town and at Rural Service Centres, Larger Villages and in the Countryside. Overall, significant negative effects are identified. However, some development would also be directed to Maidstone town centre and urban area, which would avoid agricultural land, therefore minor positive effects are also expected.

**C.248** Like Scenario 1, Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would focus development within the town centre and wider urban area of Maidstone, thereby avoiding agricultural land. However, for each scenario development would also take place in urban extensions to Maidstone town, which is mostly Grades 1 and 2 agricultural land. Each garden settlement is located within Grade 3 agricultural land and furthermore the garden settlement located at Marden would also lie partially within Grade 2 agricultural land. The extent of Grade 2 land is such that it is unlikely that its development could be avoided. 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 in both locations. Depending on where the development would take place it could be located within high quality agricultural land. As such, a mixed minor positive and significant negative effect is expected with uncertainty.

#### Mitigation

**C.249** All other matters being equal, give preference to brownfield sites, followed by greenfield sites that would avoid development within Grades 1 to 3a agricultural land.

#### Conclusion

**C.250** All of the scenarios would provide development within the town centre and urban area of Maidstone, thereby avoiding greenfield and higher quality agricultural land, resulting in minor positive effects. However, they all have the potential to have significant negative effects on this objective as all of them could result in Grades 1, 2 and 3a agricultural land being lost. Scenario 1 would provide development throughout the rest of the Borough. Scenarios 2a, b and c and 3a, b and c provide for greenfield garden settlements that

<sup>423</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)

would be likely to be within Grade 3 (and in the case of North of Marden, also some Grade 2) agricultural land. All options include development at the edges of Maidstone town and smaller settlements, most of which are likely to be greenfield.

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

**C.251** Kent is one of the driest regions in England and Wales<sup>424</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>425</sup>. These issues could 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 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. There is also an increased risk of over-abstraction of water resources.

**C.252** Scenario 1 (LP17 Continued) would provide additional housing, economic development and infrastructure which would be likely to put the region's water resources and water quality under additional stress. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand.

**C.253** Scenario 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and Scenario 2c (North of Marden + Lidsing) would have similar effects to Scenario 1 for the same reasons. In addition, these options would result in substantially more development for B-use employment than Scenario 1 and depending on the particular business activities, this could result in significant additional use of water resources and/or wastewater discharges. Therefore, significant negative effects are expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. None of the garden settlement locations is within groundwater source protection zone 1. The garden settlements developed under these options offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the

other options, which means that the scenarios also receive a minor positive effect.

**C.254** Scenario 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would concentrate development within the town centre which is already developed and contains impermeable surfaces. Additional development in this area could increase the amount of pollution in urban runoff, which is already an issue for the catchment the Borough is within. In addition, additional development would intensify the water stress within the region, similarly to the other options. In addition, this option would result in substantially more development for B-use employment than Scenario 1 (although not quite as much as Scenario 2a, b and c) and depending on the particular business activities, this could result in significant additional use of water resources and/or wastewater discharges. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. In addition, with the development of a garden settlement, there will be the need for large amounts of water, however, garden settlements offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the other options, which means that the scenario also receives a minor positive effect.

### Mitigation

**C.255** 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.

### Conclusion

**C.256** Each of the options are expected to have negative effects on this SA objective as water resources in the Borough are already suffering from high levels of water use, therefore any development without water efficiency measures will

<sup>424</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>425</sup> AECOM (2017) Kent Water for Sustainable Growth Study



worsen the situation. Of all the options, Scenarios 2a, b and c and 3a, b and c probably offer the best opportunity to design-in water efficiency and wastewater management from the outset in an integrated and comprehensive way, due to their inclusion of entirely new garden settlements.

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

**C.257** 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. 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>426</sup>.

**C.258** New development under Scenario 1 (LP17 Continued) would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, and Larger Villages). As such, it is expected to have significant negative effects on this SA objective as it would continue travel patterns that have developed over time, including significant car use, particularly in the more rural areas. Currently a high proportion of the Borough's residents drive to work, and the uptake of more sustainable travel options is limited<sup>427</sup>. It is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. However, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)<sup>428</sup>, all of which will improve the existing sustainable modes of transport, and potentially air quality, resulting in a minor positive effect.

**C.259** Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to result in a small increase in traffic congestion within the Rural Service Centres and Larger Villages due to the residual development located at these locations. Most

development under these options would be directed to new garden settlements, which seek to minimise transport impact on the existing network through the creation of high-quality large development with high levels of sustainability and trip internalisation and provide improved sustainable transport options for surrounding areas<sup>429</sup>. These options therefore present opportunities for new patterns of infrastructure provision and for the creation of a self-sustaining community. A principle of garden settlements is to provide green infrastructure and, particularly where this involves tree planting, this would help to absorb and disperse air pollutants. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. As it is likely that garden settlements will be masterplanned, the incorporation of environmentally sensitive planning and reduction of the need to travel by car through good site layout and promotion of walking, cycling and public transport is likely. However, garden settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would be unlikely to be provided in the early years of the plan period. Furthermore, research of practical experience elsewhere has shown that, despite original intentions, garden settlements can become car dependent and create more traffic for the local roads as many new residents drive to and from cities to work<sup>430</sup>. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. Car journeys into Maidstone town from any of the three garden settlements would be likely to pass through the AQMA. The North of Marden garden settlement (part of scenarios 2a and 2c) offers greater potential for longer distance journeys to be taken by rail rather than road due to its proximity to Marden rail station, which offers frequent peak services to central London via Tonbridge and Sevenoaks. In addition, Scenarios 2a, 2b and 2c would result in substantially more development for B-use employment than Scenario 1 and depending on the particular business activities and amounts of associated road traffic

<sup>426</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>427</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)

<sup>428</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

<sup>429</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

<sup>430</sup> Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality

movements and energy use from operations, this could result in significant additional air pollution emissions. Overall, mixed minor positive and significant negative effects are expected for these options.

**C.260** Development in the Maidstone urban area under Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would be accompanied by the same transport infrastructure provision as Scenario 1. It would additionally include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.<sup>431</sup> These transport improvements would benefit a large proportion of the population of the Borough since 70% of the Borough live within the urban area of Maidstone, and there would be greater opportunities to use more sustainable modes of transport including walking and cycling for everyday journeys, reducing the effects on air quality. As such, it would have significant positive effects on this SA objective. The development of a garden settlement under each of the scenarios would have similar effects on transport and air quality as described for Scenario 2 above, therefore significant negative effects are expected from that component of the option. In addition, this option would result in substantially more development for B-use employment than Scenario 1 (although not quite as much as Scenario 2) and depending on the particular business activities and amounts of associated road traffic movements and energy use from operations, this could result in significant additional air pollution emissions. Overall, significant positive and significant negative effects are expected.

### Mitigation

**C.261** 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.

### Conclusion

**C.262** Scenarios 3a, b and c perform best against this SA objective as this option aims to significantly improve public transport and infrastructure in the Maidstone urban area which would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone and currently experience high levels of air pollution. However, for Scenarios 2a, b and c and 3a, b and c, while the development of garden settlements offers the opportunity to design-in sustainable modes from the start, experience elsewhere suggests that car use will still dominate. Scenario 1 is also expected to improve public transport and active travel, particularly in Maidstone urban area, but not to the same extent as each Scenario 3.

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

**C.263** 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>432</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>433</sup>. The risk of flooding is likely to be intensified due to climate change.

**C.264** Scenario 1 (LP17 Continued) would provide additional housing, economic development and additional infrastructure in line with the existing settlement hierarchy. As such, there is a risk that development will be located within Flood Zones 2 and 3, for example in Maidstone town centre and around the Rural Service Centres in the south of the Borough, Marden, Staplehurst, and Headcorn, although proposals for development within these areas of higher flood risk would have to satisfy the sequential and exception tests, as relevant. In addition, the creation of more impermeable surfaces creates additional flood risk as it is likely that greenfield land will be developed within the more rural areas of the Borough. Overall, significant negative effects are expected, with uncertainty relating to the specific development locations that will come forward and the avoidance and mitigation that may be available within sites.

**C.265** Scenario 2a (Heathlands + North of Marden) would provide two new large garden settlements at Heathlands and North of Marden. Although neither of these locations includes significant areas within Flood Zones 2 or 3, a substantial part

<sup>431</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic paper

<sup>432</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>433</sup> Ibid

of the Heathlands and North of Marden locations have relatively high groundwater flood risk. It is likely that greenfield land will be developed for each of the large settlements, thereby reducing the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems (SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

**C.266** Scenario 2b (Heathlands + Lidsing) would provide two new large garden settlements at Heathlands and Lidsing. Although neither of these locations includes significant areas within Flood Zones 2 or 3, a substantial part of the Heathlands location has relatively high groundwater flood risk. It is likely that greenfield land will be developed for each of the large settlements, thereby reducing the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems (SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

**C.267** Scenario 2c (North of Marden + Lidsing) would provide two new large garden settlements at North of Marden and Lidsing. Although neither of these locations includes significant areas within Flood Zones 2 or 3, a substantial part of the North of Marden location has relatively high groundwater flood risk. It is likely that greenfield land will be developed for each of the large settlements, thereby reducing the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems (SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

**C.268** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would direct a significant amount of development to Maidstone town. Although some sites within the urban area would already be developed and hence contain impermeable surfaces, others at the urban edge would be on greenfield sites, therefore effects on surface water infiltration would be mixed. The River Medway runs through Maidstone town centre and has a history of flooding, which could increase due to climate change. Additional development in this area would potentially be exposed to higher levels of fluvial flood risk and could also increase the amount of urban runoff, which is already an issue for the catchment. These scenarios would also develop a new garden settlement at Heathlands, Lidsing or Marden. The effects of these are described under Scenario 2 above and overall, this scenario would have mixed significant negative and minor positive effects on this SA objective.

#### Mitigation

**C.269** Avoid development within Flood Zones 2 and 3, where appropriate and in accordance with the sequential and exception tests. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could be achieved through various mechanisms, such as S106 agreements.

#### Conclusion

**C.270** As each option aims to provide additional development throughout the Borough of Maidstone, it is likely that the increased amount of impermeable areas will reduce the infiltration capacity and flood retention provided by greenfield land. For example, each option would provide development around the settlement of Headcorn which lies within and is surrounded by Flood Zones 2 and 3. Therefore, development would have to be located to the north east of the settlement to be located out of the flood zones. However, Scenarios 2a, b and c and 3a, b and c would perform the best against this SA objective. Although the garden settlements provided under these scenarios would also result in the development of greenfield land, they would be likely to be masterplanned to employ SuDS and environmentally, climate and water sensitive planning through the incorporation of design codes.

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

**C.271** 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.

**C.272** Scenario 1 (LP17 Continued) would provide additional housing, economic development and additional infrastructure in accordance with the settlement hierarchy. As such, this development could increase greenhouse gas emissions through the higher number of private vehicles on the road and amount of energy generated from the construction and occupation of new housing and economic development. Therefore, significant negative effects are expected. However, distributing development in line with the existing settlement hierarchy would mean that a significant proportion of new development would be focused on Maidstone town, where there is good access to existing higher order services and to employment, reducing the need to travel and transport related carbon emissions. Therefore, a minor positive effect is also expected.

**C.273** Scenario 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) would provide two large new garden settlements that offer the opportunity to create energy efficient development and operations, through the promotion of an integrated network of sustainable modes of transport for internal journeys, and the incorporation of energy efficiency and renewable and low carbon energy generation into settlement design, for example by incorporation of district heating schemes. However, as has already been described, experience to date indicates that garden settlements tend to generate significant car journeys, despite best intentions at the planning and design stage. In this regard, it is notable that all of the garden settlement locations are in areas of the Borough from which average commuting distances are currently relatively long (between 12 and 15km) and there is no guarantee that new residents of garden settlements would take up new jobs that are provided in those locations, so that a proportion of new residents are likely to travel long distances to work with many of these journeys being by car with associated carbon emissions. The proximity of the North of Marden location to a rail station with frequent peak services to central London should reduce the emissions associated with long distance commuting for that garden settlement relative to the other two locations. In addition, as previously stated, it is likely that residual development within Rural Service Centres and Larger Villages will utilise the existing transport infrastructure which is already overstretched. Overall, mixed minor positive and significant

negative effects with uncertainty are expected for Scenarios 2a, 2b, and 2c.

**C.274** One element of Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would concentrate development within and adjoining Maidstone town. There is a greater opportunity in the urban area, particularly the town centre, to use sustainable modes of transport for a variety of journeys, given the concentration of a range of jobs, services and facilities. Major new public transport infrastructure investment as part of the plan to revitalise the town centre<sup>434</sup> would support modal shift. However, car use is currently high, and could increase with additional development, thereby increasing greenhouse gas emissions. There may be less opportunity to incorporate larger scale energy efficiency and renewable energy networks within an already highly developed urban area than at large new masterplanned developments on greenfield sites. In addition, each scenario under this option would provide one large garden settlement with effects similar to those already described above for Scenarios 2a/b/c. Overall, mixed significant negative and significant positive effects with uncertainty are expected from this option.

### Mitigation

**C.275** Implement Local Plan policies and design codes for strategic development that require low carbon construction, energy efficient building design, provision of decentralised, low carbon energy generation (e.g. district heating networks and micro-renewables). In addition, improvements to public transport and introduction of car sharing programs could reduce the Borough's greenhouse gas emissions.

### Conclusion

**C.276** Each of the options are expected to have negative effects on this SA objective as development requires energy use in its construction and occupation. However, Scenarios 3a, b and c offer the opportunities to incorporate, from the outset, integrated sustainable transport networks, and energy efficiency and renewable energy networks in a large new planned settlement as well as the considerable opportunity to promote sustainable modes of transport in and close to the concentration of services and facilities available at Maidstone town centre. It is therefore judged to be the most sustainable option in relation to this SA objective.

<sup>434</sup> Maidstone Borough Council (June 2020) Transport and Air Quality Topic Paper

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

**C.277** 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.

**C.278** Each option has the potential to adversely affect biodiversity. Scenario 1 (LP17 Continued) which would distribute development according to the existing settlement hierarchy represents a more dispersed approach to development than the other options. Much of the development would be likely to be on greenfield land and could be on or within close proximity to biodiversity assets or disrupt the Borough's ecological networks, although this is uncertain until development sites are allocated. Overall, a significant negative effect with uncertainty relating to the location and design of development is expected for this SA objective.

**C.279** Scenario 2a (Heathlands + North of Marden) would provide two large new garden settlements at Heathlands and North of Marden, both of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural areas and it is likely that development will occur on greenfield land. The two garden settlements to be provided by this option are close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. In addition, the garden settlement at North of Marden would be located close to and within the relevant Impact Risk Zone of Marden Meadows SSSI and would overlap with Bridgehurst Wood Ancient Woodland. The Heathlands garden settlement location overlaps several Local Wildlife Sites and areas of Ancient Woodland. Therefore, significant negative effects are identified for this option. Conversely, garden settlements are expected to provide additional green space thereby offering the opportunity to create additional wildlife habitat and biodiversity net gain. There is also the opportunity to link up habitats within biodiversity opportunity areas. Therefore, minor positive effects are also expected against this option.

**C.280** Scenario 2b (Heathlands + Lidsing) would provide two large new garden settlements at Heathlands and Lidsing, both of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural

areas and it is likely that development will occur on greenfield land. The two garden settlements to be provided by this option are close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. In addition the location for Lidsing garden settlement overlays an area of Ancient Woodland and the relevant SSSI Impact Risk Zone for Medway Estuary and Marshes SSSI. The Heathlands garden settlement location overlaps several Local Wildlife Sites and areas of Ancient Woodland. Therefore, significant negative effects are identified for this option. However, positive implications come with garden settlements, which were described above under Scenario 2a. Therefore, minor positive effects are also expected against this option.

**C.281** Scenario 2c (North of Marden + Lidsing) would provide two large new garden settlements at Lidsing and North of Marden, both of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural areas and it is likely that development will occur on greenfield land. The two garden settlements to be provided by this option are close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. In addition, the garden settlement at the North of Marden would be located close to and within the relevant Impact Risk Zone of Marden Meadows SSSI and would overlap with Bridgehurst Wood Ancient Woodland. The location for Lidsing garden settlement overlays an area of Ancient Woodland and the relevant SSSI Impact Risk Zone for Medway Estuary and Marshes SSSI. Therefore, significant negative effects are identified for this option. However, positive implications come with garden settlements, which were described above under Scenario 2a. Therefore, minor positive effects are also expected against this option.

**C.282** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) are expected to have mixed effects on this SA objective. A Maidstone-focused approach is likely to increase the potential for development on brownfield land rather than greenfield land compared to the other options, particularly Scenarios 2a/b/c, therefore minor positive effects are expected. Although, there are less biodiversity designations within Maidstone urban area, minor negative effects are also expected because sections of the urban area lie within a Biodiversity Opportunity Area, Ancient Woodland and Local Wildlife Sites. In addition, the scenarios under this option would provide one new garden settlement with effects similar to those already described above for Scenarios 2a/b/c. However, positive implications come with garden settlements, which were described above under Scenario 2a. Overall, mixed minor negative and minor positive effects are expected.

## Mitigation

**C.283** Avoidance of development in areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan 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.

## Conclusion

**C.284** Both Scenarios 1 and 3a, b and c are expected to concentrate development within the town centre of Maidstone which has the least amount of biodiversity designations compared to the potential development locations of the other options. However, Scenarios 2a, b and c and 3a, b and c provide opportunities to plan green infrastructure and biodiversity net gain on a settlement-wide scale, as part of the masterplanning of new garden settlements. As such, Scenarios 3a, b and c are expected to be the best performing option overall against this SA objective. However, each of the scenarios are expected to perform negatively as they each could adversely affect biodiversity designations and networks. For example, for each option, new development is to be provided around the settlement of Headcorn, which lies adjacent to the River Beult, SSSI.

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

**C.285** 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>435</sup>.

**C.286** Scenario 1 (LP17 Continued) is a dispersed option and therefore has the potential to adversely affect heritage assets as each existing settlement has an array of historic designations. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

**C.287** Scenario 2a (Heathlands + North of Marden) proposes two locations for potential garden settlements at Heathlands and North of Marden, each of which are close to heritage

assets. In addition, the Heathlands location contains two areas of archaeological potential and a variety of listed buildings and is adjacent to (and slightly overlapping) Chilston Park, a grade II Registered Park and Garden. However, the master planning of large new developments such as garden settlements offers the opportunity to mitigate effects on heritage significance through appropriate site layout and design codes could provide mitigation through requirements for appropriate development design. In addition, this option would provide residual new development within Maidstone Town Centre, Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

**C.288** Scenario 2b (Heathlands + Lidsing) proposes two locations for potential garden settlements at Heathlands and Lidsing, each of which are close to heritage assets. In addition, the Heathlands location contains two areas of archaeological potential and a variety of listed buildings and is adjacent to (and slightly overlapping) Chilston Park, a grade II Registered Park and Garden. However, positive implications come with garden settlements, which were described above under Scenario 2a. In addition, this option would provide residual new development within Maidstone Town Centre, Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

**C.289** Scenario 2c (North of Marden + Lidsing) proposes two locations for potential garden settlements at North of Marden and Lidsing, each of which are close to heritage assets. However, positive implications come with garden settlements, which were described above under Scenario 2a. In addition, this option would provide residual new development within Maidstone Town Centre, Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

**C.290** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach

<sup>435</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)

(Heathlands)) and 3c (One Garden Settlement Approach (Marden)) have the potential to have adverse effects on the Borough's heritage assets as the majority of Listed Buildings and Conservation Areas are within the town centre and urban area of Maidstone. In addition, this option includes development at one garden settlement, at Lidsing, Heathlands or Marden, and more dispersed residual growth, the potential effects of which are described under Scenario 2 above. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

### Mitigation

**C.291** 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.

### Conclusion

**C.292** Each of the options has the potential to have a negative impact on the historic environment, however as no heritage impact assessment has been conducted yet, the effects of each option are uncertain at this stage.

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

**C.293** 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 out in the Council's landscape capacity study.<sup>436</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).

**C.294** Scenario 1 (LP17 Continued) would distribute development according to the existing settlement hierarchy, therefore most development would be directed in or on the

edges of Maidstone town, the Rural Service Centres and the Larger Villages. 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. However, much development under this option could be on greenfield sites at the edge of settlements and a number of areas around the edge of Maidstone town, as well as around many of the Rural Service Centres and the Larger Villages which have very high or high landscape sensitivity, creating the potential for significant negative effects. These are uncertain as the exact locations of development are unknown.

**C.295** Scenario 2a (Heathlands + North of Marden) would result in the introduction of large urban developments at North of Marden and Heathlands in the form of new garden settlements. The Heathlands location lies within areas of both high and low landscape sensitivity, while the entirety of the North of Marden location lies within areas of high landscape sensitivity. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and garden settlements 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 are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely which could mitigate effects in these developments.

**C.296** Scenario 2b (Heathlands + Lidsing) would result in the introduction of large urban developments at Lidsing and Heathlands in the form of new garden settlements. 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 and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and garden settlements 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 are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for

<sup>436</sup> Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

green infrastructure, sensitive planning and strategic scale landscaping is likely which could mitigate effects in these developments.

**C.297** Scenario 2c (North of Marden + Lidsing) would result in the introduction of large urban developments at Lidsing and North of Marden in the form of new garden settlements. Lidsing lies on the edge of the AONB and is mainly within an area of moderate landscape sensitivity. The entirety of the North of Marden location lies within areas of high landscape sensitivity. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and garden settlements 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 are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely which could mitigate effects in these developments.

**C.298** Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) is more likely to avoid adverse effects on the landscape where development is concentrated within the built-up urban area but the option would also direct development to the edge of Maidstone town. However, even within the urban area some adverse effects on this SA objective could occur as there are three areas of Landscape of Local Value that run across the southern section of the urban area. In addition, Scenario 3a would provide a garden settlement at Lidsing which lies on the edge of the Kent Downs AONB and within an area of moderate landscape sensitivity. For Scenarios 3b and 3c, the garden settlement at Heathlands would partly lie within an area of high landscape sensitivity while the garden settlement at Marden would lie entirely within an area of high landscape sensitivity. Overall, significant negative effects are expected. Again, uncertainty is attached to this SA objective as the exact location of development is currently unknown.

### Mitigation

**C.299** Avoidance of development within the areas of highest landscape sensitivity would provide the best mitigation. However, requirements for development site layouts and development design that seek to reduce adverse effects on the landscape should also be implemented via Local Plan policy and design codes for large scale developments.

### Conclusion

**C.300** Each of the options has the potential to have a significant negative effect on the landscape unless appropriate mitigation (see above) is implemented.



## Appraisal of garden settlement options

**C.301** This section provides a detailed description of the SA findings for the garden settlement options. A summary of these findings, including a table of the sustainability scores, and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4**.

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

**C.302** SA objective 1: Housing was scoped out of the appraisal of garden settlement options. Performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver the right types and tenures of housing at prices that people can afford, as well as addressing the needs of specialist groups. These factors do not depend on the location of the garden settlements and information on expected affordable housing provision, provision for specialist groups, or housing design was not provided by the Council for the options. As such, these factors will instead be taken into account by the SA through appraisal of Local Plan policies on the total quantum of housing to be provided, the mix of housing types and tenures, affordable housing requirements, and design.

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

**C.303** The potential effects of the garden settlement options in relation to SA objective 2: Services and facilities were tested by analysis of their proximity to essential services and facilities, and to employment. Access to open space was considered under SA objective 4: Health and not repeated here. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.304** Effects anticipated in relation to each of the garden settlement options are quite varied. The Lidsing option is well related to existing urban areas at the Medway Towns Conurbation (including the district centre at Hempstead Valley) and also proposes significant employment provision and new services, thereby resulting in more positive sustainability effects. The Land North of Marden and Heathlands options are more remote and do not offer an equivalent provision of employment. More detail is provided in comments below.

**C.305** For the North of Marden garden settlement, the southwestern part of this site is close to Marden and this results in these facilities being within a distance which could facilitate access by walking, including a primary school and GP surgery. However, the railway has a very significant segregating effect and, as identified in the Stantec

Deliverability and Viability Assessment, an attractive and direct walking route will be required to make best use of this close proximity. The information in table 5.1 indicates that the council would require this matter to be resolved as part of the design of the garden settlement and / or planning mitigation. For those areas further away from the rail station, it is likely that distances to even the furthest boundary will still be within 5km and cycling is likely to be a feasible transport option, subject to overcoming the segregating effect of the railway. The site is also adjacent to a relatively large employment area, the Wheelbarrow/Pattenden Lane Industrial Estate (although this has little scope to expand), which would be within a suitable distance so as to make walking and cycling feasible travel options, subject to provision of appropriate routes.

**C.306** In terms of new provision, the Stantec Deliverability and Viability Assessment and the information provided by the council in Table A.7. set out that the North of Marden garden settlement would include a new primary school, nursery and health centre. In addition, new neighbourhood and local centres and a new area of employment are proposed within the site. The council policy requirements is that this settlement should deliver a ratio of 1 job to 1 house.

**C.307** As set out in the Stantec Deliverability and Viability Assessment, and information provided by the council in Table A.7, no secondary school provision is anticipated to be provided at North of Marden. It is not made clear where secondary age pupils living in the settlement will attend school in any of the reports and in any case, there are no secondary schools within a distance which would facilitate access by active transport. As such, this is likely to lead to commuting off-site on a daily basis to access secondary school provision.

**C.308** In summary, a number of facilities and services would be required to be provided within the settlement at Land North of Marden including primary school, nursery, a community facility and health provision. These are proposed within a network of neighbourhood and local centres. The location of these throughout the new settlement will need sensitive distribution to facilitate access by more sustainable modes such as walking and cycling, given the size of the site. It would be possible to achieve walking distances of approximately 1km to a central location for the whole site, and a denser provision of houses within the more central area could reduce this distance further. In addition, there are existing services and facilities at Marden which the new settlement can potentially utilise. New employment of 1 job: 1 house will be required by the council. This being the case, some people may choose to work away from the site, and even if this ratio is achieved, there are likely to be some residents who would have to find employment outside the settlement and surrounding area. Opportunities to work at the adjacent employment area exist, but the Stantec report sets out that there is little room for expansion here. As such it is anticipated

that there will be significant commuting off site and out of the area. Average commuting distances from this area are currently over 14km, and therefore relatively long for the borough, which is likely to be the case due to strong rail links to London. In addition there will be a need to travel off site for secondary age pupils. Marden rail station has approximately four services in the peak times, which becomes an approximate half hourly frequency during the day. The Stantec Deliverability and Viability Report Assessment sets out that although this is likely to be used by new residents, the extent to which it will be has not been determined. The Stantec assessment indicates significant increase in motorised vehicle traffic on the surrounding network. These things considered, it is likely that the development of a garden settlement at North of Marden is likely to lead to significant commuting off site to access services and facilities. This is likely to lead for some, to a dependence on private cars or at worst, an inability to readily access services, facilities and employment. The provision of some day to day facilities and services in the settlement will limit this, but only to a certain extent, resulting in minor negative effects overall in relation to this SA objective.

**C.309** Residents and employees in the Lidsing garden settlement option are likely to look to use existing services and facilities in the Medway Towns Conurbation, to its immediate north and within the Medway Council area. It is important to note that the area of the Medway Towns Conurbation immediately surrounding this site is largely residential and does not offer a significant provision of facilities. In accordance with the detailed site assessment, other than schools, the site is too far from existing facilities to encourage access by walking to these, however distances are likely to mean that cycling is a feasible option. The information provided by the council in Table A.7 sets out that a number of facilities would be provided within the site including a GP surgery, primary school and a community centre. A network of village / local centres is also envisaged, whereby some services will be provided. Given the size of this site, it is likely that central provision would place almost all proposed homes within 800m of these new facilities and services, which is likely to encourage access by sustainable modes. The provision of facilities at Lidsing would also help to reduce access distances for the surrounding, established residential areas. This could have positive sustainability effects but is dependent on sufficient capacity being provided to accommodate nearby, existing residents and suitable route connections. For secondary school provision, the Stantec Deliverability and Viability Assessment sets out that either a new secondary school will be provided within the proposed settlement or in an area near the proposed settlement, to the north (within Medway). However, this is not an anticipated requirement in the information provided by the council in Table A.7 and has therefore not been assumed by the SA. The proposals for

Lidsing also include significant provision of employment land, which according to the Stantec Deliverability and Viability assessment would provide an appropriate mix to meet the local market requirements, and would provide significant employment opportunities (over the 1 job : 1 house ratio sought by MBC), allowing good opportunity for residents of the settlement to work there too – although it must be noted that people will not always choose such live / work patterns. In accordance with the above, the proposed facilities and services within the Lidsing site are considered likely to enhance access to essential services and facilities compared to the current situation, for the residents of the proposed homes and the surrounding area. Occupants of the new settlement will still need to leave the site to access some higher order services and employment opportunities, however due to the relative proximity to the Medway Towns Conurbation and Maidstone, it is considered likely that these journeys would be shorter than would be the case from the other garden settlement options and therefore walking and cycling are likely to be more viable options for these off-site trips. In accordance with the above, minor positive effects are likely in relation to this SA objective.

**C.310** In relation to the Heathlands garden settlement, the area close to the western boundary of this site is within 800m of existing GP surgeries and primary schools in Lenham, which may facilitate travel on foot for those in this part of the settlement. For the majority of the site, the distance is too great to facilitate walking as a way to access these facilities. This said, the size of the site is such that travel by bicycle is likely to be a feasible option, particularly given the improvement to cycle infrastructure along the A40 corridor, as set out in Table A.7. The site is also in an area of the Borough from which average commuting distances are long relative to other parts of the Borough (over 14km), reflecting the strong rail links to London.

**C.311** The proposed centre at Heathlands will provide opportunities for employment and service provision, and this will provide opportunities for residents to access these by more sustainable means of travel. The information provided by the council in Table A.7 indicates that a GP surgery may be provided in the longer term, and whilst the timing of this is unclear, once established, this will allow residents to access facilities closer to home, which in general supports the use of sustainable travel modes. Given that the Heathlands site is larger than the other garden communities it would be appropriate to consider that the services and facilities provided here would be to a higher order than within the other options, although this is yet to be designated by policy and so does not form part of the consideration under this SA. It should also be noted that despite the provision of services and facilities within Heathlands, it will still be the case that there will be a need for residents and employees in this new settlement to access

higher order services and employment opportunities at larger and more established centres, certainly during the establishment of the garden settlement and to a lesser extent, even once the centre has been built out and occupied.

**C.312** The information provided by the council in Table A.7 and the Stantec Deliverability and Viability Assessment indicates that secondary aged pupils will be accommodated at Lenham Secondary School and that no provision is expected on site. Lenham secondary school is over 1km from the nearest boundary of the site and given the site is approx. 2.3km from western to eastern boundary, this is likely to lead to a dependency on cycling, public transport or private car as this is not likely to be an attractive distance to walk for the majority of pupils from the site. The information provided by the council in Table A.7 sets out that this garden settlement would be required to deliver employment provision equivalent of 1 job to 1 house, however it cannot be assumed that people will choose to work in the same settlement that they live. This is an important consideration given that the average commuting distance from this area is over 14km, which reflects the strong rail links with London. The Stantec Deliverability and Viability assessment identifies that the majority of residents would travel to Maidstone and Ashford to access employment. While the council envisages a new rail station which would link to Lenham, Charing, Ashford and destinations further afield, and bus services, to provide access to the surrounding settlements, there will still be a need to travel to these settlements. Although there will be options to utilise public transport, the distance travelled is not likely to encourage the use of active travel and this will result in some residents utilising the private car. For this reason Heathlands is considered likely to result in minor negative effects in relation to SA objective 2: Services and facilities.

### Mitigation

**C.313** The potential negative effects resulting from the Land North of Marden option could potentially be reduced by preparing a sustainable travel strategy to demonstrate how services and facilities will be accessed by public transport, particularly rail.

**C.314** The site at Lidsing could potentially be considered more sustainable if more information was provided about the location, deliverability and timing of the proposed secondary school and the specific provisions for active travel and public transport.

**C.315** The potential negative effects identified in relation to the Heathlands site could potentially be mitigated by the development of a sustainable travel strategy, demonstrating the likely use of sustainable modes of travel to access services and facilities.

**C.316** For all options which are likely to involve provision of secondary school places off site, consideration should be given to school buses as a way to help ensure access to schools is made by more sustainable travel modes and reduces the use of private cars.

### SA Objective 3: To strengthen community cohesion

**C.317** Although SA objective 3: Community was scoped out of the appraisal of residential site options, it is scoped in for the garden settlements as there are some general principles that will arise from garden settlement principles which have potential to affect community cohesion. Garden settlements are, by their nature, intended to be new self-sustaining settlements which offer employment, facilities and services for the community they create. For example, the information provided by the council in Table A.7 sets out that all garden settlement options will include at least one local centre and at least one community facility, as well as other facilities which are anticipated to generate a sense of community, such as primary schools. It is considered that all garden settlement options 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.

**C.318** 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. These are discussed for each option below.

**C.319** The North of Marden site is a large site, and it is indeed larger than Marden itself, and would therefore be likely to change the identity of Marden. There is uncertainty about whether this will be viewed negatively as some existing residents may, for example, welcome increased custom for existing business and the new facilities provided by the garden settlement. In addition, the Stantec report sets out that the designs of this settlement seek to achieve an area of green space in order to segregate the new settlement from Marden. This may result in the new settlement being considered as a place in its own right, rather than an extension to Marden, which could be viewed either positively or negatively by existing residents of Marden. The Stantec Deliverability and Viability Assessment indicates that traffic volumes could increase significantly (threefold in the AM peak) as a result of this option and there are also likely to be demands on existing services and facilities in Marden. It is not clear to what extent the residents of the new settlement would utilise these but some level is expected and this could be seen negatively if it reduces the capacity available to existing communities, for example availability of GPs, or train seats. In light of the above, significant negative effects are anticipated for the North of Marden option in addition to the minor positive effects

identified for all options. The negative effects are uncertain as individuals are likely to have different views about new development, which may be either positive, negative or mixed.

**C.320** As set out in the Stantec Deliverability and Viability Assessment, the Lidsing option 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 the other two options 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. As such, minor negative effects are also anticipated here in addition to the minor positive effects identified for all options. As for the other options, there is uncertainty about these effects for the reasons described for the North of Marden option.

**C.321** The Heathlands option is 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. Due to the lack of on-site provision, the Heathlands option is likely to result in greater pressure on services in Lenham, particularly GP facilities and secondary school provision and on one hand this may result in some community friction, but on the other planning contributions may enlarge and / or improve these facilities, which could be viewed positively. There is uncertainty about whether the settlement will be viewed negatively as some existing residents may, for example, welcome increased custom for existing business and the new facilities provided by the garden settlement. Overall, significant negative effects are anticipated for this option in addition to the minor positive effects identified for all options, largely due to the scale of change that this option represents. 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

**C.322** Performance of the Local Plan 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, development management policies and site-specific requirements set out in allocation policies 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. They should also seek to address any deficits in the capacity of local infrastructure that could be exacerbated by new demand from garden settlement residents.

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

**C.323** The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of noise pollution) or positive (e.g. access to open space) effects on health and well-being. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.324** In accordance with the information provided by the council in Table A.7, all garden settlement options are anticipated to include at least 50% open space. This is likely to increase opportunities for residents and employees in the garden settlements to engage in activities related to a healthier lifestyle such as outdoor sports and recreation and enjoyment of the natural world than would otherwise be the case. This is likely to result in significant positive effects for all garden settlement options in relation to this SA objective.

**C.325** Small areas of the option North of Marden are affected by rail noise. Mixed effects are therefore anticipated for this option, including the significant positive effects identified in relation to open space above, and minor negative effects in relation to the potential noise effects.

**C.326** In relation to the Lidsing option, this site is severely affected by high noise levels, due to its proximity to the M2. As such, this option is anticipated to result in mixed effects, noting the significant positive effects to arise from open space provision, significant negative effects are also anticipated arising from noise levels.

**C.327** In relation to the Heathlands option, there is a wastewater treatment works within the site. The information provided by MBC in Table A.7 sets out that this will be subject to a comprehensive review, although it is not clear at this stage what the result of this would be. In addition, there is an

inert landfill site within the site at Shepherds Farm Quarry. The Heathlands option 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. Mixed effects are therefore anticipated for this option, including the significant positive effects identified in relation to open space above, and significant negative effects in relation to the potential noise and odour effects.

### Mitigation

**C.328** In order to mitigate potential negative effects from noise, the development management or site allocation policies for the options allocated should seek to specifically address noise issues. The same is recommended for odour matters where these are likely to arise, specifically, in the Heathlands site. In this regard, it should be noted that noise and air pollution generally reduce very quickly with increasing distance from the source, therefore on the North of Marden and Heathlands options it may be possible to avoid effects by appropriate site layouts. For the Lidsing option, it may be more appropriate to address noise at the source 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.

**C.329** 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. While community spaces are proposed, this design / management principle could be included in local plan policies.

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

**C.330** All of the garden community options propose significant areas of land for economic uses and the information provided by MBC summarised in Table A.7 sets out an ambition of 1 job for every house. Should this be achieved, this will provide businesses with opportunities to find space to allow them to function. As such, all garden settlement options are considered likely to result in positive economic effects.

**C.331** It is important to note however that, as set out in the Stantec Deliverability and Viability Assessment, only the Lidsing proposal currently includes sufficient employment provision to achieve this, as a 20Ha business park is proposed which would provide space for at least 2,675 jobs. In addition the report concludes that the mix of employment would appear to meet local needs, and that the location is likely to be attractive for employment, given the proximity to the M2 and proposed junction improvement. As such, this option is considered likely to result in significant positive effects in

relation to this SA objective. The Stantec assessment sets out that the proposals for Land North of Marden include sufficient employment provision to provide for approximately 1,000 jobs, and those for Heathlands currently proposes sufficient employment provision for around 850 jobs. These are significantly less than the Lidsing option and the Council's 1:1 job to house target and as such, only minor positive effects are anticipated at these settlements in relation to this SA objective.

**C.332** There is uncertainty about these effects as the provision of employment requires the market to be able to support it in the locations proposed.

### Mitigation

**C.333** In order to increase positive sustainability effects in relation to the economy, further clarification should be provided in relation to the type and provision of employment land at the North of Marden and Heathlands garden settlement options in order to achieve the target 1:1 job to house ratio.

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

**C.334** As none of the garden settlements are proposed in or close to Maidstone Town Centre, and in the absence of evidence suggesting otherwise, negligible effects are considered likely in relation to SA objective 6: Maidstone town centre. This said, if evidence becomes available setting out the likely relationship of the garden settlements to Maidstone, for example the amount of expenditure within the town centre that is likely to arise from the garden community options, then this finding may be reviewed.

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

**C.335** 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 access to public transport facilities. This builds on the GIS-based findings in relation to the site assessment criteria set out in **Table C2** by considering other factors taken from the wider evidence base available for the garden settlements.

**C.336** For the North of Marden option, it has been noted in relation to the appraisal of SA objective 2: Services and

facilities that whilst there will be provision of new services and facilities as part of this settlement, and that whilst there are some services in Marden which are likely to be used by residents here, there will always be a need to travel out of this settlement to access higher order services and more employment opportunities. In terms of encouraging sustainable travel and reducing congestion, the southwestern corner of the site is adjacent to Marden rail station and proposals include a new link across the railway so as to make access to the station possible. This provides good potential for trips to be made using rail, thereby reducing the dependence and attractiveness of motorised private cars. As such, minor positive effects are considered likely in relation to this SA objective. As such, significant negative effects are anticipated in relation to this SA objective.

**C.337** The Lidsing garden settlement proposes a number of services and facilities within the site and a significant amount of employment. This is likely to reduce the need for residents of this settlement to travel, compared to the other options. Having said this, there will always be a need to travel out of this settlement to access higher order services and more employment opportunities. These factors have been appraised under SA objective 2: Services and facilities. In terms of encouraging sustainable travel, the proposal includes the creation of a new arm on Junction 4 of the M2. This is the key access strategy for the site and is likely to encourage use of private motorised vehicles over other modes. In terms of public transport, at present it is proposed to extend an existing bus route to increase access to Hempstead, which will form an orbital route linking Lordswood and Hempstead via the new settlement, thereby increasing route choice for the surrounding areas. However, Hempstead is predominantly a residential area rather than one that offers significant services and facilities. Due to the proximity of Lidsing to the Medway Towns conurbation, it is likely that cycling may also be a feasible option, although this will be dependent upon the provision of direct and attractive cycle routes. It is considered that on balance the proximity to the M2 and enhanced access to this is likely to facilitate use of private cars and therefore minor negative effects are anticipated from Lidsing in relation to this SA objective.

**C.338** In relation to the Heathlands option, whilst this will provide employment, facilities and services within the settlement, there will always be a need to travel out of this settlement to access higher order services and more employment opportunities. The information provided by MBC summarised in Table A.7 sets out that a new railway station will be provided on the South East line as part of this settlement, and improvements to the A40 cycling route will also be provided to enhance cycle accessibility to surrounding destinations. These new infrastructure provisions are considered likely to facilitate the use of sustainable methods of

travel for journeys offsite, resulting in minor positive effects in relation to this SA objective.

**C.339** Uncertainty is recorded against each of the findings in relation to this SA objective because the findings 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. The manner by which people will travel will be informed 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. It is therefore possible that future detail of these matters may change the SA findings.

### Mitigation

**C.340** Negative effects in relation to all garden settlement options could potentially be reduced if transport strategies were provided to demonstrate the likely use of sustainable modes of travel, particularly ensuring that public transport and active travel connections were created or enhanced as appropriate, in advance of or early in the delivery of housing development. Showcase public transport routes using attractive vehicles, high frequency services and appropriate road priority should be considered to support modal shift.

**C.341** 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.

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

**C.342** 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. Potential negative effects in relation to SA objective 8: Minerals were identified based on the proximity of development sites to relevant mineral resources. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.343** The Land North of Marden site intersects Mineral Safeguarding Areas for River Terrace Deposits. The intersection is approximately a fifth of the site, but this largely occurs at the centre of the site. The development of this

options is therefore likely to lead to the conflicts set out above, and minor negative effects are anticipated in relation to this SA objective.

**C.344** The Lidsing site does not intersect with any Mineral Safeguarding Area or Safeguarded Mineral Site and therefore negligible effects are anticipated in relation to this option.

**C.345** Regarding the Heathlands option, the 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 the boundary of the site, and a safeguarding area for this site extends east of this. In addition, approximately three quarters of the 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 option is likely to result in conflicts in relation to development and mineral-related activities. The development of this garden settlement option is considered likely to result in significant negative effects in relation to SA objective 8: Minerals.

#### Mitigation

**C.346** The potential negative effects in relation to mineral resources could be avoided by ensuring that where allocation of sites overlaying mineral resources cannot be avoided, those resources are recovered prior to construction, where economically viable.

**C.347** At Land North of Marden, consideration should be given as to whether it is appropriate to consider removal of the mineral resources as part of or prior to the construction of the garden settlement.

**C.348** For Heathlands in particular, development management policies and site allocation policies 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

**C.349** Brownfield (as opposed to greenfield) site allocations were assumed to have a positive effect in relation to this SA objective, although it is recognised that accommodating garden settlements on only previously developed land is unlikely, fewer negative sustainability implications are likely to arise from the use of more previously developed land than greenfield. 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. Further details

on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.350** All garden settlement options are on land classified as grade 3 (or better) agricultural land:

- The North of Marden option is largely grade 3 but includes areas of grade 2 in the centre and eastern tip of the site;
- The Lidsing Option sits entirely within grade 3 land;
- For the Heathlands option, 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).

**C.351** The development of all options area would therefore result in a loss of important agricultural soil resources.

**C.352** In addition, all options are identified as greenfield sites by MBC officers. Their development would therefore result in the loss of greenfield land.

**C.353** The loss of greenfield land and land which is of high agricultural quality occurs for all options and is likely to arise in significant negative effects in relation to this SA objective.

#### Mitigation

**C.354** It would be difficult to avoid all of the potential negative effects identified by the SA of garden settlement options 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

**C.355** Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies. Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local WwTWs or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual garden settlement options.

**C.356** 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. Site options were appraised in relation to these zones. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.357** All of the garden settlement options scored minor negative in relation to this SA objective because they each intersect with a drinking water safeguard zone (surface water) and/or SPZ 2 or 3.

**C.358** The entirety of the North of Marden option is within a surface water drinking water safeguarding zone but is not within an SPZ or groundwater drinking water safeguard zone.

**C.359** The entirety of the Lidsing option falls within SPZ 3 but is not within any other water protection or safeguarding areas.

**C.360** Approximately two fifths of the Heathlands site is within SPZ 3, the remainder being outside any other water protection or safeguarding areas.

### Mitigation

**C.361** 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 policies for the garden settlements allocated within the zones place appropriate requirements on development to avoid contributing to drinking water protection objectives.

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

**C.362** . 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>437</sup>.

**C.363** As discussed under SA objective 2: Services and facilities and SA objective 7: Sustainable travel, development of each of the garden settlement options has the potential to result in increased vehicular traffic and the related emissions have the potential to worsen local air quality. It is not possible with the evidence available at this stage to determine whether any of the garden settlement options will result in air pollution that significantly exacerbates issues in an existing air quality management area or would be likely to increase pollution levels above acceptable limits elsewhere. As such, effects are uncertain in relation to this SA objective. Once a preferred spatial approach has been selected, it is anticipated that transport and air quality modelling will be undertaken. This will be used to inform an appraisal against this SA objective in future iterations of the SA.

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

**C.364** 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. Garden settlement options were appraised in relation to related flood risk zones. Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design.

**C.365** The appraisal of garden settlement options in relation to this SA objective follows the findings of the detailed site assessment criteria as set out in **Table C2**, but taking into account that as large areas of development, the effects are likely to be defined by the amount of intersection with these areas, as a small amount of intersection can most likely be overcome by site specific design, whereas a larger amount of intersection is likely to affect the site in a more significant manner, for example by more severely limiting the opportunities for development within it.

<sup>437</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)



**C.366** Small areas of the North of Marden option are identified as flood zone 2 and other areas are identified as being at risk of 1 in 30 or 1 in 100 years surface water flooding. In addition approximately a fifth of the site is identified as having ground water flooding levels within 0.25m-0.5m of the surface.

**C.367** Small areas of the Lidsing option are identified as having a 1 in 30 year surface water flood risk. Groundwater flooding levels are anticipated to be at most 5m below ground level.

**C.368** Small areas within the Heathlands option are both within flood zone 3 and subject to a 1 in 30 year surface water flood risk, and in approximately a third of the site (running east-west through the centre) ground water flood risk is identified as being near the surface or within 0.5m of it.

**C.369** All garden settlement options therefore have small areas which are identified as being at risk of flooding, however in the North of Marden and Lidsing options, most of the site areas are free from such risk. Minor negative effects are therefore anticipated from these options in relation to this SA objective. In contrast, approximately a third of the Heathlands site is at high risk of groundwater flooding. As such, significant negative effects are anticipated at the Heathlands site in relation to this SA objective.

### Mitigation

**C.370** As large areas of development, the potential negative effects would be most effectively avoided by sensitive masterplanning and mitigation to avoid development in areas of the site 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

**C.371** Garden settlement options were appraised against SA objective 13: Climate change in relation to travel-related carbon emissions by reference to the appraisals for SA objectives 2, 4 and 7 on access to services, employment, open space, and public transport. Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the garden settlements and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies.

**C.372** For the North of Marden garden community option, commentary in relation to SA objective 2: Services and facilities and SA objective 7: Sustainable travel identifies that

there is likely to be out-commuting from this settlement to access employment and higher order services. The site is currently in a location which has high average commuting distances (over 14km), which suggests that residents of this garden settlement option who work off site would have a similar average commuting distance. Although Marden rail station is adjacent to the site, which is likely to facilitate the use of rail, there is still considered likely to be a need for long distance trips by private car. These journeys will result in greenhouse gas emissions. As such, significant negative effects in relation to this SA objective are anticipated.

**C.373** As set out in the commentary for the appraisal of this option against SA objective 7: Sustainable travel, the Lidsing garden community option proposes new motorway infrastructure (specifically a new arm on Junction 4 of the M2). This is considered likely to increase travel by private vehicle on the motorway network, thereby leading to increased greenhouse gas emissions. Significant negative effects in relation to this SA objective are therefore anticipated.

**C.374** For the Heathlands garden community option, as described in the commentary in relation to the appraisals of SA objective 2: Services and facilities and SA objective 7: Sustainable travel, it is considered likely that the development of this settlement will result in travel out of the settlement to access employment and higher order services. The site is currently in a location which has high average commuting distances (over 14km), which suggests that residents of this garden settlement option who work off site would have a similar average commuting distance.

**C.375** Although a new rail station and cycling improvements to wider destinations are proposed as part of this settlement, there is still considered likely to be a need for long distance trips by private car. These journeys will result in greenhouse gas emissions. As such, significant negative effects in relation to this SA objective are anticipated.

### Mitigation

**C.376** Mitigation in relation to the potential negative effects identified by the SA of site options has already been discussed under SA objectives 2, 4 and 7 above.

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

**C.377** Garden settlement options were appraised against SA 14: Biodiversity Development by consideration of their proximity to designated wildlife sites and habitats and related zones within which impacts on internationally and nationally designated sites may occur. 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. More detailed appraisal of potential effects on habitats and species on or adjacent to the potential development sites is not appropriate to this strategic level of assessment but will take place once specific proposals are developed and submitted, as part of the development management process. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.378** The North of Marden site intersects with an area of Ancient woodland at Bridgehurst wood, in the south eastern corner of the site. There is also an area of Traditional Orchard priority habitat in the centre of the site. The site also intersects with Impact Risk Zones relevant to the proposed scale and location of development. These are primarily related to the potential effects of rural residential or large non-residential development on Marden Meadows SSSI, approximately 500m east of the site boundary, and on the River Beult SSSI, approximately 1.8km north of the site boundary. The site is also within Impact Risk Zones for certain industrial processes which may cause air pollution. Ponds and Pasture at Wanshurst Green is a Local Wildlife site, approximately 150m from the eastern edge of this option. Loss of or disturbance to the ancient woodland and priority habitat within it, and upon neighbouring designations has the potential to result in significant negative effects from this settlement in relation to this SA objective.

**C.379** 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. Loss of ancient woodland within the site boundary and disturbance from this settlement on neighbouring designations has the potential to result in significant negative effects in relation to this SA objective.

**C.380** There are several local wildlife sites within the Heathlands site, 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 site at New Pond Shore, Round Wood, Tainter Field Shaw and

Wheatgratten Wood. Areas of various types of priority habitat also exist within the site. Until the potential impacts on these sites has been assessed in detail and mitigation developed and included in development management or site allocation policies, a precautionary approach is considered appropriate. Due to the potential for development of Heathlands to affect these local designations, significant negative effects are considered likely in relation to this SA objective.

### Mitigation

**C.381** Any option that overlaps an area of priority habitat, locally designated wildlife site or area of ancient woodland should consider sensitive design and masterplanning to help ensure compliance with statutory and NPPF requirements for biodiversity conservation. Additionally, Local Plan 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.

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

**C.382** 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 a garden settlement 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.

**C.383** The proximity tests used in this SA are 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. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas. Further details on the approach to appraisal of garden settlement options against this SA objective are provided in **Table C2**.

**C.384** All garden settlement options were identified as having significant negative effects with uncertainty, because they intersect with or are within close proximity to least one designated heritage asset.

**C.385** At North of Marden, there are no designated heritage assets within the site, however there are clusters of grade II listed buildings at St Ann's Green to the northeast, Wanshurst Green to the southeast and Marden to the south. The Church of St Michael and all Angels is a grade I listed building, which lies in Marden, approximately 140m south of the site boundary. It is associated with an area of archaeological potential. The Marden Conservation Area also lies to the south of the site. The potential for setting impacts on these listed buildings is considered to result in potential significant negative effects, however this is uncertain because site specific design and mitigation may overcome some impacts.

**C.386** 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. The development of this option has the potential to detrimentally affect the setting of these assets. As such, significant negative effects are considered likely in relation to this SA objective. However as with the other options this is uncertain because site specific design and mitigation may overcome some impacts.

**C.387** 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. The potential for direct and setting impacts on these listed buildings is considered to result in potential significant negative effects, however as with the other options this is uncertain because site specific design and mitigation may overcome some impacts.

#### Mitigation

**C.388** Avoidance of development that could result in harm to the significance of heritage assets, including their setting, would provide the best mitigation. Judgements on whether garden settlements are likely to be able to avoid such effects would best be informed by a historic environment sensitivity study or similar evidence. Where residual risks are likely, it may be possible to avoid significant negative effects via site-specific requirements in relation to site layout and development design.

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

**C.389** The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of garden settlement

options in relation to SA objective 16: Landscape. Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.390** Unless an area is already urban in nature, the creation of a new garden community will have a significant effect on local landscape character. Some areas are more sensitive to landscape change due to factors such as their visibility from the surrounding area and general character.

**C.391** The North of Marden area falls entirely within the Staplehurst and Low Weald landscape character area, which is of high sensitivity to change. Due to this high sensitivity, significant negative effects are anticipated to arise in relation to this SA objective.

**C.392** The Lidsing option almost entirely falls into the Bredhurst and Stockbury Downs character area, which is considered to have moderate sensitivity, which would equate to minor negative effects in relation to this SA objective. However, the Stantec Deliverability and Viability report highlights that development of a small amount of land within the North Downs AONB would be required for the new arm of junction 4 of the M2 that would form part of this option. On this basis, a significant negative effect in relation to SA objective 16 (landscape) is identified, until such time as evidence is available to suggest that landscaping mitigation would avoid a significant landscape impact.

**C.393** The Heathlands site falls into three different landscape character areas, including East Lenham Vale in the northern part of the site, which is of high sensitivity, Lenham Heath Farmlands, which are of low sensitivity, and Chilston Parklands which are of high sensitivity. Overall, the area is considered of high sensitivity to change and therefore, significant negative effects are anticipated to arise from the development of the Heathlands site in relation to this SA objective.

#### Mitigation

**C.394** Avoidance of development within the areas of highest landscape sensitivity to development would provide the best mitigation. However this will be difficult to achieve for North of Marden and Heathlands given the high level of intersection with highly sensitive landscape character areas. In these sensitive areas, Local Plan policy requirements for development site layouts and development design that seek to reduce adverse effects on the landscape could be implemented to mitigate potential negative effects. For the Lidsing option, it may be possible to avoid significant effects from the motorway junction improvement via appropriate landscaping.

## Site allocation options - appraisal criteria, options appraised and findings

**C.395** This section lists the sites that were considered by the Council to be reasonable alternatives for residential development or employment development in the period up to the Regulation 18 Preferred Approaches consultation in December 2020. Residential site options, including mixed use with a residential component, are set out in **Table C1**; employment sites options, including mixed use with an employment component are set out in **Table C3**. Each site has a unique site identification number, along with key site attributes provided by the Council.

**C.396** Subsequent to the Preferred Approaches consultation, some of the sites identified as preferred allocations were deleted from the Pre-submission plan list of allocations. The Council stated that there were a range of reasons why sites were not taken forward, for example because more suitable sites in that settlement were found or in response to consultation responses on the Regulation 18 Preferred Approaches document. In addition, one new site that was not identified as an allocation or reasonable alternative at the time of the Regulation 18 SA work was allocated in the Pre-submission plan – LPRSA364 Kent Ambulance HQ. An audit trail of these changes and the attributes of the new site are provided in **Table C5** at the end of this appendix.

**C.397** The detailed assessment criteria and associated assumptions used to appraise the site options are presented in **Table C2** (residential sites) and **Table C4** (employment sites). Each of these tables is followed by a description of the SA findings for the corresponding site options in relation to each SA objective.

**C.398** A summary of the SA findings, including tables of the sustainability scores for the residential and employment sites, and descriptions of the approaches to identification of reasonable alternatives and to carrying out the appraisal are provided in **Chapter 4**.

## Residential site options

Table C.1: Reasonable alternative site options considered for residential (including mixed) use at Regulation 18 Preferred Approaches stage

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
1	Land Adj Brhemar Garage	0.9	Residential	16	FALSE	0	Within	the Countryside	Countryside	Brownfield
2	The Homestead	1.2	Residential	22	FALSE	0	Within	the Countryside	Countryside	Brownfield
5	Land Adj to Dingly Dell	1.3	Residential	17	FALSE	0	Within	the Countryside	Countryside	Brownfield
7	The Paddocks, Staplehurst	2.6	Residential	49	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
8	Bassetts Bungalow, Marden	0.8	Mixed	19	0	0	Adjacent to	North of Staplehurst GS	Larger Villages	Greenfield
9	116 to 120 Week St	0.0	Mixed	2	38	19	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
10	Bydews Place Site 1 ACK	0.7	Residential	16	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Mixed
11	Bydews Place Site 2 ACK	0.2	Residential	5	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
12	Land at Forsham House	0.6	Residential	11	FALSE	0	Within	the Countryside	Countryside	Greenfield
13	Land at Chartway Sutton	1.6	Residential	30	FALSE	0	Within	the Countryside	Countryside	Greenfield
15	KIA site, Ashford Road	3.8	Residential	69	FALSE	0	Within	the Countryside	Countryside	Mixed
16	Fir Tree Farm and Norton Lea (North)	58.5	Residential	1245	FALSE	0	Within	South East of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
17	Land East of Maidstone Road, Headcorn	3.7	Residential	42	0	0	Potentially Adjacent to	Headcorn	Rural Service Centres	Greenfield
18	Land rear of Beech House	0.3	Residential	5	FALSE	0	Within	the Countryside	Countryside	Greenfield
19	Land at Lenham Rd, Headcorn	4.7	Residential	47	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
21	Land at Southways, Sutton Valence	0.6	Residential	12	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
27	Land at George Street	2.3	Residential	43	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
29	Court Lodge Farm	13.3	Residential	126	0	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
34	Land at George St, Staplehurst	2.8	Residential	52	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
37	Land ro The Gables, Staplehurst	1.6	Residential	31	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield

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Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
48	Plot off S side Forge Ln, E. Farleigh	6.3	Residential	133	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
50	Army Hut Farm Stables, Stockett Ln, East Farleigh	5.2	Residential	88	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Brownfield
53	12-14 Week St	0.1	Mixed	3	81	41	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
54	Chainhurst	3.5	Residential	66	FALSE	0	Within	the Countryside	Countryside	Greenfield
55	Victoria's Cabaret Club	0.3	Residential	6	FALSE	0	Within	the Countryside	Countryside	Brownfield
56	Orchard House, Clapper Ln, Staplehurst	1.5	Residential	29	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Brownfield
57	Land at Oak Farm Gardens, Headcorn	0.9	Residential	6	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
58	Green Lane Farm	2.3	Mixed	31	531	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
59	Fellinpits, Beltring	39.4	Residential	748	FALSE	0	Within	the Countryside	Countryside	Greenfield
60	Land at Rush Farm, Staplehurst	1.0	Residential	18	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
64	Land South of Marden Rd, Staplehurst	4.6	Residential	88	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
66	Land at Lodge Rd, Staplehurst	4.2	Mixed	34	3964	0	Within	Staplehurst	Rural Service Centres	Greenfield
70	Land at Willow Wood	0.8	Residential	17	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Brownfield
71	Marley Rd, Harrietsham	2.6	Residential	37	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
73	Bearstead Golf Course	0.9	Residential	19	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
77	Teiside Nurseries, Laddingford	2.7	Residential	12	FALSE	0	Within	the Countryside	Countryside	Mixed
78	Haven Farm	2.8	Residential	41	375	413	Adjacent to	Sutton Valence	Larger Villages	Greenfield
79	Land South of Heath Road	1.1	Residential	21	FALSE	0	Within	the Countryside	Countryside	Greenfield
80	Land west of Loder Close and Westwood Close	2.0	Residential	38	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield
81	Land off Lenham Road	2.1	Residential	40	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
82	Land rear of Firenze	4.6	Residential	87	FALSE	0	Within	the Countryside	Countryside	Greenfield
83	Land at Hartley Dene	1.9	Residential	37	FALSE	0	Within	the Countryside	Countryside	Mixed
84	Land off Heath Road	1.7	Residential	33	FALSE	0	Within	the Countryside	Countryside	Greenfield
86	Elsfield Cottages, Ashford Road	0.0	Residential	1	FALSE	0	Within	the Countryside	Countryside	Mixed

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Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
88	Land south of Ashford Road	0.4	Residential	8	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
90	Land adjacent to Bridgehurst Oast	1.1	Residential	20	0	0	Potentially Adjacent to	Marden	Rural Service Centres	Greenfield
91	Teston Field	4.3	Residential	82	FALSE	0	Within	the Countryside	Countryside	Greenfield
93	Land at Linden Farm	0.5	Residential	9	FALSE	0	Adjacent to	Coxheath	Larger Villages	Greenfield
94	Land South of Tumblers Hill	0.9	Residential	16	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
95	Land at Halfe Yoke	2.2	Residential	46	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
98	Land south of Ashford Rd, Harrietsham	5.0	Residential	96	0	0	Potentially Adjacent to	Harrietsham	Rural Service Centres	Brownfield
101	Land south of A20, Harrietsham	3.2	Residential	60	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
102	Ringles Nursery & Ringles Gate, Headcorn	15.6	Residential	133	0	0	Potentially Adjacent to	Headcorn	Rural Service Centres	Mixed
104	Gowan Park, Kingswood	1.0	Residential	19	FALSE	0	Within	the Countryside	Countryside	Mixed
105	Land at junction of Vicarage Lane & Lower Rd, East Farleigh	6.8	Residential	130	FALSE	0	Within	the Countryside	Countryside	Greenfield
107	Land adjacent to Westholme, Sutton Valence	1.0	Residential	19	FALSE	0	Within	North of Sutton Valence	Larger Villages	Greenfield
108	Land at South Lane, Sutton Valence	2.1	Residential	39	FALSE	0	Potentially Adjacent to	Sutton Valence	Larger Villages	Greenfield
109	Land south of Orchard End	1.3	Residential	24	FALSE	0	Within	the Countryside	Countryside	Greenfield
112	Sutton Valence Group GP Practice	0.5	Residential	4	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Brownfield
114	Land at and Adjacent to home Farm	2.6	Residential	49	0	0	Adjacent to	Staplehurst	Rural Service Centres	Brownfield
115	Farm and Yard at Boughton Mount Farm	5.9	Residential	125	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Mixed
117	Land at Loose Court Farm Cottage	3.9	Residential	84	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
118	Gibbs Hill Farm	0.6	Residential	9	0	0	Adjacent to	Headcorn	Rural Service Centres	Brownfield
119	North of Thorn View	6.1	Residential	84	0	0	Adjacent to	Pagehurst Farm Garden Settlement	New Settlements	Greenfield
120	Rowan House Farm and Fairview (Broomfield Park)	38.9	Residential	738	FALSE	0	Within	the Countryside	Countryside	Mixed
122	The Orchard Land adjacent to White Cottage	1.2	Residential	18	FALSE	0	Adjacent to	Boughton Monchelsea	Larger Villages	Greenfield
124	Old Goods Yard phase 2	1.3	Residential	25	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield
125	Old Goods Yard phase 3	2.2	Residential	42	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield

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Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
128	Land at Westfield Sole Rd, Ledding	0.3	Residential	5	FALSE	0	Adjacent to	Medway Urban Area	Edge of Maidstone Urban Extension	Brownfield
129	Land Rear of Bearstead Rd	5.4	Residential	114	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
130	Land adjacent to Ivans Field, Chart Sutton	2.7	Residential	50	FALSE	0	Within	the Countryside	Countryside	Greenfield
131	M W Wickham Estate	2.3	Residential	44	FALSE	0	Within	the Countryside	Countryside	Greenfield
132	Knoll House & Tower House, Staplehurst	2.1	Residential	40	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
133	Land NE of Old Beltingham Hall	0.8	Residential	14	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
134	Baldwins Farm	4.6	Residential	88	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
135	South of Ashford Rd, Bearstead	2.1	Residential	45	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
136	Land N of West St, Harrietsham	3.5	Residential	66	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
137	Land South of Marden Rd, Staplehurst	6.1	Residential	116	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
140	Land at Squerryes Oast, Otham	0.7	Residential	8	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
141	Eastwood Rd, Ulcombe	0.9	Residential	18	FALSE	0	Within	the Countryside	Countryside	Greenfield
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	20	334	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
144	34- 35 High Street, Maidstone	0.1	Mixed	2	56	28	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
145	Len House	1.1	Mixed	29	531	265	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
146	Maidstone East	1.6	Mixed	65	1573	787	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
147	Gala Bingo and Granada House	0.4	Mixed	71	201	100	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
148	Maidstone Riverside	6.9	Mixed	650	5149	2574	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
149	Maidstone West	2.1	Mixed	130	1035	517	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
150	Mill St Car Park	0.4	Mixed	15	358	179	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
151	Mote Rd	0.3	Mixed	84	2000	0	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
152	Royal British Legion Social Club	0.3	Mixed	4	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
156	Danebury	0.2	Residential	3	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
157	Harrietsham Rectory	0.3	Residential	5	0	0	Adjacent to	Harrietsham	Rural Service Centres	Brownfield
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	114	2778	1389	Within	the Countryside	Countryside	Greenfield
159	Yalding Hill	0.4	Residential	7	FALSE	0	Within	the Countryside	Countryside	Brownfield



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161	Bell Farm, Harrietsham	8.3	Residential	126	0	0	Potentially Adjacent to	Harrietsham	Rural Service Centres	Greenfield
162	Land north of Headcorn	15.6	Residential	275	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
167	North & West of Leeds	98.3	Mixed	1359	23097	1000	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
168	Land at Forge Lane	4.9	Mixed	68	1158	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	0	5363	0	Within	the Countryside	Countryside	Greenfield
171	Land adjoining Homewell House	0.4	Residential	7	FALSE	0	Within	North of Sutton Valence	Larger Villages	Greenfield
172	Land at Sutton Rd	10.9	Residential	139	FALSE	0	Within	South East of Maidstone Urban Extension	Maidstone Urban Area	Greenfield
173	Durrants Farm	3.1	Residential	59	FALSE	0	Within	the Countryside	Countryside	Greenfield
174	Land South of Sutton Road	9.1	Residential	185	FALSE	0	Within	South East of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
175	Land at Vicarage Road Yalding	1.0	Residential	20	FALSE	0	Adjacent to	Yalding	Larger Villages	Greenfield
176	Land North and South of Ashford Rd	23.2	Mixed	320	5444	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
177	Land between Lower St & George St	6.5	Mixed	90	1530	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
178	Land South of Warmlake Road	10.5	Residential	199	FALSE	0	Within	the Countryside	Countryside	Greenfield
179	Land at Westerhill	0.7	Mixed	33	2806	0	Adjacent to	Coxheath	Larger Villages	Greenfield
180	Land west of Otham Road	7.1	Residential	135	FALSE	0	Within	the Countryside	Countryside	Greenfield
182	Invicta Park Barracks	47.1	Residential	1002	FALSE	0	Within	Invicta Barracks	Edge of Maidstone Urban Extension	Brownfield
184	Brickfields Farm and Rosemount	14.3	Residential	272	0	0	Adjacent to	Staplehurst	Rural Service Centres	Mixed
185	Otham Glebe, Church Road	2.2	Residential	27	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
186	Land at Headcorn Road Staplehurst	9.3	Residential	132	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	89	1508	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
188	Land at Old Ashford Road Lenham	28.8	Residential	437	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield
189	Land north of Ashford Road Harrietsham	1.5	Residential	28	FALSE	0	Within	the Countryside	Countryside	Greenfield
191	Land adjacent to South Lane Sutton Valence	0.3	Residential	5	FALSE	0	Within	the Countryside	Countryside	Greenfield
192	Land adjacent to Headcorn Road Sutton Valence	0.6	Residential	10	FALSE	0	Within	the Countryside	Countryside	Greenfield

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193	Land East of Upper Street Langley	6.0	Mixed	83	1406	0	Adjacent to	South of Leeds	New Settlements	Greenfield
195	Waterside Park	16.2	Mixed	224	3814	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
196	Land at Willow Farm	2.3	Residential	45	FALSE	0	Within	the Countryside	Countryside	Greenfield
197	Golf Course Car Park Staplehurst	0.8	Residential	8	FALSE	0	Within	the Countryside	Countryside	Brownfield
198	Staplehurst Golf Course	20.0	Residential	227	FALSE	0	Within	the Countryside	Countryside	Greenfield
199	Old Cricket Ground Loose	1.5	Residential	32	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
200	Land at former cricket field, Loose	2.3	Residential	49	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
201	Land at Inkstand Cattery and Stables Lenham	1.3	Residential	21	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Mixed
202	Land at Forstal Lane Coxheath	4.7	Residential	89	FALSE	0	Within	Coxheath	Larger Villages	Mixed
203	Land at Bydews Place Tovil	2.7	Residential	47	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
204	South of Eyhorne Street Hollingbourne	0.6	Residential	11	FALSE	0	Adjacent to	Eyhorne St (Hollingbourne)	Larger Villages	Greenfield
206	Summer Place Caring Lane Bearsted	0.1	Residential	2	FALSE	0	Within	the Countryside	Countryside	Greenfield
207	Ledian Farm	1.7	Mixed	24	409	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	6	101	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
210	Land at Newlyn's Farm, Sutton Valence	1.7	Residential	31	FALSE	0	Within	the Countryside	Countryside	Mixed
211	Wheeler's Lane Linton	0.2	Residential	4	FALSE	0	Within	the Countryside	Countryside	Greenfield
212	Land at the Grange Staplehurst	6.9	Residential	130	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Mixed
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	142	0	0	Potentially Adjacent to	North of Staplehurst GS	Larger Villages	Mixed
216	Rochester Meadow	2.1	Residential	39	FALSE	0	Within	the Countryside	Countryside	Greenfield
220	Land at Bydews Farm	27.3	Residential	366	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
222	Land at Henhurst Farm, Staplehurst	16.3	Residential	309	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
224	Land West of Lenham	18.6	Residential	275	0	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
225	Tanglewood Loose	1.0	Residential	19	FALSE	0	Adjacent to	Coxheath	Larger Villages	Mixed

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226	Land north of Staplehurst - Garden village	109.3	Mixed	1658	0	1000	Within	North of Staplehurst GS	Larger Villages	Greenfield
227	Land South of Green Lane, Boughton Monchelsea	2.9	Residential	50	FALSE	0	Adjacent to	Boughton Monchelsea	Larger Villages	Greenfield
228	Land to North West View, Staplehurst	1.0	Residential	18	FALSE	0	Within	the Countryside	Countryside	Greenfield
229	Land at Stanley Farm Staplehurst	2.1	Residential	32	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
231	Land at Lested Farm Chart Sutton	28.2	Residential	534	FALSE	0	Within	the Countryside	Countryside	Mixed
233	Land west of Chart Corner Plough Wents Road Junction Chart Sutton	0.8	Residential	16	FALSE	0	Within	the Countryside	Countryside	Greenfield
234	west of North St, Barming site submission	8.6	Residential	182	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
235	Land at Boughton Lane Maidstone	9.8	Residential	69	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
236	Fairview Farm (North Parcel)	10.6	Residential	200	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Greenfield
239	Land to south Shangri-La, Langley	0.8	Mixed	12	198	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
240	Banky Meadow, Bearstead	3.5	Residential	75	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
244	Land at Iden Park, Staplehurst	3.2	Residential	21	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
245	Land north of the M2 liding - urban extension	135.3	Mixed	1974	33564	1000	Within	Liding Urban Extension	Edge of Maidstone Urban Extension	Greenfield
246	Land rear of Appletree House, Bearstead	1.2	Residential	25	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
247	Land south of Court Lodge Road Harrietsham	4.3	Residential	82	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
248	Land north & south of Kenward Road Yalding	9.9	Residential	160	FALSE	0	Adjacent to	Yalding	Larger Villages	Greenfield
250	Land rear of Butlers Farm Langley	3.6	Mixed	49	838	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
251	Land at Heath Road Coxheath	0.2	Residential	4	FALSE	0	Within	Coxheath	Larger Villages	Brownfield
252	Land rear of Lavender Cottage, Langley	1.0	Mixed	14	235	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
254	Land to South of Cotuams Hall Hollingbourne	0.7	Residential	9	FALSE	0	Adjacent to	Eyhome St (Hollingbourne)	Larger Villages	Greenfield
255	Land east of Yew Tree House Leeds	0.5	Mixed	7	112	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
257	Land at junction of Heath Road & Dean Street Coxheath	1.0	Residential	20	FALSE	0	Within	the Countryside	Countryside	Greenfield
262	Land at Fant Farm Maidstone	12.2	Residential	260	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield

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263	Land west of Ledian Farm, Leeds	1.4	Mixed	19	322	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
265	Land at Abbey Farm Tovil	31.0	Residential	527	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
266	Land North of Ware Street Bearstead	4.2	Residential	67	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
269	Land east of Copper Lane Marden	3.1	Residential	59	0	0	Potentially Adjacent to	Marden	Rural Service Centres	Greenfield
270	Land at Pested Bars Road, Boughton Monchelsea (option 1)	43.5	Residential	463	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
271	Fir Tree Farm and Norton Lea (South)	22.8	Residential	432	FALSE	0	Within	North of Sutton Valence	Larger Villages	Unknown
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	0	41023	0	Within	the Countryside	Countryside	Mixed
274	South of Leeds	104.4	Mixed	1443	24528	1000	Adjacent to	South of Leeds	New Settlements	Unknown
279	Langley Heath - Strategic Settlement	98.4	Mixed	1360	23114	1000	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	9	188	0	Within	the Countryside	Countryside	Brownfield
286	Underlyn Lane	1.3	Mixed	0	4127	0	Within	the Countryside	Countryside	Greenfield
288	Hill Farm Linton-Coxheath	5.7	Residential	107	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Greenfield
289	Heathlands Garden Community	373.3	Mixed	5161	87733	2500	Within	Heathlands	New Settlements	Greenfield
291	Bridge Farm Water Lane	4.2	Residential	90	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
292	Land at Old Ashford Rd, Lenham	14.5	Residential	138	0	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
294	Land to East of Jubilee Cottages, Sutton Valence	2.8	Residential	53	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
295	Land north of Copper Lane, Marden	3.9	Residential	74	0	0	Potentially Adjacent to	Marden	Rural Service Centres	Greenfield
296	Astor Hever	2.4	Residential	45	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
297	Bearstead Library	0.1	Mixed	1	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
298	Dorothy Lucy Centre	0.7	Residential	16	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
299	Maidstone AEC	0.1	Mixed	3	74	37	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
302	Oakwood Overflow Car Park	0.2	Residential	3	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
303	IS Oxford Rd	0.9	Mixed	14	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield

Appendix C  
SA of options – detailed findings

SA of Maidstone Local Plan Review  
September 2021

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
304	Land east of Hunton Rd, Chainhurst	0.3	Residential	6	FALSE	0	Within	the Countryside	Countryside	Greenfield
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	42	1020	510	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
306	Land South of Gore Court, Otham	2.1	Residential	45	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
307	Land N Marden Rd E of Clapper Lane, Staplehurst	1.4	Residential	27	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
308	58 Church St, Boughton Monchelsea	0.9	Residential	16	FALSE	0	Adjacent to	Boughton Monchelsea	Larger Villages	Greenfield
309	Strategic Expansion of Marden	134.1	Mixed	1854	31511	1000	Within	North of Marden	New Settlements	Greenfield
310	Land north of Mote Rd, Headcorn	7.2	Residential	116	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
312	Land north of Heath Rd, Coxheath	10.2	Residential	193	FALSE	0	Adjacent to	Coxheath	Larger Villages	Greenfield
314	East of Albion Rd, Marden	2.1	Residential	39	0	0	Adjacent to	Marden	Rural Service Centres	Greenfield
316	Binbury Park, Detling	191.0	Mixed	2113	0	1500	Within	Binbury Park	New Settlements	Mixed
317	Langley Heath	2.0	Mixed	27	458	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
318	Pagehurst Farm	82.1	Mixed	1134	0	500	Within	Pagehurst Farm Garden Settlement	New Settlements	Greenfield
319	Beaux Aires Farm	43.0	Mixed	476	0	0	Adjacent to	Binbury Park	New Settlements	Greenfield
322	Lughorse Lane, Yalding	1.1	Residential	21	FALSE	0	Adjacent to	Yalding	Larger Villages	Greenfield
324	The Grange Ashford Road	0.6	Residential	8	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Brownfield
326	Land at Amsbury Wood, Hunton	4.4	Residential	83	FALSE	0	Adjacent to	Coxheath	Larger Villages	Greenfield
327	Land at Hockers Farm, Detling	1.0	Residential	19	FALSE	0	Within	the Countryside	Countryside	Greenfield
328	Land at 59 Linton Rd, Loose	0.5	Residential	10	FALSE	0	Within	the Countryside	Countryside	Brownfield
329	Land at Sapphire Kennels, Sutton Valence	0.5	Residential	9	FALSE	0	Within	the Countryside	Countryside	Brownfield
330	Land at Seeburg, Bredhurst	1.1	Mixed	16	269	0	Within	Lidsing Urban Extension	Edge of Maidstone Urban Extension	Brownfield
331	Land south of the Lodge, Yalding	3.9	Residential	73	FALSE	0	Adjacent to	Yalding	Larger Villages	Brownfield
332	Fairview Farm (South Parcel)	10.4	Residential	198	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Greenfield
333	Land at Old Ham Lane, Lenham - Kilnwood	9.7	Residential	184	FALSE	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
334	Land at Old Ham Lane, Lenham - Old Goods Yard	0.4	Residential	7	FALSE	0	Adjacent to	Lenham	Rural Service Centres	Brownfield

Appendix C  
 SA of options – detailed findings

SA of Maidstone Local Plan Review  
 September 2021

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
335	Fir Tree Farm and Norton Lea (South)	52.8	Residential	501	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Unknown

Table C.2: Appraisal criteria for sites considered for residential use

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<b>SA objective 1: Housing - To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home</b>							
SA objective 1: Housing was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver the right types and tenures of housing at prices that people can afford, as well as addressing the needs of specialist groups. These factors do not depend on the location of the site and are taken into account by the SA through appraisal of any Local Plan policies such as the total quantum of housing to be provided, the mix of housing types and tenures, affordable housing requirements, and design.							
<b>SA objective 2: Services &amp; facilities - To ensure ready access to essential services and facilities for all residents</b>							
The effects of site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities, and to employment. Access to open space was considered under SA objective 4: Health and not repeated here.							
Accessibility scores for most services and facilities were based on walking distances. People often travel much longer distances to access employment than other services and facilities, however, and there is no guarantee that a major employment site close to where people live will offer jobs that are suited to those local residents. To appraise access to employment, reference was made to Census data indicating the main commuting destinations from each Middle-layer Super Output Area (MSOA) in the Borough. Residential development in areas with relatively low average commuting distances were rated as having better access to employment than residential development in areas with high average commuting distances.							
2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	Each criterion is scored: <ul style="list-style-type: none"> <li>• Major positive +3</li> <li>• Minor positive +1</li> <li>• Negligible 0</li> <li>• Minor negative -1</li> <li>• Major negative -3</li> </ul> Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: <ul style="list-style-type: none"> <li>• Significant positive &gt;= +2</li> <li>• Minor positive &gt;0 to &lt;2</li> <li>• Negligible 0</li> <li>• Minor negative &lt;0 to &lt;-2</li> <li>• Significant negative &gt;= -2</li> </ul>	<b>GP surgeries</b> Excludes opticians, pharmacies, hospitals, any private healthcare facilities <b>Primary and middle schools</b> Latter category may not be present; excludes private schools <b>Secondary schools</b> Excludes private schools <b>Town centres</b> Maidstone only - boundary provided by MBC <b>Retail centres within Rural Service Centres (Marden, Staplehurst, Headcorn, Lenham, Harrietsham - boundaries provided by MBC)</b> <b>2011 Census travel to work data</b> Relative performance to be confirmed once distribution of commuting distances from the Borough is known
2b Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,201m from primary or middle school	>1,200m from primary or middle school		
2c Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school		
2d Maidstone town centre	<=400m from town centre	401-800m from town centre	N/A	801-1,201m from town centre	>1,200m from town centre		
2e Rural Service Centres	<=200m from retail centre of Rural Service Centre	201-400m from retail centre of Rural Service Centre	N/A	401-800m from retail centre of Rural Service Centre	>800m from retail centre of Rural Service Centre		
2f Employment	Sites in areas where average commuting distance is in lowest 20% of distances for the Borough	Sites in areas where average commuting distance is in 20-40% range for the Borough	Sites in areas where average commuting distance is in 40-60% range for the Borough	Sites in areas where average commuting distance is in 60-80% range for the Borough	Sites in areas where average commuting distance is in 80-100% range for the Borough		
<b>SA objective 3: Community - To strengthen community cohesion</b>							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<p>SA objective 3: Community was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to these 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. These factors will be taken into account by the SA through appraisal of development management policies and site-specific requirements set out in allocation policies.</p>							
<p><b>SA objective 4: Health - To improve the population's health and wellbeing and reduce health inequalities</b></p> <p>The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of noise pollution) or positive (e.g. access to open space) effects on health and well-being.</p> <p>Footpath and cycle path networks are more likely to constitute a recreational resource if they are in or easily link to rural areas but those in urban areas may be important for commuting by active modes therefore both were considered.</p> <p>Many other factors within the scope of the Local Plan could affect achievement of this SA objective but these were tested by other site assessment criteria to which they more directly relate (e.g. access to healthcare facilities is tested under SA objective 2: Services &amp; facilities and not repeated here) and by the SA of Local Plan policies (for instance in relation to provision of new or enhancement to existing healthcare facilities, open spaces, and sports and recreation facilities).</p>							
4a AQMAs	N/A	N/A	All other sites	N/A	Site located within an AQMA	<p>Each criterion is scored:</p> <ul style="list-style-type: none"> <li>• Major positive +3</li> <li>• Minor positive +1</li> <li>• Negligible 0</li> <li>• Minor negative -1</li> <li>• Major negative -3</li> </ul> <p>Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows:</p> <ul style="list-style-type: none"> <li>• Significant positive <math>\geq +2</math></li> <li>• Minor positive <math>&gt;0</math> to <math>&lt;2</math></li> <li>• Negligible 0</li> <li>• Minor negative <math>&lt;0</math> to <math>&lt;-2</math></li> <li>• Significant negative <math>\geq -2</math></li> </ul>	<b>Air Quality Management Areas</b>
4b Road and rail noise	N/A	N/A	All other sites	Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	Lnight $\geq 55.0$ dB, or Laeq,16 $\geq 60.0$ dB		<b>Strategic noise mapping</b>
4c Odour from waste facilities	N/A	N/A	All other sites	N/A	$\leq 400$ m to wastewater treatment works or established safeguarding zone, or $\leq 250$ m to waste management facility		<b>Waste water treatment works Waste management facilities</b>
4d Open space	$\leq 300$ m from open space, sport, recreation facility, open country, or registered common land	301-800m from open space, sport, recreation facility, open country, or registered common land	N/A	801-1,200m from open space, sport, recreation facility, open country, or registered common land	$>1,200$ m from open space, sport and recreation facility  OR  Loss of open space, sport, recreation facility, open country and registered common land		<b>Open spaces</b> (existing or allocated in Local Plan 2017) <b>Sport &amp; recreation facilities</b> <b>Open country</b> <b>Registered common land</b>



Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<i>4e Public Rights of Way (PRoW) / Cycle Paths</i>	<=200m from PRoW / Cycle Paths (assumed that paths running through development sites will be retained or diverted around the site boundary)	201-400m from PRoW / Cycle Paths	N/A	401-800m from PRoW / Cycle Paths	>800m from PRoW / Cycle Paths		<b>PRoW Cycle paths</b> (no data available for local cycle network so limited to national network)

**SA objective 5: Economy - To facilitate a sustainable and growing economy**

Most factors relating to SA objective 5: Economy were scoped out of the appraisal of residential site options. Site options for employment use were the subject of a separate appraisal, guided by an amended version of the appraisal criteria for residential sites. The accessibility of residential sites to employment opportunities was addressed under SA objective 2. The provision of new homes across the plan area will create job opportunities, particularly during the construction phase but this will not vary between site locations and was scoped out of the site assessment. Performance of the Local Plan as a whole was appraised in relation to its ability to deliver sufficient employment land for different use classes that address evidenced need in different parts of the Borough, as well as how well it addresses more modern working practices such as remote/home working or the needs of smaller start-up businesses. These factors do not depend on the location of the site and were taken into account by the SA through appraisal of strategic and development management policies, as well as site-specific requirements set out in employment land allocation policies.

The exception is that potential negative effects were identified where allocation of a residential site would lead to loss of an existing employment use.

<i>5a Employment land</i>	N/A	N/A	All other sites	N/A	Site in existing employment use	If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative.  All other sites have a negligible effect vs. the SA objective.	<b>Existing use</b> Source: MBC officer assessment
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**SA objective 6: Town centre - To support vibrant and viable Maidstone town centre**

The allocation of residential development in or close to Maidstone town centre could have positive effects by providing more demand for nearby town centre uses or negative effects by preventing or resulting in the loss of existing town centre uses. The information was not available to appraise individual site allocations on this basis. Instead, the SA of the Local Plan in relation to SA objective 6: Town centre considered whether policies encourage an appropriate mix of residential, office, retail, leisure, and community uses, as well as other factors set out in the SA framework that are unrelated to residential site allocations. SA objective 6 was therefore scoped out from the appraisal of residential site options.

**SA objective 7: Sustainable travel - To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion**

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 they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities.

<i>7a Railway stations</i>	<= 500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion is scored: • Major positive +3 • Minor positive +1 • Minor negative -1	<b>Railway Stations</b>
<i>7b Bus stops</i>	<= 300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop		<b>Bus Stops</b>

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<i>7c Cycle paths</i>	<= 200m of a cycle path	201-400m of a cycle path	N/A	401-800m of a cycle path	>800m of a cycle path	<ul style="list-style-type: none"> <li>• Major negative -3</li> </ul> <p>Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows:</p> <ul style="list-style-type: none"> <li>• Significant positive &gt;= +2</li> <li>• Minor positive &gt;0 to &lt;2</li> <li>• Negligible 0</li> <li>• Minor negative &lt;0 to &lt;-2</li> <li>• Significant negative &gt;= -2</li> </ul>	<b>Cycle paths</b> (no data available for local cycle network so limited to national network)
<b>SA objective 8: Minerals - To conserve the Borough's mineral resources</b>							
Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either prevent 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 residential 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. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of residential sites to relevant mineral resources.							
<i>8a Minerals safeguarding</i>	N/A	N/A	All other sites	Site is within a Mineral Safeguarding Area  OR  within 250m of a Safeguarded Mineral Site	N/A	<p>If the criterion scores minor negative then the significance of the effect of the site vs. the SA objective is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	<b>Mineral Safeguarding Areas Safeguarded Mineral Sites</b> Source: Kent Minerals & Waste Local Plan 2019
<b>SA objective 9: Soils - To conserve the Borough's soils and make efficient and effective use of land</b>							
Prioritisation of previously developed land over greenfield sites was assumed to have a positive effect in relation to this SA objective.							
Potential harm to soil quality through the development of greenfield land was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. The classification is based on the long-term physical limitations of land for agricultural use; factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Data to subdivide the agricultural land into grades 3a and 3b were not available for Maidstone Borough therefore these grades were considered together.							
<i>9a Greenfield land</i>	Existing status of site is brownfield	N/A	N/A	Site is currently a mix of greenfield and brownfield	Existing status of site is greenfield	If any of the criteria score major negative then the significance of the effect of the site vs. the SA objective is significant negative.	<b>Brownfield vs. greenfield site status</b> Source: MBC officer assessment
<i>9b Agricultural Land</i>	N/A	N/A	All other sites	Site on Grade 3 agricultural land but	Site on Grade 1 or 2 agricultural land		<b>Agricultural Land Classifications</b>

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				not on Grades 1 or 2		<p>If only one criterion scores minor negative then the significance of the effect is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	
<b>SA objective 10: Water - To maintain and improve the quality of the Borough's waters and achieve sustainable water resources management</b>							
<p>Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies.</p> <p>Effects of development on water quality will partly depend on adoption of good practice site layout and construction techniques as well as the inclusion of sustainable drainage systems (SuDS) within the design; these factors will be considered in the SA of development management policies.</p> <p>Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local wastewater treatment works (WwTWs) or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options.</p> <p>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 increasing 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. Site options were appraised in relation to these zones.</p>							
10a Drinking water quality	N/A	N/A	All other sites	<p>Site falls within a Source Protection Zone 2 or 3</p> <p>OR</p> <p>Site falls within a drinking water safeguard zone (groundwater)</p> <p>OR</p> <p>Site falls within a drinking water safeguard zone (surface water)</p>	Site falls within a Source Protection Zone 1	<p>If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative.</p> <p>If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	<p><b>Source Protection Zones</b></p> <p><b>Drinking Water Safeguard Zones</b></p>
<b>SA objective 11: Air Quality - To reduce air pollution ensuring lasting improvements in air quality</b>							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<p>The proximity of sites to Air Quality Management Areas (AQMAs) does not robustly test the potential for such sites to generate road traffic through AQMAs. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.</p>							
<p><b>SA objective 12: Flooding - To avoid and mitigate flood risk</b></p>							
<p>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.</p> <p>Surface water flooding occurs when intense rainfall overwhelms drainage systems.</p> <p>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.</p> <p>Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design.</p>							
12a EA Flood Risk Zones	N/A	N/A	All other sites	Site within Flood Zone 2	Site within Flood Zone 3	<p>If any criterion scores major negative or two or more criteria score minor negative, the overall significance of the effect of the site vs. the SA objective is significant negative.</p> <p>If only one criterion scores minor negative, then the overall significance of the effect vs. the SA objective is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	EA Flood Risk Zones 2 and 3 (split between Zone 3a and Zone 3b not available)
12b Surface water flood risk	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding		Surface water flooding areas (Environment Agency data 'Risk of Flooding from Surface Water (Basic)' identifies areas with a 1 in 100 years or greater risk of surface water flooding)
12c Groundwater flood risk	N/A	N/A	Groundwater levels are at least 5m below the ground surface or area is categorised as "no risk"	Groundwater levels are between 0.025m and 5m of the ground surface	Groundwater levels are either at or very near (within 0.025m of) the ground surface		Groundwater flooding areas Source: Strategic Flood Risk Assessment
<p><b>SA objective 13: Climate change - To minimise the Borough's contribution to climate change</b></p>							
<p>SA 13: Climate change was appraised in relation to travel-related carbon emissions by reference to other appraisal criteria on access to services, employment, open space, and public transport.</p> <p>Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the residential site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies.</p>							
13a Access to services, employment,	See criteria: 2a to 2f	See criteria: 2a to 2f	See criteria: 2a to 2f	See criteria: 2a to 2f	See criteria: 2a to 2f	Each criterion is scored: • Major positive +3 • Minor positive +1 • Negligible 0	See data requirements for the constituent criteria

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<i>open space, and public transport</i>	4d 7a to 7c	4d 7a to 7c	4d 7a to 7c	4d 7a to 7c	4d 7a to 7c	<ul style="list-style-type: none"> <li>• Minor negative -1</li> <li>• Major negative -3</li> </ul> <p>Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows:</p> <ul style="list-style-type: none"> <li>• Significant positive &gt;= +2</li> <li>• Minor positive &gt;0 to &lt;2</li> <li>• Negligible 0</li> <li>• Minor negative &lt;0 to &lt;-2</li> <li>• Significant negative &gt;= -2</li> </ul>	
<p><b>SA objective 14: Biodiversity - To conserve, connect and enhance the Borough's wildlife, habitats and species</b></p> <p>Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>Impact Risk Zones (IRZs) defined by Natural England were used to appraise the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. IRZs define zones around each biodiversity site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Note that all SACs, SPAs, Ramsar sites and National Nature Reserves (NNRs) in England are also designated as SSSIs (although the SSSI boundary may extend beyond that of these other designations) therefore SSSIs were used as a proxy for all these designations in the SA. European sites are underpinned by the SSSI designation and their interest features and sensitivities are covered by the SSSI IRZs. Where the notified features of the European site and SSSI are different, the SSSI IRZs have been set so that they reflect both. "Residential" IRZs define unique scales of proposed housing development above which there is a potential for adverse impacts and this will be taken into account in the appraisal. The effects of the Local Plan as a whole and of preferred policies and site allocations on European sites were assessed by the separate Habitats Regulations Assessment.</p> <p>A zone of influence of 250 m was assumed for all sub-nationally designated wildlife sites and ancient woodland, based on professional judgement.</p> <p>Loss of open space is addressed under SA objective 4: Health.</p> <p>No digital data were available to confirm the location of any Regional Important/Local Geological Sites so these were excluded from the appraisal.</p>							
<i>14a Internationally and nationally designated biodiversity assets</i>	N/A	N/A	All other sites	Intersects with relevant (to allocated housing capacity and/or to rural vs urban location) 'residential', 'rural residential' or 'all	Intersects with designated site	<p>If any one of the criteria score major negative or two or more criteria score minor negative then the overall effect of the site vs. the SA objective is significant negative.</p> <p>If only one criterion scores</p>	<p><b>International and national wildlife and geological designations</b> covered by the extent of the UK's Sites of Special Scientific Interest (SSSIs).</p> <p>See Appendix 3 of IRZ Guidance for further guidance:</p>

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				planning applications' IRZ		minor negative, then the overall effect vs. the SA objective is minor negative.	/Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf
14b Locally designated wildlife sites and ancient woodland	N/A	N/A	All other sites	<=250m from designated site boundary	Intersects with designated site	All other sites have a negligible effect vs. the SA objective.	<b>Local Nature Reserves</b> <b>Local Wildlife Sites</b> <b>Ancient Woodland</b>
14c Priority Habitat Inventory (PHI) habitat	N/A	N/A	All other sites	Intersects with habitat	N/A		<b>Priority Habitat Inventory</b>
<b>SA objective 15: Historic environment - To conserve and/or enhance the Borough's historic environment</b>							
<p>The NPPF states that the "significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting". However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.</p> <p>The proximity tests used in the SA of the Local Plan site allocations are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar they are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.</p>							
15a Proximity to historic assets: sites within existing settlements	N/A	N/A	All other sites	101-250m	<=100m	One criterion for every site (either rural or urban) therefore criteria effects correspond directly to significance scores. However, all effects to acknowledge uncertainty (?) in the absence of a heritage impact assessment: • Major negative = --? • Minor negative = -? • All other = 0?	<b>Settlement boundaries</b> <b>Scheduled Monuments</b> <b>Listed Buildings</b> <b>Registered Parks and Gardens</b> <b>Conservation Areas</b> <b>Areas of Archaeological Potential</b> Not present in study area: Protected Wreck Sites; Registered Battlefields; World Heritage Sites
15b Proximity to historic assets: sites outside of existing settlements	N/A	N/A	All other sites	501-1000m	<500m		
<b>SA objective 16 Landscape - To conserve and enhance the character and distinctiveness of the Borough's settlements and landscape</b>							
<p>The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of residential sites vs. SA objective 16: Landscape.</p> <p>Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils.</p>							
16a Sensitive landscapes	N/A	N/A	Site contains landscape of "low" sensitivity or landscape was not included in sensitivity study as	Site contains landscape of "moderate" sensitivity but not landscape of "high" sensitivity	Site contains landscape of "high" sensitivity	If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative.	<b>Landscape sensitivity</b> Source: Landscape Capacity Study 2015 (a small number of LCAs containing site options were scoped out of the 2015 study - sensitivity

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 SA of options – detailed findings

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Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
			it is in Maidstone urban area			<p>If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	ratings per 2013 study were used for these)

## SA findings for residential site options

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

**C.399** SA objective 1: Housing was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver the right types and tenures of housing at prices that people can afford, as well as addressing the needs of specialist groups. These factors do not depend on the location of the site and are taken into account by the SA through appraisal of any Local Plan policies such as the total quantum of housing to be provided, the mix of housing types and tenures, affordable housing requirements, and design.

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

**C.400** The effects of residential site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities, and to employment. Access to open space was considered under SA objective 4: Health and not repeated here. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.401** Potential negative effects in relation to this SA objective were identified for the majority of residential site options, indicating that walking distances to existing, key services and facilities such as schools, GP surgeries, and service centres are relatively long and/or that the sites are in areas of the Borough from which commuting distances are relatively long. Most of the worst performing sites (significant negative effects) were in The Countryside or adjacent/potentially adjacent to Staplehurst. A smaller number of sites with significant negative effects were identified at Edge of Maidstone Urban Extensions, Larger Villages, adjacent to the outer part of Maidstone Urban Area, and at New Settlements.

**C.402** Although significant positive effects were not identified for any site options, those appraised as likely to have minor positive effects were mainly within Maidstone Town Centre. A small number of other sites with minor positive effects were identified at Edge of Maidstone Urban Extension (Invicta Barracks), within Maidstone Urban Area, and adjacent to Lenham Rural Service Centre.

#### Mitigation

**C.403** The potential negative effects identified by the SA of residential site options could be avoided by selecting sites within easy walking distance of existing key services and facilities where these have capacity or the potential exists to

expand that capacity. Where this is not possible, it will be important to ensure that new development is well provided with services and facilities and that these are delivered at the same time as housing. In terms of access to employment, it is notable that existing residents of areas in the south and east of the Borough have relatively long commuting distances (more than 13 km on average). If residential site allocations are made in these areas, particular consideration should be given to provision of more local employment opportunities and improved connectivity of these area to sustainable transport networks.

### SA Objective 3: To strengthen community cohesion

**C.404** SA objective 3: Community was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to these 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. These factors will be taken into account by the SA through appraisal of development management policies and site-specific requirements set out in allocation policies.

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

**C.405** The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of noise pollution) or positive (e.g. access to open space) effects on health and well-being. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.406** Potential minor positive effects were identified in relation to this SA objective for most residential site options, indicating an absence of negative factors such as being in an air quality management area or an area with high noise levels, combined with the presence of open space, sport and recreation facilities, or public rights of way within easy walking distance. Minor negative effects were, however, identified for a minority of sites. These were not located in particular categories of location (The Countryside, Maidstone Town Centre, etc) but rather were clustered around particular pollution hotspots, such as main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274.

#### Mitigation

**C.407** The potential negative effects identified by the SA of residential site options could be avoided by selecting sites



outside of air and noise pollution hotspots, such as close to the Borough's main roads and rail lines. In this regard, it should be noted that noise and air pollution generally reduce very quickly with increasing distance from the source, therefore on large site allocations it may be possible to avoid effects by appropriate site layouts. It may also be possible to use trees and shrubs as a natural barrier to air pollution. Providing additional green space and active travel routes alongside development where this is currently lacking would help to improve positive effects of site allocations on health and wellbeing more widely.

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

**C.408** Most factors relating to SA objective 5: Economy were scoped out of the appraisal of residential site options. Site options for employment use were the subject of a separate appraisal, guided by an amended version of the appraisal criteria for residential sites. The accessibility of residential sites to employment opportunities was addressed under SA objective 2. The exception is that potential negative effects were identified where allocation of a residential site would lead to loss of an existing employment use. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.409** Negligible effects were identified for most residential site options in relation to this SA objective, indicating that the site is not currently in employment use. Significant negative effects were identified for the remainder of the sites (approximately 16% of sites) as these are in existing employment uses which could be lost if the sites were allocated for residential use, with potential negative effects on the economy. Many of the affected sites were in Maidstone Town Centre, although significant numbers of such sites were also identified across the rest of the Borough.

#### Mitigation

**C.410** The potential negative effects identified by the SA of residential site options could be avoided by ensuring that any site selected for change of use from employment to residential is surplus to local requirements for the particular type of employment space.

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

**C.411** The allocation of residential development in or close to Maidstone town centre could have positive effects by providing more demand for nearby town centre uses or negative effects by preventing or resulting in the loss of existing town centre uses. The information was not available to appraise individual site allocations on this basis. Instead,

the SA of the Local Plan in relation to SA objective 6: Town centre considered whether policies encourage an appropriate mix of residential, office, retail, leisure, and community uses, as well as other factors set out in the SA framework that are unrelated to residential site allocations. SA objective 6 was therefore scoped out from the appraisal of residential site options.

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

**C.412** 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 they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.413** Minor negative effects were identified for the majority of residential site options, indicating that the site is not within convenient walking distance of rail, bus and cycle facilities. Significant negative effects were identified for a small number of sites that are most remote from these transport facilities, these being at South of Maidstone Urban Extension, North of Staplehurst Garden Settlement, Pagehurst Farm Garden Settlement, and in The Countryside. In addition, significant positive effects were identified for a small number of sites, all but one of these (Invicta Barracks Edge of Maidstone Urban Extension) being in Maidstone Town Centre.

#### Mitigation

**C.414** The potential negative effects identified by the SA of residential site options could be avoided by not allocating sites in locations poorly served by sustainable transport. If such sites are allocated, negative effects would be mitigated by ensuring that public transport and active travel connections were created or enhanced as appropriate, in advance of or early in the delivery of housing development.

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

**C.415** Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either prevent 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 residential 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. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of residential sites to relevant mineral resources. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.416** Minor negative effects were identified for the majority of residential site options, indicating that the site is within a Mineral Safeguarding Area or close to a Safeguarded Mineral Site. This is unsurprising given that limestone deposits extend in a broad band across the middle of the Borough while River Terrace Deposits are associated with the River Beult and other tributaries to the River Medway in the south of the Borough. The remainder of sites outside of these mineral resources scored negligible effects.

#### Mitigation

**C.417** The potential negative effects identified by the SA of residential site options could be avoided by ensuring that where allocation of sites overlaying mineral resources cannot be avoided, those resources are recovered prior to construction, where economically viable.

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

**C.418** Brownfield (as opposed to greenfield) site allocations were assumed to have a positive effect in relation to this SA objective. 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. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.419** Significant negative effects were identified for the majority of residential site options in relation to this SA objective, indicating that the site was categorised by the Council as greenfield and/or contained some Grade 1 (excellent quality) or Grade 2 (very good quality) agricultural land. The remainder of sites scored minor negative or negligible. The main areas of the Borough containing Grade 1 or Grade 2 agricultural land are a broad band across the centre of the Borough around the periphery of Maidstone urban area in the west to Boughton Malherbe in the east, as well as in the river valleys in the south of the Borough. In addition, approximately 70% of the site options were classed as greenfield sites.

#### Mitigation

**C.420** It would be difficult to avoid all of the potential negative effects identified by the SA of residential site options given the large proportion of site options affected but the effects could be mitigated by giving preference to brownfield sites and by considering whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of the best and most versatile agricultural land where this only occupies part of the site.

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

**C.421** Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies. Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local WwTWs or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options.

**C.422** 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. Site options were appraised in relation to these zones. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.423** Almost all of the residential site options scored minor negative in relation to this SA objective because the site is within a drinking water safeguard zone (surface water) and/or within Source Protection Zone 2 or 3. Most of the Borough, except for the northern edge in the North Downs is within a drinking water safeguard zone (surface water) and almost all of the rest is within Source Protection Zone 2 or 3. A small residual number of sites at Lenham scored a negligible effect as they lie outside of relevant water resource protection zones.

## Mitigation

**C.424** 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. Instead, 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 policies for sites allocated within the zones place appropriate requirements on development to avoid contributing to drinking water protection objectives.

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

**C.425** The proximity of sites to Air Quality Management Areas (AQMAs) does not robustly test the potential for such sites to generate road traffic through AQMAs. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.

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

**C.426** 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. Site options were appraised in relation to related flood risk zones. Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.427** The majority of residential site options were appraised as having significant negative effects in relation to this SA objective, indicating that part of the site was subject to one major or multiple minor forms of flood risk. These sites were distributed widely across the Borough. The main

concentrations of sites subject to fluvial or surface water flood risk were along the valleys of the River Medway (e.g. in Maidstone town) and its tributaries (such as along the River Beult in the south of the Borough) while sites subject to higher levels of groundwater flood risk were concentrated in the M20 corridor in the north of the Borough and along the River Beult in the south. A significant minority of sites were assessed as having negligible effects and the remainder of sites as having minor negative effects.

## Mitigation

**C.428** The potential negative effects identified by the SA of residential site options would be most effectively avoided by not allocating sites within the relevant areas of higher flood risk, where appropriate in accordance with the sequential and exception tests. It is notable, however, that many of the site options only partially overlay such areas and the council could therefore consider whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of areas with higher flood risk. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could also help to mitigate flood risk.

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

**C.429** Site options were appraised against SA 13: Climate change in relation to travel-related carbon emissions by reference to a basket of appraisal criteria used for SA objectives 2, 4 and 7 on access to services, employment, open space, and public transport. Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the residential site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.430** The majority of residential site options were appraised as having minor negative effects in relation to this SA objective, reflecting a balance of negative rather than positive effects in relation to the wide range of criteria used. This broadly means that most site options are not within easy walking distance of key services, open space, and public transport or are in the more remote areas of the Borough in terms of average commuting distances. A relatively small number of more inaccessible sites were identified as having significant negative effects, these mainly being located in The Countryside or at potential garden settlements at North of Staplehurst, Binbury Park, and Pagehurst Farm. Three sites

scored a significant positive effect, all of these being in Maidstone Town Centre.

### Mitigation

**C.431** Mitigation in relation to the potential negative effects identified by the SA of site options has already been discussed under SA objectives 2, 4 and 7 above.

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

**C.432** Site options were appraised against SA 14: Biodiversity Development by consideration of their proximity to designated wildlife sites and habitats and related zones within which impacts on internationally and nationally designated sites may occur. 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. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.433** Approximately one third of residential site options were appraised as having significant negative effects, one third as having minor negative effects, and the remainder as having negligible effects in relation to this SA objective. Sites were mainly identified as having significant negative effects because they were close to/ within the impact risk zone of more than one category of designated wildlife site (internationally/ nationally designated; locally designated) or close to one of these categories and also within an area of Priority Habitat. Approximately 15% of all residential site options, however, were scored significant negative because they actually overlap with a locally designated wildlife site or area of ancient woodland, although the extent of overlap was very small in a number of instances.

### Mitigation

**C.434** If any of the site options that overlap a locally designated wildlife site or area of ancient woodland are taken forward for allocation, the Council should carefully consider

whether (in some cases minor) changes to site boundaries are required to ensure compliance with statutory and NPPF requirements for biodiversity conservation. In terms of the other negative effects identified by the appraisal of site options, avoidance of development in areas with the potential to negatively affect areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan 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.

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

**C.435** The NPPF states that the *"significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting"*. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

**C.436** The proximity tests used in the SA of the Local Plan site allocations are 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. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.437** Almost all residential site options were identified as having significant negative effects with uncertainty, indicating that they are close to at least one designated heritage asset. Small numbers of sites scored minor negative with uncertainty due to being more distant from the nearest heritage asset, or negligible with uncertainty due to being relatively remote from any such assets.

### Mitigation

**C.438** Avoidance of development that could result in harm to the significance of heritage assets, including their setting, would provide the best mitigation. Judgements on whether

residential site allocations in different areas of the Borough are likely to be able to avoid such effects would best be informed by a historic environment sensitivity study or similar evidence. Where residual risks are likely, it may be possible to avoid significant negative effects via site-specific requirements in relation to site layout and development design.

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

**C.439** The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of residential site options in relation to SA objective 16: Landscape. Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C2**.

**C.440** Significant negative effects were identified for most residential site options, indicating that at least part of the site is within an area of high<sup>438</sup> landscape sensitivity. This reflects the fact that a large proportion of the Borough has been assessed as having high landscape sensitivity. Approximately one fifth of residential site options fell within areas of moderate or low landscape sensitivity and were scored as having minor or negligible effects respectively. Approximately half of these sites in less sensitive landscapes were in Maidstone Town Centre or wider Urban Area, with the remainder spread widely across the Borough.

#### **Mitigation**

**C.441** Avoidance of development within the areas of highest landscape sensitivity to development would provide the best mitigation. However, outside of Maidstone Urban Area the generally high sensitivity of the landscape will make this difficult to achieve. In these sensitive areas, Local Plan policy requirements for development site layouts and development design that seek to reduce adverse effects on the landscape could be implemented to mitigate potential negative effects.

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<sup>438</sup> Or 'very' high' sensitivity if the site was within one of the landscape character areas not assessed by the 2015 Landscape Capacity Study, necessitating reliance on the earlier 2013 study

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## Employment site options

Table C.3: Reasonable alternative site options considered for employment (including mixed) use at Regulation 18 Preferred Approaches stage

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
8	Bassetts Bungalow, Marden	0.8	Mixed	19	0	0	Adjacent to	North of Staplehurst GS	Larger Villages	Greenfield
9	116 to 120 Week St	0.0	Mixed	2	38	19	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
53	12-14 Week St	0.1	Mixed	3	81	41	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
58	Green Lane Farm	2.3	Mixed	31	531	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
66	Land at Lodge Rd, Staplehurst	4.2	Mixed	34	3964	0	Within	Staplehurst	Rural Service Centres	Greenfield
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	20	334	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
144	34- 35 High Street, Maidstone	0.1	Mixed	2	56	28	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
145	Len House	1.1	Mixed	29	531	265	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
146	Maidstone East	1.6	Mixed	65	1573	787	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
147	Gala Bingo and Granada House	0.4	Mixed	71	201	100	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
148	Maidstone Riverside	6.9	Mixed	650	5149	2574	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
149	Maidstone West	2.1	Mixed	130	1035	517	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
150	Mill St Car Park	0.4	Mixed	15	358	179	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
151	Mote Rd	0.3	Mixed	84	2000	0	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
152	Royal British Legion Social Club	0.3	Mixed	4	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	114	2778	1389	Within	the Countryside	Countryside	Greenfield
167	North & West of Leeds	98.3	Mixed	1359	23097	1000	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
168	Land at Forge Lane	4.9	Mixed	68	1158	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	0	5363	0	Within	the Countryside	Countryside	Greenfield
176	Land North and South of Ashford Rd	23.2	Mixed	320	5444	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
177	Land between Lower St & George St	6.5	Mixed	90	1530	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
179	Land at Westerhill	0.7	Mixed	33	2806	0	Adjacent to	Coxheath	Larger Villages	Greenfield

Appendix C  
SA of options – detailed findings

SA of Maidstone Local Plan Review  
September 2021

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	89	1508	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
193	Land East of Upper Street Langley	6.0	Mixed	83	1406	0	Adjacent to	South of Leeds	New Settlements	Greenfield
195	Waterside Park	16.2	Mixed	224	3814	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
207	Ledian Farm	1.7	Mixed	24	409	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	6	101	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	142	0	0	Potentially Adjacent to	North of Staplehurst GS	Larger Villages	Mixed
226	Land north of Staplehurst - Garden village	109.3	Mixed	1658	0	1000	Within	North of Staplehurst GS	Larger Villages	Greenfield
239	Land to south Shangri-La, Langley	0.8	Mixed	12	198	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
245	Land north of the M2 liding - urban extension	135.3	Mixed	1974	33564	1000	Within	Liding Urban Extension	Edge of Maidstone Urban Extension	Greenfield
250	Land rear of Butlers Farm Langley	3.6	Mixed	49	838	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
252	Land rear of Lavender Cottage, Langley	1.0	Mixed	14	235	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
255	Land east of Yew Tree House Leeds	0.5	Mixed	7	112	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
260	Land at Ashford Road Lenham	0.8	Employment	0	3108	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
263	Land west of Ledian Farm, Leeds	1.4	Mixed	19	322	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	0	41023	0	Within	the Countryside	Countryside	Mixed
274	South of Leeds	104.4	Mixed	1443	24528	1000	Adjacent to	South of Leeds	New Settlements	Unknown
279	Langley Heath - Strategic Settlement	98.4	Mixed	1360	23114	1000	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	9	188	0	Within	the Countryside	Countryside	Brownfield
286	Underlyn Lane	1.3	Mixed	0	4127	0	Within	the Countryside	Countryside	Greenfield
289	Heathlands Garden Community	373.3	Mixed	5161	87733	2500	Within	Heathlands	New Settlements	Greenfield



Appendix C  
SA of options – detailed findings

SA of Maidstone Local Plan Review  
September 2021

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m <sup>2</sup> )	A use (m <sup>2</sup> )	Adjacent or within	Growth location	Location typology	Greenfield status
297	Bearstead Library	0.1	Mixed	1	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
299	Maidstone AEC	0.1	Mixed	3	74	37	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
303	IS Oxford Rd	0.9	Mixed	14	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	42	1020	510	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
309	Strategic Expansion of Marden	134.1	Mixed	1854	31511	1000	Within	North of Marden	New Settlements	Greenfield
316	Binbury Park, Detling	191.0	Mixed	2113	0	1500	Within	Binbury Park	New Settlements	Mixed
317	Langley Heath	2.0	Mixed	27	458	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
318	Pagehurst Farm	82.1	Mixed	1134	0	500	Within	Pagehurst Farm Garden Settlement	New Settlements	Greenfield
319	Beaux Aires Farm	43.0	Mixed	476	0	0	Adjacent to	Binbury Park	New Settlements	Greenfield
330	Land at Seeburg, Bredhurst	1.1	Mixed	16	269	0	Within	Lidsing Urban Extension	Edge of Maidstone Urban Extension	Brownfield

Table C.4: Appraisal criteria for sites considered for employment use

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<b>SA objective 1: Housing - To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home</b>							
SA objective 1: Housing was scoped out of the appraisal of employment site options as it is not relevant to employment use.							
<b>SA objective 2: Services &amp; facilities - To ensure ready access to essential services and facilities for all residents</b>							
The effects of site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities that may be accessed by employees during the working day. Access to open space was considered under SA objective 4: Health and not repeated here.							
<i>2a GP surgeries</i>	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	Each criterion is scored: <ul style="list-style-type: none"> <li>• Major positive +3</li> <li>• Minor positive +1</li> <li>• Minor negative -1</li> <li>• Major negative -3</li> </ul> Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: <ul style="list-style-type: none"> <li>• Significant positive &gt;= +2</li> <li>• Minor positive &gt;0 to &lt;2               <ul style="list-style-type: none"> <li>• Negligible 0</li> </ul> </li> <li>• Minor negative &lt;0 to &lt;-2</li> <li>• Significant negative &gt;= -2</li> </ul>	<b>GP surgeries</b> Excludes opticians, pharmacies, hospitals, any private healthcare facilities  <b>Town centres</b> Maidstone only - boundary provided by MBC  <b>Retail centres within Rural Service Centres</b> (Marden, Staplehurst, Headcorn, Lenham, Harrietsham - boundaries provided by MBC)
<i>2d Maidstone town centre</i>	<=400m from town centre	401-800m from town centre	N/A	801-1,201m from town centre	>1,200m from town centre		
<i>2e Rural Service Centres</i>	<=200m from retail centre of Rural Service Centre	201-400m from retail centre of Rural Service Centre	N/A	401-800m from retail centre of Rural Service Centre	>800m from retail centre of Rural Service Centre		
<b>SA objective 3: Community - To strengthen community cohesion</b>							
SA objective 3: Community was scoped out of the appraisal of employment site options as it is not relevant to employment use.							
<b>SA objective 4: Health - To improve the population's health and wellbeing and reduce health inequalities</b>							
The effects of employment site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of air pollution) or positive (e.g. access to open space) effects on health and well-being of employees during the working day. In terms of negative determinants, employment sites were assumed to be less susceptible to environmental noise pollution than residential sites, therefore exposure to road and rail noise was scoped out.							
Footpath and cycle path networks are more likely to constitute a recreational resource if they are in or easily link to rural areas but those in urban areas may be important for commuting by active modes therefore both were considered.							
Many other factors within the scope of the Local Plan could affect achievement of this SA objective but these were tested by other site assessment criteria to which they more directly relate (e.g. access to healthcare facilities is tested under SA objective 2: Services & facilities and not repeated here) and by the SA of Local Plan policies (for instance in relation to provision of new or enhancement to existing healthcare facilities, open spaces, and sports and recreation facilities).							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
4a AQMAs	N/A	N/A	All other sites	N/A	Site located within an AQMA	<p>Each criterion is scored:</p> <ul style="list-style-type: none"> <li>• Major positive +3</li> <li>• Minor positive +1</li> <li>• Negligible 0</li> <li>• Minor negative -1</li> <li>• Major negative -3</li> </ul> <p>Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows:</p> <ul style="list-style-type: none"> <li>• Significant positive <math>\geq +2</math></li> <li>• Minor positive <math>&gt;0 &lt;2</math> <ul style="list-style-type: none"> <li>• Negligible 0</li> </ul> </li> <li>• Minor negative <math>&lt;0 &lt;-2</math></li> <li>• Significant negative <math>\geq -2</math></li> </ul>	<b>Air Quality Management Areas</b>
4c Odour from waste facilities	N/A	N/A	All other sites	N/A	<p><math>\leq 400\text{m}</math> to wastewater treatment works or established safeguarding zone, or</p> <p><math>\leq 250\text{m}</math> to waste management facility</p>		<b>Waste water treatment works</b> <b>Waste management facilities</b>
4d Open space	$\leq 300\text{m}$ from open space, sport, recreation facility, open country, or registered common land	301-800m from open space, sport, recreation facility, open country, or registered common land	N/A	801-1,200m from open space, sport, recreation facility, open country, or registered common land	<p><math>&gt;1,200\text{m}</math> from open space, sport and recreation facility</p> <p>OR</p> <p>Loss of open space, sport, recreation facility, open country and registered common land</p>		<b>Open spaces</b> (existing or allocated in Local Plan 2017) <b>Sport &amp; recreation facilities</b> <b>Open country</b> <b>Registered common land</b>
4e Public Rights of Way (PRoW) / Cycle Paths	$\leq 200\text{m}$ from PRoW / Cycle Paths (assumed that paths running through development sites will be retained or diverted around the site boundary)	201-400m from PRoW / Cycle Paths	N/A	401-800m from PRoW / Cycle Paths	$>800\text{m}$ from PRoW / Cycle Paths		<b>PRoW</b> <b>Cycle paths</b> (no data available for local cycle network so limited to national network)
<b>SA objective 5: Economy - To facilitate a sustainable and growing economy</b>							
All site options with the potential to deliver employment opportunities have the potential for positive effects in relation to SA objective 5: Economy.							
5a Employment land	N/A	All sites	N/A	N/A	N/A	A minor positive effect is recorded for all site options	N/A
<b>SA objective 6: Town centre - To support vibrant and viable Maidstone town centre</b>							
The allocation of use class A (shops, including some services such as professional services) or use class D (non-residential institutions, including many public services and entertainment/leisure) developments to Maidstone town centre would help to create a strong service offering that increases footfall for new and existing town centres uses, with positive effects on vibrancy and viability of the town centre.							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<i>6a Allocations for town centre uses in Maidstone Town Centre</i>	Sites in Maidstone Town Centre considered for use classes A or D	N/A	Sites considered for other use classes and sites not in Maidstone Town Centre	N/A	N/A	If the criterion scores major positive then the significance of the effect of the site vs. the SA objective is significant positive.  All other sites have a negligible effect vs. the SA objective.	<b>Uses for which site considered</b> Source: MBC officer assessment <b>Maidstone Town Centre</b> boundary Source: MBC
<b>SA objective 7: Sustainable travel - To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion</b>							
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 they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities.							
<i>7a Railway stations</i>	<= 500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion is scored: • Major positive +3 • Minor positive +1 • Minor negative -1 • Major negative -3  Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	<b>Railway Stations</b>
<i>7b Bus stops</i>	<= 300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop		<b>Bus Stops</b>
<i>7c Cycle paths</i>	<= 200m of a cycle path	201-400m of a cycle path	N/A	401-800m of a cycle path	>800m of a cycle path		<b>Cycle paths</b> (no data available for local cycle network so limited to national network)
<b>SA objective 8: Minerals - To conserve the Borough's mineral resources</b>							
Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either prevent future mineral extraction or delay delivery of development 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. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of employment sites to relevant mineral resources.							
<i>8a Minerals safeguarding</i>	N/A	N/A	All other sites	Site is within a Mineral Safeguarding Area  OR  within 250m of a	N/A	If the criterion scores minor negative then the significance of the effect of the site vs. the SA objective is minor negative.  All other sites have a negligible effect vs. the SA objective.	<b>Mineral Safeguarding Areas Safeguarded Mineral Sites</b> Source: Kent Minerals & Waste Local Plan 2019

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				Safeguarded Mineral Site			
<b>SA objective 9: Soils - To conserve the Borough's soils and make efficient and effective use of land</b>							
Prioritisation of previously developed land over greenfield sites was assumed to have a positive effect in relation to this SA objective.							
Potential harm to soil quality through the development of greenfield land was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. The classification is based on the long-term physical limitations of land for agricultural use; factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Data to subdivide the agricultural land into grades 3a and 3b were not available for Maidstone Borough therefore these grades were considered together.							
<i>9a Greenfield land</i>	Existing status of site is brownfield	N/A	N/A	Site is currently a mix of greenfield and brownfield	Existing status of site is greenfield	If any of the criteria score major negative then the significance of the effect of the site vs. the SA objective is significant negative.  If only one criterion scores minor negative then the significance of the effect is minor negative.  All other sites have a negligible effect vs. the SA objective.	<b>Brownfield vs. greenfield site status</b> Source: MBC officer assessment
<i>9b Agricultural Land</i>	N/A	N/A	All other sites	Site on Grade 3 agricultural land but not on Grades 1 or 2	Site on Grade 1 or 2 agricultural land		<b>Agricultural Land Classifications</b>
<b>SA objective 10: Water - To maintain and improve the quality of the Borough's waters and achieve sustainable water resources management</b>							
Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies.							
Effects of development on water quality will partly depend on adoption of good practice site layout and construction techniques as well as the inclusion of sustainable drainage systems (SuDS) within the design; these factors will be considered in the SA of development management policies.							
Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local wastewater treatment works (WwTWs) or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options.							
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 increasing 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. Site options were appraised in relation to these zones.							
<i>10a Drinking water quality</i>	N/A	N/A	All other sites	Site falls within a Source Protection Zone 2 or 3	Site falls within a Source Protection Zone 1	If the criterion scores major negative then the significance of the effect of the site vs. the	<b>Source Protection Zones</b> <b>Drinking Water Safeguard Zones</b>

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				<p>OR</p> <p>Site falls within a drinking water safeguard zone (groundwater)</p> <p>OR</p> <p>Site falls within a drinking water safeguard zone (surface water)</p>		<p>SA objective is significant negative.</p> <p>If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	
<b>SA objective 11: Air Quality - To reduce air pollution ensuring lasting improvements in air quality</b>							
The proximity of sites to Air Quality Management Areas (AQMA) does not robustly test the potential for such sites to generate road traffic through AQMA. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.							
<b>SA objective 12: Flooding - To avoid and mitigate flood risk</b>							
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 most employment uses as a 'less vulnerable', which is suitable in areas of Flood Zone 1, 2 and 3a but would require an exception test 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.							
Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design.							
12a EA Flood Risk Zones	N/A	N/A	All other sites	Site within Flood Zone 3	N/A	<p>If any criterion scores major negative or two or more criteria score minor negative, the overall significance of the effect of the site vs. the SA objective is significant negative.</p> <p>If only one criterion scores minor negative, then the overall</p>	EA Flood Risk Zone 3 (split between Zone 3a and Zone 3b not available)
12b Surface water flood risk	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding		Surface water flooding areas (Environment Agency data 'Risk of Flooding from Surface Water (Basic)' identifies areas with a 1 in 100 years or greater risk of surface water flooding)

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
12c Groundwater flood risk	N/A	N/A	Groundwater levels are at least 5m below the ground surface or area is categorised as "no risk"	Groundwater levels are in the 0.5m-5m or 0.025m-0.5m below ground surface range	Groundwater levels are either at or very near (within 0.025m of) the ground surface	significance of the effect vs. the SA objective is minor negative.  All other sites have a negligible effect vs. the SA objective.	<b>Groundwater flooding areas</b> Source: Strategic Flood Risk Assessment
<b>SA objective 13: Climate change - To minimise the Borough's contribution to climate change</b>							
SA 13: Climate change was appraised in relation to travel-related carbon emissions by reference to other appraisal criteria on access to services, employment, open space, and public transport.							
Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies.							
13a Access to services, employment, open space, and public transport	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	Each criterion is scored: • Major positive +3 • Minor positive +1 • Minor negative -1 • Major negative -3  Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	<b>See data requirements for the constituent criteria</b>
<b>SA objective 14: Biodiversity - To conserve, connect and enhance the Borough's wildlife, habitats and species</b>							
Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.							
Impact Risk Zones (IRZs) defined by Natural England were used to appraise the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. IRZs define zones around each biodiversity site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Note that all SACs, SPAs, Ramsar sites and National Nature Reserves (NNRs) are also designated as SSSIs therefore SSSIs were used as a proxy for all these designations in the SA. European sites are underpinned by the SSSI designation and their interest features and sensitivities are covered by the SSSI IRZs. Where the notified features of the European site and SSSI are different, the SSSI IRZs have been set so that they reflect both. The effects of the Local Plan as a whole and of preferred policies and site allocations on European sites were							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
assessed by the separate Habitats Regulations Assessment.							
A zone of influence of 250 m was assumed for all sub-nationally designated wildlife sites and ancient woodland, based on professional judgement.							
Loss of open space is addressed under SA objective 4: Health.							
No digital data were available to confirm the location of any Regional Important/Local Geological Sites so these were excluded from the appraisal.							
14a Internationally and nationally designated biodiversity assets	N/A	N/A	All other sites	Intersects with 'rural non-residential', 'air pollution', 'water supply', or 'all planning applications' IRZ	Intersects with designated site	<p>If any one of the criteria score major negative or two or more criteria score minor negative then the overall effect of the site vs. the SA objective is significant negative.</p> <p>If only one criterion scores minor negative, then the overall effect vs. the SA objective is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	<p><b>International and national wildlife and geological designations</b> covered by the extent of the UK's Sites of Special Scientific Interest (SSSIs).</p> <p>See Appendix 3 of IRZ Guidance for further guidance: /Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf</p>
14b Locally designated wildlife sites and ancient woodland	N/A	N/A	All other sites	<=250m from designated site boundary	Intersects with designated site		<p><b>Local Nature Reserves</b> <b>Local Wildlife Sites</b> <b>Ancient Woodland</b></p>
14c Priority Habitat Inventory (PHI) habitat	N/A	N/A	All other sites	Intersects with habitat	N/A		<p><b>Priority Habitat Inventory</b></p>
<b>SA objective 15: Historic environment - To conserve and/or enhance the Borough's historic environment</b>							
<p>The NPPF states that the "<i>significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting</i>". However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.</p> <p>The proximity tests used in the SA of the Local Plan site allocations are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.</p>							
15a Proximity to historic assets: sites within existing settlements	N/A	N/A	All other sites	101-250m	<=100m	<p>One criterion for every site (either rural or urban) therefore criteria effects correspond directly to significance scores. However, all effects to acknowledge uncertainty (?) in the absence of a heritage impact assessment:</p>	<p><b>Settlement boundaries</b> <b>Scheduled Monuments</b> <b>Listed Buildings</b> <b>Registered Parks and Gardens</b> <b>Conservation Areas</b> <b>Areas of Archaeological Potential</b> Not present in study area: Protected</p>
15b Proximity to historic assets: sites outside of	N/A	N/A	All other sites	501-1000m	<500m		



Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
<b>existing settlements</b>						<ul style="list-style-type: none"> <li>• Major negative = --?</li> <li>• Minor negative = -?</li> <li>• All other = 0?</li> </ul>	Wreck Sites; Registered Battlefields; World Heritage Sites
<b>SA objective 16 Landscape - To conserve and enhance the character and distinctiveness of the Borough's settlements and landscape</b>							
The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of employment sites vs. SA objective 16: Landscape.							
Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils.							
16a Sensitive landscapes	N/A	N/A	All other sites	Site within landscape of "moderate" sensitivity	Site within landscape of "high" sensitivity	<p>If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative.</p> <p>If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative.</p> <p>All other sites have a negligible effect vs. the SA objective.</p>	<p><b>Landscape sensitivity</b> Source: Landscape Capacity Study 2015 (a small number of LCAs containing site options were scoped out of the 2015 study - sensitivity ratings per 2013 study were used for these)</p>

## SA findings for employment site options

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

**C.442** SA objective 1: Housing was scoped out of the appraisal of employment site options as it is not relevant to employment use.

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

**C.443** The effects of site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities that may be accessed by employees during the working day. Access to open space was considered under SA objective 4: Health and not repeated here. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.444** Potential negative effects in relation to this SA objective were identified for the majority of employment site options, indicating that walking distances to existing, key services and facilities such as GP surgeries and service centres are relatively long. Many of the worst performing sites (significant negative effects) were in potential new settlements (including North of Staplehurst Garden Settlement), with smaller numbers of other sites having a significant negative score in The Countryside, Lidsing Urban Extension on the edge of Maidstone, in Maidstone Urban Area, or in Staplehurst.

**C.445** Although significant positive effects were not identified for any site options, those appraised as likely to have minor positive effects were mainly within Maidstone Town Centre, plus one at North of Marden new settlement.

#### Mitigation

**C.446** The potential negative effects identified by the SA of employment site options could be avoided by selecting sites within easy walking distance of existing key services and facilities where these have capacity or the potential exists to expand that capacity. Where this is not possible, it will be important to ensure that new development is well provided with relevant services and facilities and that these are delivered at the same time as development.

### SA Objective 3: To strengthen community cohesion

**C.447** SA objective 3: Community was scoped out of the appraisal of employment site options as it is not relevant to employment use.

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

**C.448** The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of air pollution) or positive (e.g. access to open space) effects on health and well-being of employees during the working day. In terms of negative determinants, employment sites were assumed to be less susceptible to environmental noise pollution than residential sites, therefore exposure to road and rail noise was scoped out. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.449** Potential minor positive effects were identified in relation to this SA objective for most employment site options, indicating an absence of negative factors such as being in an air quality management area, combined with the presence of open space, sport and recreation facilities, or public rights of way within easy walking distance. Minor negative effects were, however, identified for a minority of sites. These were mainly located in the main road corridors in and around Maidstone town where AQMAs are designated, with the remaining ones close to waste management facilities. The remainder of sites had a negligible effect score.

#### Mitigation

**C.450** The potential negative effects identified by the SA of employment site options could be avoided by selecting sites outside of air pollution hotspots or by further investigating the potential for negative effects on health and wellbeing from waste management facilities within or close to allocated employment sites. In relation to air pollution from roads, it should be noted that this generally reduces very quickly with increasing distance from the source, therefore on large site allocations it may be possible to avoid effects by appropriate site layouts. It may also be possible to use tree or shrub planting as a natural barrier to air pollution. Providing additional green space and active travel routes alongside development where this is currently lacking would help to improve positive effects of site allocations on health and wellbeing of employees more generally.

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

**C.451** All site options with the potential to deliver employment opportunities have the potential for positive effects in relation to SA objective 5: Economy. All employment site options therefore scored a minor positive effect.

#### Mitigation

**C.452** None required as no negative effects identified.

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

**C.453** The allocation of use class A (shops, including some services such as professional services) or use class D (non-residential institutions, including many public services and entertainment/leisure) developments within or close to Maidstone town centre would help to create a strong service offering that increases footfall for new and existing town centres uses, with positive effects on vibrancy and viability of the town centre. Such site options were considered to have significant positive effects in relation to this SA objective with other site options assumed to have a negligible effect.

**C.454** Significant positive effects were identified for approximately 20% of the employment site options – those being considered for A class or D class uses within Maidstone Town Centre. Negligible effects were identified for the remainder of the site options.

#### Mitigation

**C.455** None required as no negative effects identified.

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

**C.456** 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 they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.457** Minor negative effects were identified for the majority of employment site options, indicating that the site is not within convenient walking distance of rail, bus and cycle facilities. Significant negative effects were identified for two sites that are remote from these transport facilities, these being adjacent to North of Staplehurst Garden Settlement and at Pagehurst Farm Garden Settlement. Significant positive effects were identified for approximately 20% of employment site options, all these being in Maidstone Town Centre. The remaining site options scored minor positive in relation to this SA objective.

#### Mitigation

**C.458** The potential negative effects identified by the SA of residential site options could be avoided by not allocating sites in locations poorly served by sustainable transport. If such

sites are allocated, negative effects would be mitigated by ensuring that public transport and active travel connections were created or enhanced as appropriate, in advance of or early in the delivery of housing development.

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

**C.459** Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either prevent 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. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of employment sites to relevant mineral resources. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.460** Minor negative effects were identified for approximately 60% of employment site options, indicating that the site is within a Mineral Safeguarding Area or close to a Safeguarded Mineral Site. This reflects the fact that limestone deposits extend in a broad band across the middle of the Borough while River Terrace Deposits are associated with the River Beult and other tributaries to the River Medway in the south of the Borough. The remainder of sites outside of these mineral resources scored negligible effects.

#### Mitigation

**C.461** The potential negative effects identified by the SA of employment site options could be avoided by ensuring that where allocation of sites overlaying mineral resources cannot be avoided, those resources are recovered prior to construction, where economically viable.

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

**C.462** Brownfield (as opposed to greenfield) site allocations were assumed to have a positive effect in relation to this SA objective. 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. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.463** Significant negative effects were identified for approximately 65% of employment site options in relation to this SA objective, indicating that the site was categorised by

the Council as greenfield and/or contained some Grade 1 (excellent quality) or Grade 2 (very good quality) agricultural land. The main areas of the Borough containing Grade 1 or Grade 2 agricultural land are a broad band across the centre of the Borough around the periphery of Maidstone urban area in the west to Boughton Malherbe in the east, as well as in the river valleys in the south of the Borough. Approximately 60% of the employment site options were classed as greenfield sites. Most of the remaining sites were assessed as having a negligible effect, indicating no loss of greenfield or agricultural land to development, these sites being in Maidstone Town Centre or wider Urban Area. The few remaining sites scored minor negative against this SA objective.

#### Mitigation

**C.464** It would be difficult to avoid all of the potential negative effects identified by the SA of employment site options given the large proportion of site options affected but the effects could be mitigated by giving preference to brownfield sites and by considering whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of the best and most versatile agricultural land where this only occupies part of the site.

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

**C.465** Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies. Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local WwTWS or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options.

**C.466** 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 increasing 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. Site options were appraised in relation to these zones. Further details on the

approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.467** Almost all of the employment site options scored minor negative in relation to this SA objective because the site is within a drinking water safeguard zone (surface water) and/or within Source Protection Zone 2 or 3. Most of the Borough, except for the northern edge in the North Downs is within a drinking water safeguard zone (surface water) and almost all of the rest is within Source Protection Zone 2 or 3. One site at Lenham scored a negligible effect as it was outside of relevant water resource protection zones.

#### Mitigation

**C.468** Given that almost all of the Borough is within relevant water resource protection zones it is not feasible to avoid these when allocating employment sites. Instead, 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 policies for sites allocated within the zones place appropriate requirements on development to avoid contributing to drinking water protection objectives.

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

**C.469** The proximity of sites to Air Quality Management Areas (AQMAs) does not robustly test the potential for such sites to generate road traffic through AQMAs. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.

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

**C.470** 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 most employment uses as a 'less vulnerable', which is suitable in areas of Flood Zone 1, 2 and 3a but would require an exception test 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. Site options were appraised in relation to

related flood risk zones. Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.471** Just over half of employment site options were appraised as having significant negative effects in relation to this SA objective, indicating that the part of the site was subject to one major or multiple minor forms of flood risk. These sites were mainly in Maidstone town or a potential new settlement. The main concentrations of sites subject to fluvial or surface water flood risk were along the valleys of the River Medway (e.g. in Maidstone town) and its tributaries (such as along the River Beult in the south of the Borough) while sites subject to higher levels of groundwater flood risk were concentrated in the M20 corridor in the north of the Borough and along the River Beult in the south. Half of the remaining sites were assessed as having minor negative effects and half as having negligible effects.

#### Mitigation

**C.472** The potential negative effects identified by the SA of employment site options would be most effectively avoided by not allocating sites within the relevant areas of higher flood risk, where appropriate in accordance with the sequential and exception tests. It is notable, however, that many of the site options only partially overlay such areas and the council could therefore consider whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of areas with higher flood risk. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could also help to mitigate flood risk.

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

**C.473** Site options were appraised against SA 13: Climate change in relation to travel-related carbon emissions by reference to a basket of appraisal criteria used for SA objectives 2, 4 and 7 on access to services, employment, open space, and public transport. Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the residential site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.474** Approximately 75% of employment site options were appraised as having negative effects in relation to this SA objective, with about half of these significant negative. This broadly means that most site options are not within easy walking distance of key services, open space, or public. The more inaccessible sites having significant negative effects were widely distributed across the different location typologies (The Countryside; New Settlements etc.). Five sites scored a significant positive effect, all of these being in Maidstone Town Centre. Remaining sites scored minor positive or negligible.

#### Mitigation

**C.475** Mitigation in relation to the potential negative effects identified by the SA of site options has already been discussed under SA objectives 2, 4 and 7 above.

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

**C.476** Site options were appraised against SA 14: Biodiversity Development by consideration of their proximity to designated wildlife sites and habitats and related zones within which impacts on internationally and nationally designated sites may occur. 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. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.477** Approximately 40% of employment site options were appraised as having significant negative effects and all but one of the remaining sites having minor negative effects. One site adjacent to Lenham had negligible effects in relation to this SA objective. Sites were mainly identified as having significant negative effects because they were close to/ within the impact risk zone of more than one category of designated wildlife site (internationally/ nationally designated; locally designated) or close to one of these categories and also within an area of Priority Habitat. Approximately 25% of all employment site options, however, were scored significant negative because they actually overlap with a locally

designated wildlife site or area of ancient woodland, although the extent of overlap was very small in a number of instances.

### Mitigation

**C.478** If any of the site options that overlap a locally designated wildlife site or area of ancient woodland are taken forward for allocation, the Council should carefully consider whether (in some cases minor) changes to site boundaries are required to ensure compliance with statutory and NPPF requirements for biodiversity conservation. In terms of the other negative effects identified by the appraisal of site options, avoidance of development in areas with the potential to negatively affect areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan 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.

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

**C.479** The NPPF states that the *"significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting"*. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

**C.480** The proximity tests used in the SA of the Local Plan site allocations are 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. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.481** Almost all employment site options were identified as having significant negative effects with uncertainty, indicating that they are close to at least one designated heritage asset. Small numbers of sites scored minor negative with uncertainty due to being more distant from the nearest heritage asset, or negligible with uncertainty due to being relatively remote from any such assets.

### Mitigation

**C.482** Avoidance of development that could result in harm to the significance of heritage assets, including their setting, would provide the best mitigation. Judgements on whether residential site allocations in different areas of the Borough are likely to be able to avoid such effects would best be informed by a historic environment sensitivity study or similar evidence. Where residual risks are likely, it may be possible to avoid significant negative effects via site-specific requirements in relation to site layout and development design.

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

**C.483** The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of employment site options in relation to SA objective 16: Landscape. Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils. Further details on the approach to appraisal of site options against this SA objective are provided in **Table C4**.

**C.484** Significant negative effects were identified for approximately 70% of employment site options, indicating that at least part of the site is within an area of high<sup>439</sup> landscape sensitivity. This reflects the fact that a large proportion of the Borough has been assessed as having high landscape sensitivity. Most of the remaining employment site options fell within areas of low landscape sensitivity and were scored as having negligible effects; most of these sites were in Maidstone Town Centre. The few remaining sites scored minor negative against this SA objective.

### Mitigation

**C.485** Avoidance of development within the areas of highest landscape sensitivity to development would provide the best

<sup>439</sup> Or 'very' high' sensitivity if the site was within one of the landscape character areas not assessed by the 2015 Landscape Capacity Study, necessitating reliance on the earlier 2013 study

mitigation. However, outside of Maidstone Urban Area the generally high sensitivity of the landscape will make this difficult to achieve. In these sensitive areas, Local Plan policy requirements for development site layouts and development design that seek to reduce adverse effects on the landscape could be implemented to mitigate potential negative effects.

Table C5: New or deleted site allocations between Regulation 18 Preferred Approaches and Regulation 19 Pre-submission Local Plan stages (Sites allocated at Regulation 19 stage are shown in **bold**)

UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
1	Land Adj Brhemar Garage	LPRSA001	Not allocated	
2	The Homestead	Reasonable alternative	Not allocated	
5	Land Adj to Dingly Dell	LPRSA005	Not allocated	
7	The Paddocks, Staplehurst	Reasonable alternative	Not allocated	
8	Bassetts Bungalow, Marden	Reasonable alternative	Not allocated	
9	116 to 120 Week St	LPRSA009	Not allocated	
10	Bydews Place Site 1 ACK	LPRSA010	Not allocated	
11	Bydews Place Site 2 ACK	Reasonable alternative	Not allocated	
12	Land at Forsham House	Reasonable alternative	Not allocated	
13	Land at Chartway Sutton	Reasonable alternative	Not allocated	
15	KIA site, Ashford Road	Reasonable alternative	Not allocated	
16	Fir Tree Farm and Norton Lea (North)	Reasonable alternative	Not allocated	
17	Land East of Maidstone Road, Headcorn	Reasonable alternative	Not allocated	
18	Land rear of Beech House	Reasonable alternative	Not allocated	
19	Land at Lenham Rd, Headcorn	Reasonable alternative	Not allocated	
21	Land at Southways, Sutton Valence	LPRSA021	Not allocated	Deleted and merged with expanded site 78
27	Land at George Street	Reasonable alternative	Not allocated	
29	Court Lodge Farm	Reasonable alternative	Not allocated	
34	Land at George St, Staplehurst	Reasonable alternative	Not allocated	
37	Land ro The Gables, Staplehurst	Reasonable alternative	Not allocated	
48	Plot off S side Forge Ln, E. Farleigh	Reasonable alternative	Not allocated	
50	Army Hut Farm Stables, Stockett Ln, East Farleigh	Reasonable alternative	Not allocated	
53	12-14 Week St	LPRSA053	Not allocated	
54	Chainhurst	Reasonable alternative	Not allocated	
55	Victoria's Cabaret Club	Reasonable alternative	Not allocated	
56	Orchard House, Clapper Ln, Staplehurst	Reasonable alternative	Not allocated	
57	Land at Oak Farm Gardens, Headcorn	Reasonable alternative	Not allocated	
58	Green Lane Farm	Reasonable alternative	Not allocated	
59	Fellinpits, Beltring	Reasonable alternative	Not allocated	



UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
60	Land at Rush Farm, Staplehurst	Reasonable alternative	Not allocated	
64	Land South of Marden Rd, Staplehurst	Reasonable alternative	Not allocated	
<b>66</b>	<b>Land at Lodge Rd, Staplehurst</b>	<b>LPRSA066</b>	<b>LPRSA066</b>	
70	Land at Willow Wood	Reasonable alternative	Not allocated	
<b>71</b>	<b>Marley Rd, Harrietsham</b>	<b>LPRSA071</b>	<b>LPRSA071</b>	
73	Bearstead Golf Course	Reasonable alternative	Not allocated	
77	Teiside Nurseries, Laddingford	Reasonable alternative	Not allocated	
<b>78</b>	<b>Haven Farm</b>	<b>LPRSA078</b>	<b>LPRSA078</b>	
79	Land South of Heath Road	Reasonable alternative	Not allocated	
80	Land west of Loder Close and Westwood Close	Reasonable alternative	Not allocated	
81	Land off Lenham Road	Reasonable alternative	Not allocated	
82	Land rear of Firenze	Reasonable alternative	Not allocated	
83	Land at Hartley Dene	Reasonable alternative	Not allocated	
84	Land off Heath Road	LPRSA084	Not allocated	
86	Elsfield Cottages, Ashford Road	Reasonable alternative	Not allocated	
88	Land south of Ashford Road	Reasonable alternative	Not allocated	
90	Land adjacent to Bridgehurst Oast	Reasonable alternative	Not allocated	
91	Teston Field	Reasonable alternative	Not allocated	
93	Land at Linden Farm	Reasonable alternative	Not allocated	
94	Land South of Tumblers Hill	Reasonable alternative	Not allocated	
95	Land at Halfe Yoke	Reasonable alternative	Not allocated	
98	Land south of Ashford Rd, Harrietsham	Reasonable alternative	Not allocated	
<b>101</b>	<b>Land south of A20, Harrietsham</b>	<b>LPRSA101</b>	<b>LPRSA101</b>	
102	Ringles Nursery & Ringles Gate, Headcorn	Reasonable alternative	Not allocated	
104	Gowan Park, Kingswood	Reasonable alternative	Not allocated	
105	Land at junction of Vicarage Lane & Lower Rd, East Farleigh	Reasonable alternative	Not allocated	
107	Land adjacent to Westholme, Sutton Valance	Reasonable alternative	Not allocated	
108	Land at South Lane, Sutton Valance	Reasonable alternative	Not allocated	
109	Land south of Orchard End	Reasonable alternative	Not allocated	
112	Sutton Valance Group GP Practice	Reasonable alternative	Not allocated	

UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
<b>114</b>	<b>Land at and Adjacent to home Farm</b>	<b>LPRSA114</b>	<b>LPRSA114</b>	
115	Farm and Yard at Boughton Mount Farm	Reasonable alternative	Not allocated	
117	Land at Loose Court Farm Cottage	Reasonable alternative	Not allocated	
118	Gibbs Hill Farm	Reasonable alternative	Not allocated	
119	North of Thorn View	Reasonable alternative	Not allocated	
120	Rowan House Farm and Fairview (Broomfield Park)	Reasonable alternative	Not allocated	
122	The Orchard Land adjacent to White Cottage	LPRSA122	Not allocated	
124	Old Goods Yard phase 2	Reasonable alternative	Not allocated	
125	Old Goods Yard phase 3	Reasonable alternative	Not allocated	
128	Land at Westfield Sole Rd, Ledsing	Reasonable alternative	Not allocated	
129	Land Rear of Bearstead Rd	Reasonable alternative	Not allocated	
130	Land adjacent to Ivans Field, Chart Sutton	Reasonable alternative	Not allocated	
131	M W Wickham Estate	Reasonable alternative	Not allocated	
132	Knoll House & Tower House, Staplehurst	Reasonable alternative	Not allocated	
133	Land NE of Old Beltingham Hall	Reasonable alternative	Not allocated	
134	Baldwins Farm	Reasonable alternative	Not allocated	
135	South of Ashford Rd, Bearstead	Reasonable alternative	Not allocated	
136	Land N of West St, Harrietsham	Reasonable alternative	Not allocated	
137	Land South of Marden Rd, Staplehurst	Reasonable alternative	Not allocated	
140	Land at Squerryes Oast, Otham	Reasonable alternative	Not allocated	
141	Eastwood Rd, Ulcombe	Reasonable alternative	Not allocated	
143	Land south of Heath Rd, Langley Heath	Reasonable alternative	Not allocated	
<b>144</b>	<b>34- 35 High Street, Maidstone</b>	<b>LPRSA144</b>	<b>LPRSA144</b>	
<b>145</b>	<b>Len House</b>	<b>LPRSA145</b>	<b>LPRSA145</b>	
<b>146</b>	<b>Maidstone East</b>	<b>LPRSA146</b>	<b>LPRSA146</b>	
<b>147</b>	<b>Gala Bingo and Granada House</b>	<b>LPRSA147</b>	<b>LPRSA147</b>	
<b>148</b>	<b>Maidstone Riverside</b>	<b>LPRSA148</b>	<b>LPRSA148</b>	
<b>149</b>	<b>Maidstone West</b>	<b>LPRSA149</b>	<b>LPRSA149</b>	
150	Mill St Car Park	LPRSA150	Not allocated	
<b>151</b>	<b>Mote Rd</b>	<b>LPRSA151</b>	<b>LPRSA151</b>	
<b>152</b>	<b>Royal British Legion Social Club</b>	<b>LPRSA152</b>	<b>LPRSA152</b>	

UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
156	Danebury	LPRSA156	Not allocated	
157	Harrietsham Rectory	Reasonable alternative	Not allocated	
158	Land adj Headcorn Rd & Heniker Ln	Reasonable alternative	Not allocated	
159	Yalding Hill	Reasonable alternative	Not allocated	
161	Bell Farm, Harrietsham	Reasonable alternative	Not allocated	
162	Land north of Headcorn	Reasonable alternative	Not allocated	
167	North & West of Leeds	Reasonable alternative	Not allocated	
168	Land at Forge Lane	Reasonable alternative	Not allocated	
169	Land adj to Long Oast, Paddock Wood	Reasonable alternative	Not allocated	
171	Land adjoining Homewell House	Reasonable alternative	Not allocated	
<b>172</b>	<b>Land at Sutton Rd</b>	<b>LPRSA172</b>	<b>LPRSA172</b>	
173	Durrants Farm	Reasonable alternative	Not allocated	
174	Land South of Sutton Road	Reasonable alternative	Not allocated	
175	Land at Vicarage Road Yalding	Reasonable alternative	Not allocated	
176	Land North and South of Ashford Rd	Reasonable alternative	Not allocated	
177	Land between Lower St & George St	Reasonable alternative	Not allocated	
178	Land South of Warmlake Road	Reasonable alternative	Not allocated	
179	Land at Westerhill	Reasonable alternative	Not allocated	
180	Land west of Otham Road	Reasonable alternative	Not allocated	
182	Invicta Park Barracks	Reasonable alternative	Not allocated	
184	Brickfields Farm and Rosemount	Reasonable alternative	Not allocated	
185	Otham Glebe, Church Road	Reasonable alternative	Not allocated	
186	Land at Headcorn Road Staplehurst	Reasonable alternative	Not allocated	
187	Land at Penfold Hill and Ashford Road	Reasonable alternative	Not allocated	
188	Land at Old Ashford Road Lenham	Reasonable alternative	Not allocated	
189	Land north of Ashford Road Harrietsham	Reasonable alternative	Not allocated	
191	Land adjacent to South Lane Sutton Valence	Reasonable alternative	Not allocated	
192	Land adjacent to Headcorn Road Sutton Valence	Reasonable alternative	Not allocated	
193	Land East of Upper Street Langley	Reasonable alternative	Not allocated	
195	Waterside Park	Reasonable alternative	Not allocated	
196	Land at Willow Farm	LPRSA196	Not allocated	

UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
197	Golf Course Car Park Staplehurst	Reasonable alternative	Not allocated	
198	Staplehurst Golf Course	Reasonable alternative	Not allocated	
199	Old Cricket Ground Loose	Reasonable alternative	Not allocated	
200	Land at former cricket field, Loose	Reasonable alternative	Not allocated	
201	Land at Inkstand Cattery and Stables Lenham	Reasonable alternative	Not allocated	
202	Land at Forstal Lane Coxheath	LPRSA202	Not allocated	
203	Land at Bydews Place Tovil	Reasonable alternative	Not allocated	
<b>204</b>	<b>South of Eyhorne Street Hollingbourne</b>	<b>LPRSA204</b>	<b>LPRSA204</b>	
206	Summer Place Caring Lane Bearsted	Reasonable alternative	Not allocated	
207	Ledian Farm	Reasonable alternative	Not allocated	
208	Land adjacent to the Kent House B&B Leeds	Reasonable alternative	Not allocated	
210	Land at Newlyn's Farm, Sutton Valence	Reasonable alternative	Not allocated	
211	Wheeler's Lane Linton	Reasonable alternative	Not allocated	
212	Land at the Grange Staplehurst	Reasonable alternative	Not allocated	
215	Woodford Yard Depot, Staplehurst	Reasonable alternative	Not allocated	
216	Rochester Meadow	LPRSA216	Not allocated	
220	Land at Bydews Farm	Reasonable alternative	Not allocated	
222	Land at Henhurst Farm, Staplehurst	Reasonable alternative	Not allocated	
224	Land West of Lenham	Reasonable alternative	Not allocated	
225	Tanglewood Loose	Reasonable alternative	Not allocated	
226	Land north of Staplehurst - Garden village	Reasonable alternative	Not allocated	
227	Land South of Green Lane, Boughton Monchelsea	Reasonable alternative	Not allocated	
228	Land to North West View, Staplehurst	Reasonable alternative	Not allocated	
229	Land at Stanley Farm Staplehurst	Reasonable alternative	Not allocated	
231	Land at Lested Farm Chart Sutton	Reasonable alternative	Not allocated	
233	Land west of Chart Corner Plough Wents Road Junction Chart Sutton	Reasonable alternative	Not allocated	
234	west of North St, Barming site submission	Reasonable alternative	Not allocated	
235	Land at Boughton Lane Maidstone	LPRSA235	Not allocated	
236	Fairview Farm (North Parcel)	Reasonable alternative	Not allocated	
239	Land to south Shangri-La, Langley	Reasonable alternative	Not allocated	

UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
240	Banky Meadow, Bearstead	Reasonable alternative	Not allocated	
244	Land at Iden Park, Staplehurst	Reasonable alternative	Not allocated	
245	Land north of the M2 liding - urban extension	Reasonable alternative	Not allocated	
246	Land rear of Appletree House, Bearstead	LPRSA246	Not allocated	
247	Land south of Court Lodge Road Harrietsham	Reasonable alternative	Not allocated	
<b>248</b>	<b>Land north &amp; south of Kenward Road Yalding</b>	<b>LPRSA248</b>	<b>LPRSA248</b>	
250	Land rear of Butlers Farm Langley	Reasonable alternative	Not allocated	
<b>251</b>	<b>Land at Heath Road Coxheath</b>	<b>Reasonable alternative</b>	<b>LPRSA251</b>	
252	Land rear of Lavender Cottage, Langley	Reasonable alternative	Not allocated	
254	Land to South of Cotuams Hall Hollingbourne	Reasonable alternative	Not allocated	
255	Land east of Yew Tree House Leeds	Reasonable alternative	Not allocated	
257	Land at junction of Heath Road & Dean Street Coxheath	LPRSA257	Not allocated	
<b>260</b>	<b>Land at Ashford Road Lenham</b>	<b>LPRSA260</b>	<b>LPRSA260</b>	
262	Land at Fant Farm Maidstone	Reasonable alternative	Not allocated	
263	Land west of Ledian Farm, Leeds	Reasonable alternative	Not allocated	
<b>265</b>	<b>Land at Abbey Farm Tovil</b>	<b>LPRSA265</b>	<b>LPRSA265</b>	
<b>266</b>	<b>Land North of Ware Street Bearstead</b>	<b>LPRSA266</b>	<b>LPRSA266</b>	
269	Land east of Copper Lane Marden	Reasonable alternative	Not allocated	
<b>270</b>	<b>Land at Pested Bars Road, Boughton Monchelsea (option 1)</b>	<b>LPRSA270</b>	<b>LPRSA270</b>	
271	Fir Tree Farm and Norton Lea (South)	Reasonable alternative	Not allocated	
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	LPRSA273	Not allocated	
274	South of Leeds	Reasonable alternative	Not allocated	
279	Langley Heath - Strategic Settlement	Reasonable alternative	Not allocated	
285	Land at Dickley Court, Dickley Lane Lenham	LPRSA285	Not allocated	
286	Underlyn Lane	Reasonable alternative	Not allocated	
288	Hill Farm Linton-Coxheath	Reasonable alternative	Not allocated	
289	Heathlands Garden Community	Reasonable alternative	Not allocated	
291	Bridge Farm Water Lane	Reasonable alternative	Not allocated	

UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
292	Land at Old Ashford Rd, Lenham	Reasonable alternative	Not allocated	
294	Land to East of Jubilee Cottages, Sutton Valence	Reasonable alternative	Not allocated	
<b>295</b>	<b>Land north of Copper Lane, Marden</b>	<b>LPRSA295</b>	<b>LPRSA295 &amp; 314</b>	<b>Merged with site 314</b>
296	Astor Hever	Reasonable alternative	Not allocated	
297	Bearstead Library	Reasonable alternative	Not allocated	
298	Dorothy Lucy Centre	LPRSA298	Not allocated	
299	Maidstone AEC	Reasonable alternative	Not allocated	
302	Oakwood Overflow Car Park	Reasonable alternative	Not allocated	
<b>303</b>	<b>IS Oxford Rd</b>	<b>LPRSA303</b>	<b>LPRSA303</b>	
304	Land east of Hunton Rd, Chainhurst	Reasonable alternative	Not allocated	
305	Maidstone East Station (within Maidstone East Site 146)	Reasonable alternative	Not allocated	
306	Land South of Gore Court, Otham	Reasonable alternative	Not allocated	
307	Land N Marden Rd E of Clapper Lane, Staplehurst	Reasonable alternative	Not allocated	
308	58 Church St, Boughton Monchelsea	Reasonable alternative	Not allocated	
309	Strategic Expansion of Marden	Reasonable alternative	Not allocated	
<b>310</b>	<b>Land north of Mote Rd, Headcorn</b>	<b>LPRSA310</b>	<b>LPRSA310</b>	
<b>312</b>	<b>Land north of Heath Rd, Coxheath</b>	<b>Reasonable alternative</b>	<b>LPRSA312</b>	
<b>314</b>	<b>East of Albion Rd, Marden</b>	<b>LPRSA314</b>	<b>LPRSA295 &amp; 314</b>	<b>Merged with site 295</b>
316	Binbury Park, Detling	Reasonable alternative	Not allocated	
317	Langley Heath	Reasonable alternative	Not allocated	
318	Pagehurst Farm	Reasonable alternative	Not allocated	
319	Beaux Aires Farm	Reasonable alternative	Not allocated	
322	Lughorse Lane, Yalding	Reasonable alternative	Not allocated	
324	The Grange Ashford Road	Reasonable alternative	Not allocated	
326	Land at Amsbury Wood, Hunton	Reasonable alternative	Not allocated	
327	Land at Hockers Farm, Detling	Reasonable alternative	Not allocated	
328	Land at 59 Linton Rd, Loose	Reasonable alternative	Not allocated	
329	Land at Sapphire Kennels, Sutton Valence	LPRSA329	Not allocated	
330	Land at Seeburg, Bredhurst	Reasonable alternative	Not allocated	
331	Land south of the Lodge, Yalding	Reasonable alternative	Not allocated	

UID	Site name	Reg 18 Preferred Approaches allocation policy	Reg 19 Pre submission allocation policy	Notes
332	Fairview Farm (South Parcel)	Reasonable alternative	Not allocated	
333	Land at Old Ham Lane, Lenham - Kilnwood	Reasonable alternative	Not allocated	
334	Land at Old Ham Lane, Lenham - Old Goods Yard	Reasonable alternative	Not allocated	
335	Fir Tree Farm and Norton Lea (South)	LPRSA335	Not allocated	
360	<b>Campfield Farm, Haste Hill Road, Boughton Monchelsea, Maidstone</b>	<b>LPRSA360</b>	<b>LPRSA360</b>	
362	<b>Kent Police Headquarters</b>	<b>LPRSA362</b>	<b>LPRSA362</b>	
364	<b>Kent Ambulance HQ</b>	N/A	<b>LPRSA364</b>	Site newly identified at Reg 19 stage for 15 residential units (nil employment use). This is a brownfield, 0.35 ha site located within the Coxheath growth location (typology: larger village)
366	<b>KCC Library HQ</b>	<b>LPRSA366</b>	<b>LPRSA366</b>	

## Appraisal of thematic topic paper options

**C.486** This section provides a detailed description of the SA findings for the thematic environment, housing, and infrastructure potential policy alternatives that were set out in the Council's June 2020 topic papers, as described in **Chapter 4**.

## Topic paper environment options

**C.487** In addition to the options reflected in the separately appraised Spatial Approaches, two further alternative policy approaches to the natural environment are outlined in the Environment Topic Paper (June 2020):

- **Approach C: Go above and beyond LP17 measures** - this policy approach would continue the spatial pattern of growth as per LP17 but set more stringent environmental standards than those required by the current Local Plan 2017 requirements in relation to climate change, biodiversity, landscape, the historic environment, flood risk, and so on.
- **Approach D: Relax the current LP17 measures** - this approach would continue the spatial pattern of growth as per LP17 but would relax the current LP17 measures in relation to environmental matters.

**C.488** The sustainability implications of these alternative approaches to the environmental policies that will cover biodiversity, landscape, the historic environment and flood risk are expected to be as follows.

### Climate change

**C.489** The SA of the Local Plan 2017 summarised its likely effects in relation to climate change sustainability objectives as follows:

"There could be a reduction in carbon emissions (compared to growth without a Local Plan in place) from transport. Design policies should help to improve resilience to the effects of climate change. Together, these factors should lead to positive effect on the baseline. However, growth per se, is likely to generate an increased overall level of greenhouse gas emissions.<sup>440</sup>"

**C.490** In relation to transport-related carbon emissions associated with proposals in the Local Plan, these are likely to be most heavily influenced by the choices made in the Local Plan about the locations for new residential development in

relation to existing or planned key employment opportunities, education facilities, and centres for the provision of other services, as well as by policies that support the provision of low carbon transport routes and services. As detailed in the SA for the adopted Local Plan 2017, these factors are already taken into account in the current Local Plan 2017 approach, including by a spatial strategy focussed on Maidstone and Rural Service Centres and by development management policies that seek to promote sustainable travel choices.

**C.491** The nature of the additional localised evidence and more stringent climate change measures envisaged by the Environment Topic Paper, June 2020 (Approach C) are not known. Examples of opportunities to enhance the sustainability of the Local Plan in relation to climate change objectives include:

- Identifying particular locations where barriers to sustainable travel choices exist that are unlikely to be apparent from high level spatial analysis (for example low uptake of public transport due to perceptions of poor frequency, high cost, or fear of crime) and seeking to target these via location-specific policies.
- Analysing the potential of different parts of the Borough to accommodate renewable energy development to inform locally-specific policy on support for renewable energy generation infrastructure or development management policy, such as requirements to be capable of connecting to a renewable heat network.

**C.492** While such policies could have positive effects in relation to SA objective 13 (Climate change) they might also require trade-offs in order to preserve economic viability, as discussed at the end of this section.

**C.493** Conversely, relaxation of the Local Plan 2017 policy approach in relation to climate change (Approach D) would have negative effects in relation to SA objective 13 (Climate change), for example due to increased transport-related emissions from development located in places with poor access to employment, services and sustainable transport networks or reduced resilience to overheating, drought, extreme weather events, and other conditions expected under climate change. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**C.494** However, the Local Plan will need to comply with national policy, and there is a clear requirement in the NPPF to take a proactive approach to mitigating and adapting to climate change. Paragraph 150 of the NPPF states that new development should be planned for in ways that:

<sup>440</sup> AECOM (2016) SA of Maidstone Local Plan Non-Technical Summary



“a) avoid increased vulnerability to the range of impacts arising from climate change.”; and

“b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design.”

**C.495** Paragraph 151 of the NPPF requires plans to help increase the use and supply of renewable and low carbon energy and heat, stating that they should:

- “a) provide a positive strategy for energy from these sources”;
- b) consider identifying suitable area for renewable and low carbon energy source”; an
- c) identify opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply systems”

**C.496** Therefore, it is questionable whether a policy approach that seeks to relax climate change measures, such that it does not comply with national policy, is a reasonable alternative.

### Biodiversity

**C.497** The SA of the Local Plan 2017 summarised its likely effects in relation to biodiversity as follows:

“Although the direct effect on designated habitats is likely to be insignificant, development could have localised negative effects on wildlife habitats and species. This would be determined at the project scale, and mitigation should be possible. In fact, Local Plan policies seek to ensure that impacts on wildlife habitats and species are mitigated, and where possible enhancements are secured as part of new development. This could lead to improvements in connectivity between habitats, having a significant positive effect on the baseline.

In terms of recreational pressure, the Habitats Regulations Assessment determined that a concentration of development in the Maidstone Urban Area could lead to additional recreational activity within the North Downs Woodlands (Boxley Warren) SAC. However, provided that existing measures in place are suitably maintained, significant effects should be avoided.<sup>441</sup>”

**C.498** By seeking to avoid development in locations that would lead to loss of valued biodiversity assets and placing

requirements on development to mitigate and where possible enhance biodiversity, the current Local Plan policy approach already has positive effects on SA objective 14 (Biodiversity) relative to unplanned development.

**C.499** The nature of the additional localised evidence and more stringent biodiversity measures envisaged by the Environment Topic Paper (June 2020) are not known. Indeed, the SA of the adopted Local Plan<sup>442</sup> states that it already seeks to mitigate potential negative effects through site specific policies. Nevertheless, localised evidence gathering may provide opportunities to enhance the sustainability of the Local Plan in relation to biodiversity objectives. This might be achieved by analysing in more detail the existing habitats and species at development site options, in terms of existing pressures on these, their sensitivities to different typologies of development, and the opportunities to enhance pre-existing habitats or create linkages between adjoining ones as part of a wider biodiversity network.

**C.500** While more stringent biodiversity conservation and enhancement policies based on such location-specific evidence (Approach C) could have positive effects in relation to SA objective 14 (Biodiversity) they might also require trade-offs in order to preserve economic viability, as discussed at the end of this section.

**C.501** Conversely, relaxation of the Local Plan 2017 policy approach in relation to biodiversity (Approach D) would have negative effects in relation to SA objective 14 (Biodiversity), for example due to loss of or harm to habitats within or adjacent to development sites or failure to identify opportunities for development to enhance on-site habitats or connectivity between surrounding habitat networks. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**C.502** However, the Local Plan will need to comply with national policy, and there is a clear requirement in the NPPF to provide greater emphasis on enhancing biodiversity. Paragraph 174b of the NPPF states that Local Plans should:

“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.

**C.503** Therefore, it is questionable whether a policy approach that seeks to relax protection of biodiversity, such that it does not comply with national policy, is a reasonable alternative.

<sup>441</sup> AECOM (2016) SA of Maidstone Local Plan Non-Technical Summary

<sup>442</sup> AECOM (2016) SA of Maidstone Local Plan Non-Technical Summary

### Landscape and heritage conservation

**C.504** The SA of the Local Plan 2017 summarised its likely effects in relation to landscape and heritage conservation sustainability objectives as follows:

“Despite landscaping at development sites, the scale of growth and/or sensitivity of landscape is likely to lead to a change/loss of character in some parts of Maidstone. Cumulatively, this represents a significant negative effect.

Substantial development in the South East of the Maidstone urban area could also have a cumulative negative effect on local character, although this would not be directly within any designated areas. Mitigation and enhancement measures should help to minimise these impacts though.

Conversely, significant effects on the most sensitive locations such as Kent AONB are likely to be avoided; though allocated sites in Lenham (including the broad location) and Harrietsham in particular will need to be sensitively designed.

Heritage features are likely to be maintained and in some places enhanced through regeneration; which would constitute significant positive effects. At this stage, whether these positive effects will occur is somewhat uncertain as it will depend upon project design.<sup>443</sup>”

**C.505** The nature of the additional localised evidence and more stringent landscape and heritage conservation measures envisaged by Approach C in the Environment Topic Paper (June 2020) are not known. Indeed, the SA of the adopted Local Plan<sup>444</sup> states that it already seeks to mitigate potential negative effects through site specific policies. Nevertheless, localised evidence gathering may provide opportunities to enhance the sustainability of the Local Plan in relation to landscape (SA objective 16) and the historic environment (SA objective 15). This might be achieved by analysing in more detail the landscape context and heritage assets (including the setting of off-site assets) at development site options and then specifying in more detail for each location the development typologies that would be acceptable and the design requirements that must be met to conserve and where possible enhance the landscape and historic environment.

**C.506** Rather than a more locally-specific approach, an alternative approach to increasing the positive effects of the Local Plan on landscape would be to plan for enhancement at a landscape scale, across local authority boundaries.

**C.507** While more stringent landscape and heritage conservation and enhancement policies (Approach C) could have positive effects in relation to corresponding sustainability objectives they might also require trade-offs in order to preserve economic viability, as discussed at the end of this section.

**C.508** Conversely, relaxation of the Local Plan 2017 policy approach in relation to landscape and heritage conservation (Approach D) would have more negative effects in relation to landscape (SA objective 16) and the historic environment (SA objective 15), for example due to failure to require appropriate landscaping of development sites or to identify opportunities for development to enhance heritage assets. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**C.509** However, the Local Plan will need to comply with national policy. In relation to landscape, paragraph 170 of the NPPF states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes...b) recognising the intrinsic character and beauty of the countryside”.

**C.510** In relation to the historic environment, paragraph 185 of the NPPF states that:

“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”.

**C.511** Therefore, it is questionable whether a policy approach that seeks to relax protection of landscape or heritage, such that it does not comply with national policy, is a reasonable alternative.

### Flood risk

**C.512** The SA of the Local Plan 2017 summarised its likely effects in relation to flood risk sustainability objectives as follows:

“There is potential for increased flood risk due to the cumulative effect of new development on greenfield land. However, new developments could actually help to mitigate flood risk and manage surface water run-off through the use of SUDS. This would lead to a significant positive effect on the baseline position.

<sup>443</sup> AECOM (2016) SA of Maidstone Local Plan Non-Technical Summary

<sup>444</sup> AECOM (2016) SA of Maidstone Local Plan Non-Technical Summary

The majority of allocated housing sites avoid areas at risk of flooding. Mitigation measures are also proposed at sites within close proximity to areas of flood risk. Nevertheless, development in some areas is within or adjacent to flood zone 2 or 3 and this presents the potential for negative impacts.<sup>445</sup>

**C.513** Relative to a baseline of unplanned development, the effects of the existing Local Plan policy approach on SA objective 12 (Flooding) are positive due to requirements for measures to mitigate flood risk but negative due to the location of some allocated development.

**C.514** The Environment Topic Paper (June 2020) outlines that Strategic Flood Risk Assessment (SFRA) Levels 1 and 2 would be updated under all policy approaches, including continuation of the Local Plan 2017 approach. However, under Approach C it suggests that a more stringent policy approach could involve refusing any development that may cause even limited flooding and/or drainage issues. Such an approach would certainly deliver more positive effects in relation to SA objective 12 (Flooding). However, depending on the findings of the updated SFRA, it might also mean that insufficient land could be identified for development allocations (with negative effects on social and economic sustainability objectives due to unmet need) or that a reduced choice of site options limited the potential for development to be allocated in sustainable locations in terms of potential harm to environmental assets or sustainable travel patterns, with negative effects on associated environmental or social sustainability objectives.

**C.515** Conversely, relaxation of the Local Plan 2017 policy approach in relation to flood risk (Approach D) would have more negative effects in relation SA objective 12 (Flooding), for example due to failure to require flood resilient design or flood mitigation by SUDS in appropriate development sites. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**C.516** However, the Local Plan will need to comply with national policy, and there is a clear requirement in the NPPF for plans to manage flood risk from all sources. Paragraphs 155 to 157 of the NPPF state that:

“inappropriate development in areas at risk of flooding should be avoided” and that

“all plans, should apply a sequential, risk-based approach to the location of development...so as to avoid, where possible, flood risk to people and property”.

**C.517** Therefore, it is questionable whether a policy approach that seeks to relax flood risk management, such that it does not comply with national policy, is a reasonable alternative.

#### Trade-offs in relation to all environment policy options

**C.518** While the existing Local Plan 2017 approach has generally positive effects relative to unplanned development in relation to the environmental sustainability objectives, there may be scope to improve this performance via localised evidence gathering to justify more locally-specific<sup>446</sup> and/or more stringent policy requirements – Approach C in the Environment Topic Paper (June 2020). This would result in positive effects in relation to corresponding SA objectives such as SA12 Flooding, SA13 Climate change, SA14 Biodiversity, and SA16 Landscape.

**C.519** In locations with relatively low property sales values or relatively high land preparation costs, it is possible that overall economic viability and hence deliverability of development could be threatened by more stringent environmental policy requirements (Approach C). However, by identifying at the plan-making rather than proposal stage where greater developer contributions towards environmental mitigation or enhancement are likely to be required to achieve sustainable development, the Council should be able to check that the cumulative cost of all relevant policies does not undermine viability. In line with government guidance<sup>447</sup>, land value in such calculations should be based on existing use value a reasonable incentive to the landowner to sell land for development. If viability calculated on this basis is confirmed, then more stringent environmental policies should not threaten deliverability of development. If viability is threatened then a trade-off would be necessary, i.e. more stringent environmental policies could only be applied if other policy requirements, such as developer contributions towards affordable housing or social infrastructure, were relaxed.

**C.520** In addition to viability considerations, it is also possible that more stringent environmental policy under Approach C could limit the number of site options that are deemed acceptable, such that overall development needs across the Borough cannot be met. This would result in negative effects on social and economic sustainability objectives associated with development benefits. It is therefore important to consider

<sup>445</sup> AECOM (2016) SA of Maidstone Local Plan Non-Technical Summary

<sup>446</sup> It should be noted that, given the geographic scope and the level of detail of local plans, some locally-specific requirements might be more suited to neighbourhood plans than a borough-wide local plan

<sup>447</sup> MHCLG (2019) Viability [online] Available at: <https://www.gov.uk/guidance/viability>

the sustainability advantages and disadvantages of all reasonable alternative development site options in the round so that potential trade-offs are explicit and informed choices can be made. The SA of site options will provide such an analysis.

**C.521** If environmental policy requirements were to be relaxed relative to the Local Plan 2017 approach (Approach D), this would be likely to increase the risk of negative effects in relation to environmental sustainability objectives such as such as SA12 Flooding, SA13 Climate change, SA14 Biodiversity, and SA16 Landscape. Adherence to environmental policy requirements, for example provision of more energy efficient homes, often carries a direct, short term cost to developers. Reduction of this cost may allow other policy requirements that rely on developer contributions, for example provision of affordable housing, to be tightened with positive effects in relation to associated sustainability objectives such as SA1 (Housing).

**C.522** In addition to these short-term consequences, it should be remembered that relaxation of environmental requirements for development will often carry with it a longer term cost that will be borne by the occupiers of new development (for example higher energy bills as a result of lower energy efficiency standards) or by wider society (for example reduced health and well-being as a result of reduced access to or quality of the natural and historic environment).

**C.523** Finally, the scope to relax environmental policy requirements in the Local Plan may be curtailed by the numerous environmental regulatory requirements of international and national policies (for example in the NPPF) and laws, as described in the policy context sections of the SA Scoping Report<sup>448</sup>.

## Topic paper housing options

### Affordable housing

**C.524** Three alternative policy approaches to affordable housing provision are outlined in the Housing Topic Paper (June 2020):

- **RA1: Keep the Local Plan 2017 affordable housing policy** - maintain the policy of 30% affordable housing for sites within the Maidstone urban area, and 40% for those sites outside.
- **RA2: Seek to maximise affordable housing** - look to maximise the amount of affordable housing.
- **RA3: Apply a more localised approach to affordable housing** - This approach draws on the current Local

Plan 2017 approach but seeks to further target the provision of tenures of affordable housing based on where there is localised need. This would include setting different targets for overall, social rented, and other affordable products in different areas across the Borough.

**C.525** The SA of the Local Plan 2017 summarised its likely effects in relation to housing sustainability objectives as follows:

“Residents are likely to have better access to the type of home they need. New houses are also likely to be of higher quality. Together, this constitutes a significant positive effect.<sup>449</sup>”

**C.526** The Council’s recently updated Strategic Housing Market Assessment (SHMA) shows that the average house price to earnings ratio in Maidstone Borough rose sharply during 2011 to 2017 and states that in 2018, the median house price was a significant 11.20 times median earnings in the Borough, higher than the ratio in Kent or the South East. The SHMA points to an affordable housing need of 464 homes per year which equates to 38% of the total housing need as derived from the government’s standard method (1,214 dwellings per annum - dpa), compared to actual delivery rates of 30% since 2011 and the current policy requirements of 30% (within Maidstone urban area)/ 40% (outside urban area). However, as the SHMA notes, the situation is complex. Although there is some basis for considering planning for higher housing provision in order to meet the affordable housing need, the standard method implies a significant increase on historical housing delivery rates, and a substantial rate of housing growth. If this increased housing supply leads to reduced average house prices, it will reduce the need for affordable housing.

**C.527** The SHMA also identifies three housing market sub-areas in the Borough – Maidstone Urban Area; Rural Centre and North; and Rural South. The SHMA states that the annual affordable need in absolute terms is greatest in the Urban sub-area (307 dpa), with smaller requirements in the Rural Centre and North (119 dpa) and Rural South (38 dpa) sub-areas. However, it is unclear what the total need is in each of these sub-areas and hence how the affordable housing need for these sub-areas compares to the requirements set out in the Local Plan 2017 policy approach (30% for urban sites; 40% for rural sites).

**C.528** Affordable housing often accounts for the largest proportion of developer contributions. Setting a higher

<sup>448</sup> LUC (2019) SA Scoping for Maidstone Local Plan Review

<sup>449</sup> AECOM (2016) SA of Maidstone Local Plan Non-Technical Summary

affordable housing requirement, as envisaged by option RA2, while likely to have positive effects in relation to SA objective 1 (Housing) could require trade-offs against other calls on developer contributions such as the provision of social and green infrastructure (such as open space). This would result in negative effects in relation to corresponding SA objectives such as SA2 Services & facilities, SA3 Community, and SA4 Health. However, by making policy requirements clear and analysing economic viability at the plan-making stage, there is a greater chance that viability issues will not prevent the delivery of sustainable development. These issues have been explored in greater depth above, in relation to the potential trade-offs associated with policy options that would strengthen environmental requirements.

**C.529** Rather than seeking higher amounts of affordable housing overall, option RA3 would gather evidence to justify more spatially specific targets than the simple urban vs. rural split seen in current Local Plan 2017 policy. Option RA3 would also set more spatially specific tenure split targets for affordable housing than the Borough-wide targets of 70% affordable rented or social rented vs, 30% intermediate affordable housing seen in current Local Plan 2017 policy.

**C.530** Since the SHMA identifies three housing market sub-areas within the Borough, separate affordable housing and housing tenure split targets for each of these sub-areas would appear logical and more likely to address unmet affordable housing needs of different groups, with positive effects in relation to SA objective 1 (Housing). It is questionable whether setting even more spatially specific affordable housing requirements, i.e. within individual housing market sub-areas, would have significant additional benefits given that these sub-areas are presumably defined at least in part on the basis that housing provided anywhere within the sub-area is capable of meeting need arising anywhere within that sub-area.

### Housing typologies

**C.531** Two alternative policy approaches to housing typologies are outlined in the Housing Strategy Topic Paper:

- **RA1: Keep the Local Plan 2017 housing mix policy and add detail about typologies as set out in the NPPF** - would likely be the focus of Development Management policies, and potentially an update to the Affordable Housing Needs SPD. This approach is based on a site-by-site negotiation on planning applications.
- **RA2: Apply a neighbourhood-level housing type and mix policy** - draws on the current LP17 approach but

would set different targets for the size and type of new homes in different parts of the Borough, based on local stock and need evidence.

**C.532** Policy SP 19: Housing mix of the Local Plan 2017 seeks:

“a sustainable range of house sizes, types and tenures (including plots for custom and self-build) that reflect the needs of those living in Maidstone Borough now and in years to come”. It also states that “Accommodation profiles detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform developers to determine which house sizes should be delivered in urban and rural areas to meet the objectively assessed needs of the area”.

**C.533** The SA of the Local Plan 2017 concludes that the current Housing Mix policy will have positive effects in relation to the Housing sustainability objective and that:

“Implementation of this policy will help to improve the mix of dwelling sizes and tenures within Maidstone over the plan period.”

**C.534** Adding detail about typologies, as suggested by option RA1, would ensure compliance with the current version of NPPF<sup>450</sup> and help to ensure that the housing needs of different groups are met, with positive effects for SA objective 1 (Housing).

**C.535** The Council's latest SHMA sets out the need for homes of different sizes in the affordable rented, low cost ownership, and market housing sectors. It goes on to suggest that prescriptive figures do not necessarily need to be included within the Local Plan but that they could be used a guidelines when considering the appropriate mix on larger development sites and as a monitoring tool to ensure that future delivery is in line with the likely requirements, as driven by demographic change in the area. In light of these recommendations and the fact that Local Plan 2017 policy already cross-refers to accommodation profiles detailed in the current and future SHMAs, there may be little benefit in defining house size and tenure needs within the Local Plan policy itself, as implied by option RA2.

**C.536** There may, however, be some additional benefit in gathering more locally-specific evidence on how the required size, type, and tenure of housing varies within the Borough,

<sup>450</sup> Para. 61 states that “...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people,

students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.”

since the SHMA generally only reports this for the Borough as a whole, although rented affordable need vs. affordable ownership requirements are already established for the three housing market sub-areas. This could allow new housing development to be more closely aligned with local needs (assuming that these vary significantly across the Borough), with positive effects in relation to SA objective 1 (Housing). This additional geographic detail could reside within a refined SHMA and be cross referenced in Local Plan and/or Neighbourhood Plan policies, as appropriate.

## Topic paper infrastructure options

**C.537** In addition to the options reflected in the separately appraised Spatial Approaches, one further alternative policy approaches to infrastructure provision is outlined in the Infrastructure Topic Paper (June 2020):

- **Approach RA3: Apply a more localised approach to infrastructure provision** - This approach would focus on delivering more, smaller pieces of infrastructure in closer proximity to people's homes.

**C.538** The Infrastructure Topic Paper (June 2020) refers to three types of infrastructure with different spatial requirements – utilities infrastructure (water/wastewater, power, digital services); social/community services (e.g. health, education, social services); and social/community spaces (e.g. open space, leisure facilities, community facilities). The scope to provide each of these types more locally and the potential sustainability implications of doing so are considered below:

### Utilities infrastructure

**C.539** Provision of water/wastewater, power, and increasingly digital services is essential to development functionality and hence needs to be provided at every dwelling or employment space. As such there is little scope to vary the consumption pattern of this type of infrastructure.

**C.540** For some utilities, such as wastewater treatment, the options for a more dispersed, localised approach to service provision may be limited by technical issues, including water supply and through flows. There may, however, be opportunities for the Local Plan to support different geographies of provision for other types of utility infrastructure. For example, rainwater harvesting and grey water recycling could be encouraged at the local level. In addition, relative to centralised energy generation, distributed generation can increase the potential to make use of heat created in the generation process that would otherwise be wasted and reduce electrical energy lost during transmission, with positive effects for SA objective 13 (Climate change). Distributed power generation can also help reduce capacity issues in traditional transmission lines, and offer businesses greater siting flexibility, although economies of scale in power

generation may be lost, with mixed effects on SA objective 5 (Economy).

### Social/community services

**C.541** Social infrastructure such as new schools or healthcare facilities to serve new development typically requires a threshold level of additional demand for services before service providers (e.g. in the case of these examples, Kent County Council and Kent and Medway Clinical Commissioning Group) will consider providing new infrastructure in a location. Long term trends have generally been for smaller and more local infrastructure such as village schools and single GP medical practices to be consolidated into fewer facilities with larger catchment areas, for reasons of greater efficiency (due to economies of scale) and effectiveness (by attaining the critical mass required to provide specialist expertise).

**C.542** The scope for the Local Plan to provide for smaller facilities closer to where people live is therefore likely to be limited. Nevertheless, limited 'outreach/spoke' services, delivered from larger 'hubs' may be possible, particularly in relation to healthcare and social services. To the extent that a more localised model of provision is possible, positive sustainability effects may arise from improved access to such facilities, especially by active travel modes (e.g. in relation SA2 Services & facilities and SA7 Sustainable travel). However, smaller, more localised provision may result in increased costs of service provision due to loss of economies of scale and therefore trade-offs with the provision of other publicly or developer-funded facilities, as well as and less potential to provide centres of expertise and excellence (e.g. negative effects in relation to SA2 Services & facilities, SA4 Health, SA5 Economy).

### Social/community spaces

**C.543** Option RA3 proposes a more localised approach to provision of social infrastructure, including social/community spaces. By improving access to open space and community facilities, especially for those without a car, there could be positive effects in relation to SA objectives 2 (Services & facilities), 3 (Community), and 4 (Health).

**C.544** While local provision of social and community spaces has sustainability benefits, for open spaces in particular, it is only part of the picture. A spatial hierarchy of open spaces linked by safe, attractive walking and cycling routes provision offers the greatest potential sustainability benefits. Neighbourhood scale green streets, pocket parks, playgrounds, and outdoor meeting places help to ensure that everyone can access these spaces with positive effects in relation to community cohesion (SA objective 3) and health and wellbeing (SA objective 4). Such spaces should be supplemented with a smaller number of more widely

distributed larger public open spaces linked by walking and cycling routes that offer greater opportunities for long walks, dog walking, cycling, horse riding, access to nature, formal recreation, outdoor education, public outdoor events, appreciation of cultural heritage, and so on. Provision of these should be informed by an open space strategy to understand supply and demand for open spaces, to identify deficiencies, to secure new provision, and to improve quality through better management.

Appendix C  
SA of options – detailed findings

SA of Maidstone Local Plan Review  
September 2021