

# Sustainability Appraisal of Maidstone Local Plan

SA Report

Non-Technical Summary

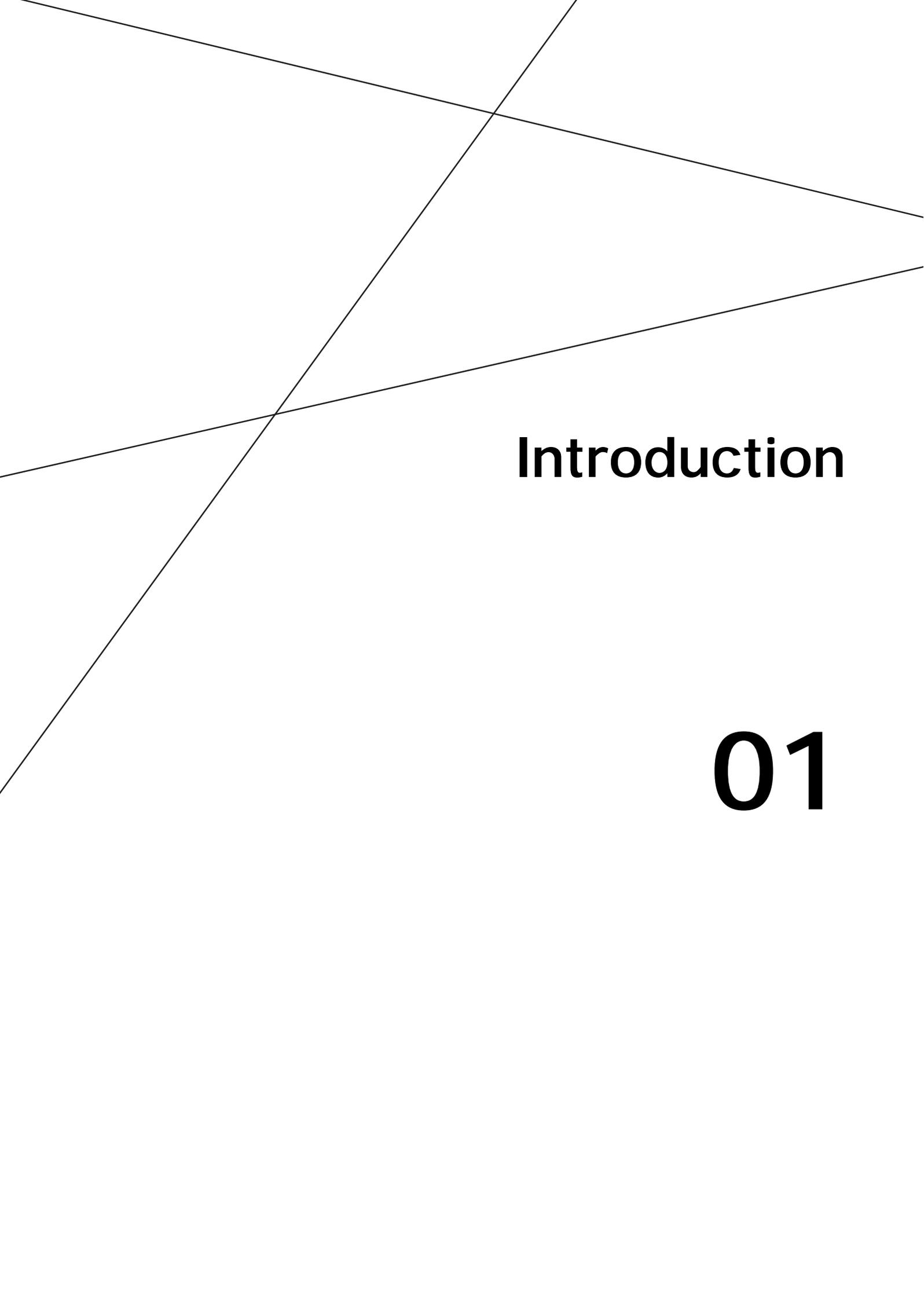
February 2016



## Table of Contents

---

1	Introduction .....	4
1.1	Outline of the Plan .....	4
2	Scoping.....	7
2.1	Background .....	7
2.2	Key issues .....	7
2.3	The SA Objectives .....	12
3	Alternatives.....	14
3.2	Housing growth and distribution.....	14
3.4	Employment growth and distribution .....	18
3.5	Site options for housing, employment and mixed use development.....	20
3.5	Gypsy and Traveller accommodation.....	28
3.6	Broad locations for housing growth.....	29
3.7	Sustainable transport.....	32
3.8	Other local plan issues.....	33
4	Appraisal findings.....	35

The page features three thin, black, intersecting lines that create a series of geometric shapes, including triangles and quadrilaterals, across the white background. The lines are positioned in the upper left and middle sections of the page.

# **Introduction**

**01**

---

# 1 INTRODUCTION

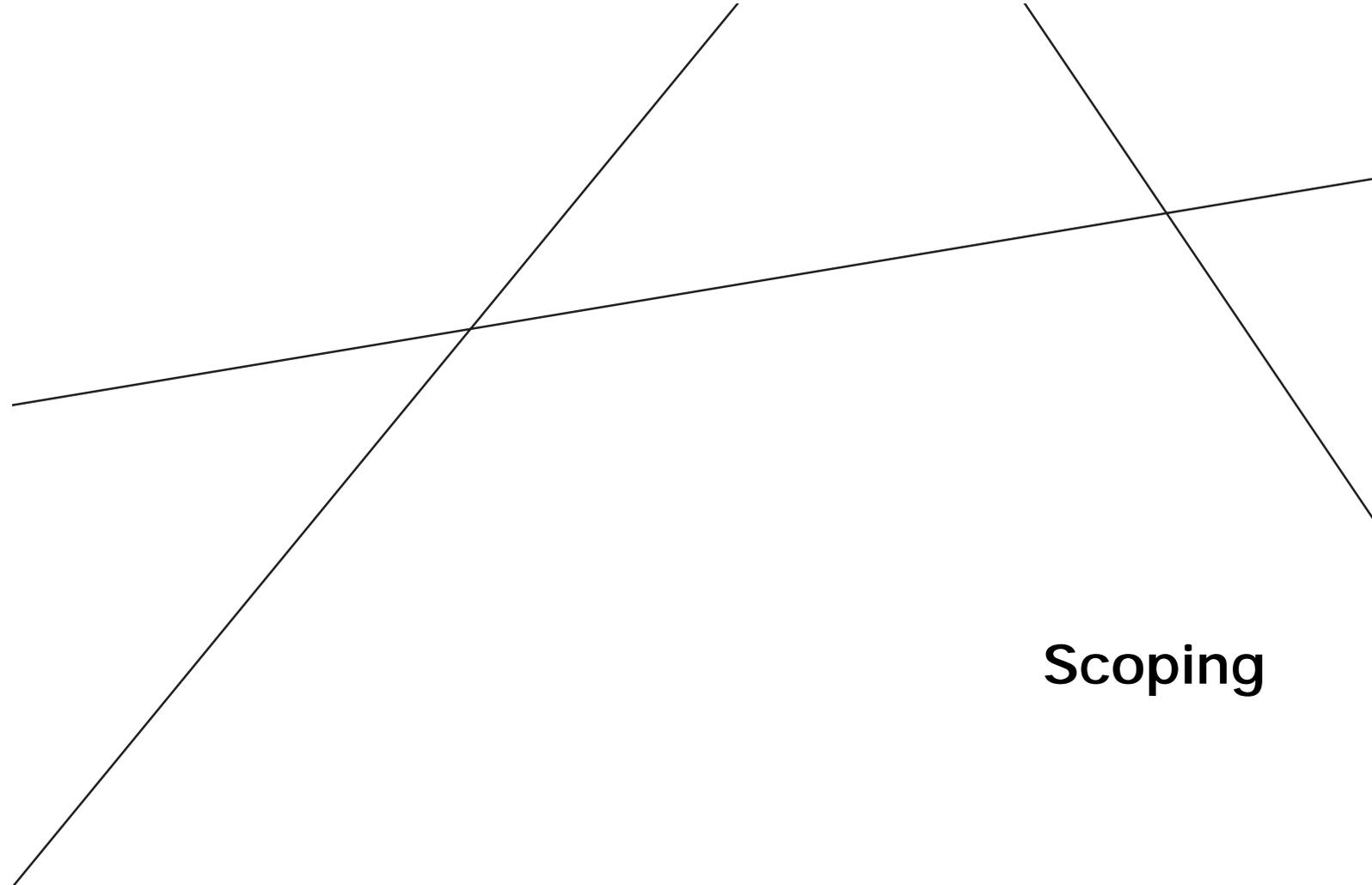
---

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Maidstone Borough Council Local Plan. SA is a mechanism for considering and communicating the likely significant effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.
- 1.1.2 This document is a Non-Technical Summary of the main SA Report which appraises the implications of the Maidstone Local Plan (Pre-submission version), as well as documenting the SA process and outputs from previous stages of the plan-making process.
- 1.1.3 SA is a process for helping to ensure that Local Plans achieve an appropriate balance between environmental, economic and social objectives. SA should help to identify the sustainability implications of different plan approaches and recommend ways to reduce any negative effects and to increase the positive outcomes.
- 1.1.4 The Local Plan, once adopted, will set the scale and distribution of development in Maidstone from 2011-2031. It plans for homes, jobs, shopping, leisure and the environment, including the associated infrastructure to support development. The plan will also guide how and when development will be delivered, whilst protecting and enhancing the environment.

## 1.1 Outline of the Plan

- 1.1.5 The local plan contains eleven spatial objectives, which will be delivered to meet the spatial vision:
- 1) To provide for a balance of new homes and related retail and employment opportunities, with an emphasis on increasing skilled employment opportunities in the borough alongside developing learning opportunities;
  - 2) To focus new development:
    - i. Principally within the Maidstone urban area and at the strategic development locations at the edge of town, including junction 7 of the M20 motorway;*
    - ii. To a lesser extent at the five rural service centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst consistent with their range of services and role; and*
    - iii. Limited development at the five larger settlements of Boughton Monchelsea, Coxheath, Eyhorne Street (Hollingbourne) and Sutton Valence and Yalding where appropriate;*
  - 3) To transform the offer, vitality and viability of Maidstone town centre including its office, retail, residential, leisure, cultural and tourism functions together with significant enhancement of its public realm and natural environment including the riverside;
  - 4) To reinforce the roles of the rural service centres through the retention of existing services, the addition of new infrastructure where possible, and the regeneration of employment sites including the expansion of existing employment sites where appropriate;

- 5) To support new housing in villages that meets local needs and is of a design, scale, character and location appropriate to the settlement and which supports the retention of existing services and facilities;*
- 6) To safeguard and maintain the character of the borough's landscapes including the Kent Downs Area of Outstanding Natural Beauty and other distinctive landscapes of local value whilst facilitating the economic and social well-being of these areas including the diversification of the rural economy;*
- 7) To retain and enhance the character of the existing green and blue infrastructure and to promote linkages between areas of environmental value;*
- 8) To ensure that new development takes account of the need to mitigate the impacts of climate change, implementing sustainable construction standards for both residential and non-residential schemes;*
- 9) To ensure that new development is of high quality design, making a positive contribution to the area including protection of built and natural heritage and biodiversity;*
- 10) To provide for future housing that meets the changing needs of the borough's population including provision for an increasingly ageing population and family housing, an appropriate tenure mix, affordable housing and accommodation to meet the needs of the Gypsy and Traveller community; and*
- 11) To ensure that key infrastructure and service improvements needed to support delivery of the Maidstone Borough Local Plan are brought forward in a co-ordinated and timely manner, and that new development makes an appropriate contribution towards any infrastructure needs arising as a result of such new development.*

Three thin black lines intersect to form a large triangle. One line is nearly horizontal, sloping slightly upwards from left to right. The other two lines are steeper, meeting at a point above the horizontal line.

**Scoping**

**02**

---

## 2 SCOPING

---

### 2.1 Background

2.1.1 The scoping stage of sustainability appraisal involves the collation of evidence relating to the baseline position and policy context - culminating in a series of key issues that should be a focus for the SA and which helped to establish a sustainability framework. These key issues are summarised below.

### 2.2 Key issues

#### *Housing*

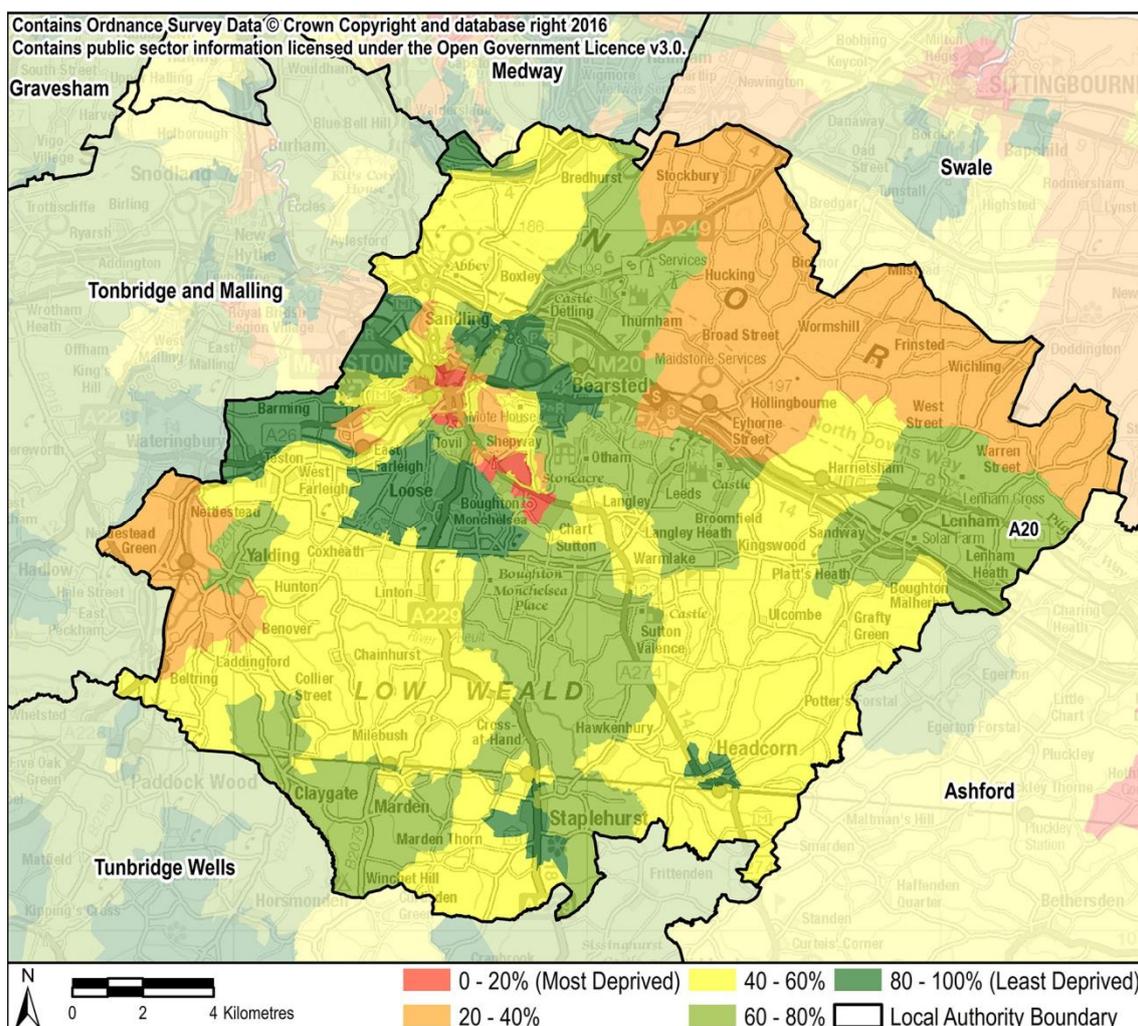
- Population and household projections demonstrate that there is a significant demand for new housing over the plan period.
- There is a shortage of deliverable housing land in the short term, with only a 3.3 year supply being identified in the 2015 AMR.
- There is a need to ensure that the size of new homes, particularly affordable housing meet the needs of the existing and future population, including elderly people.

#### *Flood risk*

- SuDs should be an essential component of new developments.
- There is a need to ensure that new development can be accommodated by sewer and drainage infrastructure.

#### *Health and wellbeing*

- There is a need to tackle poor air quality in Maidstone town centre.
- There are areas of deprivation in the borough that experience higher levels of crime, poor health, educational achievement and unemployment (see map below).
- There is a need to regenerate Maidstone town centre and combat deprivation.
- Some schools in the borough perform poorly.
- Crime and perceptions of crime is more prevalent in deprived communities.



### Transport

- There is a lack of viable alternatives to the car.
- There is a need to support active modes of travel.
- Congestion is an issue in the Maidstone urban area.
- Access to services and public transport in rural areas needs to improve.

### Economy

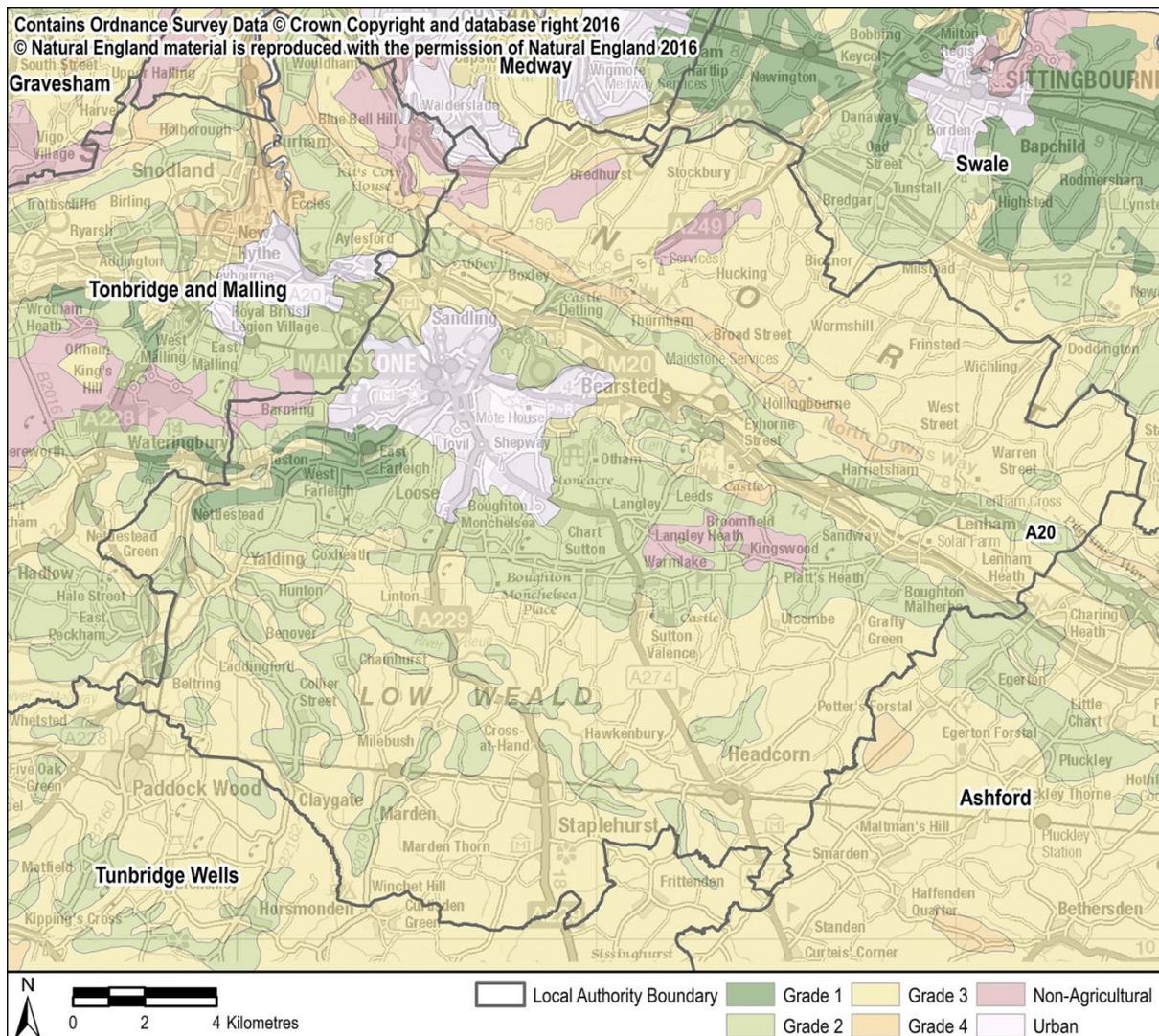
- There is a need to encourage new business creation particularly those which may lead to specialisation of the economy and innovation.

### Community

- There is a need to support the development of social capital.
- There is a need to maintain and enhance access to and engagement in cultural activity, especially from deprived communities.

**Land Use**

- Maidstone contains significant areas of best and most versatile agricultural land; much of which is adjacent to settlements, and at risk of development (see map below).

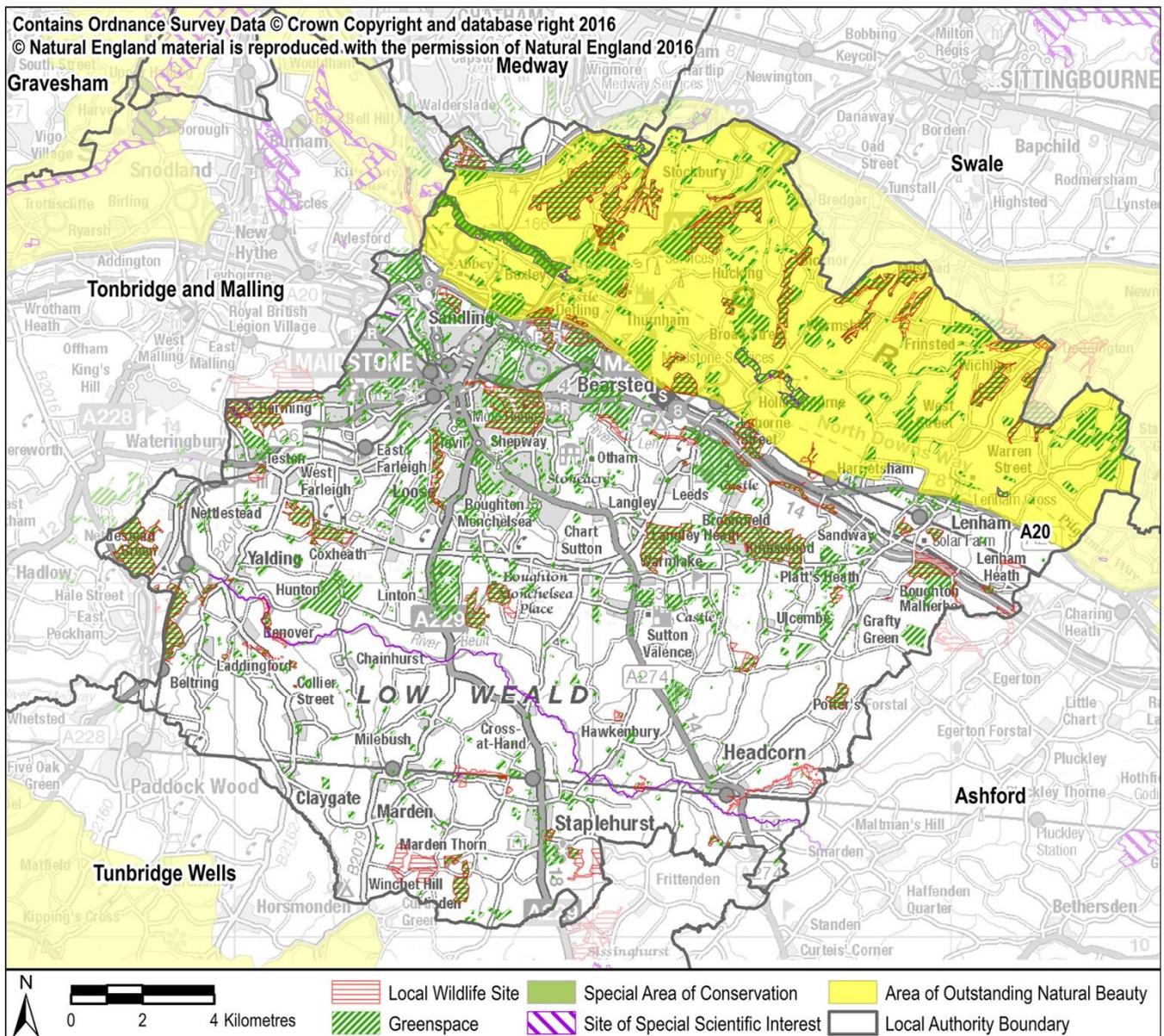


**Climate Change**

- Greenhouse gas emissions are similar to the national average – there is a need to reduce emissions to contribute to the achievement of emissions reductions targets.
- There is a need to increase the installed capacity of low carbon energy generation.
- The energy efficiency of new development will need to improve to contribute to carbon emissions reduction targets.

**Biodiversity**

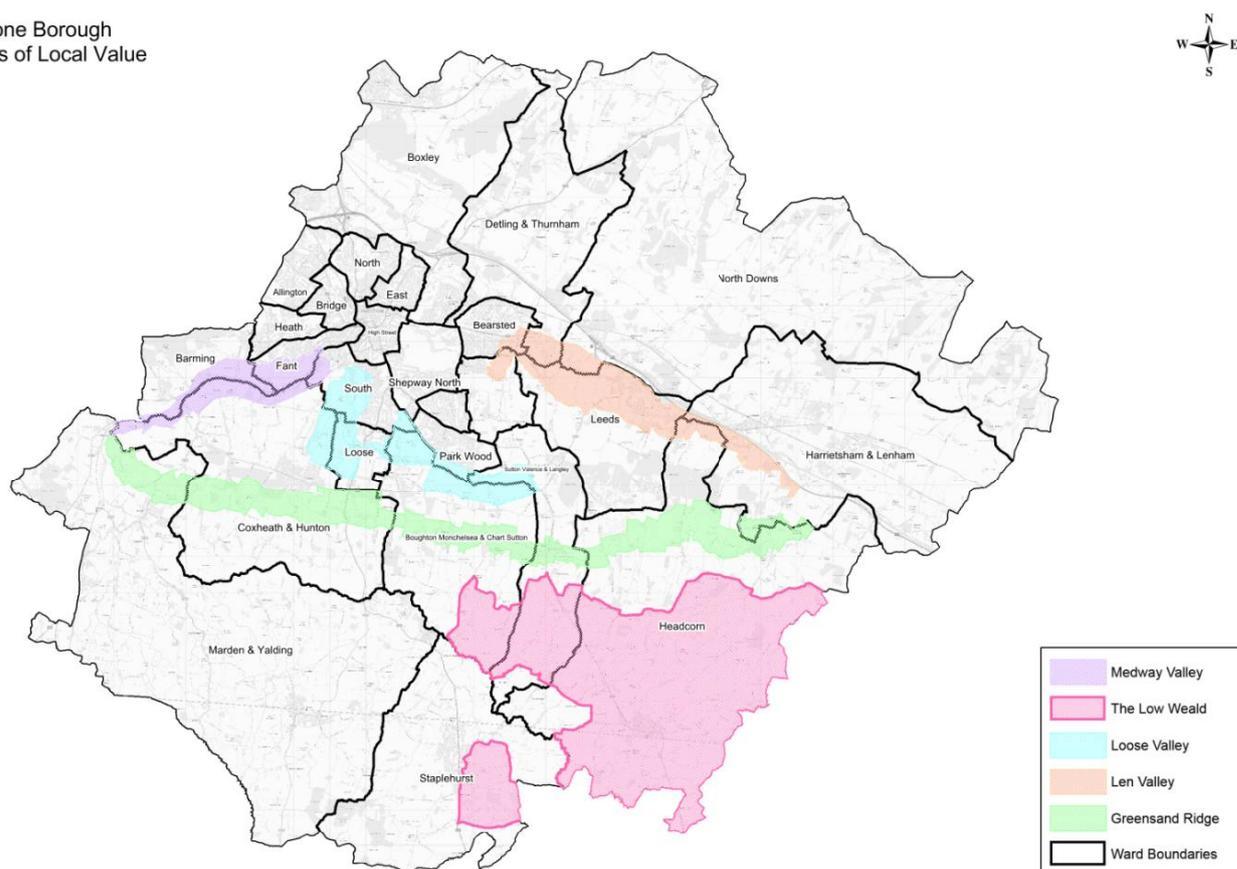
- There is a need to protect and enhance areas of importance for biodiversity (see map below).
- Water courses have particular value for biodiversity and amenity, and should be conserved and enhanced.
- Standards for green space are not being met – there is a need to strengthen the network of green infrastructure, using development contributions where possible.



### *Built and natural heritage*

- There is a need to protect valued and importance landscapes, heritage assets and their setting.
- The AONB is sensitive to change and should be protected from development.
- There are a number of sensitive landscapes of Local Value identified across the Borough (see map below).
- There is a need to protect and enhance the condition and setting of heritage assets.

Maidstone Borough  
Landscapes of Local Value



Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. The Maidstone Borough Council Licence No 100019636, 2016 Scale 1:136000. Produced by GIS MidKent Services.

### *Waste and Minerals*

- There are positive trends in waste recycling, composting and reuse that should be maintained.
- Minimising the amount of waste generated and sent to landfill will remain a priority.

### *Water*

- Maidstone is located in a water scarce area, which will be exacerbated due to climate change and future growth and development.
- There is a need to improve the water quality of Maidstone's water courses in line with the Water Framework Directive requirements.

## 2.3 The SA Objectives

2.3.1 A series of Sustainability objectives were established through the scoping process, which have been used as the framework for appraising the effects of the Plan (and any alternatives).

1. To ensure that the residents of Maidstone have the opportunity to live in a well-designed, sustainably constructed, decent and affordable home.
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.
3. To improve the health and well-being of the population and reduce inequalities in health.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest.
5. To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work.
6. To reduce crime and the fear of crime
7. To create and sustain vibrant, attractive and clean communities.
8. To improve accessibility to all services and facilities.
9. To encourage increased engagement in cultural activity across all sections of the community in the Borough.
10. To improve efficiency in land use.
11. To reduce road congestion and pollution levels and ensure air quality continues to improve.
12. To address the causes of climate change and ensure that the Borough is prepared for its impacts.
13. To conserve and enhance the Borough's biodiversity and geodiversity.

Three thin black lines intersect in the top-left corner of the page. One line is nearly horizontal, sloping slightly downwards from left to right. Two other lines are steeper, one more vertical than the other, creating a triangular area in the top-left.

**Alternatives**

**03**

---

## 3 ALTERNATIVES

---

3.1.1 The SA has appraised a range of alternative approaches to the delivery of the Local Plan strategy for the following topics:

- Housing growth and distribution
- Employment growth and distribution
- Site options for housing, employment and mixed use development
- Gypsy and Traveller accommodation
- Broad locations for future housing growth
- Sustainable transport.

3.1.2 The alternatives considered and a summary of the appraisal findings are presented below for each of these topics.

### 3.2 Housing growth and distribution

3.2.3 The housing strategy for the Local Plan has been informed by the testing of a range of alternative approaches.

3.2.4 The amount of housing that needs to be planned for has been determined through a separate study called a Strategic Housing Market Assessment. Several different housing targets have been identified since the inception of the plan-making process back in 2006, with a general upward trend in needs. As a result, a number of different strategies and alternatives have been appraised as the plan has progressed. The outcome of this work has been to confirm that the overall approach should include a focus on Maidstone Urban Area, including strategic extensions to the north west and south east. However, a range of alternatives have been tested to determine where the remainder of housing needs should be met.

3.2.5 The most recent evidence suggests that there is a need to plan for approximately 18,600 homes in the plan period of 2011-2031. The SA has looked at how these needs could be distributed. The SA has also tested a higher scale of growth (19,600 homes) to show what the implications would be of providing greater choice and flexibility.

3.2.6 The following five alternatives have been appraised in the SA:

Ref	Scale	Summary
H1	19,600	The majority of development would be directed to the urban area, including urban extensions to the South East and North West. Would also include three broad locations in the Town Centre, Maidstone Barracks and Lenham. Would allocate a higher number of dwellings in rural centres (i.e. an additional 200 dwellings for each Rural Service Centre compared to H3)
H2	19,600	The majority of development would be directed to the urban area, including urban extensions to the South East and North West. Would also include three broad locations in the Town Centre, Maidstone Barracks and Lenham.  However, this alternative would involve the development of a new settlement (4,500 dwellings) to the South East of the urban area. The new settlement takes the form of a 'garden suburb' and is located, within the countryside, approximately 1km south east of the existing Maidstone urban area. It would require a significant amount of new infrastructure to be provided at this part of the town, namely the provision of a purpose-built, strategic link road between the A274 Sutton Road and the A20 Ashford Road, as the existing local highway network could not be enhanced to the required standard.
H3	18,600	Similar to alternative H1 in that the majority of development would be located in the urban area, at urban extensions and three broad locations. However, there would be a lesser amount of development in the 'rest of the urban area' and less development around other service centres to the South of the Borough.
H4	18,600	This alternative would provide the same distribution of development as alternative 2 (i.e. significant growth through a new settlement). However, the level of development in the rural service centres would be slightly greater, and there would be no development at the three broad locations (Lenham, Town Centre and Maidstone Barracks).
H5	18,600	The same distribution as alternative H3 in that the majority of development would be located in the urban area, at urban extensions, followed by growth at rural service centres. However, there would only be development at two broad locations at the Town Centre and Maidstone Barracks. The additional 1500 dwellings not being delivered at Lenham would be dispersed across the rural service centres (Approximately 250 additional dwellings for each of the five service centres of Lenham, Marden, Staplehurst, Harrietsham and Headcorn and 250 dwellings at the larger villages)

### The Councils approach

- 3.3.1 The Councils preferred approach is broadly reflective of Alternative H3. The council's rationale for selecting this approach is summarised below.
- 3.3.2 At consultation in 2011, there was a consensus of support from both the development industry and residents for a dispersed distribution pattern of development that delivers housing at the urban fringe and at rural service centres. This consensus was also generally demonstrated by the responses to the 2014 Regulation 18 consultation on the draft Plan. Whilst the 2015 Regulation 18 consultation did not focus on the spatial distribution of development, there was some general support for the spatial strategy and the development of brownfield land.
- 3.3.3 The preferred approach focuses development at the most sustainable settlements and makes best use of brownfield sites.

- 3.3.4 It builds on existing infrastructure rather than requiring significant investment in new infrastructure. Building on existing infrastructure (roads, schools, etc.) is considered to be more sustainable than providing for new infrastructure. The need for investment in significant new infrastructure would likely affect the delivery of the Local Plan due to land assembly and lead-in times necessary before construction can commence. The cost of major new highway infrastructure could also affect site viability in terms of providing for other infrastructure requirements such as affordable housing (the council's first priority), open space provision or education.
- 3.3.5 It provides a range and choice of sites in different locations – assisting deliverability – and provides affordable housing in areas of need throughout the borough.
- 3.3.6 It would have a less negative impact on sensitive landscapes and countryside compared to exceeding full objectively assessed need. The preferred approach includes mitigation measures for each site, where appropriate, in order to reduce the impact of development on sensitive landscapes. Mitigation measures were given consideration in the assessment of all potential development sites.
- 3.3.7 The development of a new settlement for 4,500 dwellings (and associated infrastructure) would fundamentally change the character of the small villages and hamlets to the south east of Maidstone. This area is characterised by small scale field patterns, shelterbelts and tall hedgerows, small farms and cottages, and narrow roads. The change in character of the area would result in considerable harm to the countryside and would spread the town of Maidstone into the countryside. Furthermore, given the fact that the new settlement is not immediately adjacent to the urban boundary, it would result in an awkward gap of rural sporadic development between significant areas of development that would emphasise the harm to the character of the area.
- 3.3.8 Regular engagement and consultation with infrastructure providers (such as highways, education, utility companies, environment groups, etc.) has been undertaken during local plan preparation in accordance with the planning regulations and the Council's Statement of Community Involvement. A number of informal meetings with neighbouring authorities and the county council have also been held. As part of the public consultation on the draft Local Plan, the Council held a series of Duty to Cooperate meetings with relevant authorities, which included discussions on meeting the borough's unmet housing need. All consultation and engagement undertaken by the Council for the preparation of the Local Plan is recorded in the Consultation Statement and Duty To Cooperate Statement, which form part of the submission of the Local Plan.

#### Summary of SA findings

- 3.3.9 There are likely to be significant positive effects on housing associated with each alternative; as development seeks to meet the identified housing need in the SHMA. Alternative H1 would be most likely to achieve the OAHN given that the target is higher; which provides slightly greater choice and flexibility.
- 3.3.10 Each of the alternatives seeks to focus the majority of housing development into the Maidstone Urban Area. This could help to tackle deprivation in the most deprived areas of need; with positive implications for health and wellbeing and access to services. However, the significant increase in development within the Maidstone Urban Area could lead to a significant increase in congestion; particularly for alternatives H1 and H2. This would have negative implications for business efficiency, air quality, and health.

- 3.3.11 Each of the alternatives would provide a boost to the local economy by supporting the construction industry and helping to ensure that there is suitable accommodation for the labour force. However, alternatives H1 and H2 could provide a slight oversupply of housing compared to the level of jobs provided, which could have negative implications.
- 3.3.12 There are negative effects on land use across all of the alternatives; with a significant loss in greenfield and agricultural land. Alternatives H1, H2, H3 and H5 however do contain a greater element of previously developed land at two 'broad locations'; which would help to secure regeneration in these areas.
- 3.3.13 Accessibility to services, jobs and facilities is likely to improve for each alternative, as much of the housing would be located in central urban areas. Strategic development would also present opportunities to enhance local services.
- 3.3.14 There is likely to be a significant negative effect from each of the alternatives on the character of the landscape and countryside. For alternative H1 and H5 this involves significant development on the urban fringe and around numerous settlements across the Borough. For alternatives H2 and H4, this is largely attributed to the implications of a large new settlement on coalescence, whilst H3 would lead to substantial growth in Lenham within the setting of an AONB. Although development has the potential to have effects on the setting of historic buildings, it is anticipated that Local Plan policies would ensure that appropriate mitigation measures were secured at the project level.
- 3.3.15 There are positive implications for health across all alternatives as they will increase the provision of services available, however air quality could suffer in alternative H1 where congestion increases.
- 3.3.16 Whilst alternatives H1 and H2 would have a more pronounced positive impact on housing and economic factors, adverse effects through increased levels of congestion would be more likely. There could also be a slight oversupply of housing compared to the level of jobs planned for. In combination, these factors could have negative implications for the wider local economy, health and wellbeing.
- 3.3.17 Alternatives H3-H5 meet identified housing needs, but would also be likely to have a less severe effect in terms of congestion, and other environmental constraints. These alternatives are also likely to be more suitably matched to the number of projected jobs. However, due to the constraints and uncertainties associated with the delivery of a new settlement, it is considered that alternatives H3 and H5 are more favourable than alternative H4.
- 3.3.18 There are many similarities between H3 and H5, with the only difference being increased dispersal for H5 and the inclusion of a broad location for housing at Lenham under H3. The differences in effects are limited to the following factors.
- 3.3.19 H5 is predicted to have more negative effects on landscape across the borough, whilst H3 would have more profound effects in Lenham.
- 3.3.20 H5 is predicted to have potential negative effects on education provision.
- 3.3.21 H5 is more likely to secure enhancements to community facilities across a wider range of rural service centres (through potentially increased contributions to community facility enhancements).

### 3.4 Employment growth and distribution

#### The reasonable alternatives

3.4.22 The employment strategy was influenced by evidence of employment needs as well as aspirations to deliver 14,400 jobs. Three alternatives were appraised that looked at how employment land could be distributed to meet identified needs.

- Alternative 1: 14,394 jobs to be created; including a strategic site at Junction 7 of the M20 (Medical Campus), a high density town centre office development in Maidstone and a focus on redevelopment / extensions to existing sites and industrial sites.
- Alternative 2: 14,394 jobs to be created; including a strategic site at Junction 7 of the M20 (Medical Campus) and a high density town centre office development in Maidstone. As opposed to alternative 1 there would be less focus on extensions to sites in the Rural Service Centres, rather one single large greenfield site would be allocated at Junction 8 of the M20.
- Alternative 3: 14,394 jobs to be created; including a strategic site at Junction 7 of the M20 (Medical Campus) and a high density town centre office development in Maidstone. This option would also include redevelopment or extensions to existing sites and industrial sites, and one single large greenfield site would be allocated at Junction 8 of the M20.

#### The Councils approach

3.4.23 The Council's preferred approach is broadly aligned with Alternative 3, as outlined above. This includes the allocation of a town centre site for office based development, strategic development at Newnham Park, allocation of land at Junction 8 of the M20 and a dispersed approach to employment development at existing employment sites throughout the borough.

3.4.24 The Kent Institute for Medicine and Surgery (KIMS) has been completed on the northern perimeter of the allocated site at Junction 7 of the M20, together with a new access road and highway improvements. Expanded hospital facilities and associated development to form a medical campus to the south of KIMS will create a specialist knowledge cluster that will attract a skilled workforce to support the council's vision for economic prosperity.

3.4.25 Newnham Court Shopping Village is an existing retail site that lies immediately to the west of the proposed new medical campus. The complex has been developed in a piecemeal fashion over time and the visual appearance of the site is poor. The inclusion of the Shopping Village as part of the allocation will deliver a comprehensively planned redevelopment of the site and, jointly, will provide for quality buildings in a parkland setting. Additional retail floorspace will be restricted and measures are in place to ensure the redeveloped site is complementary to (rather than in conflict with) the vitality and viability of the town centre, which remains the primary retail and office location in the borough.

3.4.26 Mitigation measures are in place to minimise the impact of medical and retail development on the Kent Downs Area of Outstanding Natural Beauty and its setting, and improved landscaping and highway schemes will be required as part of proposals.

- 3.4.27 Junction 8 as a location for new employment floorspace has some significant, qualitative advantages. Key is its location immediately adjacent to the strategic road network, which helps to drive its market attractiveness and would serve to control HGV movements on local roads.
- 3.4.28 By limiting the scale of growth at this location and incorporating substantial landscaping buffers, it is considered that potential harm to the character of the AONB and wider landscape could be minimised to acceptable levels.
- 3.4.29 Although the site is not ideally located in terms of access by public transport or other sustainable modes of travel; development would need to demonstrate the delivery of a significant package of sustainable transport measures as well as highways improvements which ought to improve accessibility to this location, particularly for deprived communities.
- 3.4.30 In terms of office provision, the NPPF directs a town centre first approach to new office development. There has been no significant new office development delivered in or close to the town centre since the County Gate scheme in the late 1990s, despite planning permissions being granted. In contrast there is over-supply of poorer quality stock. In the first instance this oversupply needs to be rationalised through the conversion of offices to alternative uses. To this end the draft Local Plan seeks to protect only the better quality office locations as 'economic development areas' (Policy DM 21).
- 3.4.31 There is the opportunity to allocate land at Mote Road, Maidstone to provide substantive new town centre offices over the timescale of the Plan.

#### Summary of SA findings

- 3.4.32 Each alternative would have a significant positive effect by increasing the quantity and quality of employment opportunities. There would also be benefits in terms of increased opportunities to develop skills and employment in the health sector in particular. Each alternative would help to tackle deprivation by providing jobs in close proximity to areas of need. This is particularly the case for alternatives 2 and 3. However, there is a danger that increased movements into the Maidstone urban area could exacerbate existing congestion and air quality issues; having an effect on the wider local economy, business efficiency and health for alternatives 2 and 3. These effects would be less pronounced for alternative 1, which would disperse employment to a number of settlements to the south of the urban area. This dispersal strategy would also support the local economies in a number of service centres, but would not provide the types of sites that would attract high-profile development. Whilst alternative 3 also involves development at a number of locations to the South of the urban area, it also includes development at the M20 Junction 8 site.
- 3.4.33 Alternatives 2 and 3 are predicted to have significant negative effects on landscape character due to the location of the Junction 8 site in relation to the Kent Downs AONB. Although alternatives 1 and 3 could still lead to localised impacts on character around a number of settlements, these effects are considered less significant. Each of the alternatives makes some use of previously developed land but would also lead to a significant loss of grade 2 and 3 agricultural land. The effects would be most pronounced for Alternative 3, which includes the Junction 8 site as well as dispersed development.
- 3.4.34 Mixed use development in Yalding is within areas at significant risk of flooding, which has also been recorded as a negative effect for alternatives 1 and 3.

3.4.35 Overall, each of the three alternatives score fairly similarly against the range of sustainability criteria. This is due to the fact that each contains common elements. However, whilst alternative 1 would be least likely to have negative effects upon congestion, landscape and soils, the positive effects upon the economy, accessibility and deprivation would be less pronounced compared to alternative 2 and (particularly) alternative 3.

### 3.5 Site options for housing, employment and mixed use development

- 3.5.1 The Council proposed a list of preferred sites and presented them in the Core Strategy Strategic Site Allocations Public Consultation in 2012. These sites were selected in the context of the preferred strategic approach and evidence at the time, which was based on an overall housing figure of 10,800 dwellings.
- 3.5.2 The Council planned to allocate further sites for housing and employment to meet the balance of land requirements not met through the strategic allocations identified in the 2012 consultation.
- 3.5.3 A 'call for sites' exercise was undertaken in December 2012 – January 2013 to identify further potential sites for housing allocation.
- 3.5.4 In March 2013 the Core Strategy and Development Delivery DPD were amalgamated into a single Maidstone Borough Local Plan, an approach supported by the NPPF, and the plan period was rolled forward from 2006-26 to 2011-31.
- 3.5.5 As the Local Plan began to take shape, the evidence suggested that a higher level of housing growth should be planned for. Therefore, it was likely that a higher amount of housing allocations would need to be identified to give certainty to the delivery of the spatial strategy and identified housing targets. The council therefore sought to allocate more housing land to meet this need, and this involved reconsideration of a range of sites that could be considered 'strategic'.
- 3.5.6 The council carried out a borough-wide 'call for sites' exercise in December 2012 in order to assess what sites were available for housing, mixed use, retail, employment and Gypsy and Traveller and Travelling Showpeople development. Over 200 sites were submitted and each site was rigorously assessed against criteria set out in a site pro-forma agreed by Cabinet. External bodies such as Kent County Council, the Environment Agency and the Kent Downs AONB Unit were also given the opportunity to comment on the sites before officers made their conclusions and recommendations. Each site was then subject to independent sustainability appraisal.
- 3.5.7 In total, a list of 20 employment sites, 18 mixed use/retail sites and 185 housing sites were considered as part of the SA site appraisal process. This also included the strategic site options previously consulted on and identified as preferred options in the Core Strategy Strategic Site Allocations Public Consultation in 2012.
- 3.5.8 A strict 'criteria based' appraisal methodology was applied to each site option to determine the sustainability impacts.

Town Centre		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 6 housing sites allocated / 1 site rejected</li> <li>• 2 mixed use sites allocated</li> <li>• 1 employment site allocated</li> </ul>	<p>Maidstone urban area is identified in the settlement hierarchy as the most sustainable settlement with the best service and employment opportunities and the best transport options.</p> <p>By virtue of their central location, these sites have good access to the services and facilities in the urban area.</p>	<p>As might be expected, the allocated housing sites generally have good access to employment areas, retail and public transport links. However, there could be effects on heritage assets, and access to play space and greenspace could be improved in the town centre area.</p>
Urban Area (north west strategic development location)		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 4 housing sites allocated / 3 sites rejected / 1 consented scheme</li> </ul>	<p>Maidstone urban area is identified as the most sustainable settlement with the best service and employment opportunities and accessibility.</p> <p>As such, the settlement hierarchy identifies Maidstone urban area as capable of receiving a significant proportion of housing, employment and retail development. In this location there will be high density redevelopment of brownfield sites and significant greenfield development at the urban edge.</p>	<p>The sites allocated are all located adjacent to the existing urban boundary and as such, have good access to the services and facilities in the urban area.</p> <p>The main issues associated with development at each of the sites would be the loss of greenfield land. There is also the potential for impacts on landscape character on some of the sites. Two of the sites are also near an Ancient Woodland which would likely require mitigation.</p>
Urban area (south-east strategic development location)		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 6 housing sites allocated / 1 rejected</li> </ul>	<p>Maidstone urban area is identified as the most sustainable settlement with the best service and employment opportunities and accessibility.</p> <p>As such, the settlement hierarchy identifies Maidstone urban area as capable of receiving a significant proportion of housing, employment and retail development. In this location there will be high density redevelopment of brownfield sites and significant greenfield development at the urban edge.</p> <p>Of the sites that were rejected, one would create a new freestanding settlement. The substantial scale of likely development on the site would cause significant harm to the open character of the countryside, ancient woodland and to a number of listed buildings and the conservation area. There are significant ecological constraints to be addressed and development is reliant on the delivery of significant new transport infrastructure which is unlikely to be delivered. Moreover, development of this</p>	<p>These sites are all located either within the urban area or adjacent to the existing urban boundary. As such, they have good access to the services and facilities in the urban area.</p> <p>Apart from access to a train station, each of the allocated sites is in fairly close proximity to local services such as schools, GP, a bus stop and play space. However, the totality of development might mean that enhancement of existing facilities or new facilities are required to support the new communities. In the main, the landscape character of the sites is classified as being of 'moderate sensitivity'. Each site would also lead to the loss of best and most versatile agricultural land.</p> <p>Although some local facilities are fairly close to the site (HO-155), development here would require new services to support the significant new community that would be created. This site also has the</p>

	site would not conform to the spatial strategy.	potential for greater impacts on landscape character compared to the alternative site options in this area, with the landscape being classified as very sensitive in the Landscape Character Assessment 2012. This site also contains a significant amount of best and most versatile land and is in fairly close proximity to Ancient Woodland. The County Ecologist has also stated there is potential for significant ecological impacts at this site.
<b>Rest of urban area</b>		
<b>Sites considered</b>	<b>Councils reasons</b>	<b>Summary of SA</b>
<ul style="list-style-type: none"> <li>• 22 housing sites allocated / 33 rejected / 1 consented</li> <li>• 1 employment site allocated / 1 rejected / 2 consented</li> <li>• 1 mixed use rejected</li> </ul>	<p>Maidstone urban area is identified as the most sustainable settlement with the best service and employment opportunities and the best transport options. As such, the settlement hierarchy identifies Maidstone urban area as capable of receiving a significant proportion of housing, employment and retail development. In this location there will be high density redevelopment of brownfield sites and significant greenfield development at the urban edge.</p> <p>Site's not selected included residential gardens, development of which would cause harm to the character of the local area. Other sites also included active employment sites, which were unavailable.</p>	<p>The allocated housing sites generally have good access to key services and public transport links. The main issue associated with development on the majority of the site options would be the loss of greenfield land.</p> <p>The SA does indicate that some housing sites perform similarly and one is picked whereas two are not.</p>
<b>Harrietsham</b>		
<b>Sites considered</b>	<b>Councils reasons</b>	<b>Summary of SA</b>
<ul style="list-style-type: none"> <li>• 3 housing sites allocated / 12 rejected</li> </ul>	<p>Harrietsham is identified as a rural service centre. The village provides a range of key services. Provision of, and access to, schools and community facilities in the village are adequate but will require improvement with any increase in population. Harrietsham has good public transport connections to Maidstone town centre and other retail and employment centres.</p> <p>The three allocated sites are all located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Harrietsham. With the exception of one site, which was rejected for being too small, the rest of the rejected sites are located within the open countryside, and are divorced from Harrietsham village. In addition, the sites north of the village cause significant harm to the setting of the Kent Downs AONB.</p>	<p>The SA findings show that access to some facilities (such as a post office and play space), are not ideal in Harrietsham.</p> <p>In the main, the sites that are adjacent to the settlement boundary are most suitably located, whilst those that are further away would rely more heavily on the use of a private vehicle.</p> <p>Although the rejected sites to the north of Harrietsham would be more likely to have negative effects on the setting of the AONB, some of the preferred sites are still sensitive to development and mitigation will be required in the form of landscape buffering and design.</p>

Headcorn		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 6 housing sites allocated/ 14 sites rejected / 1 consented</li> <li>• 1 employment site allocated</li> <li>• 2 mixed use sites rejected</li> </ul>	<p>Headcorn is identified as a rural service centre. The village has a diverse range of services and community facilities which are easily accessible on foot or by cycle due to the compact form of the village.</p> <p>Headcorn has local employment opportunities and there is a local aspiration to ensure that existing employment sites are kept in active employment use. A regular bus service runs between Headcorn and Maidstone town centre and the village has good rail links to other retail and employment centres, including London. Flooding is an issue in Headcorn as the village is surrounded on three sides by the functional flood plain of the River Beult and its tributaries.</p> <p>The allocated sites are all located either within or adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Headcorn.</p> <p>The rejected sites are located within the open countryside, are divorced from Headcorn village, and in some cases create ribbon development to the north of Headcorn. Some sites have been rejected due to serious flood risk also.</p>	<p>The SA finds that the differences between some allocated and rejected sites are not significant, and in some cases, the allocated sites present constraints that are not an issue for some of the rejected sites.</p> <p>There are still issues that need to be resolved with some of the allocated sites, such as the potential for impacts on listed buildings and the character of Conservation Areas and the countryside. However, a number of the rejected sites would also have the potential to impact on heritage features, and the countryside.</p>
Lenham		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 1 housing site allocated / 11 rejected</li> <li>• 1 mixed use site allocated / 3 rejected</li> <li>• 1 employment site rejected</li> </ul>	<p>Lenham is identified as a rural service centre and as such, has the key services and community facilities expected of one.</p> <p>The allocated sites are located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Lenham.</p> <p>The rejected housing and mixed use sites are located within the open countryside, and are divorced from Lenham village. Development at these locations is considered unacceptable. One site is an exception to this but it is considered too small for an allocation.</p>	<p>The SA findings suggest that overall, each of the sites considered for housing perform similarly across the range of sustainability criteria. However, there are differences in performance across specific criteria. One rejected site performs comparably to some allocated sites but is not being taken forward.</p>

Marden		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 5 housing sites allocated / 9 rejected / 1 consented</li> <li>• 2 employment sites allocated / 1 rejected</li> </ul>	<p>Marden is identified as a rural service centre. The village is successful, particularly in terms of employment opportunities, and also has strong key community facilities such as a medical centre, library and village hall. Marden has frequent rail connections to London and other retail and employment centres, which has created a demand for new development.</p> <p>The allocated sites are all located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Marden.</p> <p>All but one of the rejected sites are located within the open countryside, which are divorced from Marden village, and in some cases have been rejected due to serious flood risk. The other site was rejected due to flood risk.</p> <p>Two employment sites were rejected due to the adverse impact it would have on residential amenity.</p>	<p>The allocated sites are all located in close proximity to a number of basic services, including a medical hub, GP services and a primary school. The allocated sites generally have higher capacity to accommodate landscape change compared to most rejected sites that are located on the outskirts of Marden.</p> <p>There are some rejected sites which score comparably to some allocated sites, also there are flood concerns with some allocated sites.</p>
Staplehurst		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 3 housing sites allocated / 17 rejected / 2 consented</li> <li>• 2 mixed use sites rejected</li> <li>• 1 employment site rejected</li> </ul>	<p>Staplehurst is identified as a rural service centre. The village is the largest of the rural service centres in terms of population and size, and has a number of the key community services and facilities one would expect, including good health care services consisting of a health centre, pharmacy, optician and chiropractic clinic. The village also has more employment providers than most of the other rural service centres with the exception of Marden. Current transport infrastructure in Staplehurst is good but improvements are essential to cope with high levels of demand at peak times.</p> <p>The sites allocated are located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Staplehurst.</p> <p>The rejected sites are located either within the open countryside, or adjacent to the settlement boundary but would cause significant harm to the open character of the countryside.</p>	<p>The SA findings show that access to a secondary school is not ideal in Staplehurst. Access to other basic services such as a primary school, GP/medical services and public transport differ at the various site options, although not to a major extent. In the main, the sites that are adjacent to the settlement boundary are most suitably located, whilst those that are further away would rely more heavily on the use of a private vehicle.</p>

Boughton Monchelsea		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 6 housing sites allocated / 8 sites rejected</li> </ul>	<p>Boughton Monchelsea is identified as a larger village. The village has good education and childcare services including a primary school, playgroup, nursery and nearby secondary school. It has poor health care facilities, with no GP surgery. However, there is a local shop, post office, village hall and recreation areas. The settlement is quite dispersed and is in close proximity to the Maidstone urban area. Transport and employment opportunities in Boughton Monchelsea are limited.</p> <p>The allocated sites are located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in the village.</p> <p>Eight sites have been rejected. Two of the sites are brownfield sites however are considered to be unsustainable due to their separation from Boughton Monchelsea village. Another site has been rejected due to the harmful impact on the character of the area.</p>	<p>The SA findings for the sites considered in Boughton Monchelsea illustrate similar performance across the different options. Generally, there is poor access to a local GP and a train station and most sites have poor access to both primary and secondary schools (by foot). This reflects the characteristics of the village.</p> <p>One of the brownfield sites rejected has good access to a local secondary school and is located entirely within previously developed land. In this respect, it performs better than the allocated sites in Boughton Monchelsea, which are greenfield. However, this site lies neither in the Maidstone Urban Area or the Boughton Monchelsea settlement and is therefore rather isolated.</p>
Coxheath		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 5 housing sites allocated / 5 rejected.</li> <li>• 1 mixed use site allocated / 1 rejected</li> </ul>	<p>The village has the advantage of a compact urban form and a good offering of key services and facilities to support a growing population. Healthcare services in the village are particularly strong and include two GP surgeries, a dentist, community trust clinic, chiropractic clinic and a pharmacy. However, the GP surgeries are currently at capacity and any further development in Coxheath will be expected to contribute towards ensuring healthcare facilities can meet the demands of future growth. Coxheath has a regular bus service which connects the village to Maidstone town centre. Coxheath also has the advantage of being in close proximity to Maidstone town centre, which affords good access to a number of secondary schools and other facilities.</p> <p>Three sites were rejected because of the risk of coalescence with neighbouring settlements. One had insufficient access and another was adjacent to ancient woodland.</p>	<p>There are relatively few environmental constraints at each of the alternative site options in and around Coxheath. The main issue associated with development at each of the sites would be the loss of greenfield land. There is also the potential for negative effects on landscape character. Coxheath does not have good links to a train station, but is generally well serviced by local facilities and bus services.</p> <p>The allocated sites are in the main better related to the urban area than those that have been rejected, which means they are broadly closer to local facilities such as a GP, and primary school.</p>

Hollingbourne (Eythorne Street)		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 3 housing sites allocated / 6 rejected</li> <li>• 2 employment sites rejected</li> </ul>	<p>Hollingbourne (Eythorne Street) is identified as a larger village. The village does not have a GP surgery or health care facilities apart from an osteopath clinic, but it does have some good key facilities including a village hall, local shop, post office, pubs and a restaurant. Rail connections to Maidstone town centre and other retail and employment centres are good, and the village also has a regular bus service to Maidstone town centre.</p> <p>These sites are located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in the village.</p>	<p>The SA findings suggest that there are some accessibility issues with all of the housing sites in and around Hollingbourne. A doctor's surgery, secondary school and retail / employment areas are not provided locally. However, there is access to a primary school and public transport links are adequate. Given that the level of housing development is only small, the village should be able to continue to support itself. There are potential impacts on Listed Buildings and Conservation Areas associated with both the rejected and allocated sites.</p>
Sutton Valence		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 1 housing site allocated / 15 rejected</li> <li>• 1 mixed use site rejected</li> </ul>	<p>Sutton Valence is identified as a larger village. The village has good education facilities including a preschool, primary school and the Sutton Valence boarding school which caters for children from the age of 3 to 18. Sutton Valence has pubs, a church, a village hall, mobile library service and good playing pitches. The village has a GP surgery but no dentist or pharmacy. Public transport connections to Maidstone town centre and Headcorn are good due to a regular bus service. The village does not have a train station.</p> <p>Most of the rejected housing sites and one mixed use site are all divorced from the village centre and are located in the open countryside, and development at some sites would also intrude into the undeveloped gap between the upper and lower sections of Sutton Valence.</p>	<p>The appraisal undertaken for the strategic options indicates that development would achieve a better balance in terms of sustainability by focusing on urban areas and the higher order settlements. Sites around Sutton Valence are mostly poorly located in terms of access to a secondary school, local services, public transport and key employment areas. The majority of sites also contain grade 2 or 3 agricultural land.</p>
Yalding		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 1 housing site allocated / 8 sites rejected</li> <li>• 1 mixed use site allocated</li> </ul>	<p>Yalding is identified as a larger village; and as such contains a number of key services and facilities. The village is served by a nearby train station and has connections by bus to Maidstone town centre, which is essential in terms of access to secondary education. Yalding also has sustainable connections to nearby Paddock Wood, which also has a range of services and facilities, including a secondary school. Flooding is an issue</p>	<p>The SA findings illustrate that the site options are broadly similar in their performance, with all having access to basic services, but poor access to secondary schools and a local service centre.</p> <p>All site options also contain 'best and most versatile' agricultural land (with the exception of one site)</p>

	<p>in Yalding.</p> <p>The allocated mixed use site is a large brownfield site located outside of the existing village boundary, so it is important that safe and sustainable links between this site and Yalding village are provided. In addition, flood mitigation measures will have to form an essential part of any development proposal here. The housing site is located adjacent to the existing settlement boundary and as such, has good access to the services and facilities available in Yalding.</p> <p>Sites have been rejected due to being away from the existing settlement boundary and environmental constraints.</p>	<p>The site options each have their own specific constraints, including the mixed use site lying adjacent to a Scheduled Monument and partly within flood risk Zone 3b, which could restrict development potential.</p>
<b>Countryside</b>		
Sites considered	Councils reasons	Summary of SA
<ul style="list-style-type: none"> <li>• 1 housing site allocated / 86 rejected</li> <li>• 5 employment sites rejected</li> <li>• 1 mixed use site consented</li> </ul>	<p>All rejected sites lie outside of the settlements identified in the settlement hierarchy and are therefore considered unsustainable.</p> <p>One site was allocated as Councillors considered the environmental benefits of removing the existing commercial vehicle scrapyards use and improving the setting of the listed building on the site and securing ecological enhancement were of overriding weight.</p>	<p>The SA undertaken for the strategic distribution options highlighted that a dispersed approach to housing development would not make the best use of existing infrastructure and could have significant impacts on the character of rural areas. This is largely reflected in the individual site appraisals, which illustrate that for sites located in the wider countryside, proximity / access to local services and public transport links are typically very poor. Furthermore, whilst a small number of these sites are fairly well located in terms of access to local facilities and services, there are other significant constraints such as proximity to Ancient Woodland and highly sensitive landscapes. Most of these sites are greenfield and contain agricultural land. However, the majority of sites have good access to natural greenspace.</p>

### 3.6 Gypsy and Traveller accommodation

- 3.6.1 The Council is required by the National Planning Policy Framework (NPPF) (more specifically the Planning Policy for Travellers Sites, 2012) and the Housing Act 2004 to meet the accommodation needs of the population within their area. This includes the needs of the Gypsy and Traveller community and that of Travelling Show People.
- 3.6.2 The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTTSA) revealed a need for 187 permanent Gypsy and Traveller pitches to be provided in the borough during the period October 2011 and March 2031. A further 11 plots for Travelling Showpeople will be required over the same period.
- 3.6.3 The Council has assessed a range of site options throughout the preparation of the Plan including at existing gypsy and traveler sites, through several 'calls for sites' and at sites rejected for housing allocation. The table below summarises this process.

Sites considered	Councils reasons	Summary of SA
16 sites allocated of 123 'reasonable' site options	<p>All the potential sites were assessed following the criteria in an assessment proforma. These criteria largely mirrored the criteria used in the assessment of housing sites. As many of the potential Gypsy sites are located in rural locations, landscape impact was a particularly important consideration as was the sites' propensity to flood, as mobile homes are particularly vulnerable to flood risk.</p> <p>All of the selected sites are established sites with either existing sufficient landscaping to mitigate the impact of the development and/or with the potential for existing natural screening to be enhanced. The capacity of the acceptable sites was assessed to determine whether additional pitches could be accommodated.</p> <p>For the sites which were not selected for allocation, the harm resulting from the development was not considered to be outweighed by the scale of the need for additional pitches. The most common reasons for rejecting sites were adverse landscape impacts, flooding and, sometimes, potential ecological impacts.</p>	<p>Most of the Gypsy and Traveller site options (including allocated sites) perform very poorly in terms of access to local services and public transport.</p> <p>A few of the allocated sites are also within close proximity to ancient or semi-natural woodland and in areas of sensitive landscape. However, these sites are already established, so the impacts would not be expected to be significant compared to the current situation given the small number of pitches planned for at each site.</p> <p>The majority of rejected sites also present further issues in relation to landscape character, flood risk and / or potential impacts on wildlife. As these site options are not yet occupied, the potential for negative impacts is considered to be higher.</p>

### 3.7 Broad locations for housing growth

3.7.1 In order to meet housing need without the need to allocate unfavourable sites in the Local Plan, the Council has identified three broad areas for future housing growth that are anticipated to deliver 3,500 homes over the plan period. These are as follows:

- Invicta Park Barracks;
- Maidstone Town Centre;
- Lenham.

3.7.2 Given the extensive number of sites already identified to be allocated in the Local Plan at this stage and to avoid allocating sub-optimal sites; it has been considered necessary to identify broad locations which would represent larger scale opportunities for development.

3.7.3 Whilst there are no firm proposals for development at this time, the Council expect that opportunities will be created in the medium to longer term.

3.7.4 The identification of the most appropriate areas to establish broad locations should (where relevant) be influenced by an appraisal of the sustainability implications of any reasonable alternatives.

#### *Discussion of alternatives*

3.7.5 The Council considers that there are limited reasonable alternatives for broad locations for housing growth at this stage in the plan preparation process.

3.7.6 The two broad locations in the Town Centre and at Invicta Barracks are both brownfield sites within the Maidstone Urban Area, which is the principal focus for development within the spatial strategy. Extensive research has revealed limited opportunities to identify further broad locations for housing development within the Maidstone urban area or rural service centres (particularly on brownfield land). It is therefore considered that there are no reasonable alternatives to these two broad locations.

3.7.7 The broad location in Lenham would be on Greenfield land outside of the Maidstone Urban Area. It is therefore reasonable to explore alternatives for broad locations at other rural service centres and at the edge of the urban area.

3.7.8 The Council considers that there is only one reasonable alternative location for a strategic broad location for housing development. This would involve the allocation of a broad location to the North West of Headcorn; where a combination of SHLAA sites could potentially deliver approximately 1000 dwellings.

3.7.9 Although Headcorn is constrained by a sensitive landscape, and has recognised waste water treatment constraints; development of 1500 dwellings in Lenham could also have impacts on landscape and infrastructure. Therefore, it is useful to undertake a strategic appraisal that establishes the sustainability implications of allocating a broad location for housing at each of these settlements.

Reasonable alternative	Rationale
<p><b>Lenham:</b></p> <p>Land is available to the east and west of the village that has potential to deliver in the region of 1,500 dwellings.</p>	<p>Lenham is a compact settlement surrounded by flat, arable land. The village is within the setting of the Kent Downs AONB, but benefits from a good range of infrastructure and facilities, including a primary school, secondary school, train station, village hall, local shops, and a medical centre. The village has access to employment opportunities locally, and good rail and bus links to Maidstone and Ashford towns. There is easy access to the A20 which leads to Junction 8 of the M20 motorway. Although the village is currently well served by infrastructure, it may be necessary to secure improvements to support development of this scale.</p>
<p><b>Headcorn:</b></p> <p>Land is available to the North East of Headcorn that has the potential to deliver in the region of 1,000 dwellings.</p>	<p>A number of sites are identified in the SHLAA to the North West of the settlement. These sites have not been allocated in the Local Plan due to potential impacts on sensitive landscape, infrastructure constraints, and flood risk. However, the suitability of this area as a broad location for housing ought to be assessed to determine whether this would be suitable for development in the <u>longer term</u> (with the potential to mitigate potential impacts / overcome constraints).</p>

#### The Councils approach

- 3.7.10 As discussed above the Council has proposed to establish three broad locations at this stage in the plan preparation process for future housing growth.
- 3.7.11 Invicta Park Barracks - Covers a substantial area (41 ha) to the north of the town centre. It comprises a range of military buildings and the MoD has categorised the site as a 'retained' site in a recent review. There are no immediate plans to vacate the site, but the MoD keeps its property portfolio under regular review and has confirmed there could be some prospect for the site to be declared surplus in the longer term. In recognition of this potential, and the need to plan positively for it, Invicta Park Barracks is identified as a broad location for future housing growth in the medium to longer term. The site has the potential to deliver in the order of 1,300 new homes.
- 3.7.12 Town centre - There is an oversupply of poorer quality office stock in the town centre which is no longer fit for purpose and this has the effect of suppressing the office market and inhibiting new development which could better meet modern business needs.
- 3.7.13 A route to tackle this is to rationalise the supply of the poorest stock through conversion to alternative uses. Over the timeframe of the plan the value of the lowest quality office stock (in terms of rents) is expected to fall further, making redevelopment for alternative uses increasingly viable. With a corresponding uplift in the market for town centre apartments, this trend could see the delivery of significant new housing in and around the town centre before the end of the plan period. Office rationalisation; comprehensive redevelopment of The Mall and other large scale brownfield opportunities have the potential to generate an additional 700 dwellings.

- 3.7.14 Lenham - Is a compact settlement surrounded by flat, arable land. The village benefits from a good range of infrastructure and facilities, including a primary school, secondary school, train station, village hall, local shops, and a medical centre. The village has access to employment opportunities locally, and good rail and bus links to Maidstone and Ashford towns. There is easy access to the A20 which leads to Junction 8 of the M20 motorway. There are some landscape impacts (in relation to the setting of the AONB), but despite this, the benefits of selecting this most sustainable of all the rural service centres outweighs the negative impacts. Further studies are likely to be required to assess the impact of development on the environment and to identify the mitigation measures necessary for any proposals to proceed. Recognising the need to avoid coalescence with the village of neighbouring Harrietsham, land at Lenham is available to the east and west of the village that has potential to deliver in the region of 1,500 dwellings.
- 3.7.15 The Council dismissed a broad location in Headcorn because it is considered further development would have an unacceptable negative effect on landscape of high sensitivity or good condition (as identified in the Maidstone Landscape Character Assessment 2012, and/or the Landscape Sensitivity Study, 2014) and flood risk as the village is surrounded on three sides by the functional floodplain of the River Beult and its tributaries.

#### Summary of SA findings

- 3.7.16 The SA findings suggest that Lenham performs slightly better across the range of sustainability objectives compared to Headcorn.

### 3.8 Sustainable transport

3.8.1 A number of strategic options for transportation were formulated by the Council. These options were appraised and the findings were presented in an SA Report for Maidstone Preferred Options in 2007. These options were not mutually exclusive, and as such, the appraisal did not seek to pick out a preferred option, but rather to identify the strengths and weaknesses of each option and which would be most desirable to take forward to the preferred options stage. These basic options were as follows:

3.8.2 The following alternative approaches were considered:

- Option 1: Identified Road Schemes: - aim to build the South East Maidstone Strategic Link (formerly the Leeds-Langley Bypass) and the Upper Stone Street / All Saints Link Road to improve access into the town from the south and to improve traffic flows in that part of town.
- Option 2: Status Quo Parking: - continue with the existing parking policy allowing similar amounts of car parking in new development as elsewhere in Kent and keeping Town Centre parking charges similar too.
- Option 3: Improve Park and Ride Services: - Improved services from existing facilities including better disabled access to buses.
- Option 4: Alternatives to the Car: - reducing demand for the motorcar especially at peak traffic hours by enhancing bus, rail, cycle and pedestrian facilities.

#### The Councils approach

3.8.3 Consultation responses to the Issues and Options paper revealed that there was support for options 1, 3 and 4. However, option 2 was not welcomed by the majority of consultees. The preferred approach broadly reflects a mix of options 3 and 4 from the issues and options consultation.

3.8.4 The Councils preferred approach is to set a number of Development Management policies that support sustainable modes of travel. There is no commitment to specific strategic road schemes, but new parking standards will be set seeking to discourage the use of cars. Two sites at London Road (to serve the A20 west corridor) and Willington Street (to serve the A20 east corridor) will continue to be promoted for Park and Ride in the draft Local Plan.

#### Summary of SA findings

3.8.5 The Local Plan reflects the SA findings, which suggest that option 4 performs well against the sustainability objectives, due to a reduction in greenhouse gas emissions, improvements to air quality and encouraging healthier patterns of travel. The SA findings also suggested that option 2 should be rejected, which has been reflected in the council's preferred approach.

3.8.6 The SA suggested that option 1 could have positive social-economic effects, but this alternative has not been pursued, due to the constraints of delivering a strategic link road.

### 3.9 Other local plan issues

3.9.1 There are a number of policy issues that the Council have addressed in the Local Plan without undertaking sustainability appraisal of options / alternatives to inform the preferred approach.

3.9.2 This includes Policies to address the following issues:

- Design principles.
- Environmental protection.
- Town centre uses.
- Affordable housing.
- Housing mix and density.
- Sustainable construction.

3.9.3 It is considered that policies to address these issues can be prepared on the basis of the National Planning Policy Framework, a robust evidence base and consultation exercises. Sustainability Appraisal can then be used more purposefully to inform policy approaches at a later stage of plan development when there is more policy detail (i.e. the 'preferred options'). The sustainability appraisal framework can also be used to help guide policies as they develop, so that the principles of sustainability are 'frontloaded'.



# **Appraisal of the draft plan**

**04**

## 4 APPRAISAL FINDINGS

4.1.1 The table below sets out a summary of the effects of the Local Plan when considered 'as a whole' against a range of sustainability factors (The SA Framework). The table focuses on where significant effects could occur. Where significant effects are identified, measures to mitigate these have been suggested if possible. Further measures to enhance the positive effects of the Local Plan have also been suggested where possible. Finally, the table outlines how the effects of the Local Plan could be monitored. These monitoring measures are suggestions at this stage; with a monitoring framework being finalised upon the Plans' adoption.

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Housing	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 <b>significant positive effect</b> .	To ensure that the objectively assessed housing need is met in full, a higher housing target could be planned for to provide flexibility. Allocating more housing sites in the short term would also help to demonstrate an ongoing 5 year supply.	Number of households on the Housing Register. Number of new dwellings built compared to targets. Net additional Gypsy and Traveller pitches.
Flooding	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 <b>significant positive effect</b> on the baseline position.  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.	The Local Plan sets out measures to ensure that flood risk is minimised, SUDs are incorporated into developments and green and blue infrastructure is enhanced.  Seeking to ensure that greenfield development achieves <i>no net increase or a net decrease</i> in rates of run-off would have further benefits. It would also be beneficial to reduce run off rates from new development in urban areas, and this could be stipulated as a general or site specific policy requirement.	New development in the floodplain. Development permitted contrary to advice by the Environment Agency on flood risk. % of developments implementing SUDS.

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Health	<p>Improved access to health facilities and open space should be achieved for most communities, having a <b>significant positive effect</b> on the baseline position.</p> <p>However, there is potential for <b>negative effects</b> on some communities if levels of congestion and reduced air quality increase due to urban concentration.</p>	The Local Plan seeks to minimise potential congestion and air quality issues, in part through the preparation of an Integrated Transport Strategy.	<p>% of residents that consider their health to be good.</p> <p>Distance travelled to services.</p>
Poverty	<p>There should be a reduction in social exclusion and poverty, particularly within the most deprived parts of Maidstone. This would constitute a <b>significant positive effect</b>.</p> <p>However, some strategic development is not in close proximity to deprived areas, which means certain communities may be less likely to benefit.</p> <p>There is also a risk of increased congestion in Maidstone town centre. This could worsen air quality and access to services for some deprived communities in the urban area. This would represent a <b>significant negative effect</b>.</p>	<p>The Plan is predicted to have positive effects. No recommendations to enhance these effects have been identified.</p> <p>With regards to potential negative effects; the Plan seeks to minimise congestion and air quality issues through an Integrated Transport Strategy (as well as other plan policies such as DM24-DM26).</p>	<p>Difference in levels of deprivation between the most and least deprived areas.</p> <p>Levels of unemployment.</p>
Education	New development should help to improve the provision and / or enhancement of education facilities. This is a <b>significant positive effect</b> .	Seek to improve access schools from Gypsy and Traveller sites.	<p>Number of schools that are at capacity / surplus.</p> <p>Pupils achieving grades A-C.</p>
Crime	No significant effects are anticipated. However, by providing a deliverable strategy for housing and employment, the Local Plan will support regeneration in areas of need, with knock on positive effects in terms of community safety.	No measures identified.	<p>Levels of crime in town centres.</p> <p>Crime rates per 1000 population.</p>
Vibrant Community	Improved access to community facilities in new developments. Impacts are not considered to be significant though.	No measures identified.	Loss / gain of community facilities.

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Accessibility	<p>Overall, there should be an increased proportion of trips by walking, public transport and possibly cycling. Access to local services and facilities in urban and rural areas should also improve. Together, this would lead to a <b>significant positive effect</b> on the baseline provided that people are willing to swap their private vehicle for other transport modes.</p> <p>Accessibility at some of the proposed site allocations for Gypsies and Travellers is very poor. This will affect a very small number of people, but it is a negative effect nonetheless.</p>	<p>The Plan is predicted to broadly have positive effects.</p> <p>Policy DM 15 could be enhanced by encouraging and prioritising new developments that maximise accessibility to sustainable and active modes of travel.</p> <p>Seek to improve access to facilities and services from existing and allocated Gypsy and Traveller sites.</p>	<p>% of relevant applications where a Travel Plan is secured.</p> <p>% of trips to work, school, leisure using public transport, walking and cycling.</p> <p>Develop indicators to look at access issues in rural areas.</p>
Culture	<p>Although the Local Plan should have a generally positive effect, no significant effects are anticipated.</p>	<p>No measures identified.</p>	<p>Number of visits to the Borough.</p>
Land Use	<p>Development of housing and employment sites will lead to the permanent loss of greenfield land and in most locations this will include grade 2 or 3 agricultural land. This represents a <b>significant negative effect</b>.</p> <p>However, there should be a decreased amount of previously developed land left derelict, which is a <b>significant positive effect</b>.</p>	<p>Ensure that development leading to the loss of best and most versatile agricultural land contributes towards provision for allotments and/or rural diversification schemes.</p>	<p>% of development on previously developed land.</p> <p>Net loss of agricultural land.</p> <p>Number of new allotment pitches provided through development contributions.</p>
Congestion	<p>Increased development could lead to higher levels of congestion in the Maidstone Town centre. This could lead to a <b>significant negative effect</b>.</p> <p>However, development would be required to implement strategic improvements to the network, which could mitigate the impacts or possibly help to improve traffic flows. The residual impact would therefore be less significant or potentially positive.</p> <p><i>The impacts are uncertain at this stage though.</i></p>	<p>The Local Plan seeks to minimise potential congestion and air quality issues through a number of plan policies, which includes the preparation of an Integrated Transport Strategy.</p> <p>No further recommendations have been identified.</p>	<p>Peak traffic flow.</p> <p>Travel times.</p> <p>Investment in road infrastructure.</p>

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Climate Change	<p>There could be a reduction in carbon emissions (<i>compared to growth without a Local Plan in place</i>) from transport.</p> <p>Design policies should help to improve resilience to the effects of climate change. Together, these factors should lead to <b>positive effect</b> on the baseline.</p> <p>However, <i>growth per se</i>, is likely to generate an increased overall level of greenhouse gas emissions.</p>	No measures identified.	<p>CO2 emissions per capita.</p> <p>Number of new residential developments where the energy/emissions standards in the Building Regulations Part L have been exceeded.</p> <p>Number of developments where 'adaptation statements' have been produced.</p>
Biodiversity	<p>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.</p> <p>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.</p>	The Plan seeks to mitigate potential negative effects on biodiversity through site specific and more general development management policies.	<p>Net loss/gain of designated wildlife habitats.</p> <p>Condition of wildlife sites.</p>

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Countryside and Heritage	<p>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 <b>significant negative effect</b>.</p> <p>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.</p> <p>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.</p> <p>Heritage features are likely to be maintained and in some places enhanced through regeneration; which would constitute <b>significant positive effects</b>. At this stage, whether these positive effects will occur is somewhat uncertain as it will depend upon project design.</p>	<p>The Plan seeks to mitigate potential negative effects on landscape character through site specific and more general development management policies.</p>	<p>Landscape character appraisals and impacts.</p> <p>Number of heritage restoration projects completed.</p>
Waste	<p>No significant effects have been identified. However, new development has the potential to put increased pressure on waste collection services, especially if not well designed for storage and access.</p>	<p>No measures identified. Standards for waste management ought to be adequately provided for through national housing standards.</p>	<p>Number of complaints to the Council related to waste storage and collection at new developments.</p> <p>Amount of construction and demolition waste.</p> <p>Waste generated per capita.</p>
Water Management	<p>Increased growth could lead to pressure on already scarce water resources. Policy DM2 could help to mitigate this effect though. Development could present the opportunity to improve drainage and sewerage networks through infrastructure upgrades. This would lead to <b>significant positive effects</b>.</p>	<p>The Plan is predicted to have positive effects. No recommendations to enhance these effects have been identified.</p>	<p>Water availability / consumption ratios.</p> <p>Ecological / chemical status of water bodies.</p>

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Energy	<p>Increased levels of growth could lead to higher overall levels of energy consumption. However, development would be likely to occur in the absence of the Plan to meet demand for housing and employment. Therefore, the effects are not significant.</p> <p>The delivery of low carbon infrastructure is not prioritised in the Local Plan, and therefore insignificant effects are predicted.</p>	No measures identified.	<p>New installed renewable energy capacity.</p> <p>Total energy consumption.</p>
Economy	<p>The Local Plan supports the development of land for employment in accessible locations. A range of jobs are likely to be created including in higher skilled sectors. This is predicted to have a <b>significant positive effect</b> on the economy.</p>	<p>The Plan is predicted to have positive effects. No recommendations to enhance these effects have been identified.</p>	<p>Total amount of additional floorspace by type.</p> <p>Unemployment rate.</p>

