

AECOM



**Sustainability Appraisal (SA) of the
Maidstone Local Plan**



**SA Report
February 2016**

SCHEDULE					
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INTRODUCTION

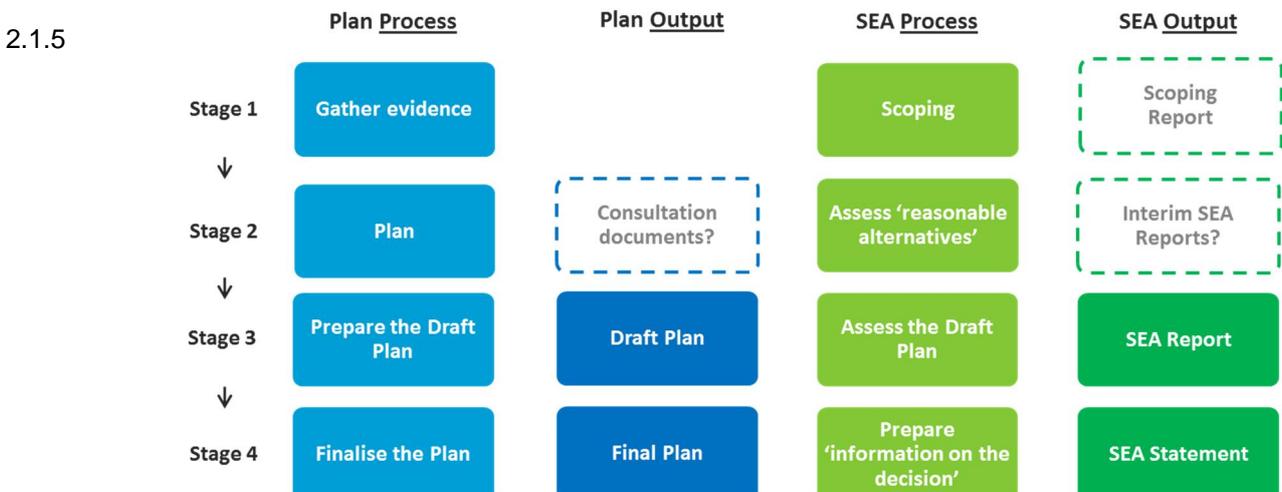
1 BACKGROUND

- 1.1.1 AECOM (formerly URS) 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
- 1.1.2 This SA Report 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.

2 SA EXPLAINED

- 2.1.1 Sustainability Appraisal (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.
- 2.1.2 SA is also a tool for communicating the likely significant effects of a Plan (and any reasonable alternatives), explaining the decisions taken with regards to the approach decided upon, and encouraging engagement from key stakeholders such as local communities, businesses and plan-makers.
- 2.1.3 Although SA can be applied flexibly, it integrates strategic environmental assessment (SEA) which has legal requirements under the ‘Environmental Assessment of Plans and Programmes Regulations 2004 (which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive).² The regulations set out prescribed processes that must be followed. **In particular the Regulations require that a report is published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’.**³ The SA/SEA report must then be taken into account, alongside consultation responses when finalising the plan (**See Appendix 1 for an explanation of the regulatory requirements**).
- 2.1.4 SA can be viewed as a four-stage process that produces a number of statutory and non-statutory outputs. This SA Report is set out in four parts to mirror the process illustrated in Figure 2.1 below.

Figure 2.1: The ‘four stage’ SA process⁴.



¹ The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ Plan document.

² Directive 2001/42/EC

³ Regulation 12(2)

⁴ Mandatory processes and outputs are represented by shaded boxes. Voluntary outputs are illustrated by clear boxes with dashed lines.

PART 1: WHAT'S THE SCOPE OF THE SA?

3 INTRODUCTION (TO PART 1)

3.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA and address the requirements of the SEA Regulations (see **Table 3.1**).

Table 3.1: Scoping questions answered

SCOPING QUESTION	CORRESPONDING REQUIREMENT (THIS SA REPORT INCLUDES)
What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan'
What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes' The relevant environmental protection objectives, established at international or national level
What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan'
What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

3.2 Consultation on the scope

3.2.1 The SEA Regulations require that: "*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are Natural England, The Environment Agency and Historic England.⁵ The consultation bodies were first consulted on the scope of this SA in 2009⁶. This consultation was achieved by providing a draft 'Scoping Report' for their comment. The draft Scoping Report was also sent to a range of other stakeholder organisations at this time so that they might have the opportunity to comment.

3.2.2 The Scoping Report was subsequently finalised and is available online at:

http://www.maidstone.gov.uk/data/assets/pdf_file/0008/12113/Sustainability-Appraisal-Scoping-Report-2009.pdf

3.2.3 The scope of the SA was updated in 2012, with findings presented in an interim SA Report⁷ for the Maidstone Strategic Site Allocations consultation. The scope was updated again at subsequent stages of plan making, including the draft Plan Consultation in March 2014. Both updates were presented in interim SA Reports that were made available for consultation with the statutory consultation bodies as well as a wider range of stakeholders.

⁵ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because '*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme*.'

⁶ Scott Wilson (2009) Maidstone Borough Council Sustainability Appraisal Scoping Report, Final Report, November 2009.

⁷ URS (2012) Maidstone Borough Council Strategic Site Allocations Sustainability Appraisal, Interim Report. [online] available at: <http://www.maidstone.gov.uk/residents/planning/local-plan/local-plan-progress>

4 WHAT IS THE PLAN SEEKING TO ACHIEVE?

4.1.1 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.

4.1.2 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.

4.2 What's the plan not trying to achieve?

4.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

5 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

5.1 Introduction

5.1.1 An important step when seeking to establish the appropriate 'scope' of an SA involves reviewing 'sustainability context' messages (e.g. issues, objectives or aspirations) set out within relevant published plans, policies, strategies and initiatives (PPSIs). Sustainability context messages are important, as they aid the identification of the 'key sustainability issues' that should be a focus of the SA. Key messages from this review are summarised below.

5.2 Key messages from the National Planning Policy Framework (NPPF)⁸

5.2.1 In March 2012 the National Planning Policy Framework (NPPF) was published. The NPPF, read as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system. The following is a summary of guidance included in the NPPF that is of relevance to this SA.

5.2.2 Community wellbeing social role of the planning system is defined in the NPPF as 'supporting vibrant and healthy communities', with a 'core planning principle' being to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.

5.2.3 The NPPF advises that planning policies should promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. The NPPF states that ensuring that there is a 'sufficient choice of school places' is of 'great importance'. To this end, local authorities are called upon to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

5.2.4 Specific protection and promotion of town centres is encouraged. Specifically, local planning authorities should 'define the extent of town centres' and set policies that 'make clear which uses will be permitted in such locations', and 'promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres'.

The Economy

5.2.5 The NPPF highlights the contribution the planning system can make to building a strong, responsive 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'.

5.2.6 There is an emphasis on capitalising on 'inherent strengths', and to meeting the 'twin challenges of global competition and of a low carbon future'. There is a need to support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.

5.2.7 Furthermore, the NPPF states that local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses.

5.2.8 In terms of ensuring the vitality of Town Centres, the NPPF sets out the need to allocate a range of suitable sites to meet the scale and type of retail.

⁸ CLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

Housing

- 5.2.9 The NPPF states that local planning authorities should meet the ‘full, objectively assessed need for market and affordable housing’ in their area. With a view to creating ‘sustainable, inclusive and mixed communities’ authorities should ensure provision of affordable housing onsite or externally where robustly justified. Plans for housing mix should be based upon ‘current and future demographic trends, market trends and the needs of different groups in the community’. Larger developments are suggested as sometimes being the best means of achieving a supply of new homes, with these to be developed in accordance with the ‘principles of Garden Cities’.

Transport and Accessibility

- 5.2.10 In terms of transport and travel policies, the NPPF notes that these will have an important role in ‘contributing to wider sustainability and health objectives’. It calls for the transport system to be balanced ‘in favour of sustainable transport’, with developments to be located and designed to facilitate these modes of travel. In order to minimise journey lengths for employment, shopping, leisure and other activities, the NPPF calls for planning policies that aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

Air and causes of climate change

- 5.2.11 The NPPF makes clear that planning policies should be compliant with and contribute towards EU limit values and national objectives for pollutants; and states that new and existing developments should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account Air Quality Management Areas (AQMAs) and cumulative impacts on air quality.
- 5.2.12 The NPPF identifies as a ‘core planning principle’ the need to ‘support the transition to a low carbon future in a changing climate’. A key role for planning in securing radical reductions in GHG emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008. Specifically, planning policy should support the move to a low carbon future through: planning for new development in locations and ways which reduce GHG emissions; actively supporting energy efficiency improvements to existing buildings; setting local requirements for building’s sustainability in a way that is consistent with the Government’s zero carbon buildings policy; positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.

Water resources and quality

- 5.2.13 In relation to water resources, the NPPF states that local planning authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.

Land use, landscape and the historic environment

- 5.2.14 The NPPF states that the planning system should protect and enhance valued landscapes. Particular weight is given to ‘conserving landscape and scenic beauty’. According to the NPPF, ‘great weight’ should be given to the conservation of the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB), which have the ‘highest level of protection’ in this regard. The conservation of cultural heritage and wildlife in these areas is also an ‘important consideration’.

- 5.2.15 The NPPF calls for planning policies and decisions to ‘encourage the effective use of land’ through the reuse of land which has been previously developed, ‘provided that this is not of high environmental value’. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to ‘set out their own approach to housing density to reflect local circumstances’. The value of best and most versatile agricultural land should also be taken into account.
- 5.2.16 In relation to the coast, the NPPF states that local planning authorities should maintain the character of such areas by ‘protecting and enhancing distinctive landscapes’, including in those areas that have been defined as Heritage Coast. Authorities should also look to improve ‘public access to and enjoyment of the coast’.
- 5.2.17 The NPPF states that local planning authorities should set out in their local plan a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk. Assets should be recognised as being an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ that conservation can bring, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- 5.2.18 In relation to conserving and enhancing the natural environment, the NPPF calls upon the planning system to protect and enhance soils. It should also prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.

Flood Risk

- 5.2.19 The NPPF requires Local Plans to take account of the effects of climate change in the long term, taking into account factors such as ‘flood risk, coastal change, water supply and changes to biodiversity and landscape’. Planning authorities are encouraged to ‘adopt proactive strategies’ to adaptation. New developments should be planned so that they avoid increased vulnerability to climate change impacts. Risks should be managed through adaptation measures including the well planned green infrastructure.
- 5.2.20 In terms of flooding, the NPPF calls for development to be directed away from areas highest at risk, with development ‘not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere. The NPPF also states that local planning authorities should avoid ‘inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast’ in order to reduce the risk from coastal change.

Biodiversity and Green Infrastructure

- 5.2.21 In order to contribute to the Government’s commitment⁹ to halt the overall decline in biodiversity, the NPPF states that the planning system should look to minimise impacts on biodiversity, with net gains in biodiversity achieved wherever possible.
- 5.2.22 The NPPF states that planning policies should promote the ‘preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species’. The NPPF contains a commitment to ‘plan for biodiversity at a landscape-scale across local authority boundaries’.

⁹ At the European level, a new EU Biodiversity Strategy was adopted in May 2011 in order to deliver on the established Europe-wide target to ‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’.

5.2.23 The NPPF calls upon local authorities to set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.

5.2.24 Positive planning for 'green infrastructure' is recognised as part of planning for ecological networks. Green infrastructure is defined as being: 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'.

5.3 Supplementing the NPPF

5.3.1 In addition to reviewing relevant contextual messages set out within the NPPF, it is also important to 'cast the net wider' and consider contextual messages established through other plans, policies, strategies and initiatives. The following is a summary of the detailed review presented within the Scoping Report.

Community wellbeing

5.3.2 Further policy background is provided by the 'Marmot review' which discusses the relationship between planning and health and the Health and Social Care Act 2012, which reflects the changing legislative environment relating to local government and health (**Box 5.1**). This is followed by details of the long term sustainable community strategy that has been prepared by Maidstone Borough Council (**Box 5.2**).

Box 5.1: 'The Marmot Review: Implications for Spatial Planning'¹⁰ (2011) and 'Get in on the Act: Health and Social Care Act'¹¹ (2012)

'Fair Society, Healthy Lives' ('The Marmot Review') 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. It does so 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'.

It highlights three main policy actions to ensure that the built environment promotes health and reduces inequalities. These should be applied on a universal basis, but with a scale and intensity that is proportionate to the level of disadvantage. Specifically these actions are to:

- 'Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality'
- 'Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: improving active travel; improving good quality open and green spaces; improving the quality of food in local areas; and improving the energy efficiency of housing'
- 'Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation'.

The Public Health Outcomes Framework for England 2013-2016 builds upon these principles and seeks to achieve two key outcomes:

- Increased healthy life expectancy - Taking account of health quality as well as length of life.
- Reduced differences in life expectancy and healthy life expectancy between communities - Through greater improvements in more disadvantaged communities.

The increasing role that local level authorities are expected to play in producing health outcomes is well

¹⁰ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

¹¹ LGA (2012) Get in on the Act: Health and Social Care Act [online] available at: http://www.local.gov.uk/c/document_library/get_file?uuid=81914af4-5de6-4ccb-93e2-3764523dd8b0&groupId=10171

demonstrated by Government legislation. The Health and Social Care Act 2012 transfers responsibility for public health from the NHS to local government²⁴, giving them a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

Box 5.2: 'The Sustainable Community Strategy for Maidstone Borough'¹² (2009)

Maidstone Borough Council has recently prepared a community plan for the area. The vision set out within the community plan, also known as Maidstone 2020, is to make Maidstone Borough 'a vibrant, prosperous 21st Century urban and rural community at the heart of Kent, where its distinctive character is enhanced to create a safe, healthy, excellent environment with high quality education and employment where all people can realise their aspirations.'

In order to fulfil the vision, Maidstone Borough has finalised four objectives based on an extensive community consultation. These are outlined below:

- Build stronger and safer communities;
- Make Maidstone Borough a place where people of all ages – children young people and families – can achieve their aspirations;
- Develop a vibrant economy, create prosperity and opportunities for all; and
- Develop an efficient, sustainable, integrated transport system;

As well as these four objectives, the Strategy also highlights the importance of the following points:

- Retaining and enhancing Maidstone Borough's distinctive history, landscape and character;
- Building a thriving sporting, creative and cultural life for all;
- Creating healthier communities and encourage more active older people;
- Developing Maidstone Borough's urban and rural homes and communities as models for 21st century quality and sustainable living;
- Establishing Maidstone Borough's reputation as a place for environmental excellence and action on climate change;
- Tackling health, education and employment inequalities in areas of disadvantage; and
- Ensuring public agencies and their partners undertake a programme of community engagement and work with communities to resolve their issues at community level.

The Sustainable Community Strategy addresses these objectives with key actions identified in order to achieve the objectives.

¹² Maidstone Borough Council (2009) Sustainable Community Strategy [online] available at http://www.maidstone.gov.uk/community_and_living/community_advice/community_strategy.aspx

The Economy

5.3.3 In **Box 5.3** below, the Government's Local Growth White Paper is summarised. This is supplemented by information from two reports, the first of which focuses on local parades of shops, and the latter on rural economy (**Box 5.4**).

Box 5.3: The Local Growth White Paper

Government interventions should support investment that will have a long term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. In some cases this means focusing investment at areas with long term growth challenges, so that these areas can undergo transition to an economy that responds to a local demand. Places that are currently successful may also wish to prioritise activity to maximise further growth by removing barriers, such as infrastructure constraints.

However, the White Paper also emphasises that: *'This does not mean that every place will grow at the same rate or that everywhere will, or will want to, become an economic powerhouse. Long term economic trends make differences in economic performance inevitable and these can and do change over time'*.

Specific examples of areas where it makes sense for Government intervention to tackle market failures include: investment in infrastructure; tackling barriers such as transport congestion and poor connections; other support to areas facing long term growth challenges where this can help them manage their transition to growth industries; and strategic intervention where it can stimulate private sector investment in new green technology in strategic locations.

Finally, the White Paper identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings (including future generations), whilst also focused on businesses that compete with the best internationally.

Box 5.4: 'Parades of Shops – towards an understanding of performance and prospects'¹³ (2012) and 'The Missing Links - Revitalising our rural economy'¹⁴ (2012)

Despite their local economic and social importance, shopping parades have been subject to a continued decline. In order to buck this trend, the report suggests the need for appropriate policy responses. It is suggested that:

- The diversity of neighbourhood parades is recognised through flexible policy initiatives. These responses should look to „reinforce local distinctiveness and community value, and develop the social function of neighbourhood parades“ with a view to underpinning 'on-going commercial viability'.
- The role of local parades in developing local economies by 'providing a seed-bed function for start-up businesses' could be enhanced through the focused support for their 'enterprise formation and employment growth potential'.

Another important area of concern for local economic growth is rural areas. The 'significant untapped potential' of rural areas to contribute to economic growth and employment is the focus of the report 'Missing Links'. It considers distance to market to be a crucial concern and calls for the improvement of transport links and the provision of adequate digital infrastructure.

¹³ CLG (2012) Parades of shops: towards an understanding of performance and prospects [online] available at: <http://www.communities.gov.uk/documents/regeneration/pdf/2156925.pdf>

¹⁴ Federation of Small Businesses (2012) The Missing Links - Revitalising our rural economy [online] available at: http://www.fsb.org.uk/policy/assets/rural_report_web_final_proof.pdf

Housing

- 5.3.4 Of further interest are the objectives of the Government in terms of housing, as laid out in its 2011 housing strategy (**Box 5.5**). This is supplemented by a summary of recent progress on housing issues.

Box 5.5: 'Laying the foundations'¹⁵ (2011) and 'The Housing Report'¹⁶ (2012)

The Government's housing strategy 'Laying the Foundations' sets out a number of key objectives, including in relation to the quality of homes. The 'Housing report' report collates the official figures available on housing in order to establish whether the Government's approach to housing is succeeding. A challenge identified for the Government is to produce a step change in housing in order to meet the nations needs and aspirations, especially given that: 'Many of the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify over the coming years'. The Government's performance is analysed under a number of main headings, the following of which are of significance:

- Housing Supply: A small increase of new build is recorded, but this is from a historically low base. The number of completions in 2011 was 38% below the 2007 peak.
- Overcrowding: This situation is worsening, and current measures to tackle under-occupation may not necessarily resolve the problem.
- Homelessness: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit during 2013.
- Empty Homes: Despite 720,000 homes currently being classed as empty, the situation seems to be an improving one. Home Ownership: House prices are relatively steady, sales are up, and affordability is increasing.
- However, homeownership rates are falling and there is a decline in low cost ownership sales. Home ownership remains out of reach for most people.

DCLG Planning Policy for Traveller Sites (2012)¹⁷ states that Local Plans should seek to treat travellers in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community, through promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites; enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and having due regard for the protection of local amenity and environment.

Transport and Accessibility

- 5.3.5 The third edition of the 'Local Transport plan for Kent' covering the county is detailed in **Box 5.6**. This is followed by **Box 5.7** and the 'Integrated Transport Strategy for Maidstone' which addresses the issues on an even more local scale. A new Integrated Transport Strategy is being prepared that will accompany the Local Plan.
- 5.3.6 'Understanding Walking and Cycling' which examined the barriers and drivers relating to walking and cycling in the UK and suggests policies that could result in an increase in uptake is detailed in **Box 5.8**. This is of importance given the need for a shift towards more sustainable modes of transport.

¹⁵ DCLG (2011) – Laying the foundations: a housing strategy for England [online] available at <https://www.gov.uk/government/publications/laying-the-foundations-a-housing-strategy-for-england--2>

¹⁶ The Housing Report (2012) [online] available at <http://www.cih.co.uk/housingreport>

¹⁷ DCLG (2012) Planning policy for traveller sites [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf>

Box 5.6: 'Local Transport Plan for Kent 2011-2016'¹⁸ (2011)

This document is Kent's third Local Transport Plan (LTP3). Its purpose is to set out Kent County Council's (KCC) Strategy and Implementation Plans for local transport investment for the period 2011-16.

The strategy approach for LTP3 has been to develop five Themes, based on the previous Government's five National Transport Goals as set out in the LTP3 Guidance, but made relevant to Kent:

- Growth Without Gridlock
- A Safer and Healthier County
- Supporting Independence
- Tackling a Changing Climate
- Enjoying Life in Kent

Box 5.7: Maidstone Integrated Transport Strategy 2005—2015'¹⁹ (2011)

This report was produced out of the need to improve the transport situation in the Borough. The vision was "to develop a sustainable, integrated transport system serving Maidstone Borough that provides choice and accessibility for all, and ensures that the County Town and related settlements are competitive and attractive places to live and work".

There were seven key themes in which the strategy addresses. These are outlined below:

1. Improving accessibility to Jobs and Services
2. Better Use of the Existing Transport System to restrict traffic growth
3. Reducing the Environmental Impact of Traffic
4. Improved Integration between Different Transport Modes
5. Improve Road Safety
6. Support Sustainable Regeneration and Appropriate Development
7. Develop Realistic Alternatives to the Car

The strategy is out of date. An updated strategy is being prepared with a draft currently in progress.

Box 5.8: 'Understanding Walking and Cycling'²⁰ (2011)

This report looks to understand why sustainable and active travel is relatively uncommon in British towns when, potentially, higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related greenhouse gas emissions. It recognises that physical infrastructure alone is not sufficient, with a more holistic approach required to incentivise such journeys. Creating a safe physical environment for pedestrians and cyclists – e.g. through fully segregated cycle path; and restrictions on vehicle access – is one important measure.

Air quality and causes of climate change

- 5.3.7 The Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK. This is supplemented by more recent guidance on how air pollution and climate objectives can be realised together through an integrated policy approach (**Box 5.9**).

¹⁸ Kent County Council (2011) – Local Transport Plan [online] available at http://www.kent.gov.uk/roads_and_transport/highway_improvements/our_transport_vision/local_transport_plan.aspx

²⁰ Lancaster University, University of Leeds & Oxford Brookes University (2011) Understanding Walking and Cycling: Summary of Key Findings and Recommendations [online] available at: http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCReportSept2011.pdf

Box 5.9: 'Air Quality Strategy for England, Scotland, Wales and Northern Ireland'²¹ (2007) and 'Air Pollution: Action in a Changing Climate'²² (2010)

The Air Quality Strategy sets out plans to improve and protect air quality in the UK. It considers ambient air quality only, leaving occupational exposure, in-vehicle exposure and indoor air quality to be addressed separately. The strategy sets health-based objectives for nine main air pollutants²³. Performance against these objectives is monitored where people are regularly present and might be exposed to air pollution.

Given the rapid development of climate change focused policy since the publication of the Air Quality Strategy, additional guidance has been published on the synergies between these two issues. In particular, it notes the potential for additional *health* benefits through the closer integration of climate and air pollution policy. It is suggested that co-benefits can be realised through a variety of means, including promoting low carbon vehicles and renewable energy.

5.3.8 The role that local authorities can play in reducing emissions is the subject of recent Committee on Climate Change guidance. This is summarised below in **Box 5.10**, alongside further information on the future of low-carbon district heating networks. **Box 5.11** meanwhile discusses the new approaches to flood risk management brought about through the 2010 Flood and Water Management Act. This is supplemented with additional information on the benefits of using Sustainable urban Drainage Systems (SuDs) in developments. **Box 5.12** highlights the importance of considering the social dimensions of vulnerability to climate change when producing adaptation policy. **Box 5.13** highlights the actions Kent requires for a low carbon and sustainable future and **Box 5.14** on the National Adaptation Programme.

Box 5.10: 'How local authorities can reduce emissions and manage climate risk'²⁴ and 'The Future of Heating'²⁵ (2012)

Planning functions are described as being a 'key lever in reducing emissions and adapting localities to a changing climate', with it considered particularly important that local authorities use these to:

- Enforce energy efficiency standards in new buildings and extensions;
- Reduce transport emissions by concentrating new developments in existing cities and large towns and/or
- ensuring they are well served by public transport;
- Work with developers to make renewable energy projects acceptable to local communities;
- Avoid increasing the areas risk to climate change impacts by locating new development in areas of lowest flood risk; and
- Plan for infrastructure such as low-carbon district heating networks, green infrastructure and sustainable drainage systems.

With regards to the latter point on low-carbon district heating networks, the DECC produced document 'The future of heating' provides further guidance. It points out that around half (46%) of the final energy consumed in the UK is used to provide heat, contributing roughly a third of the nation's greenhouse gas emissions. Renewable heat currently represents 1% of heat generation in the UK, although this is expected to grow significantly if decarbonisation targets are to be met. The Government's vision is of: 'buildings benefiting from a combination of renewable heat in individual buildings, particularly heat pumps, and heat networks distributing low carbon heat to whole communities...focusing first on the energy efficiency of our buildings...'

²¹ Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at:

<http://www.defra.gov.uk/environment/quality/air/air-quality/approach/>

²² Defra (2010) Air Pollution: Action in a Changing Climate [online] available at: <http://www.defra.gov.uk/publications/files/pb13378-airpollution.pdf>

²³ Benzene; 1,3-butadiene; carbon monoxide (CO); lead; nitrogen dioxide (NO₂); ozone; particles (PM₁₀); sulphur dioxide (SO₂); and polycyclic aromatic hydrocarbons.

²⁴ Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] available at: http://hmccc.s3.amazonaws.com/Local%20Authorities/1584_CCC_LA%20Report_bookmarked_1b.pdf

²⁵ DECC (2012) The Future of Heating: A strategic framework for low carbon heat in the UK [online] available at: <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/heat/4805-future-heating-strategic-framework.pdf>

Box 5.11: 'Flood and Water Management Act'²⁶ (2010) and 'Planning for SuDs'²⁷ (2010)

The Flood and Water Management Act highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings);
- Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Sustainable drainage systems (SuDS)
- N.B. The government proposes that the provisions of Schedule 3 to the Flood and Water Management Act 2010 will come into force on the 1st of October 2012 and will make it mandatory for any development in England or Wales to incorporate SuDs.

In relation to SuDS, further guidance is provided in the document 'Planning for SuDs'. This report calls for greater recognition of the opportunities for multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

Box 5.12: 'Climate change, justice and vulnerability'²⁸

This report calls for greater recognition of the social dimensions of vulnerability to climate change when considering adaptation policy. It notes that how badly a person or group will be affected by an extreme weather event is determined not only by their exposure to the event, but also on their vulnerability. This combination of factors can be described in terms of 'Climate Disadvantage'. This is a function of:

- a. the likelihood and degree of exposure to a hazard; and
- b. individual or group vulnerability with regards to such hazards.

Once recognised, these social dimensions of vulnerability require a widening of the scope of climate adaptation policy to take into account a broader set of concerns than has traditionally been the case. These concerns will include a number of areas of social policy which are not specifically concerned with climate change. For instance, a variety of social factors can affect the capacity of households to prepare for, and respond to and recover from flooding:

- Low-income households are less able to take measures to make their property resilient to flooding and to respond to and recover from the impacts of floods
- The ability to relocate is affected by wealth, as is the ability to take out insurance against flood damage.
- Social networks affect the ability of residents to respond to flooding. For example, by providing social support and a response network, and by improving the local knowledge base.

²⁶ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

²⁷ CIRIA (2010) *Planning for SuDs – making it happen* [online] available at:

<http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465>

²⁸ Joseph Rowntree Foundation (2011) *Climate change, justice and vulnerability* [online] available at:

<http://www.jrf.org.uk/sites/files/jrf/climate-change-social-vulnerability-full.pdf>

Box 5.13: 'Kent Environment Strategy'²⁹, (2011)

The Kent Environmental Strategy sets out how Kent will achieve a high quality environment, low carbon, resilient to climate change, and that has a thriving 'green economy' at its heart. Its aims are for:

- An Integrated Transport Strategy
- Housing Strategy
- Low Carbon Sector Strategy
- Flood Select Committee Report
- Biodiversity Action Plan for Kent
- Countryside Access and Improvement Plan
- Areas of Outstanding Natural Beauty Management Plan.

Box 5.14: 'The National Adaptation Programme'³⁰, (2013)

The National Adaptation Programme (2013) highlights the importance of adaptation to help the UK become more resilient to climate change. It also reiterates the need for Local Plans to be proactive in adaptation as set out in the NPPF.

Water resources and quality

5.3.9 The recent Government White Paper on Water provides further key background on the issues of water quality and resources (**Box 5.15**)

Box 5.15: The Water White Paper³¹ (2011)

The UK strategy seeks to achieve a secure supply of water resources whilst protecting the water environment. This means greater efficiency in water use, application of Sustainable Urban Drainage Systems, managing diffuse pollution from agriculture, tackling flood risk and reducing greenhouse gas emissions.

Land use, landscape and the historic environment

5.3.10 Of further interest is the following summary of the Government's vision and relevant strategic aims in relation to the historic environment (**Box 5.16**). The Kent Downs AONB management Plan provides further local level guidance on the protection and enhancement of these important landscapes (**Box 5.17**).

Box 5.16: 'The Government's Statement on the Historic Environment for England'³² (2010)

This document 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. Also of note is the reference to promoting the role of the historic environment within the Government's response to climate change and wider sustainable development agenda.

²⁹ Kent Forum (2011) – Kent Environment Strategy [online] available at

http://www.kent.gov.uk/environment_and_planning/environment_and_climate_change/kent_environment_strategy.aspx

³⁰ DEFRA (2013) The National Adaptation Programme: Making the Country Resilient to a Changing Climate [online] available at: www.gov.uk/defra

³¹ Defra (2011) Water for life (The Water White Paper) [online] available at <http://www.officialdocuments.gov.uk/document/cm82/8230/8230.pdf>

³² HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx

Box 5.17: Kent Downs AONB - Management Plan (20014-2019)³³

This recent update to the management plan for the Kent Downs AONB sets out to secure the natural beauty, special landscape character and community vitality of the area. It includes a 'Vision for 2029' which describes how the area can respond to change in a manner which preserves the AONB for future generations. It sets out the need for the Kent Downs to be a landscape in which change (e.g. development or climate change related) supports the distinctive features of the AONB.

Biodiversity and Green Infrastructure

5.3.11 In addition to the NPPF, it is worthwhile taking note of the initiatives presented within the recent Natural Environment White Paper and related documents (**Box 5.18**). The latest developments in relation to the Wildlife Trusts' 'Living Landscapes' initiative and recent guidance on biodiversity and green infrastructure provides further supporting detail (**Box 5.19**). This is accompanied by how to integrate climate change and biodiversity into SEA (**Box 5.20**) and **Box 5.21** outlines the key aims of the Biodiversity Action Plan at the local level for Maidstone.

Box 5.18: 'The Natural Environment White Paper (NEWP)³⁴, 'UK National Ecosystem Assessment (NEA)³⁵ and 'Biodiversity 2020'³⁶

The NEWP sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in 'nature reserves' to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.
- In terms of urban green infrastructure, the NEWP recognises that it is 'one of the most effective tools available to us in managing environmental risks such as flooding and heatwaves'.

The NEWP drew on the findings of the National Ecosystem Assessment (NEA), a major project that was able to draw conclusions on the 'substantial' benefits that ecosystems provide to society directly and through supporting economic prosperity. The NEA identified development as a key driver of loss and biodiversity offsets as a possible means of increasing 'private sector involvement in conservation and habitat creation'. The Government has also published 'Biodiversity 2020', which builds on the Natural Environment White Paper and sets out the strategic direction for biodiversity policy for the next decade. In relation to planning, it states that the objective should be to: 'guide development to the best locations, encourage greener design and enable development to enhance natural networks'.

³³ Kent Downs Area of Outstanding Natural Beauty – Management plan (2014-2019)

³⁴ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

³⁵ UNEP-WCMC (2011) UK National Ecosystem Assessment [online] available at: <http://uknea.unepwcmc.org/Resources/tabid/82/Default.aspx>

³⁶ Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: <http://www.defra.gov.uk/publications/files/pb13583-biodiversity-strategy-2020-111111.pdf>

Box 5.19: The Wildlife Trusts' 'Living Landscapes' initiative³⁷ and 'Planning for green infrastructure and biodiversity'³⁸ (2012)

The Wildlife Trusts 'Living Landscape' initiative focuses on the conservation of biodiversity over large areas of land where habitats are fragmented. Within 'Living Landscapes', a spatial approach to ecological restoration is applied with the aim of:

- Protecting and maximising the value of areas that are already rich in wildlife;
- Expanding, buffering, and creating connections and stepping stones between these areas; and
- Making the wider landscape more permeable to wildlife.

It is hoped that this restoration will both provide a healthy environment in which wildlife can thrive and enhance those natural processes that benefit people. A partnership approach is called for, with local government, agencies, the private sector and voluntary bodies required to act together.

In support of this landscape scale approach and the NPPF's call for positive planning for green infrastructure (GI), the TCPA and the Wildlife trusts have produced guidance on 'Planning for Biodiversity'. It notes that as well as benefiting biodiversity, green infrastructure can help to 'deliver and complement some of the services currently provided by hard engineering techniques'. Local authorities are called upon to 'identify strategic GI within Local Plans' and also focus on making the built environment permeable for wildlife.

Box 5.20: Integrating Climate Change and Biodiversity into Strategic Environmental Assessment (2013)³⁹

The European Commission Guidance on **Integrating Climate Change and Biodiversity into Strategic Environmental Assessment** (2013) suggests that an SEA should focus on ensuring 'no-net-loss of biodiversity' before considering mitigation and compensation. The assessment should also take account of 'ecosystem services' and the links between natural environment and economy.

Box 5.21: The Maidstone Biodiversity Strategy: A Local Biodiversity Action Plan 2009-2014

This report sets out a series of key objectives. These are:

- To develop and consolidate a sound biological knowledge base.
- To consistently translate national biodiversity targets into effective action at the local level.
- To examine local biodiversity status and issues, and identify conservation targets for locally important habitats.
- To develop sustainable local partnerships to help deliver programmes for biodiversity conservation, education and environmental stewardship.
- To increase public awareness of, and participation in, conserving biodiversity locally.
- To ensure that opportunities for biodiversity conservation and enhancement are identified and fully considered via all statutory and local processes and initiatives.
- To provide a basis for measuring and monitoring progress in biodiversity conservation at a local level, and contributing to national efforts.

³⁷ The Wildlife Trusts (2010) A Living Landscape: play your part in nature's recovery [online] available at: <http://www.wildlifetrusts.org/aliveinglandscape>

³⁸ The Wildlife Trusts & TCPA (2012) Planning for a healthy environment: good practice for green infrastructure and biodiversity [online] available at: <http://www.wildlifetrusts.org/news/2012/07/06/planning-healthy-and-natural-environment>

³⁹ European Commission (2013) Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment [online] available at: <http://ec.europa.eu/environment/eia/pdf/SEA%20Guidance.pdf>

6 WHAT'S THE SUSTAINABILITY 'BASELINE' AT THE CURRENT TIME?

6.1 Introduction

- 6.1.1 Another important step when seeking to establish the appropriate 'scope' of an SA involves reviewing *the situation now* for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide 'benchmarks' for the appraisal of significant effects.
- 6.1.2 A review of the sustainability baseline is presented within the SA Scoping Report (2009). This section presents a summary, updated as necessary.

6.2 Community wellbeing

Deprivation

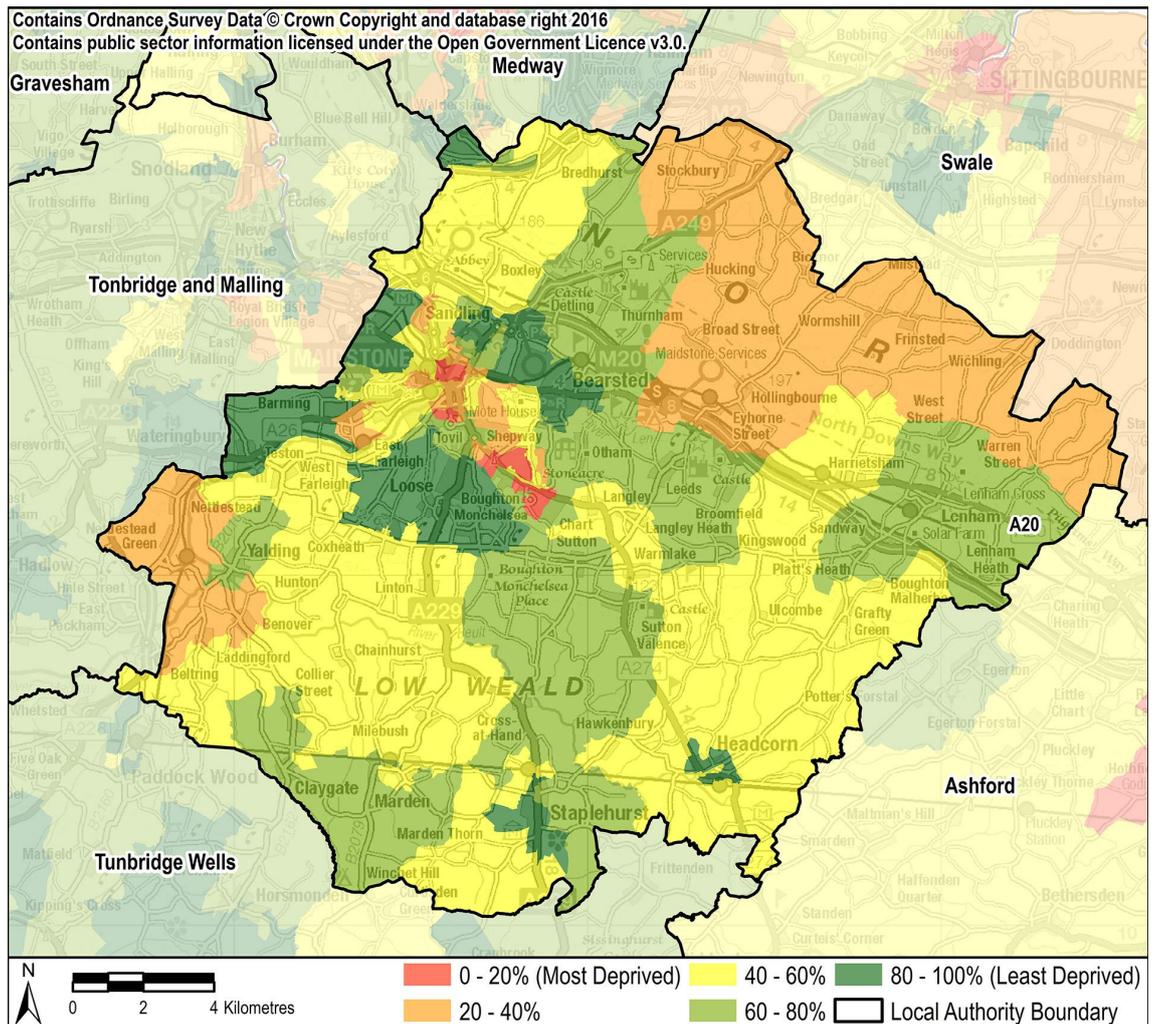
- 6.2.1 Maidstone's population is predicted to increase from 161,800 from mid-2014⁴⁰ to 187,700 in 2031⁴¹. This constitutes a 16% growth. One of the key aspects of future population in Maidstone is the trend towards an ageing population which is not unique to the Borough. The number of households is forecast to rise more than the level of population growth in the same period.
- 6.2.2 The Strategic Housing Market Assessment suggests the contrast in population and household increase is due to a predicted continued decrease in household size caused by an increase in single person households as elderly people live longer, people separate and divorce, and young people form single person households.
- 6.2.3 Based on the IMD, 2015 Maidstone was ranked 198th out of 326 authorities, compared to 217th out of 326 authorities in England. With 1 being the most deprived, this means that overall deprivation has worsened within Maidstone. Although Maidstone is a relatively prosperous Borough, there are pockets of deprivation in the town centre area and areas to the southeast of the town. These areas are in the 20% most deprived in the Country (shaded red on **Figure 6.1**).
- 6.2.4 When looking at the different components of the Index of Multiple Deprivation (IMD), deprivation in terms of education, skills and training is also high in the areas to the southeast of the town.
- 6.2.5 Health deprivation is also particularly high in the same areas. Maidstone's Sustainable Community Strategy (refreshed in 2013) states that 11% of Maidstone's population live in areas considered to be in the 20% most deprived in the country⁴². The SCS highlights a series of problems in the most deprived areas within the Borough: men live on average five years less than those from the most affluent areas, there are higher levels of teenage pregnancy, lower levels of skills/qualifications and higher levels of crime and child poverty.

⁴⁰ Kent County Council (2015) Population Estimates – [online] available at http://www.kent.gov.uk/_data/assets/pdf_file/0020/14726/Mid-year-population-estimates-time-series.pdf

⁴¹ Kent County Council (2014) http://www.kent.gov.uk/_data/assets/excel_doc/0019/12880/Interactive-population-forecast-toolkit-3.xls

⁴² Maidstone Borough Council (2013) Sustainable Community Strategy [online] available at http://www.maidstone.gov.uk/_data/assets/pdf_file/0019/19153/Sustainable-Community-Strategy-2009-2020-July-2013.pdf

Figure 6.1: National Rank of Lower Super Output Areas in Maidstone based on the IMD 2015



Education

- 6.2.6 The Borough performs well compared to national, regional and county averages for GCSE attainment of 5 A* to C grades, but other GCSE statistics show Maidstone in comparison not performing as well. According to the SCS, the Borough has a higher proportion of school leavers achieving five or more A* to C grade GCSEs. There are considerable differences between the performances of different schools. For instance, four secondary schools in the Borough performed below the 30% threshold set by national government.

Health

- 6.2.7 In terms of health, Maidstone has its own hospital and the Sustainable Communities Strategy indicates that the Borough performs similarly to other Kent Boroughs within all of the key areas assessed for health.
- 6.2.8 The Maidstone Borough Health Profile is produced annually and provides detailed statistics about health in the Borough. Taken from the 2015 profile, for children in Maidstone the profile noted that in Year 6, 17.3% (263) of children were classified as obese. This is compared to a percentage of 19.1% in England. The rate of alcohol-specific hospital stays among those under 18 was 26.4 (rate per 100,000 population), which was better than the average for England (40.1). The profile also noted that the levels of teenage pregnancy, GCSE attainment, and smoking all scored better than the England average.

- 6.2.9 For adults, it states that 18.9% were classified as obese which is better than the average for England (23%). It also stated that the rate of alcohol related harm hospital stays was 493 (rate per 100,000 population) which again is better than the average for England (645). The rate of smoking related deaths was 270 (rate per 100,000 population) which represents 233 deaths per year. This is lower than the England average (288). The profile also states that sexually transmitted infections and TB scores are better than average, however the rate of violent crime is worse than average for England⁴³.

Crime

- 6.2.10 Taken from the 2013 AMR, between 2011/12 and 2012/13 there was a fall in the number of crimes for all offences for the South East as a whole, however Maidstone and Kent do not follow this regional trend. In Maidstone, the largest increase was in violence without injury and the largest fall was for violence with injury.
- 6.2.11 The number of vehicle offences only fell very slightly and the number of domestic burglaries and robberies increased marginally between 2011/12 and 2012/13. In Kent the number of domestic burglaries increased far more significantly than in Maidstone⁴⁴.
- 6.2.12 The Council addresses local crime and disorder through the Safer Maidstone Partnership. The Maidstone Community Safety Plan 2013-18 is a rolling five year document, which highlights how to tackle community safety issues that matter to the local community.

Table 6.1: Crime Statistics⁴⁵

Offence Type	Maidstone Borough			Kent (including Medway)	South East
	2011/12 (count)	2012/13 (count)	% change	% change	% change
Domestic burglary	431	438	1.62	22.12	-4.74
Robbery	46	47	2.17	-6.3	-19.11
Vehicle offences	795	794	-0.13	6.66	-8.03
Violence with injury	881	802	-8.97	1.76	-7.53
Violence without injury	661	768	16.19	13.79	-4.13

Community engagement and culture

- 6.2.13 Maidstone borough has a range of high quality attractions and Leeds Castle is the most high profile with over 500,000 visitors per annum. Maidstone has three Museums which contribute to the tourism offer of the borough. According to ONS figures, 2013 was a record year for overseas visitor numbers to Maidstone with a large increase in the number of Chinese visitors⁴⁶.

⁴³ Public Health England – Maidstone (2015) Health Profile [online] available at http://www.apho.org.uk/resource/view.aspx?RID=171907&bcsi_scan_e956bcbe8adbc89f=Jc06QgXb1XpX8u3kNxi1t6lZnLctAAAA2WXAOg==:1

⁴⁴ Maidstone Borough Council (2014) Annual Monitoring Report 2012/13 [online] available at http://www.maidstone.gov.uk/_data/assets/pdf_file/0011/49736/Annual-Monitoring-Report-2012-13.pdf

⁴⁵ Maidstone Borough Council (2014) Annual Monitoring Report 2012/13 [online] available at http://www.maidstone.gov.uk/_data/assets/pdf_file/0011/49736/Annual-Monitoring-Report-2012-13.pdf

⁴⁶ Maidstone Borough Council (2015) Maidstone Borough's Museum forward Plan [online] at <http://services.maidstone.gov.uk/meetings/documents/s41607/Enc.%201%20for%20Maidstone%20Museums%20Forward%20Plan%202014-2019.pdf>

6.2.14 The main drivers for UK visitors to Maidstone are historic aspects/heritage (54.9%), closely followed by an interest in the attractive countryside (53.5%). (NB shopping was not a motivating factor for people from further afield – although 1 in 4 said they shopped once in Maidstone)⁴⁷.

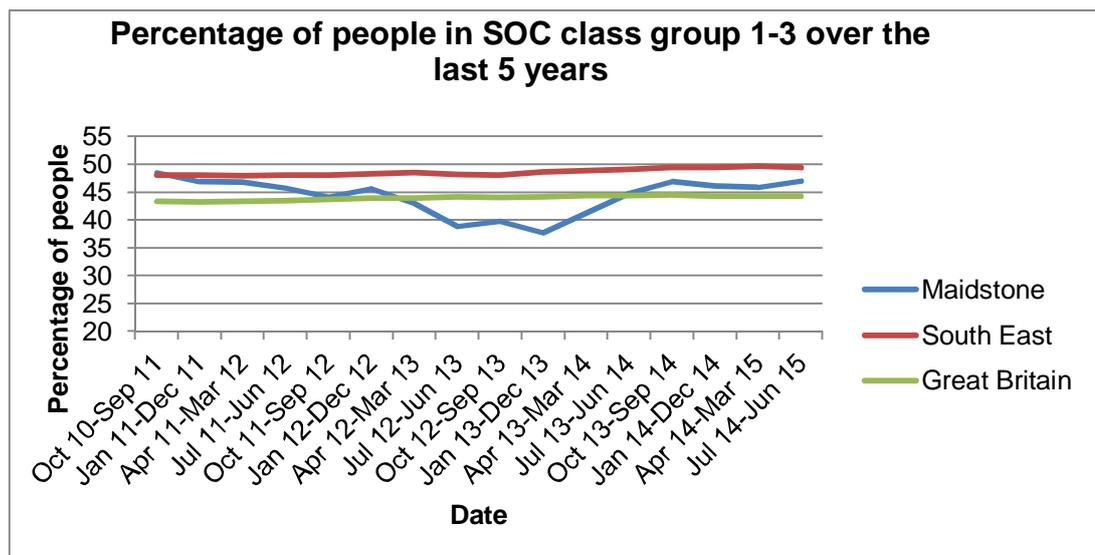
6.3 The Economy

6.3.1 In Maidstone between July 2014 and June 2015, 79.0% of people were economically active compared with the British average of 77.5%. This pattern is mirrored with 0.9% of people living in Maidstone claiming jobseekers allowance compared to the average of 1.5% for the whole of Britain⁴⁸.

6.3.2 In 2015 the average for Maidstone's gross weekly pay for residents was £558. This was lower than the South East average (£575) but higher than the British average (£530).

6.3.3 In terms of job type, 47% of the Maidstone workforce falls into group 1-3 of the Standard Occupation Classification groups. This includes; managers, directors and professionals. This is lower than the South East average (49.4%) but higher than the British average (44.3%). As shown in Figure 6.2, over the last 5 years this figure has been more volatile in Maidstone, compared to the South East and Great Britain. This suggests a need for higher skilled jobs in Maidstone, which are crucially more secure.

Figure 6.2: Percentage of people in SOC class group 1-3 over the last 5 years



6.3.4 Maidstone has 15.7% in group 8-9 which includes machine operatives and elementary occupations. This is higher than the South East average (13.9%) but lower than the Great Britain average (17.2%)⁴⁹.

⁴⁷ Maidstone Borough Council and Visit Kent (2015) Maidstone Destination Management Plan [online] available at [http://www.visitmaidstone.com/dbimg/Maidstone%20DMP%20-%20FINAL%20030915\(1\).pdf](http://www.visitmaidstone.com/dbimg/Maidstone%20DMP%20-%20FINAL%20030915(1).pdf)

⁴⁸ Nomis Web (2015) – Official Labour Market Statistics [online] available at <http://www.nomisweb.co.uk/reports/lmp/la/1946157316/report.aspx>

⁴⁹ Nomis Web (2015) – Official Labour Market Statistics [online] available at <http://www.nomisweb.co.uk/reports/lmp/la/1946157316/report.aspx>

- 6.3.5 The Maidstone Borough Council Economic Sensitivity Testing and Employment Land Forecast (February 2014) prepared an economic forecast that analyses, understands and interprets the economic potential of the Borough. Scenarios have been developed to seek to model the opportunities for economic growth locally. By bringing the scenarios together into a final employment growth scenario the work provides a consistent base position from which future planning policy and evidence can be developed⁵⁰.
- 6.3.6 Based on the translation of the combined growth for Maidstone into B class employment space, the anticipated floorspace demand is set out in **Table 6.2**.
- 6.3.7 The Forecast states that there is a gross requirement for an additional c.18ha of employment land within the Borough (outside of the KIMS/MMC Site).

Table 6.2: Employment Land Requirement (2011-2031)

	Job Creation	Floorspace Demand 2011 - 2031 m ²	Allowance for Churn m ²	Change in floorspace m ²	Change in Land Ha
Office	3,053	36,636	3,194	39,830	2.7
Industrial	226	8,154	12,136	20,290	5.1
Warehouse	453	31,724	18,187	49,911	10.0
General Requirement	3,733	76,513	33,517	110,030	17.7
KIMS/MMC	4,200	tbc	0	0	19
Total	7,933				37

Source: Economic Sensitivity Testing and Employment Land Forecast (2014)

- 6.3.8 Building from the base scenario of 7800 jobs between 2011, 2031, Bilfinger GVA⁵¹ consider the locally relevant factors that could drive economic growth, considering where the base scenario under- or over-plays the potential for growth in some of Maidstone's existing key sectors. In addition, the consultants assess the potential for growth in new 'opportunity' sectors, reviewing some of the emerging technologies that could drive growth and how applicable they are to Maidstone's economy.
- 6.3.9 Based on this analysis, Bilfinger GVA conclude that it is reasonable to anticipate that employment growth will, in certain sectors, grow beyond what 'business as usual' or historic trends would suggest. To quantify the potential uplift, three sensitivity tests are applied. First, comparator areas are identified and their forecasts for sector growth compared with Maidstone. Second, the impact of proposed developments in Maidstone are considered, including KIMS/KMC and the Newnham Court Shopping Village. Third, the key elements of sensitivities 1 and 2 are integrated to arrive at an enhanced growth scenario of 14,400 jobs over the period 2011 to 2031.

⁵⁰ Maidstone Borough Council (2014) Economic Sensitivity Testing and Employment Land Forecast [online] available at http://www.maidstone.gov.uk/data/assets/pdf_file/0003/47640/Economic-Sensitivity-Testing-and-Employment-Land-Forecast-February-2014.pdf

⁵¹ Bilfinger GVA (2014) 'Economic Sensitivity Testing & Employment Land Forecast for Maidstone Borough Council'

6.4 Housing

Housing need

- 6.4.1 The Maidstone housing land supply⁵² as at 1st April 2015 was calculated at 3.3 years. This represents an undersupply of the 5 year supply target. A detailed breakdown of the figures is given in **Table 6.3** below.

*Table 6.3: Calculating 5 year housing land supply for the objectively assessed need of 18,560 dwellings (as of 1st April 2015)*⁵³

	Number of dwellings
Objectively Assessed Need	18,560
Annual Target	928
Completions (1/4/2011 – 31/3/2015)	2,341
Delivery Due (1/4/11 to 31/3/15 (928p.a. x 4 years)	3,712
Shortfall in delivery (3,712-2,341)	1,317
5-year OAN (928p.a.x5 years)	4,640
Plus shortfall in delivery	1,371
Total 5 year target	6,011
Add 5% buffer per NPPF requirement	301
Final total 5 year target	6,312
Supply	
Supply - extant permissions (database phasing)	2,743
Supply - S106 at 1/4/15	1,411
Annual target (6312/5)	1,262
No. of years 4,154/1,262	3.3 years

Gypsy and Traveller accommodation

- 6.4.2 The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 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.

Affordable housing

- 6.4.3 The SHMA (2014) shows an overall need for affordable housing of 5,800 units over the next 18-years from 2013 to 2031 (322 per annum). The following table shows the affordable housing completions between 2008-2013.

⁵² Maidstone Borough Council (2015) 5 year housing land supply – [online] available at http://www.maidstone.gov.uk/_data/assets/pdf_file/0007/99466/Five-Year-Housing-Supply-1-April-2015.pdf

⁵³ Ibid.

Table 6.4: Affordable Dwellings Completed⁵⁴

	All dwellings completed (net)	Affordable dwellings completed (net)	% of affordable dwellings completed
2012/13	630	183	29%
2011/12	873	380	44%
2010/11	649	254	39%
2009/10	581	273	47%
2008/09	441	204	46%

6.5 Transport and Accessibility

6.5.1 Maidstone is the 'County Town' of Kent and is consequently a busy town which suffers from traffic congestion at peak times. The current transport network is said to be fragmented and historically constrained. The situation has worsened over the last twenty years and there is a risk that the current issues may affect the future economic prosperity of the Borough. Current transport issues are also likely to be exacerbated in the future years as the new housing allocated in Local Plans and the associated services and business are developed.

The key issues that affect the transport system in Maidstone include:

- High car use, which is also forecast to increase, peak time traffic delays and gridlock caused by capacity of the M20;
- Lack of appropriate access to and from the south of the Borough;
- Lack of viable alternatives to the car, including the presently limited cycle and pedestrian network, poor public transport in rural areas, inadequate rail links and slow journey times;
- Environmental problems, particularly air pollution; and
- Increased pressure caused by new development.

6.5.2 Three railway routes through the Borough serve 13 passenger stations and the principal route serving urban Maidstone is the London-Ashford via Maidstone East. From Maidstone East, the principal station in the Borough, journey time to London is less than an hour. Direct rail links to London and the proximity of the capital is identified in the AMR as factor in shaping local economy, house prices and travel.

6.5.3 The SHMA 2014 analyses commuting patterns in detail using 2001 and 2011 Census data. The analysis found that the highest commuting flows are between Tonbridge & Malling and Maidstone (13,900 people daily) which is likely to be partly influenced by the concentration of employment at Kings Hill in West Malling and at Aylesford. There are also see very high commuting flows (12,770 people daily) between Maidstone and Medway. 7,670 people commute daily between Maidstone and Swale and 4,610 people commute daily between Maidstone and Tunbride Wells. There is a weak commuting relationship between Ashford and Maidstone with daily flows of only 2,620 people. 7,132 people from Maidstone commute to London daily. Maidstone borough's direct rail links to London and the proximity of the capital are factors in shaping the local economy, house prices and travel.

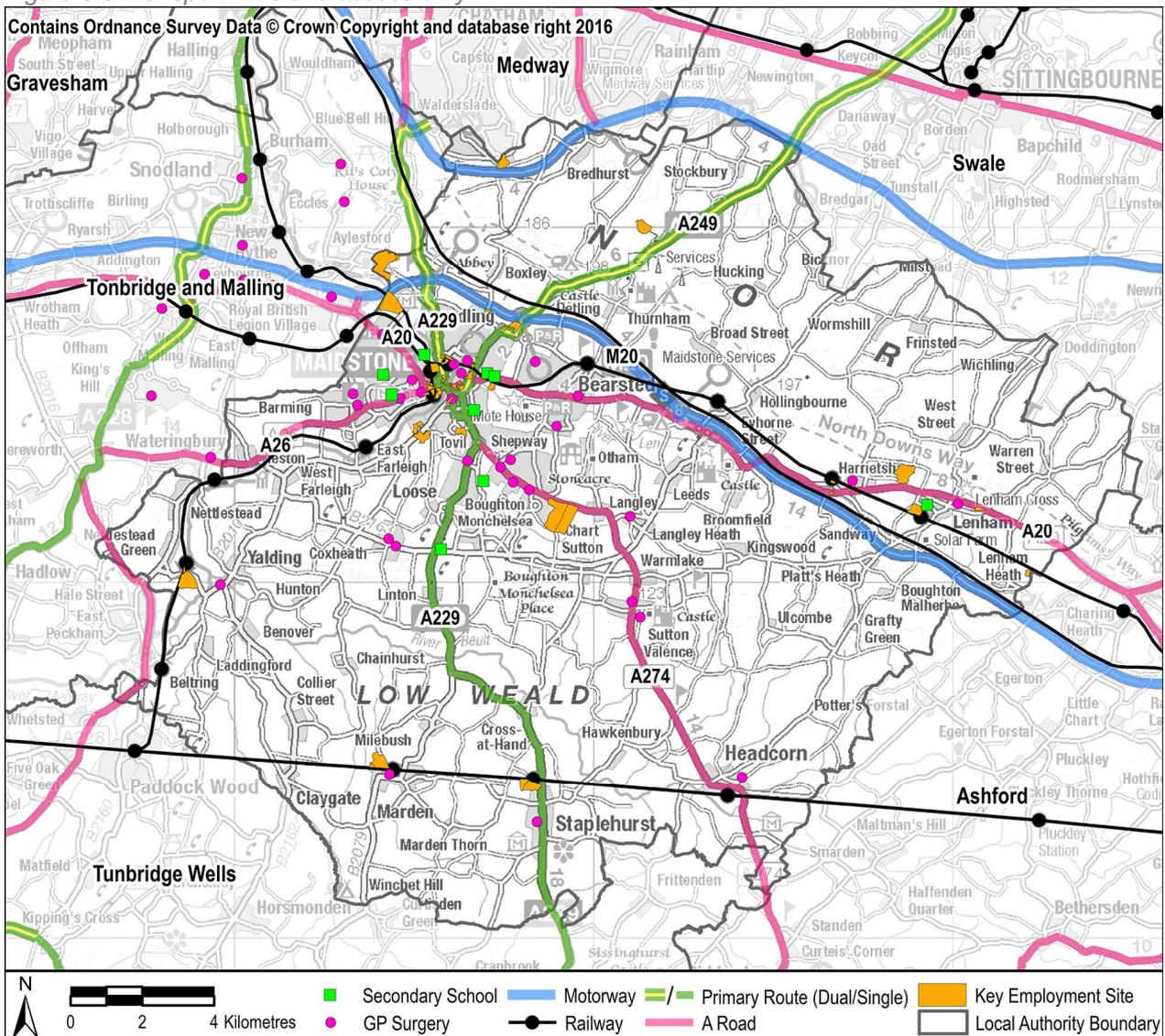
6.5.4 2011 census data shows that Maidstone has a lower percentage of households with no cars or vans (16%) than the South East (18.6%) and particularly England (25.8%). The Borough has fewer households with one car or van, but more households with two, three or four cars and vans, than the South East and England⁵⁵.

⁵⁴ Maidstone Borough Council (2014) Annual Monitoring Report 2012/13 [online] available at http://www.maidstone.gov.uk/data/assets/pdf_file/0011/49736/Annual-Monitoring-Report-2012-13.pdf

⁵⁵ ONS (2011) Census Data [online] available at: <https://www.nomisweb.co.uk/census/2011/KS404EW/view/1946157316?cols=measures>

- 6.5.5 The five Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst all provide a good range of services which serve both the villages and the surrounding hinterland. All provide a nursery and primary school; a range of shops (including a post office); a doctors surgery, at least one place of worship, public houses, restaurants and community hall as well as open space provision. All have a range of local employment opportunities. The Centres are connected by at least four bus journeys on weekdays and all have a frequent train service.
- 6.5.6 The five Larger Villages of Coxheath, Boughton Monchelsea, Eyhorne Street (Hollingbourne), Sutton Valence and Yalding 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 provision. All have a range of local employment opportunities. The villages are connected by at least four bus journeys/weekday and Hollingbourne and Yalding are served by a train station.

Figure 6.3 Transport links and accessibility



6.6 Air and causes of climate change

Air Quality

6.6.1 Maidstone's town centre, key road junctions and the M20 have generally poor air quality primarily resulting from traffic emissions and congestion. Three additional air pollution 'hotspots' have been identified at busy traffic junctions within the Maidstone Town urban area (Fountain Lane, Well Street, W heatsheaf Junction) in addition to the existing hotspots in the town centre and the M20. This has contributed to the enlargement of the AQMA designation to encompass the whole of Maidstone Town urban area. NO₂ is produced by road vehicles and can cause respiratory illnesses and possibly increase the risk of lung infections. This pollutant affects young children and asthma sufferers in particular⁵⁶.

Climate Change

6.6.2 As shown in **Table 6.5**, the average per capita emissions for Maidstone in 2011 were 6.3 tonnes per head (CO₂), the same as the average for the South East. In comparison to other local authorities in Kent, per capita emissions in Maidstone are relatively low e.g. Tonbridge and Malling (11.2). Kent County as a whole was estimated at 6.9 tonnes per head (CO₂).

Table 6.5: Detailed emissions data: Total and Per capita CO₂ emissions⁵⁷

Estimated per capita emissions of CO₂			
	2009	2010	2011
	Tonnes per head (CO ₂)		
Maidstone	6.6	6.7	6.3
South East	6.8	7.0	6.3
England	7.1	7.3	6.7

Source: Department of Energy and Climate Change

6.6.3 A list of the Borough's renewable energy schemes up until 2010, together with their status, is set out below. There is no current renewable energy data in the 2012/13 AMR.

- A 150kw biomass plant building powered from the burning of wood chippings was installed in July 2009. This new biofuel system in West Farleigh replaced the existing fossil fuel system that serves a sizable group of listed buildings that have a greater demand for energy than the average rural home.
- The 5kw wind turbine given planning permission in 2008/09, in Harrietsham.
- The 5.67kw solar photo-voltaic panels given planning permission in 2008/09, at Downswood Community Centre, but was not installed during 2009/10 because there was no funding available.
- A building to house a biomass electricity plant at the Apiary Park, generating electricity from burning coppice wood chips sourced from the by-products associated with the local coppicing industry was granted planning permission in 2008/09. During 2009/10, planning permission was granted for a similar scheme in Grafty Green. The plant will produce 100kW of instantaneous power and is capable of providing almost 800MWh over a year of carbon neutral electricity to the national grid, equivalent to the average annual electricity demand of approximately 170 homes.

⁵⁶ Maidstone Borough Council and Maidstone Matters Partnership (2009) *Sustainable Community Strategy* [online] available at: http://www.maidstone.gov.uk/community_and_living/community_advice/community_strategy.aspx

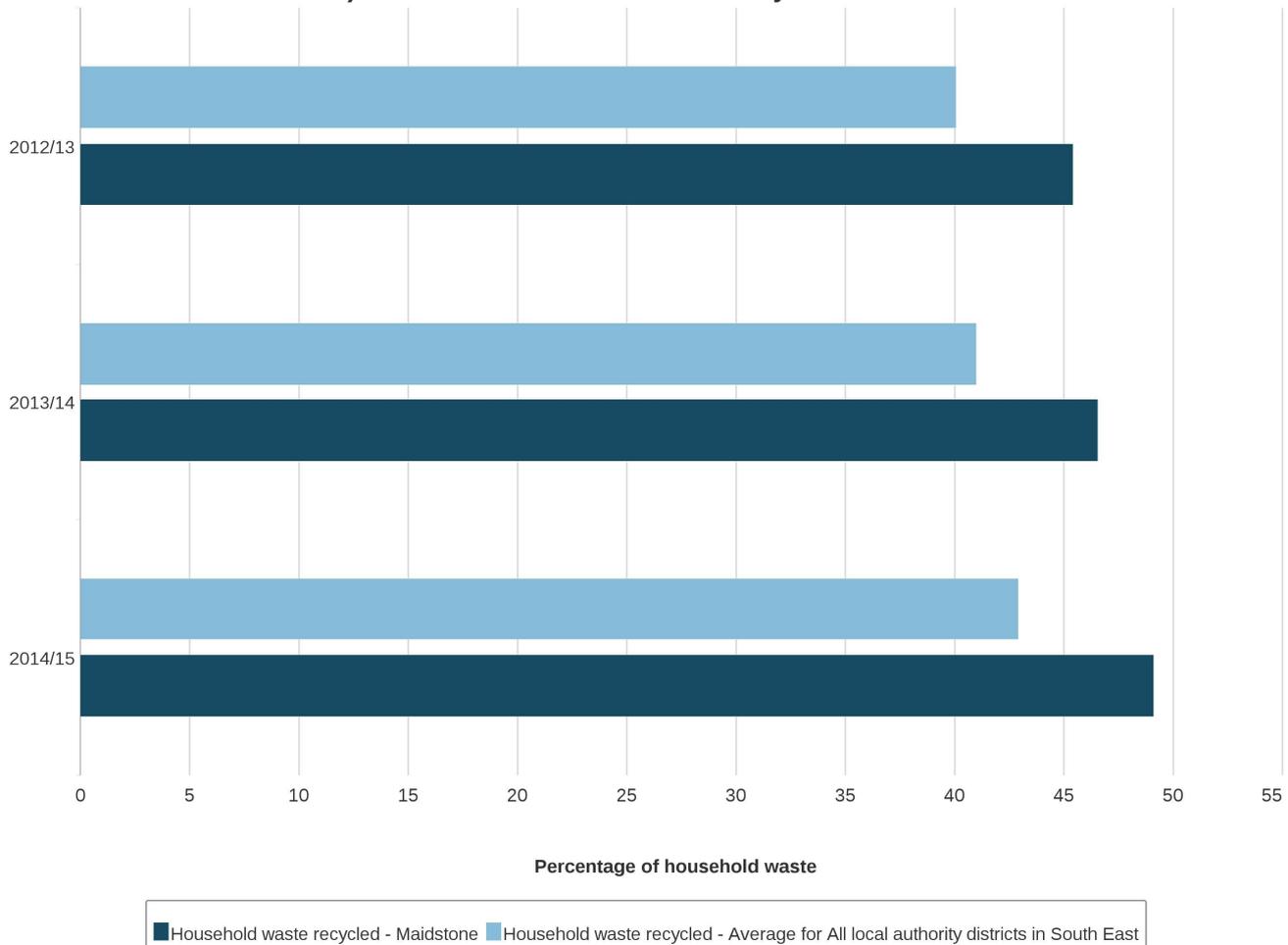
⁵⁷ DECC (2013) *Environmental* (data) [online] available at: <http://neighbourhood.statistics.gov.uk/dissemination/Info.do?m=0&s=1373450973322&enc=1&page=analysisandguidance/analysisarticle/local-authority-profiles.htm&njsjs=true&nscck=false&nssvg=false&nswid=1276>

Waste

6.6.4 **Figure 6.4** shows that the percentage of recycling in Maidstone has increased year on year from 2012-2015. It has also been above the average rate of recycling for the south east over the same time period.

Figure 6.4: Percentage of household waste reused, recycled and composted, 2012-2015⁵⁸

Percentage of household waste sent for reuse, recycling and composting(Raw values)(from 2012/13 to 2014/15) for Maidstone & All local authority districts in South East



Source:

Department for Environment, Food and Rural Affairs

Powered by LG Inform

⁵⁸ Local Government Association (2015) Household waste sent for reuse, recycling and composting in Maidstone [online] available at: http://lginform.local.gov.uk/reports/lgastandard?mod-metric=46&mod-area=E07000110&mod-group=AllDistrictInRegion_SouthEast&mod-period=3

6.7 Water resources and quality

- 6.7.1 Maidstone is located in an area of water scarcity and experienced a two year drought following the heat wave of 2003⁵⁹.
- 6.7.2 In 2007, the Environment Agency designated the south east of England as being seriously water stressed.
- 6.7.3 Weather patterns are becoming less predictable. Between 2010 and 2014 the South East experienced untypically dry and wet weather:
- The 17 months between October 2010 and February 2012 saw exceptionally low rainfall across the majority of our area. By April 2012, groundwater levels were the lowest since records began in 1904; and
 - In contrast between October 2013 and February 2014 the south east experienced its sixth wettest winter since 1910 causing flooding and distress⁶⁰.
- 6.7.4 The South East Water Resources Management Plan (2015) states that even following a wet winter, the south east of England is only ever 18 months away from the start of a potential drought due to only being able to store a limited amount of rainfall and much of it flows out to streams, rivers and ultimately the sea.
- 6.7.5 Maidstone Borough lies predominantly within the Thames River Basin District. The River Medway is a “main river” which flows through Maidstone Borough. Currently only 16 km of river length (4%) in the Medway catchment areas is achieving good ecological status/potential and the River Medway suffers from high nutrient levels. The Thames district is one of the driest in the UK due to low rainfall levels. Groundwater is important in providing around 40% of public water supplies with chalk forming the predominant aquifer type. However, current assessments show that groundwater is fully utilised over much of the Thames River Basin District and, therefore, the draft Plan for the Basin District states that maintaining the quantity and quality of groundwater is extremely important for the District⁶¹.
- 6.7.6 Maidstone Borough’s drinking water is generally of good quality, with a small improvement in overall compliance with drinking water standards at the consumers’ taps (99.96% compared to 99.95% in 2006)⁶². The water infrastructure system is operated by Southern Water (sewerage systems) and South East Water (public water supplies).

⁵⁹ Maidstone Borough Council (undated) *Climate change and Maidstone Borough* [online] available at:

http://www.maidstone.gov.uk/environment_and_planning/sustainability_and_climate_change/cha/climate_change.aspx

⁶⁰ South East Water (2015) Water Resources Management Plan 2015-2040 [online] available at:

<http://www.southeastwater.co.uk/media/6322/12074%20SEW%20WRMP%20Summary%20AW9.pdf>

⁶¹ Environment Agency (2008) *River Basin Management Plan for the Thames River Basin District* [online] available at:

<http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/thames/Intro.aspx>

⁶² Drinking Water Inspectorate (2008) *Drinking water 2007: Southern region*.

6.8 Land use, landscape and the historic environment

Landscape

- 6.8.1 Maidstone is covered by several planning and landscape designations including Metropolitan Green Belt, the Area of Outstanding Natural Beauty and contains special landscape values (see Table 6.7). The Kent Downs is a nationally important landscape and the eighth largest AONB in England and Wales.

Table 6.7: Key Assets of Maidstone's Natural Environment 2013⁶³

Natural environment assets	Km ²	%
Total area of Borough	393.4	100
Metropolitan Green Belt	5.29	1.24
Area of Outstanding Natural Beauty	107.19	27.25
Special Area Conservation	1.37	0.35
Sites of Special Scientific Interest	4.92	1.25
Local Wildlife Sites	27.76	7.06
Ancient Woodland	28.28	7.19

- 6.8.2 The initial Landscape Character Assessment and Landscape Guidelines were adopted by Maidstone Borough Council in 2000. Since then changes have occurred with respect to landscape character assessment methodology as well as to the physical fabric of Maidstone's countryside. To account for these changes the **Maidstone Landscape Character Assessment (2012)**⁶⁴ (LCA) replaces the landscape character assessment section of the Maidstone Landscape Character Assessment and Landscape Guidelines (2000). The main findings of the 2012 LCA are:

- The significant majority of the Borough's landscape character areas are of good condition and high sensitivity and tend to relate to the more rural areas away from Maidstone and the Medway Towns further north.
- Very little of the Borough's landscape is of poor condition and low sensitivity.
- The great majority of Maidstone's urban periphery is abutted by landscape of good condition and high sensitivity, with only a relatively small area to the North West being of low-moderate condition and low sensitivity. At the finer level of detail, there is wider range of conditions and sensitivities but there is no obvious consistent pattern.
- The area of the North Downs AONB lying between Maidstone and Medway Towns is assessed as falling within a range of sensitivities (moderate to high) and condition (poor to good) , largely reflecting the intense urban pressures this area is experiencing.

- 6.8.3 The report includes key landscape characteristics; landscape condition and sensitivity; and landscape guidelines for the 58 Borough-wide Landscape Character Areas identified across the rural area of the Borough.

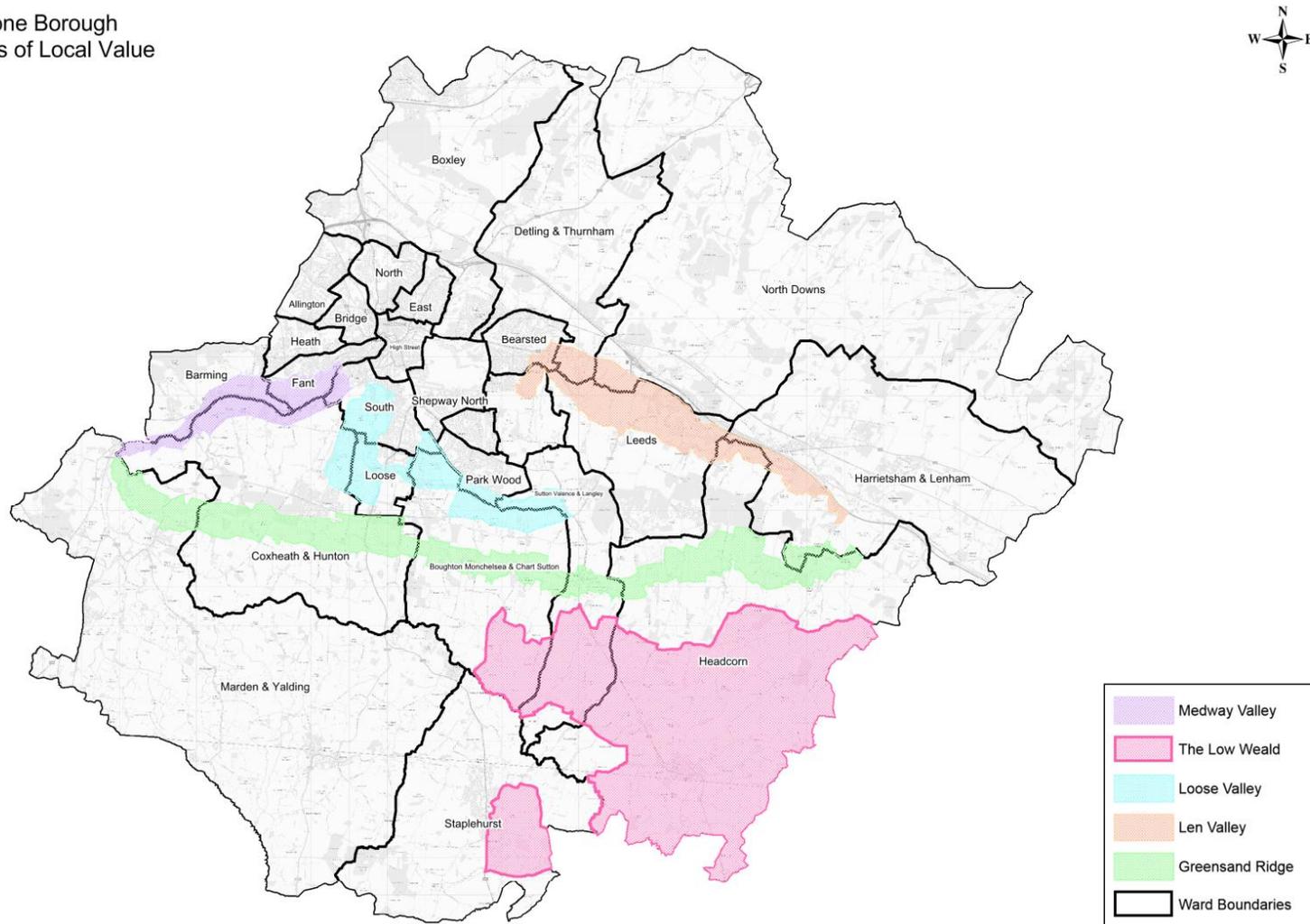
⁶³ Maidstone Borough Council (2014) *Annual Monitoring Report 2012/13* [online] available at: http://www.maidstone.gov.uk/data/assets/pdf_file/0011/49736/Annual-Monitoring-Report-2012-13.pdf

⁶⁴ Maidstone Landscape Character Assessment (2012) – available [online] at http://www.maidstone.gov.uk/environment_and_planning/conservation/landscape_character_assessment.aspx

- 6.8.4 In 2014 further work was undertaken by the council to build on the 2012 LCA. The study identified the sensitivity of landscapes and capacity to accommodate change. Specific sites were assessed in the study to aid in the site selection process. These assessments have been taken into account in the SA.
- 6.8.5 In addition to the AONB, the Borough includes significant tracts of landscape which are highly sensitive to significant change. Such '*Landscapes of local value*' have been identified by the Council according to criteria relating to their character and sensitivity:
- i. Part of a contiguous area of high quality landscape;
 - ii. Significant in long distance public views and skylines;
 - iii. Locally distinctive in their field patterns, geological and other landscape features;
 - iv. Ecologically diverse and significant;
 - v. Preventing the coalescence of settlements which would undermine their character;
 - vi. Identified through community engagement;
 - vii. Providing a valued transition from town to countryside.
- 6.8.6 Five distinct areas have been identified as landscapes of local value as illustrated on **Figure 6.5**.

Figure 6.5: Landscapes of local value

Maidstone Borough
Landscapes of Local Value



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Heritage

- 6.8.7 In terms of historical assets, as of 2013, the Borough contained about 2,000 listed buildings, six conservation areas within or adjoining the town centre and 35 village conservation areas. There are 28 Scheduled Ancient Monuments and parks and gardens of historical value including Mote Park, Grade II on the English Heritage register of Historic Parks⁶⁵.
- 6.8.8 Maidstone town is home to Mote Park, a Grade II English Heritage listed park, as well as a number of other parks including the newly created Whatman Millennium Park and two Millennium Greens.
- 6.8.9 Maidstone's Green Space Strategy highlights that some areas in the Borough have a low provision of green space. In addition, a lack of key linkages of green spaces to create linear walkways, green and wildlife corridors, and failing recreational infrastructure due to neglect and lack of expenditure have also been identified as issues. The standard of green space quality is said to be variable, with some areas having limited variety and interest. Future threats include lack of funding and a lack of forward planning to meet the demands of users⁶⁶.
- 6.8.10 In terms of heritage at risk, the 2014 Historic England Risk Register identifies Maidstone as having 12 'assets at risk'. This includes two conservation areas and two Grade I listed buildings/place of worship, All Saints Church in Ulcombe and Parish Street church of All Saints on Mill Street.
- 6.8.11 The assets on the Risk Register are mostly in poor or very bad condition. Whilst there are no priority A risks (the highest priority), most of the assets are priority C. Priority C means there is slow decay, with no solution agreed.
- 6.8.12 There has been some improvement from the 2013 Risk Register, with the Dovecotes at Leeds Priory, being downgraded in risk from a B to a C, however there have been worsening conditions at Boxley Abbey Barn and The Dairy at Cobham Hall which has seen their priority rise from an E to a C over the same period⁶⁷.

Land use

- 6.8.13 The Borough contains substantial areas of high grade agricultural land and areas of Grade 1 (highest quality) extend along the Medway Valley to the west of Maidstone town.
- 6.8.14 **Figure 6.6** illustrates the agricultural land classification for Maidstone, showing considerable areas of Grade 1, Grade 2 and Grade 3a (Collectively referred to as 'best and most versatile agricultural land'), in the countryside and surrounding settlements across the borough. Given the widespread nature of agricultural land it is likely to come under pressure from development⁶⁸.

⁶⁵ Maidstone Borough Council (2014) Annual Monitoring Report 2012/13 [online] available at http://www.maidstone.gov.uk/_data/assets/pdf_file/0011/49736/Annual-Monitoring-Report-2012-13.pdf

⁶⁶ Maidstone Borough Council (2005) *The Maidstone Green Spaces Strategy* [online] available at: www.maidstone.gov.uk/pdf/0507green_spacesstrategy.pdf

⁶⁷ Historic England (2014) Heritage at Risk Register 2014 [online] available at <https://content.historicengland.org.uk/images-books/publications/har-2014-registers/se-HAR-register-2014.pdf/>

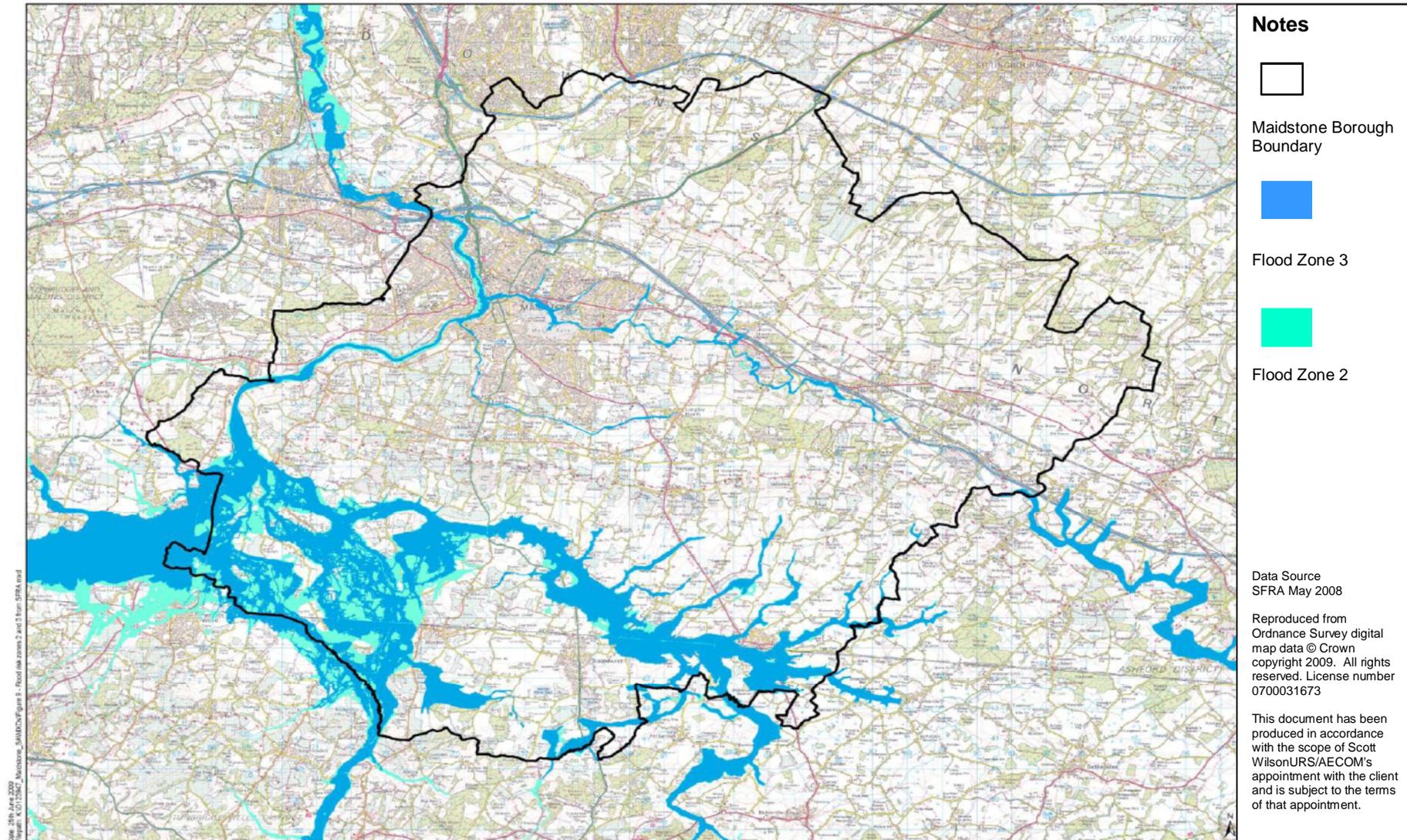
⁶⁸ *Detailed agricultural land studies have been undertaken for some parcels of land that demonstrate land is different to that identified in the broad ACL classification. Site proformas identify where this is the case.*

6.9 Flood Risk

- 6.9.1 According to Maidstone's SFRA (2008)⁶⁹ there are areas in Maidstone at risk from frequent flooding as they are located in the functional floodplain of the River Medway, River Len, River Loose and their tributaries. As **Figure 6.7** shows, flood risk is particularly high in the southwest of the Borough and there is some flood risk through Maidstone town, along river courses.
- 6.9.2 The SFRA indicates that the majority of flood risk from watercourses within Maidstone is from fluvial flooding, although there is some risk of tidal flooding in the vicinity of Allington.
- 6.9.3 The SFRA includes information on historical floods: the centre of Maidstone was flooded both in the November 1960 and September 1968 floods. 70 people were also affected by the floods in Maidstone in October 2000. Other flood incidents have been isolated fluvial flooding in Maidstone Town and incidents due to blockages in the river channel, causing backing up of water. There have also been a few isolated incidents of surface water flooding throughout Maidstone Town.
- 6.9.4 In terms of surface water flooding incidents in Maidstone, the SFRA highlights that these are very localised and have occurred in several areas across the Borough, but particularly in the South. This is due to the geology of the area which has low permeability and slow infiltration rates. The SFRA also reported that surface water flooding throughout the Borough has mainly been caused by the blockage of gullies and ditches leading to insufficient drainage and ponding of water.
- 6.9.5 The findings of the SFRA indicate that incidents of sewer flooding are more prominent in urban areas where there is a higher density of sewers and more water being discharged into the sewer system, although localised incidents of sewer flooding in rural areas have also been reported. Sewer flooding has been caused due to insufficient sewer capacity, as well as blockages in the sewer system.
- 6.9.6 The SFRA (2008) will be supplemented with an update once the latest modelling has been received from the Environment Agency.

⁶⁹ Maidstone Borough Council (2008) *Strategic Flood Risk Assessment* [online] available at: [http://www.digitalmaidstone.co.uk/pdf/080714_MaidstoneBC_SFRA_FINAL_May08%20\(amended\).pdf](http://www.digitalmaidstone.co.uk/pdf/080714_MaidstoneBC_SFRA_FINAL_May08%20(amended).pdf)

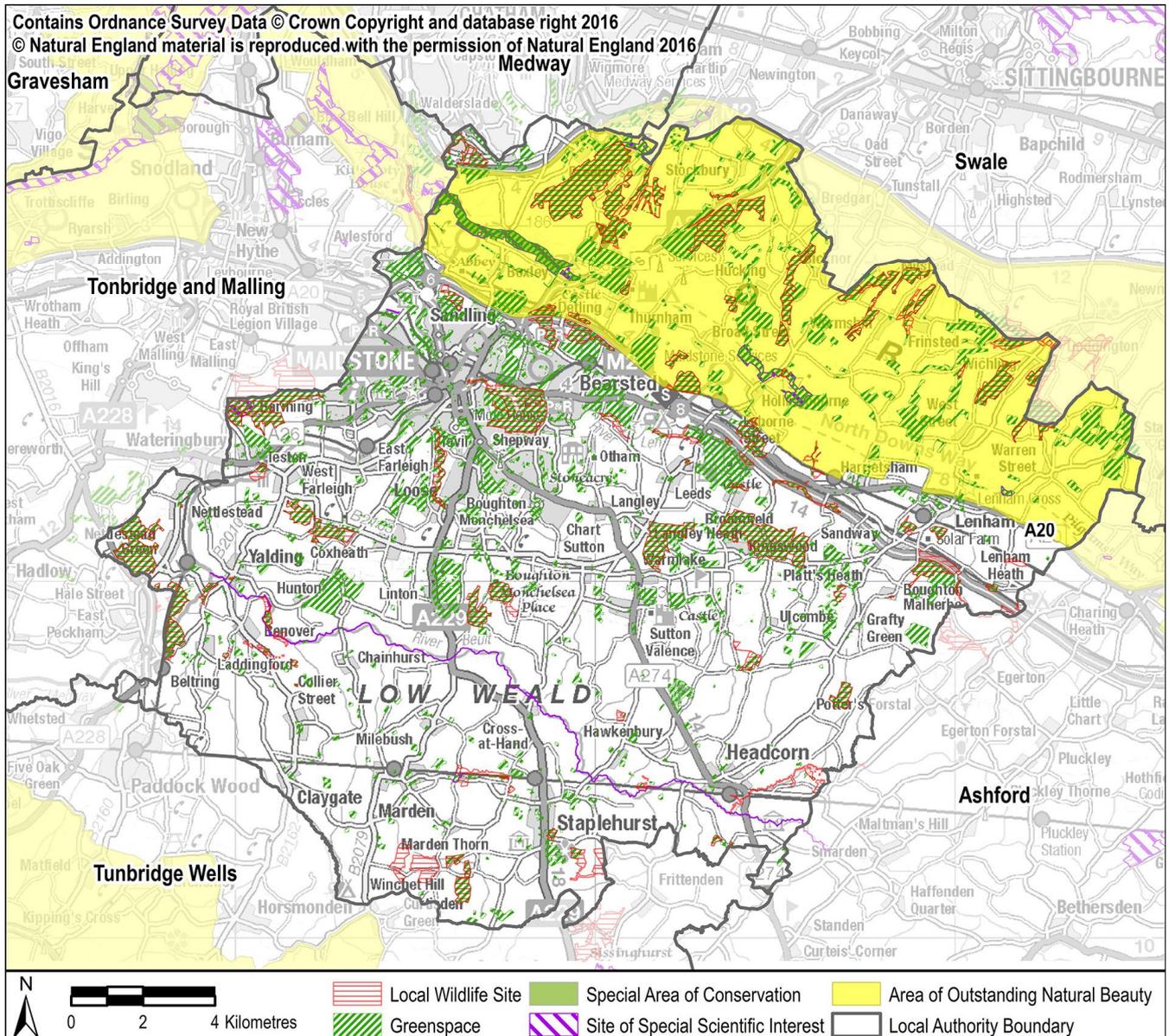
Figure 6.7: Fluvial flood risk in Maidstone Borough



Biodiversity

- 6.9.7 The spatial distribution of habitat designated as being of European or National importance is shown in **Figure 6.8** below, which also illustrates local wildlife sites and greenspace.

Figure 6.8: Environmental designations



- 6.9.8 The AMR for Maidstone Borough states that much of the Boroughs rural area contains high quality landscape and is rich in biodiversity. Indeed, 27.25% of the Boroughs total area is AONB, 0.35% SAC, 0.69% SSSI and 5.75% Local Wildlife Sites. There are also 34 roadside verges of nature conservation interest and three Local Nature Reserves (Bell Lane, Vinters Valley Park and Boxley Warren), with further LNR designations being pursued by MBC at Fant Wildlife, Bredhurst Wood, Sandling Park, Horish Wood, Admiral and Gorham Wood. The River Len reserve is currently an informal reserve which will be formally declared as an LNR in the future.

- 6.9.9 North Downs Woodlands to the west of the district is a Special Area of Conservation (SAC) comprising of dry grassland steppes (14%), broad-leaved deciduous woodland (63%) and coniferous woodland (23%). The site was primarily designated due to the presence of *Asperulo-Fagetum* beech forests and *Taxus baccata* yew woods on steep slopes. Queendown Warren SAC lies on the northern border of Maidstone Borough. The district also contains five Local Nature Reserves (LNRs) (Boxley Warren, Vinters Valley Park, Len Valley, Fant and Bell Lane), 2 Country Parks (White Horse Wood and Teston Bridge) and three Millennium Greens (Allington, Collis and Hollingbourne).
- 6.9.10 A Maidstone Biodiversity Action Plan (BAP) has been drafted. The BAP proposes specific objectives and targets for safeguarding and enhancing Maidstone's natural environment. The plan identifies the following Habitat Action Plans (HAP):
- Lowland calcareous grassland;
 - Dry acid grassland;
 - Lowland meadows;
 - Lowland beech and yew woodland;
 - Wet woodland;
 - Wood pasture and parkland;
 - Lowland deciduous mixed woodland;
 - Traditional orchards;
 - Lowland heathland;
 - Ponds;
 - Rivers; and
 - Urban green spaces.
- 6.9.11 Maidstone is identified in the Kent BAP for a number of important wildlife habitats. Important natural features in Maidstone Borough include; almost a third of native yew and beech woodlands found in the county, river habitats, including the River Beult Site of Special Scientific Interest (SSSI), the River Medway and the River Len, Low Weald meadows, including Marden Meadow SSSI with its abundant orchids, the distinctive Low Weald landscape, with its small fields, hedgerows and ponds, woodland and grassland habitats on the chalk, Gault clay and Greensand and important geological sites, including Aylesford Quarry and Aylesford Pit⁷⁰.
- 6.9.12 Maidstone's Green Space Strategy highlights that some areas in the Borough have a low provision of green space. In addition, a lack of key linkages of green spaces to create linear walkways, green and wildlife corridors, and failing recreational infrastructure due to neglect and lack of expenditure have also been identified as issues.
- 6.9.13 The standard of green space quality is said to be variable, with some areas having limited variety and interest. Future threats include lack of funding and a lack of forward planning to meet the demands of users⁷¹.
- 6.9.14 In Maidstone 13 habitats are considered a priority within the Borough: all but one (Urban Green Space) are UK priority habitats. The majority of the Borough is covered by arable and horticulture land practices. However, Maidstone holds a large amount of Lowland Mixed Deciduous Woodland, a UK priority habitat. A large amount of calcareous grassland, representing 9% of the county resource is found in the Borough.

⁷⁰ Maidstone Borough Council and Maidstone Matters Partnership (2009) *Sustainable Community Strategy* [online] available at: http://www.digitalmaidstone.co.uk/community/community_strategy.aspx

⁷¹ Maidstone Borough Council (2005) *The Maidstone Green Spaces Strategy* [online] available at: www.maidstone.gov.uk/pdf/0507greenspacesstrategy.pdf

- 6.9.15 Reports predating the Maidstone LBAP identified habitat fragmentation as an issue for Kent and saw this being exacerbated by estimated changes in the distributions of species as predicted by climate change. However the Conservation Status Map developed in the LBAP indicates a large amount biodiversity action in the Borough is currently achieving connectivity of key UK priority habitats in a strategic and co-ordinated manner⁷².
- 6.9.16 Through environmental stewardship schemes run by Natural England (NE) and the Forestry Commission (FC) a significant area of Maidstone is currently managed to promote biodiversity.

⁷² Maidstone Borough Council (2011) – *Local Biodiversity Action Plan* available [online] at www.maidstone.gov.uk/pdf/1.%20Intro%20&%20Background.pdf (accessed 05/2013)

7 WHAT'S THE BASELINE PROJECTION?

7.1.1 Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might 'evolve' in the future under the no plan / business as usual scenario. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide 'benchmarks' for the appraisal of significant effects. The following is a summary:

Community wellbeing

7.1.2 The ageing population could put increasing pressure on health and other services. Whilst the Borough is likely to remain relatively prosperous in comparison to the Kent and British average the already disadvantaged areas may continue to suffer current or increasing levels of deprivation across all indicators. A concern is the issues affecting young people in the deprived areas in the Borough which are also likely to increase in response to higher levels of deprivation. These include high numbers of teenage pregnancies, high number of 16 to 18 year olds who are not in education, employment or training and high number of young offenders.

7.1.3 The incidence of road accidents and deaths is already high and is likely to be a priority within the Maidstone Integrated Transport Strategy which is currently being updated.

The Economy

7.1.4 Drawing from the Maidstone Economic Strategy a number of threats and opportunities have been identified to the economy that help to forecast the future baseline. .

Opportunities

- The working age population is forecast to grow.
- Strong base of entrepreneurs to further develop
- Higher education capacity is likely to improve, with a focus on health-related opportunities relating to the Kent Medical Campus and the UCA provision at Maidstone Studios

Threats

- Decreasing proportion of the population in the 30-59 age band.
- Major growth proposals in neighbouring local authority areas could provide competition.
- Competition from established locations for 'value added' sectors
- The dominance of Kings Hill in the regional office market could continue.

Housing

7.1.5 The demand for affordable housing is likely to increase due to the projected increase in population, exacerbating the already existing difference between affordable housing demand and supply (the first exceeding the second). The trend towards an ageing population would mean that there will be an increased shortage of housing appropriate for elderly and disabled people.

Transport and Accessibility

- 7.1.6 In the future it may be expected that the combination of continuing population growth and existing approaches to planning for transport infrastructure would probably worsen transport problems in the Borough such as congestion and accessibility. This would hinder access to services and facilities.
- 7.1.7 The impacts upon the local economy from poor transport infrastructure could be adverse. Without adequate transport measures in place to support an increasing population and the business community, in particular necessary transport links with London and neighbouring areas, local business could suffer and inward business investment in the Borough could be discouraged.

Air and the causes of climate change

- 7.1.8 Research suggests that background air quality throughout the UK will improve significantly by 2020 primarily as a result of tightening Euro emission standards for cars and lorries and cleaner energy generation⁷³.

Water resources and quality

- 7.1.9 Climate change is likely to lead to both less water being available in hot summers, and people wanting to use more water during those times. **Figure 7.1** shows predicted reductions in summer rainfall to about 2080⁷⁴; winter rainfall is expected to increase over time, but not as quickly as summer rainfall will decrease.
- 7.1.10 Water quality and quantity would be likely to be adversely affected by new development particularly in the absence of a plan that sets out the appropriate distribution and phasing of development to take into account infrastructure and environmental constraints.
- 7.1.11 **Figure 7.2** illustrates that even under 'medium' growth scenarios large parts of Maidstone would be in substantial deficit of water resources. Although this figure does not include consideration of improvements or efficiencies, it is reasonable to expect that water resource shortages will continue to be an issue for the South East of England.

⁷³ Grice, S. et al (2006) *Baseline projections of air quality in the UK for the 2006 review of the Air Quality Strategy*, report to Defra et al [online] available at: http://www.airquality.co.uk/archive/reports/cat16/0604041040_baselineprojectionsreport5.pdf and Grice, S. et al. (2007) *Updated projections of air quality in the UK for base case and additional measures for the Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007*, report to Defra et al [online] available at: http://www.airquality.co.uk/archive/reports/cat17/0707171116_newbaselineandadditionalmeasuresreport_v6.pdf

⁷⁴ UKCIP (2009) *Regional scenarios for the South East* [online] available at: http://www.ukcip.org.uk/index.php?option=com_content&task=view&id=177b

Figure 7.1: Percentage change in Summer Precipitation (UKCIP, 2009)⁷⁵

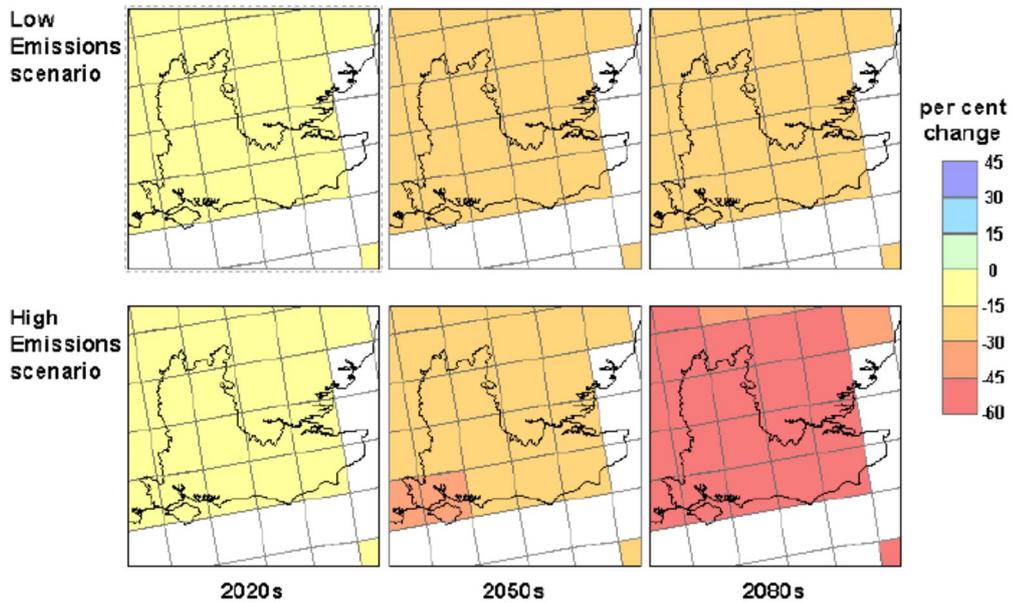
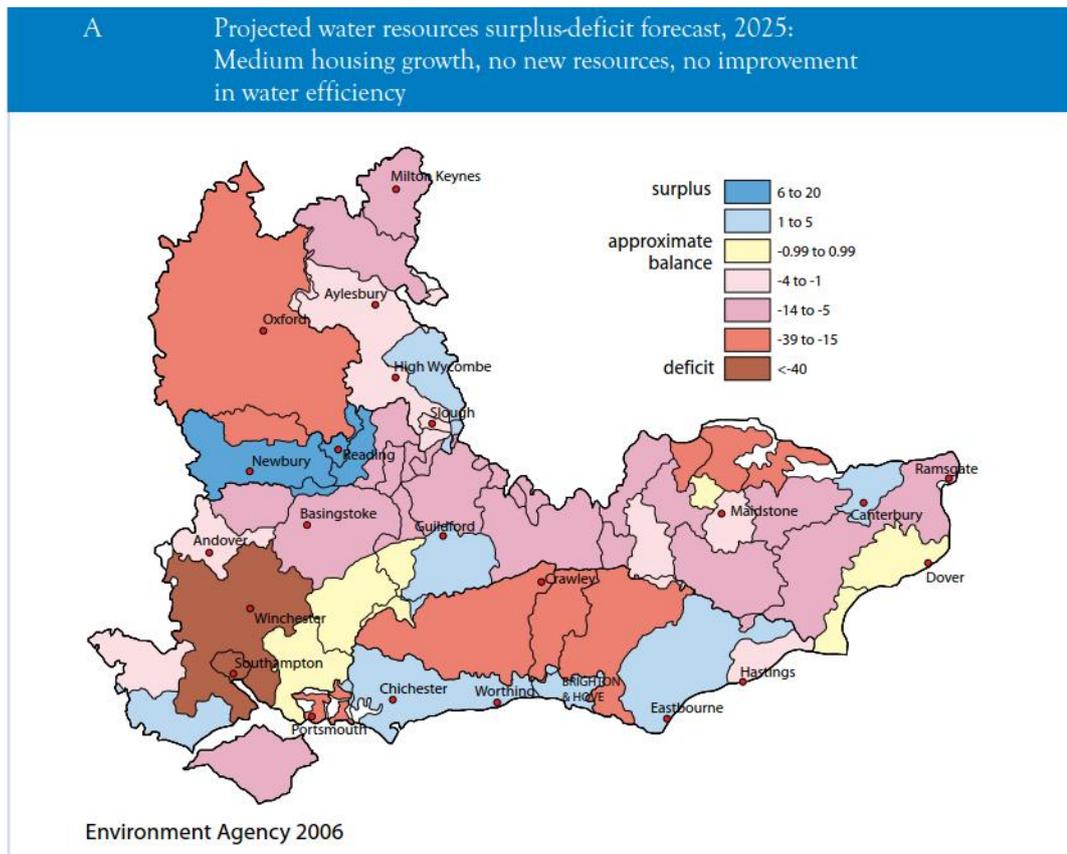


Figure 7.2: Protection surplus-deficit forecast for the South East of England, 2025



⁷⁵ UKCIP (2009) *Regional scenarios for the South East* [online] available at: http://www.ukcip.org.uk/index.php?option=com_content&task=view&id=177b

Land use, landscape and the historic environment

- 7.1.12 Maidstone is rich in landscape and historical assets. Without the plan, it is possible that inappropriate development may take place which could potentially affect these assets. Without the plan, it is also possible that many of the opportunities for historical buildings and areas to contribute towards regeneration may be lost.

Flood Risk

- 7.1.13 Flood risk is likely to increase in the future even if no further development took place in the South East region, due to the effects of climate change. Generally, rising sea levels will increase coastal flooding (although not a particular issue for Maidstone); and increased rain in the winter and stronger storm events will increase fluvial flooding. The Pitt Review concluded that flood risk will increase in the future: *“The scale of the problem is... likely to get worse... events of this kind are expected to become more frequent... climate change has the potential to cause even more extreme scenarios than were previously considered possible. The country must adapt to increasing flood risk”*.
- 7.1.14 For Maidstone specifically there is likely to be further frequent flooding in areas of Maidstone located along the River Medway (which has suffered from flooding in the past).

Biodiversity and Green Infrastructure

- 7.1.15 Development within the district may result in increased fragmentation and isolation of habitats. Climate change is also a key threat to the biodiversity of the Borough. The Borough of Maidstone may experience shifting habitat ranges, an increased risk to native wildlife and an increase in foreign (e.g. continental) biodiversity, beyond that which is already anticipated.
- 7.1.16 The green spaces strategy has identified local standards and inadequacies of provision of open space within the Borough. Without adequate measures set out within the Local Plan, it may be anticipated that this situation may not be reversed. The limited funds identified as available for green infrastructure would affect the ability for comprehensive coverage and thus targets for quantity and quality may not be reached for green space.

8 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

8.1 Introduction

8.1.1 Drawing on the review of the sustainability context and baseline, a range of sustainability issues have been identified that should be a focus of the SA. Sustainability issues are listed in Table 8.1 below for each of the sustainability topic headings that were used as the basis for scoping. These issues have helped to inform the SA objectives and sub-objectives that provide the methodological framework for appraising the draft plan (and reasonable alternatives).

Table 8.1: Sustainability issues and corresponding objectives (i.e. the SA framework)

Key issue	Maidstone Sustainability Objective	Guiding questions
<p>Population and household projections demonstrate that there is a significant demand for new housing over the plan period.</p> <p>There is a shortage of deliverable housing land in the short term, with only a 3.3 year supply being identified in the 2012/2013 AMR.</p> <p>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.</p>	<p>1. To ensure that the residents of Maidstone have the opportunity to live in a well-designed, sustainably constructed, decent and affordable home.</p>	<ul style="list-style-type: none"> • Will it improve the mix of dwelling sizes and tenures? • Will it increase the number / proportion of decent homes? • Will it improve the supply of affordable housing? • Will it address changes in future housing need? • Will it increase the supply of Lifetime Homes?
<p>SuDs should be an essential component of new developments.</p> <p>There is a need to ensure that new development can be accommodated by sewer and drainage infrastructure.</p>	<p>2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.</p>	<ul style="list-style-type: none"> • Will it limit development in the flood plain? • Will it reduce the number of properties affected by flooding incidents? • Will it employ the use of SuDS?
<p>There is a need to tackle poor air quality in Maidstone town centre.</p>	<p>3. To improve the health and well-being of the population and reduce inequalities in health.</p>	<ul style="list-style-type: none"> • Will it reduce rates of sickness and death? • Will it improve accessibility to local GP? • Will it reduce noise pollution? • Will it encourage healthy lifestyles, including travel choices?
<p>There are areas of deprivation in the borough that experience higher levels of crime, poor health, educational achievement and unemployment.</p> <p>There is a need to regenerate Maidstone town centre and combat deprivation.</p>	<p>4. To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest.</p>	<ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas most affected? • Will it reduce the number of households in fuel poverty? • Will it reduce the number of households with no central heating? • Will it reduce the number of children living in low income Households?

Key issue	Maidstone Sustainability Objective	Guiding questions
Some schools in the borough perform poorly.	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.	<ul style="list-style-type: none"> • Will it increase the numbers of school-leavers achieving GCSE passes? • Will it increase numbers undertaking further and higher education? • Will it enhance opportunities for adult education? • Will it encourage training opportunities for higher quality employment?
Crime and perceptions of crime is more prevalent in deprived communities.	6. To reduce crime and the fear of crime	<ul style="list-style-type: none"> • Will it reduce actual levels of crime? • Will it reduce the fear of crime, esp. among vulnerable individuals / communities? • Will it aid in adopting Safer by Design technologies?
There is a need to support the development of social capital.	7. To create and sustain vibrant, attractive and clean communities.	<ul style="list-style-type: none"> • Will it increase the ability of people to influence decisions? • Will it encourage engagement with community activities? • Will it increase opportunities for consultation?
There is a lack of viable alternatives to the car. There is a need to support active modes of travel.	8. To improve accessibility to all services and facilities.	<ul style="list-style-type: none"> • Will it improve access for the disabled? • Will it improve accessibility to health, education, shopping and leisure? • Will it enhance community and public transport?
There is a need to maintain and enhance access to and engagement in cultural activity, especially from deprived communities.	9. To encourage increased engagement in cultural activity across all sections of the community in the Borough.	<ul style="list-style-type: none"> • Will it increase the numbers involved in cultural activities? • Will it increase the number of cultural enterprises organisations in the Borough?
Maidstone contains significant areas of best and most versatile agricultural land; much of which is adjacent to settlements, and at risk of development.	10. To improve efficiency in land use.	<ul style="list-style-type: none"> • Will it use land that has been previously developed in preference to Greenfield? • Will it re-use buildings and materials? • Will it protect and enhance the best and most versatile agricultural land?

Key issue	Maidstone Sustainability Objective	Guiding questions
<p>Congestion is an issue in the Maidstone urban area.</p> <p>Access to services and public transport in rural areas needs to improve.</p>	<p>11. To reduce road congestion and pollution levels and ensure air quality continues to improve.</p>	<ul style="list-style-type: none"> • Will it improve air quality? • Will it reduce other forms of pollution such as light pollution? • Will it improve travel choice? • Will it reduce the need for travel by car / lorry? • Will it reduce the need to travel for long distances? • Will it reduce the need to travel for commuting?
<p>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.</p> <p>Climate change is forecast to lead to hotter, drier summers that will exacerbate water shortage issues and affect water quality.</p> <p>Wetter weather could also increase the risk and severity of flooding.</p>	<p>12. To address the causes of climate change and ensure that the Borough is prepared for its impacts.</p>	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases? • Will it reduce traffic volumes? • Will it encourage travel by means other than the car? • Will it assist in preparing the Borough for impacts of climate change? • Will it assist in new homes meeting the BREEAM standards?
<p>There is a need to protect and enhance areas of importance for biodiversity.</p> <p>Water courses have particular value for biodiversity and amenity, and should be conserved and enhanced.</p> <p>Standards for green space are not being met – there is a need to strengthen the network of green infrastructure, using development contributions where possible.</p>	<p>13. To conserve and enhance the Borough's biodiversity and geodiversity.</p>	<ul style="list-style-type: none"> • Will it protect sites designated for nature conservation interest? • Will it help achieve Biodiversity Action Plan targets?

Key issue	Maidstone Sustainability Objective	Guiding questions
<p>There is a need to protect valued and importance landscapes, heritage assets and their setting.</p> <p>The AONB is sensitive to change and should be protected from development.</p> <p>There are a number of sensitive landscapes of Local Value identified across the Borough.</p> <p>There is a need to protect and enhance the condition and setting of heritage assets.</p>	<p>14. To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment.</p>	<ul style="list-style-type: none"> • Will it protect or enhance sites, features of areas of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled monuments)? • Will it enhance, protect and make accessible for enjoyment the Borough's water environment? • Will it create vibrant, multifunctional countryside in and around towns? • Will it protect and enhance the historic environment within built-up areas? • Will it protect and enhance open spaces of amenity and recreational value? • Will it maintain and enhance the character of landscape and townscape?
<p>There are positive trends in waste recycling, composting and reuse that should be maintained.</p> <p>Minimising the amount of waste generated and sent to landfill will remain a priority.</p>	<p>15. To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste.</p>	<ul style="list-style-type: none"> • Will it reduce household and other forms of waste? • Will it increase waste recovery and recycling? • Will it encourage waste treatment locally? • Will it increase opportunities for domestic recycling?
<p>Maidstone is located in a water scarce area, which will be exacerbated due to climate change and future growth and development</p> <p>There is a need to improve the water quality of Maidstone's water courses in line with the Water Framework Directive requirements</p>	<p>16. To achieve sustainable water resources management.</p>	<ul style="list-style-type: none"> • Will it reduce water consumption? • Will it reduce the generation of wastewater? • Will it encourage the re-use of water? • Will it improve the quality of the Borough's rivers? • Will it improve the quality of the Borough's groundwater?
<p>There is a need to increase the installed capacity of low carbon energy generation.</p> <p>The energy efficiency of new development will need to improve to contribute to carbon emissions reduction targets.</p>	<p>17. To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough.</p>	<ul style="list-style-type: none"> • Will it increase the proportion of energy needs being met from renewable sources? • Will it reduce the demand for energy?

Key issue	Maidstone Sustainability Objective	Guiding questions
<p>There is a need to encourage new business creation particularly those which may lead to specialisation of the economy and innovation.</p>	<p>18. To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough.</p>	<ul style="list-style-type: none"> • Will it ensure high and stable levels of employment? • Will it promote 'conditional growth' (balancing growth with housing provision and investment in social infrastructure)? • Will it stimulate economic revival in priority regeneration areas? • Will it increase provision of better quality jobs /skilled employment? • Will it ensure the correct mix of skills to meet the current and future needs of local employers? • Will it encourage the development of a buoyant, sustainable tourism sector?

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

9 INTRODUCTION (TO PART 2)

9.1.1 The ‘story’ of plan-making / SA up to this point is told within this Part of the SA Report. Specifically, this Part of the SA Report describes how, prior to preparing the Pre-Submission Local Plan, there has been an appraisal of reasonable alternatives addressing a range of plan issues; and precisely how the Council took account of these ‘interim’ SA findings.

9.2 Alternatives for what?

9.2.1 The SEA Regulations⁷⁶ are not prescriptive, stating only that the SA Report should present an appraisal of the ‘*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme*’.

9.2.2 In practice, local authorities in England tend to consider reasonable alternatives for... “*a reasonable range of the issues addressed through plan-making*”.

9.2.3 This Chapter describes how, as an interim plan-making / SA step, reasonable alternatives were considered for the following plan issues:

- Strategic approach to housing growth
- Strategic approach to employment growth
- Site allocations for housing and employment
- Broad locations for future housing growth
- Site allocations for Gypsy and Traveller plots
- Sustainable travel options
- Other plan issues

9.3 Structure of Part 2

9.3.1 Each plan issue is assigned a chapter below. Each chapter is structured as follows:

- Background

This section outlines why alternatives have been considered for this plan issue and sets out how the Local Plan has evolved and how this has influenced the selection of alternatives. Where appropriate, there is also a discussion of related issues for which alternatives have not been considered

- What are the reasonable alternatives?

This section outlines the reasonable alternatives that have been appraised. Where appropriate, there is also a discussion of other alternatives that have not been considered.

- Why has the preferred approach been selected?

This section presents the Council’s rationale for selecting the preferred approach and rejecting reasonable alternatives. As part of the answer to this question an explanation is given as to how the selection of the preferred approach reflects the findings of SA.

⁷⁶ Environmental Assessment of Plans and Programmes Regulations 2004

10 STRATEGIC APPROACH TO HOUSING GROWTH

10.1 Background

10.1.1 The choice of a broad approach to housing growth is one of the most important decisions made through the Local Plan. Hence, it is important that the Council's preferred approach is justified by a robust evidence-base. In light of this, it was considered important to subject alternative approaches to SA.

10.2 Evolution of the Local Plan options

Issues and options

10.2.1 Preparation of Maidstone Borough Council's Core Strategy began in 2006 when the Council sought the public's views on local issues and options through a series of café conversations⁷⁷. Following the public response, 12 draft spatial development scenarios were developed.

10.2.2 Three broad distribution patterns were presented: 'Urban-led', 'edge of centre', and 'new rural settlement'. Each of these options was also divided into a further four growth options ranging from 8,200 to 15,000 households. An assumed number of jobs (based on a 1:3 ratio of jobs per household).associated with each option was also presented for each option. An appraisal of each option was undertaken and presented in an interim SA Report for Maidstone Preferred Options in 2007.

Preferred option 7C

10.2.3 A Preferred Option (known as Option 7C) was presented for public consultation in 2007. Option 7C was an edge of centre and urban regeneration led approach that included a dwelling target of 10,080 houses for the plan period between 2006 and 2026. At that time in 2007, a total of 3,000 dwellings had been built or were in the pipeline; the focus of development was in a single strategic development area of 5,000 dwellings together with a strategic link road to serve it; and the balance of housing was located within and adjacent to the urban area and larger villages. To balance housing growth with employment opportunities and to increase prosperity, Option 7C also identified a need to provide for at least 10,000 new jobs in a range of sectors and locations.

10.2.4 Option 7C was developed within the context of an emerging South East Plan, an adopted Kent and Medway Structure Plan and national policy that focused on the redevelopment of brownfield sites at high densities. The Preferred Option was subject to public consultation in January 2007, and was supported by 56% of respondents to the consultation.

10.2.5 Following consultation on Option 7C in 2007, the Core Strategy programme was delayed while the Council gathered a considerable amount of evidence to respond to a representation (*and subsequent planning application*) seeking land at junction 8 of the M20 motorway for a strategic rail freight interchange allocation. The Council ultimately rejected the representation, and the planning application was subsequently dismissed at appeal.

10.2.6 The Core Strategy programme restarted in June 2009 with a review of the evidence base and changes that had occurred since 2007. Across the UK changes to the economic climate had generally affected the deliverability of housing and associated infrastructure needed to support new development, and there were further changes as to how new development and supporting infrastructure could be funded. The revision of Planning Policy Statement 12 (creating strong safe and prosperous communities through Local Spatial Planning) in 2008 and the publication of guidance on the tests of soundness by the Planning Inspectorate placed a greater emphasis on ensuring Core Strategies were deliverable. New plan making regulations were also introduced in 2008 and 2009.

⁷⁷ The Café Conversations were a series of public consultation events held at various locations around Maidstone over one week in February 2006.

- 10.2.7 The regional spatial strategy (South East Plan) was published in May 2009, which superseded the Kent & Medway Structure Plan (2006). Dwelling completions and outstanding planning permissions had risen from 3,000 units in 2007 to 5,800 units in 2010 and there was further potential for 1,770 units comprising identified brownfield sites and a windfall allowance, resulting in a need to find greenfield land for 3,230 units at 1 April 2010. By contrast, greenfield sites for 7,000 dwellings were required in 2007: (5,000 dwellings were to be focused in a single strategic development area supported by a strategic link road, the balance of 2,000 units distributed around the urban area and at the larger villages). By 2010 development of a strategic development area would not commence until the latter part of the Core Strategy plan period and, given expected build rates, only about 2,600 homes could be built by 2026 (as opposed to 5,000 previously).
- 10.2.8 These changes, coupled with the fact that development that had been built or granted planning consent since 2006 could not contribute towards new infrastructure; cast doubts on the delivery of Preferred Option 7C.
- 10.2.9 The Council concluded that a strategic link road of an acceptable design (alignment and length) could not be adequately funded within the plan period to 2026 because of the need for a wide range of infrastructure (identified through the Infrastructure Delivery Plan) to support new housing, employment and other development. The concentration of 2,600 homes in one location without a link road would have an unacceptable impact on congestion and air quality. Additional evidence also demonstrated that a single large strategic development area to the south east of the urban area would have a negative impact upon the historic and wildlife-rich landscape in this vicinity. The absence of funding for the strategic link road to serve 5,000 dwellings, coupled with the adverse impact 2,600 homes would have on the area without such a link, meant Option 7C was no longer considered deliverable; so the Core Strategy would be found unsound.
- Moving on from Option 7C
- 10.2.10 Following the restart of the Core Strategy programme (June 2009), the Council focused on updating the evidence base and reviewing local issues that the Core Strategy needed to address, such as providing for gypsy and traveller accommodation, defining the rural service centres, and town centre regeneration. The draft vision and objectives for the Core Strategy were considered by Members in June 2010. By that time, the government had signalled its intention to revoke regional strategies but the new plan making system had yet to be outlined and primary legislation introduced.
- 10.2.11 In July 2010 the Secretary of State for Communities and Local Government attempted to revoke regional strategies (and the associated housing targets) and advised local planning authorities to continue to develop Core Strategies, reflecting local peoples' aspirations and decisions on important issues. Where development plan documents were being prepared, local planning authorities could decide to review or revise their emerging policies in the light of the revocation, whilst ensuring that the requirements for soundness and other policy requirements under current legislation are met.
- 10.2.12 Maidstone Borough Council responded by agreeing to progress its Core Strategy, and to review the appropriate housing target and the implications of any change to the strategy; to consider a locally derived local Gypsy and Traveller figure; and to undertake a review the gaps that would be created by the revocation of the South East Plan. The action to revoke regional strategies was subsequently challenged and, following a judicial review, the Secretary of State's decision of the 6 July was quashed on the 10 November 2010 by the High Court. Consequently the South East Plan remained part of the development plan for Maidstone until the revocation of regional strategies could be pursued through the Localism Act.

10.2.13 However, given the work that had been undertaken on option testing, which had had regard to the range of South East Plan policies, in February 2011, Members agreed to undertake public consultation on a local housing target of 10,080 dwellings in a dispersed distribution of development for the period 2006 to 2026.

Consideration of strategic sites and responding to the NPPF

10.2.14 Following consultation on the draft Core Strategy in September 2011, a number of issues were raised which called for allocation of strategic sites in the Core Strategy. The National Planning Policy Framework (NPPF) was also published, which encourages the inclusion of strategic development allocations in local plans. Consequently, the Council resolved to allocate sites within the strategic locations identified on a draft key diagram and to undertake a further partial public consultation on the Core Strategy. Another public consultation followed in August 2012 that set out the council's preferred strategic site allocations.

10.2.15 At the time of preparing the preferred site allocations for the Core Strategy, the Council was working towards a housing target of 10,080 dwellings over the plan period 2006-2026. However, in November 2012, following the introduction of the NPPF, Cabinet agreed to delay the plan making programme and to undertake the following tasks:

- Update demographic and economic demand data;
- Commission a new Strategic Housing Market Assessment (SHMA);
- Produce new Strategic Housing and Employment Land Availability Assessments (SHLAA and SEDLAA);
- Amalgamate the Core Strategy with the Development Delivery DPD into a single Maidstone Borough Local Plan; and
- Roll forward the plan period from 2006-2026 to 2011-2031 to ensure the council has a 15-year plan from the date of its adoption in accordance with the requirements of the NPPF.

10.2.16 The demographic and economic demand data was subsequently updated to reflect the new plan period. The results indicated that the Core Strategy targets were too low and raised severe concerns that the plan would not be found sound at examination. Therefore, in March 2013 Cabinet agreed an interim housing target of 14,800 dwellings for the period 2011-2031. This target was based on a ten year migration trend taken from the latest DCLG projections.

Alternatives appraised at draft Local Plan stage

10.2.17 Following Cabinet agreement of a housing target of 14,800 dwellings, the SHMA (*prepared jointly with Ashford Borough Council and Tonbridge and Malling Borough Council*) was updated. The SHMA was produced using the National Planning Policy Guidance methodology and all previous housing targets were superseded by an objectively assessed need of 19,600 dwellings for Maidstone.

10.2.18 Although the Council had already undertaken appraisals of a range of scale and distribution options (and consulted upon these), it was considered necessary to establish a 'new' set of reasonable alternatives to reflect the updated evidence (higher housing need) and policy context. However, the alternatives identified at this stage were developed in the context of the preferred approaches that had already been presented and agreed earlier in the Local Plan development process.

- 10.2.19 To assist in the identification of the necessary sites that would likely to be allocated under each option, the council also carried out a fresh borough-wide 'call for sites' exercise in December 2013. Each site was subject to sustainability appraisal using a site appraisal methodology. This allowed an element of 'bottom-up' information to be utilised alongside the 'top-down' strategic approach.
- 10.2.20 Six strategic alternatives were tested in the SA and the findings were presented in an interim SA Report, which accompanied the draft Local Plan consultation in March 2014. These alternatives are outlined briefly in Table 10.1 below.

Table 10.1 Reasonable alternatives tested prior to consultation on the draft Local Plan

Alternatives	Scale	Urban extensions	Broad locations	Rural centres and other settlements
Alt 1	19,600	South-east and north-west	Town centre / Maidstone Barracks / Lenham	Higher number of dwellings in rural centres to meet full OAHN.
Alt 2	19,600	South-east and north-west plus a 'new settlement'	Town centre / Maidstone Barracks / Lenham	Lower levels of growth at rural centres and other settlements.
Alt 3	17,100	South-east and north-west	Town centre / Maidstone Barracks / Lenham	Lower levels of growth at rural centres and other settlements compared to Alt 1.
Alt 4	17,100	South-east and north-west plus a 'new settlement'	None	Dispersed approach, so higher growth in these areas compared to Alt 3. Significant growth in Staplehurst.
Alt 5	14,100	South-east and north-west	None	Similar distribution and scale of growth as Alt 3.
Alt 6	14,100	South-east and north-west plus a 'new settlement'	None	Similar distribution to Alt 3, but lower levels of growth in the urban areas and rural centres.

- 10.2.21 The SA findings presented in the interim SA Report found that Alternative 3 was the best balanced; despite the likelihood of adverse effects on the character of the landscape and countryside, Alternative 3 was predicted to be the most appropriate approach - in that it would not have a significant negative effect on social and economic factors, yet had the least adverse effects on the character of the landscape and countryside compared to the other alternatives.

- 10.2.22 The Council's preferred approach at this stage was broadly reflective of Alternative 3 and was identified as the preferred spatial strategy in the draft Local Plan.

Further updates to the evidence

- 10.2.23 Following consultation on the draft Local Plan in March 2014, the evidence underpinning the Local Plan has developed further. Key updates that have influenced the latest iteration of the Plan are listed below.

- The objectively assessed housing need has been established at 18,560 dwellings in the period 2011-2031⁷⁸

⁷⁸ Strategic Housing Needs Assessment Update (June, 2015)

- The range of potential sites for development has increased, with further rounds of SA and public consultation on further housing site options.
- Detailed technical studies have been undertaken as follows:
 - A Landscape Capacity and Sensitivity Study;
 - Additional Agricultural Land Classification Surveys to supplement the existing information; and
 - Transport modelling to consider future growth and congestion as well as potential measures to address this.

10.2.24 In light of these updates, it has been necessary to re-examine the reasonable alternatives for the spatial strategy to ensure that they remain valid and relevant. This is discussed in section 10.3 below.

10.3 What are the reasonable alternatives?

10.3.1 This section sets out the reasonable alternative approaches identified by the Council for delivering the spatial strategy for Maidstone.

10.3.2 As outlined in the previous section, there have been several appraisals of options/alternatives as the Local Plan has developed and the evidence has evolved. These alternatives and appraisal findings are relevant as they have helped to shape the spatial strategy to date. However, given that the evidence has changed, it is sensible to review the reasonable alternatives to ensure that they remain valid and comprehensive.

10.3.3 Of particular relevance are those alternatives considered at the last formal stage of plan making (i.e. the draft Plan Consultation in March 2015). Therefore, as a starting point, the six alternatives presented in the interim SA Report have been examined to determine whether they remain relevant and should be taken forward to the next stage of appraisal.

Table 10.2 Re-examining existing alternatives.

	Scale	Discussion
Alt 1	19,600	These alternatives represent the former objectively assessed housing need identified at 19,600 dwellings. It is considered reasonable to keep these alternatives in the appraisal at this stage as they represent the delivery of a slightly higher housing target compared to the OAHN of 18,560. These alternatives therefore represent approaches that would allow for a greater range of housing choice and flexibility to ensure the OAHN was met.
Alt 2	19,600	
Alt 3	17,100	The Council do not consider these alternatives to be reasonable as they would fall short of achieving the objectively assessed housing needs of 18,560 dwellings. There is insufficient evidence to support a strategy that fails to meet housing needs.
Alt 4	17,100	
Alt 5	14,100	The Council do not consider these alternatives to be reasonable as they would fall well short of achieving the objectively assessed housing needs of 18,560 dwellings that the Council has resolved to meet. There is insufficient evidence to support a strategy that fails to meet housing needs to such an extent.
Alt 6	14,100	

10.3.4 For the reasons identified in table 10.2, only alternatives 1 and 2 are considered to be reasonable alternatives to carry forward to the next stage of appraisal.

10.3.5 Given that none of the alternatives discussed above explicitly cover the objectively assessed need of 18,560, it has been considered useful to establish 'new' alternatives that reflect this updated target.

Relationship to job creation

- 10.3.6 The Strategic Housing Market Assessment (Updated 2015) tested an economic-led scenario i.e. how many new homes would be needed to house the associated increase in working age population that scenario of 14,400 jobs would generate. The SHMA highlighted that depending on the assumptions applied, this would generate a need for in the range of 15,780-18,560 new homes. The Council has resolved to meet the 18,560 dwellings, and therefore this level of housing is sufficient to meet the maximum jobs being planned for.
- 10.3.7 Table 10.3 below sets out the reasonable alternatives identified at this stage taking account of all the factors discussed above.

Table 10.3: The reasonable alternatives for housing

Reasonable alternatives	Rationale and assumptions
<p>H1 c19,600 dwellings. 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)</p>	<p>This alternative would exceed the objectively assessed need of 18,560 dwellings, by focusing dwellings in a dispersed pattern and, in the medium to longer term at broad locations. Exceeding OAHN would allow for greater choice and flexibility, but it is anticipated that development of this scale would be more likely to have significant adverse impacts on highly valued and sensitive landscapes.</p> <p>This alternative seeks to makes best use of, and build upon, existing infrastructure e.g. train stations, bus services, shops, schools, doctors surgeries. Improvements to existing infrastructure will be required in some areas. Improvements to existing infrastructure will be required in some areas although it is not anticipated that there would be any major infrastructure constraints to delivery during the Local Plan period</p> <p>Nevertheless, in order to achieve and exceed the objectively assessed need, and bearing in mind completions since 2011 and dwellings that are already in the supply (totalling 5,248), the sites allocated in this option would require the development of sub-optimal sites.</p>
<p>H2. c19,600 dwellings. 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.</p> <p>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.</p>	<p>This alternative would exceed the objectively assessed need, but would focus dwellings in a new settlement to the south east of the urban area as well as a reduced number of dwellings in a dispersed pattern, and in the medium to longer term, at broad locations.</p> <p>Exceeding OAHN would allow for greater choice and flexibility, but it is anticipated that development of this scale would be more likely to have significant adverse impacts on highly valued and sensitive landscapes.</p> <p>Development at a new settlement, was originally identified as part of the original preferred strategy '7C'. However, significant concerns about the deliverability of the scale of development and the necessary infrastructure led to this alternative being discarded. However, it was considered appropriate to reassess this alternative in the context of increased housing need identified in the updated SHMA.</p> <p>In order to achieve the objectively assessed need, and bearing in mind completions since 2011 and dwellings that are already in the supply (totalling 5,248), the sites allocated in this option would require the development of fewer sub-optimal sites (in rural service centres) compared to Alternative 1.</p>

Reasonable alternatives	Rationale and assumptions
<p>H3: c18,560 dwellings. 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.</p>	<p>Alternative H3 sets housing provision at 18,560 dwellings to meet objectively assessed housing needs in full. Outside of the urban area, dwellings are focused in a dispersed pattern (albeit fewer numbers) and, in the medium to longer term, at broad locations.</p> <p>This alternative seeks to makes best use of, and build upon, existing infrastructure e.g. train stations, bus services, shops, schools, doctors surgeries. Improvements to existing infrastructure will be required in some areas although it is not anticipated that there would be any major infrastructure constraints to delivery during the Local Plan period.</p>
<p>H4: c18,560 dwellings. 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).</p>	<p>Alternative H4 sets housing provision at 18,560 dwellings to meet objectively assessed housing needs in full. The strategy focuses dwellings in a new settlement to the south east of the urban area as well as in a dispersed pattern.</p> <p>This alternative would not require the provision of long term broad locations for housing development.</p> <p>In addition, the sites allocated in this option would require the development of some sub-optimal sites which significantly impact on highly valued and sensitive landscapes, congestion and air quality in the borough.</p> <p>Significant new infrastructure would be required in order to facilitate the development of a new settlement; the deliverability of which is questionable.</p>
<p>H5: c18,560 dwellings. 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 (<i>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</i>)</p>	<p>Alternative H5 sets housing provision at 18,560 dwellings to meet objectively assessed housing needs in full. Outside of the urban area dwellings would be focused in a dispersed pattern and at a higher level than proposed under alternatives H4 and H5 (Given that there would be no broad location at Lenham).</p> <p>This alternative seeks to makes best use of, and build upon, existing infrastructure e.g. train stations, bus services, shops, schools, doctors surgeries. Improvements to existing infrastructure will be required in some areas although it is not anticipated that there would be any major infrastructure constraints to delivery during the Local Plan period.</p>

10.4 Unreasonable alternatives

10.4.1 The Council has considered a range of alternative approaches to the spatial strategy as the plan has been prepared. A number of alternatives were discarded as 'unreasonable' and therefore a detailed appraisal in the SA was not deemed necessary. These alternatives are discussed below:

Increased dispersal to the rural service centres (As per H5) and all three broad locations (meaning less growth in the Maidstone urban area at strategic extensions).

10.4.2 This alternative was rejected primarily as it would direct growth away from the principal town in the settlement hierarchy (i.e. Maidstone), and therefore not contribute to a key Plan objective relating to the regeneration of the Maidstone urban area.

A new settlement to the South East of Maidstone and two or three broad locations for growth (meaning less growth at the Rural Service Centres and within the Maidstone urban area)

10.4.3 This approach would place a large proportion of the housing provision at large strategic sites. This could make the delivery of housing in the short term more uncertain. Reducing the amount of housing delivered at Rural Service Centres could lead to a shortage of housing (especially affordable) in these areas, and could also see the role of these centres decline.

10.5 Why has the preferred approach been selected?

10.5.1 The Council's preferred approach is broadly reflective of Alternative H3. The council's rationale for selecting this approach is summarised below.

10.5.2 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.

10.5.3 The preferred approach focuses development at the most sustainable settlements and makes best use of brownfield sites.

10.5.4 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.

10.5.5 It provides a range and choice of sites in different locations – assisting deliverability – and provides affordable housing in areas of need throughout the borough.

10.5.6 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.

- 10.5.7 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.
- 10.5.8 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*
- 10.5.9 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.
- 10.5.10 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.
- 10.5.11 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.
- 10.5.12 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.
- 10.5.13 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.
- 10.5.14 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.

- 10.5.15 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.
- 10.5.16 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.
- 10.5.17 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
- 10.5.18 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.
- H5 is predicted to have more negative effects on landscape across the borough, whilst H3 would have more profound effects in Lenham.
 - H5 is predicted to have potential negative effects on education provision.
 - 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).

11 STRATEGIC APPROACH TO EMPLOYMENT DEVELOPMENT

11.1 Background

- 11.1.1 Local Authorities should identify the strategic priorities for the area in the Local Plan. This includes setting the direction for the economy including the amount and type of jobs to plan for and the best locations.
- 11.1.2 There is more than one approach Maidstone could focus on to form the economic strategy for the area. It is useful to start at a high-level to identify which broad approaches are most appropriate to achieve sustainable development.
- 11.1.3 The Issues and Options stage of the plan-making process involved evidence gathering through public consultation exercises called *Café Conversations* in February 2006 and a series of special events held for stakeholders including the Local Strategic Partnership, partnership organisations, local developers, local businesses and the Youth Forum.
- 11.1.4 Subsequently, a number of strategic options for employment 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:
- Option 1: Existing Trend: - *accept existing 'dormitory' trend of out commuting to work and allow this trend to grow. This may be achieved by not necessarily balancing housing and employment development*
- Option 2: Balance Housing / Jobs: - *seek to achieve a balance of housing and jobs through mixed-use developments and strategic location of housing within easy reach of existing employment hubs*
- Option 3: Develop Motorway Junctions: - *seek to develop sites around the motorway junctions to attract new business and jobs*
- Option 4: Local Higher Education: - *encourage more people to take up Higher and Further education locally by improving facilities and links with industry*
- 11.1.5 Options 2-4 received public support through consultation and had a mix of positive and negative impacts. Due to the lack of public support and poor performance against social and economic aspects of the sustainability appraisal framework, option 1 was rejected.
- 11.1.6 Alongside these broad options, 12 detailed growth scenarios were also appraised (as described in Section 10). Each of these options presented different levels of housing and employment growth for three different spatial strategies (urban-led, edge of centre, rural settlements). The level of employment growth ranged from 11,000 – 20,000 jobs. The ratio of houses to jobs was set at 1.3 jobs for every household.
- 11.1.7 The preferred approach consulted on in 2007 was known as 7C. As described in Section 10 this was an edge of town strategy that set out the requirement for at least 10,080 households and 13,400 jobs. However, as the plan progressed and evidence evolved, this option was no longer considered to be appropriate.
- 11.1.8 The next iteration of the Core Strategy was the Public Consultation version of the Core Strategy, published in September, 2011. This set out a requirement to plan for 10,080 new dwellings and 10,000 new jobs. The strategic approach to employment development was to retain and encourage development at existing sites, whilst providing strategic opportunities at motorway Junctions. This included Junction 7 and Junction 8 of the M20 as strategic development locations.

- 11.1.9 Following consultation responses to the 2011 draft Core Strategy, the Council sought to assess and allocate strategic sites as opposed to just identifying broad locations. A site allocations appraisal was subsequently undertaken and the findings were consulted on in August / September 2012.
- 11.1.10 In March 2013, the outcomes of the consultation were presented to Cabinet. The issues raised in connection with Junction 8 were wide ranging and, to a large extent, focused on public opposition to the principle of development in this location. The main issues raised included the questioning of the need for the development, the availability of alternative sites within and outside the borough, impact on the AONB, impact on the highway network, the loss of countryside, the sustainability (or otherwise) of the location, precedent and concerns over the quality of jobs which would be generated.
- 11.1.11 In the same report, Cabinet was presented with an update of the borough's employment land demand (*based on delivering interim housing provisions of 14,800 dwellings up to 2031*). The updated evidence pointed to a more modest requirement for employment land overall than previously, with a particular emphasis on office uses. Based on this updated evidence, the justification to release employment land at Junction 8 became less clear cut than it had been previously.
- 11.1.12 Nevertheless, Cabinet took the decision to retain Junction 8 as a strategic development location for employment until such time as the work identifying employment land demand (Employment Land Forecast) and supply (the Strategic Economic Development Land Availability Assessment (SEDLAA)) had been completed.
- 11.1.13 The updated employment land forecast was undertaken to cover the plan period (2011-31). As well as providing the basis for employment land forecasting, this work was also the starting point for the 'economic-led' housing projection in the SHMA, enabling consistency across the Council's evidence base.
- 11.1.14 The updated forecast stated that a total of 14,394 jobs would be created in the period between 2011-2031 of which 7,933 would be in the office, industrial and warehousing based sectors and at the Maidstone medical campus. The corresponding land requirement for employment would be the same for all five of the housing growth alternatives discussed in section 10.3.
- 11.1.15 Alongside the updated Employment Land Forecast, a SELAA was undertaken in parallel with the SHLAA. The SELAA concluded that the new industrial and warehousing floorspace required could be delivered in a dispersed pattern of new employment allocations.
- 11.1.16 In light of these findings, and in the context of concerns raised over the allocation of a strategic site at Junction 8 of the M20; it was therefore considered appropriate to assess a range of distribution options for meeting the identified employment land requirement. These are described in section 11.3 below.
- 11.2 What are the reasonable alternatives?**
- 11.2.1 In terms of distribution, three alternatives have been identified to meet the identified level of employment floorspace requirement.

Table 11.1 Reasonable alternatives for employment land distribution.

Reasonable alternatives	Why have these alternatives been considered?
<p>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; extensions to two business areas within the Rural Service Centres of Marden and Headcorn; and redevelopment of site at Yalding (brownfield) for mixed employment/housing .</p>	<p>Each of the alternatives includes the strategic employment allocation at Junction 7 of the M20. This location was identified as a strategic opportunity for development in 2012. Part of the site is already developed and consent has been given to create a medical campus, which will create up to 4000 jobs.</p> <p>Redevelopment of town centre site (Mote Road)</p> <p>Development/redevelopment of vacant plots and implementation of extant planning permissions at existing, designated Economic Development Areas</p> <p>Alternative 1 meets the remaining employment need by focusing on redevelopment and/or extensions to existing sites and industrial estates at the edge of the rural service centres. These sites generally have fewer impacts on landscape compared to strategic development along the M20. This dispersed pattern also provides for the localised expansion of existing successful business locations. It could better enable the expansion of firms in situ, and potentially better serve established, local firms. However, these sites are not as well placed to meet the gap identified in the types of sites available (to meet 'strategic' employment developments and office floorspace). Therefore, this alternative is less likely to achieve the forecast of 14.394 jobs.</p>
<p>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 Rural Service Centres, rather there would be one single large greenfield site would be allocated at Junction 8 of the M20.</p>	<p>Alternative 2 focuses the remaining employment need at a single large greenfield site at junction 8 of the M20 motorway. This site is available and could help to provide a prestigious business park offer and help to provide a significant marketing opportunity to promote the Borough as a premier business location.</p> <p>However, this site is removed from the built up area of Maidstone and development might have a significant impact on the landscape, as it is located at the foot of the Kent Downs AONB.</p>
<p>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 include extensions to two business areas within the Rural Service Centres of Marden and Headcorn, as well as a single large greenfield allocation at Junction 8 of the M20.</p>	<p>Alternative 3 involves the extension of existing sites at the edge of rural settlements but also includes a single large greenfield site at Junction 8 of the M20. This approach was considered as it allows for choice and flexibility yet still promotes a strategic higher value site at Junction 8 of the M20.</p> <p>This approach could 'overprovide' the required employment land/office floorspace, but allows for a degree of flexibility and localised expansion.</p>

11.3 Why has the preferred approach been selected?

- 11.3.1 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.
- 11.3.2 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.
- 11.3.3 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.
- 11.3.4 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.
- 11.3.5 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.
- 11.3.6 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.
- 11.3.7 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.
- 11.3.8 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). 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

- 11.3.9 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.
- 11.3.10 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.
- 11.3.11 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.
- 11.3.12 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. The SA findings are presented in full in **Appendix III**.

12 SITE OPTIONS FOR HOUSING, EMPLOYMENT AND MIXED USE/RETAIL

12.1 Background

- 12.1.1 The Council published the *Core Strategy Public Participation Draft* for consultation in September 2011. The key diagram in this document identified four strategic development locations:
- North West of the urban area for approximately 975 dwellings
 - South East of the urban area for approximately 1,000 dwellings
 - Junction 8 of the M20 motorway for 11 hectares (net) employment land (B2 and B8 use classes)
 - Junction 7 of the M20 for a medical campus in association with an approved clinic.
- 12.1.2 Respondents to this consultation called for the allocation of strategic sites rather than broad locations; an approach which is also encouraged in the NPPF.
- 12.1.3 Consequently, the Council resolved to provide further detail and certainty by identifying site specific locations for development and to undertake a partial public consultation on the Core Strategy in this respect.
- 12.1.4 The Council issued a fresh call for employment and housing sites between 11th May and 15th June 2012 inviting landowners, developers and their agents to use a pro forma to submit information about available sites within the identified strategic locations. All known sites within the strategic locations were assessed on an equal basis, including legacy sites the Council was previously aware of, even if no further information came forward as part of the call for sites.
- 12.1.5 The sites listed in Table 12.1 below were considered to be the ‘reasonable alternatives’ and were subject to sustainability appraisal; the findings of which were published in an Interim SA Report in 2012.
- 12.1.6 Through the work on looking at sites and assessing their suitability, it was apparent that a strategic location to the north/north-east of Maidstone was not appropriate due to the location of the Kent Downs AONB; and to the south /south-west the Loose valley and its Conservation Area would provide a considerable constraint on an urban extension in that location. Therefore the north-west and the south-east were considered most suitable for urban extensions (*and that extensions to the south/south-west and north/north-east were ‘unreasonable alternatives’*).
- 12.1.7 The Council proposed a list of preferred sites (in bold below), 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.

Table 12.1: Strategic Site Alternatives (Core Strategy Site Allocations Consultation, 2012)

South East Alternatives	North West Alternatives	Employment Alternatives
Bicknor Farm	Oakapple Lane	Junction 8 of the M20
Rumwood Nursery	South of Allington Way	Land to East of A20/M20 Junction
Gore Court at Church Road	Bridge Nursery	Land to the South of A20/M20 Junction
Gore Court Road	East of Hermitage Lane	Land to the West of A20/M20 Junction
Langley Park	West of Hermitage Lane	Land at Newnham Park
North of Sutton Road / North of Bicknor Wood	Bell Farm	
	Gatland Nursery	
	Bunyards Farm	

- 12.1.8 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.
- 12.1.9 A 'call for sites' exercise was undertaken in December 2012 – January 2013 to identify further potential sites for housing allocation.
- 12.1.10 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.
- 12.1.11 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'.
- 12.2 What are the reasonable alternatives?**
- 12.2.1 The Council moved away from specifying and allocating '*strategic sites*', rather it sought to identify a list of sites to allocate in order to meet the preferred strategic approach and housing targets. As would be expected, a number of these sites were 'strategic in nature'.
- 12.2.2 The 'reasonable alternatives' (*the site options*) were generated using SHLAA and Employment Land Review data as well as a 'call for sites'.
- 12.2.3 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.

12.2.4 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*.

12.2.5 A strict 'criteria based' appraisal methodology was applied to each site option to determine the sustainability impacts. The detailed methodology can be found in **Appendix IV**, whilst the full appraisal findings for each site can be found in **Technical Appendix A** (housing) and **Technical Appendix B** (Employment and Mixed use / retail).

12.3 Why has the preferred approach been selected?

12.3.1 The Council utilised a range of evidence to come to a decision on a list of site allocations. The proposed approach is to allocate:

- Four sites for retail / mixed use development (*Including Newnham Park Strategic Site*) (Policy RMX1);
- Five sites for employment uses (Policy EMP1); and
- Sixty-eight site allocations for housing development listed under Policy H1 (*some are a combination of more than one site option*).

12.3.2 The tables that follow list all the site options considered and those that have been selected for inclusion in the Plan. The sites have been grouped by geographical areas to illustrate the preferred approach to development. Following each table, there is a discussion of the council's rationale for selecting certain sites and rejecting the alternatives. This is followed by a summary of how the findings of the SA have been taken into account / are reflected in these decisions.

12.3.3 In each table, employment sites proposed for allocation are highlighted purple. Sites highlighted green have been allocated for housing. Sites allocated as mixed-use/retail have been highlighted orange.

12.4 Town centre

Site ID	Site name	Allocated?
HO-25	6 Tonbridge Road (15 dwellings)	Housing
HO-103	Laguna Motorcycles, Hart Street (76 dwellings)	Housing
HO2-187	Medway Street (40 dwellings)	Housing
HO2-188	American Golf, Tonbridge Road (60 dwellings)	Housing
ED-13	Haynes, Ashford Road	No
ED2-20	Whatmans, Mill Lane	Housing
MX-13	Springfield, Royal Engineers Road (500 dwellings)	
MX-9	Former Pickfords Removals, Hart Street	Consented
MX-15	Mote Road	Employment
MX2-17	Maidstone East and sorting office, Sandling Road (210 dwellings)	Mixed use
MX2-18	King Street car park and former AMF bowling site (53 dwellings)	Mixed use

The Council's reasons for selecting these sites

12.4.1 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. 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, specifically to the north west and south east of the urban area.

12.4.2 A total of 954 dwellings are proposed for allocation in Maidstone town centre, to be delivered across six housing sites and two mixed use sites. By virtue of their central location, these sites have good access to the services and facilities in the urban area.

12.4.3 An employment site is proposed for allocation in Maidstone town centre, providing local and accessible employment opportunities.

Summary of SA findings

12.4.4 All of the site options considered have been allocated or already have consent. This reflects the spatial strategy, which seeks to focus development in the Maidstone Urban area and maximise brownfield land use where possible.

12.4.5 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.

12.5 Urban area (north west strategic development location)

Site ID	Site name	Allocated?
HO-3	Land off Marigold Way	Consented
HO-10	Land off Oakapple Lane 187	Housing
HO-41	Land west of Hermitage Lane 330	Housing
HO-60	Land at Oakapple Lane	No
HO-66	Land east of Hermitage Lane 500	Housing
HO-107	Bridge Nurseries, London Road 140	Housing
HO-137	Land rear of 109 and 111 Tonbridge Road	No
HO-140	Land rear of 127-141 Tonbridge Road	No

The Council's reasons for selecting these sites

12.5.1 Maidstone urban area is identified as the most sustainable settlement with the best service and employment opportunities and accessibility. 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.

12.5.2 A total of 1,157 dwellings are proposed for allocation in the 'north-west' of the Maidstone urban area, to be delivered across four housing sites identified above. These sites are all located adjacent to the existing urban boundary and as such, have good access to the services and facilities in the urban area.

12.5.3 Of the sites that were rejected, HO-137 and HO-140 are residential gardens, development of which would cause harm to the character of the local area. HO-60 is adjacent to ancient woodland.

Summary of SA findings

12.5.4 The selection of the preferred site allocations broadly reflects the findings of the SA.

12.5.5 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. The SA indicates that two of the allocated housing sites (HO-10 and 41) are located in close proximity to Ancient Woodland. However, the SA identifies the need to consider the potential impacts of developing these sites on ancient woodland and possible mitigation.

12.6 Urban area (south-east strategic development location)

Site ID	Site name	Allocated?
HO-2	Bicknor Farm, Sutton Road (335 dwellings)	Housing
HO-31	Land south of Sutton Road (800 dwellings)	Housing
HO-33	Land north of Sutton Road (286 dwellings)	Housing
HO-74	Land at Fant Farm	No
HO3-123	Land north of Bicknor Wood (190 dwellings)	Housing
HO-123	Land West of Church Road (allocate in part) (440 dwellings)	Housing
HO-155	Maidstone urban extension	No
HO-158	Land at Langley Park, Sutton Road (600 dwellings)	Housing

The Council's reasons for selecting these sites

- 12.6.1 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.
- 12.6.2 A total of 2,651 dwellings are proposed for allocation in the south east of the Maidstone urban area, to be delivered across six housing sites. 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.
- 12.6.3 Of the sites that were rejected, HO-155 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 site would not conform to the spatial strategy.

Summary of SA findings

- 12.6.4 The site options considered in the south east of the Maidstone Urban area contain the three strategic sites that were proposed in the 2012 Site Allocations Public Consultation. In addition, a number of additional sites have been identified and allocated to help meet the higher level of housing need. The SA findings therefore mirror the strategic appraisals that were undertaken at earlier stages of the plan making process.
- 12.6.5 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'. Development at the allocated sites would also lead to the loss of some best and most versatile agricultural land.
- 12.6.6 The rejected site, HO-155, reflects the 'new settlement' option that was discussed through the strategic alternatives and appraisal several times as the Local Plan progressed.

12.6.7 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 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.

12.7 Rest of urban area

Site ID	Site name	Allocated?
HO-4	3 Cripple Street, Loose	No
HO-5	Roseacre Farm, Bell Lane, Bearsted	No
HO-20	Hoppersfield, Tonbridge Road	No
HO-21	North of Teasaucer Hill	No
HO-22	Cripple Street	No
HO-49	466-470 Loose Road	No
HO-50	The Mote Cricket Club, Willow Way	No
HO-55	Cross Keys, Bearsted (50 dwellings)	Housing
HO-67	West of Burial Ground Lane, Tovil	No
HO-68	Postley Road (62 dwellings)	Housing
HO-69	West of Eclipse (35 dwellings)	Housing
HO-76	Land to rear of Kent Police HQ, Sutton Road (112 dwellings)	Housing
HO-77	Land at Kent Police Training School, Sutton Road (90 dwellings)	Housing
HO-82	New Line Learning Academy, Heath Road, Loose	No
HO-83	Gatland House, Gatland Lane	Consented
HO-86	Grove Lodge, New Cut Road	No
HO-93	Cuxton Road	No
HO-95	Land at Farleigh Lane and Gatland Lane	No
HO-101	Barty Farm, Roundwell, Thurnham (122 dwellings)	Housing
HO-109	New Line Learning, Boughton Lane (220 dwellings)	Housing
HO-113	Land to the west of North Street (35 dwellings)	Housing
HO-121	19-59 John Street	No
HO-127	8-28 Boughton Lane	No
HO-128	Land at Longsole Church, Long Rede Lane	No
HO-129	Church Cross House, Church Lane	No
HO-139	41 and 56 Valley Drive, Loose	No
HO-142	Land at 1B Whitmore Street (5 dwellings)	Housing
HO2-186	Ware Street, Thurnham	No
HO3-192	Bridge Industrial Centre, Wharf Road, Tovil (15 dwellings)	Housing
HO3-204	The Dunning Hall, off Fremlin Walk (14 dwellings)	Housing
HO3-211	18-21 Foster Street (5 dwellings)	Housing
HO3-213	Slencrest House, Tonbridge Road (10 dwellings)	Housing
HO3-214	75-75a College Road	No
HO3-223	The Russell Hotel, 136 Boxley Road	Consented
HO3-225	Playing Fields at St Simon Stock Catholic School	No
HO3-226	South of Hermitage Court, Hermitage Lane	No
HO3-229	Land at Little Squerryes, Church Road, Otham	No
HO3-230	Baltic Wharf, St Peters Street	No
HO3-231	North Car Park, Baltic Wharf, St Peter's Street	No
HO3-239	180-188 Union Street (30 dwellings)	Housing
HO3-243	Land at Former Astor of Hever Community School	No
HO3-254	Granada House, Lower Stone Street	No
HO3-268	Tovil Working Men's Club (20 dwellings)	Housing
HO3-271	Land south of Cripple Street, Loose	No
HO3-272	Homewood Orchard, Farleigh Lane	No
HO3-280	Banky Meadow, north of Fauchons Lane, Bearsted	No
HO3-300	Bearstead Station Goods Yard (20 dwellings)	Housing

Site ID	Site name	Allocated?
HO-95	(part of) Half Yoke Land	No
HO3-309	Land at Wrens Cross, Upper Stone Street (60 dwellings)	Housing
HO3-295	Rear of the Orchard Spot, Downswood	No
ED-9	Eclipse Park, Sittingbourne Road	Consented
ED-10	Island site, Junction 6 of M20	Consented
ED-15	Newnham Park, Bearsted Road	Employment
ED2-19	Cobtree Forstal, Forstal Road	No
MX-14	Unicum Lane	No

The Council's reasons for selecting these sites

- 12.7.1 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.
- 12.7.2 A total of 905 dwellings are proposed for allocation in 'other urban area locations' within Maidstone, to be delivered across seventeen housing sites⁷⁹. These sites are all located either within the urban area or adjacent to the existing urban boundary and as such, have good access to the services and facilities in the urban area.
- 12.7.3 Of the housing sites that were rejected, HO-4, HO-49, HO-86, HO-121, HO-127 and HO-139 are residential gardens, development of which would cause harm to the character of the local area. HO-67 and HO-93 are in active employment use and therefore unavailable. HO128 and HO129 are also unavailable. The remaining housing sites would cause harm to the character of the local area including the River Medway corridor (for example HO-95 and MX14). HO-20 could negatively impact on adjacent listed buildings.
- 12.7.4 An employment site is proposed for allocation in the general Maidstone urban area, providing local employment opportunities. The other employment site was rejected as it is unavailable.

Summary of SA findings

- 12.7.5 The selection of the preferred site allocations broadly reflects the findings of the SA. 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.
- 12.7.6 The SA findings indicate that housing site HO-68 (allocated) and HO-21, HO-22 (unallocated) all perform similarly. These three sites are located adjacent to each other. The allocated site is located within a Conservation Area, whereas the unallocated site HO21 is located close to the Conservation Area. All three site are located in close proximity to a Local Wildlife Site.

⁷⁹ In addition to allocations for housing and mixed use development in the 'town centre' as outlined in section 12.4

12.8 Harrietsham

Site ID	Site name	Allocated?
HO-8	Plot 2, Stede Hill	No
HO-29	Mayfield Nursery, Ashford Road (49 dwellings)	Housing
HO-32	Louverne, Stede Hill	No
HO-72	Land at Church Road (80 dwellings)	Housing
HO-78	Land at West Street	No
HO-79	Land at Bell Farm, East Street	No
HO-89	Millfield Reclamation Yard, Holm Mill Lane	No
HO-108	Land east of Stede Hill and south of Pilgrims Way	No
HO-156	Tongs Meadow and land at Harrietsham Primary School	No
HO-157	Land south of Ashford Road (113 dwellings)	Housing
HO2-167	Winders (west of Reservoir Cottage), Lenham Road	No
HO2-173	Land south of Court Lodge Cottages, Court Lodge Road	No
HO3-224	Upper Dane, Ashford Road	No
HO3-266	Land off West Street	No
HO3-282	Bell Farm North	No

The Council's reasons for selecting these sites

- 12.8.1 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. There is a local aspiration for replacement almshouses to support the local elderly population and for additional retail and play facilities, which are limited.
- 12.8.2 The settlement hierarchy places the rural service centres below the Maidstone urban area. They are categorised as the most sustainable rural settlements as they have an appropriate level of services, facilities and infrastructure to serve the surrounding villages. As such, the rural service centres are capable of receiving a significant amount of housing development and appropriately scaled employment opportunities.
- 12.8.3 A total of 242 dwellings are proposed for allocation in Harrietsham, to be delivered across three sites. These sites are all located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Harrietsham.
- 12.8.4 With the exception of HO3-224, 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. Development at these locations is considered unacceptable and does not conform to the spatial strategy.
- 12.8.5 HO3-224 is rejected because it is considered too small, but also because the topography of the site would make it unlikely that a yield of more than 1 additional dwelling could be provided.
- 12.8.6 There are no employment sites proposed for allocation in Harrietsham due to the lack of sites submitted in the call for sites. However, employment sites proposed at the other rural service centres and in Maidstone urban area provide local employment opportunities.

Summary of SA findings

- 12.8.7 The SA findings show that access to some facilities (such as a post office and play space), are not ideal in Harrietsham. Access to basic services such as a primary school, secondary school 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. Therefore, the allocated sites broadly reflect the SA findings in this respect.
- 12.8.8 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.

12.9 Headcorn

Site ID	Site name	Allocated?
HO-6	Land at Kent Cottage, Grigg Lane	Consented
HO-7 HO-70	Land between Ulcombe Road and Millbank (220 dwellings) Land at Kings Road	Housing
HO-24	Land at Maidstone Road	No
HO-30	Land to rear of Elizabeth House, Grigg Lane	Consented
HO-36	Twelve Acre Farm, Grigg Lane	No
HO-65	Land north west of Maidstone Road	No
HO-105	Land at Moat Farm, Moat Road	No
HO-131	Land adjacent to Lenham Road (next to tennis and cricket club)	No
HO-132	Land adjacent to Lenham Road	No
HO-133	Land A, rear of Knaves Acre	No
HO-134	Land B, rear of Knaves Acre (5 dwellings)	Housing
HO-135	Land between Grigg Lane and Lenham Road (86 dwellings)	Housing
HO-144	Old School Nursery, Station Road (9 dwellings)	Housing
HO-152	Greengates, Lenham Road	No
HO-153	Land at Great Love Farm, Love Lane	No
HO2-174	Land south of Grigg Lane (55 dwellings)	Housing
HO3-238	North of Lenham Road (48 dwellings)	Housing
HO3-261 HO-24	Land at Tong Farm between Mill Bank (A274) and Ulcombe Roads, Headcorn - red area	No
HO3-262	Land at Tong Farm between Mill Bank (A274) and Ulcombe Road, Headcorn	No
HO3-278	Moat Road	No
HO3-306	Land North of Lenham Road Headcorn	No
MX-1	Land south of Headcorn railway station	No
MX-10	Ringles Nursery, Grigg Lane	No
ED-1	Land to the rear of Barradale Farm, Maidstone Road	Employment

The Council's reason's for selecting these sites

- 12.9.1 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.
- 12.9.2 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.

- 12.9.3 The settlement hierarchy places the rural service centres below the Maidstone urban area. They are categorised as the most sustainable rural settlements as they have an appropriate level of services, facilities and infrastructure to serve the surrounding villages. As such, the rural service centres are capable of receiving a significant amount of housing development and appropriately scaled employment opportunities.
- 12.9.4 A total of 423 dwellings are proposed for allocation in Headcorn, to be delivered across six sites. These 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.
- 12.9.5 The rejected sites are located within the open countryside and/or 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 (for example HO3-306). Development at these locations is considered unacceptable and does not conform to the spatial strategy.
- 12.9.6 One site is proposed for employment in Headcorn, which will provide local employment opportunities.
- Summary of SA findings*
- 12.9.7 Considered as a whole, the allocated sites generally perform better than the rejected sites across the range of sustainability criteria. However, the differences are not significant, and in some cases, the allocated sites present constraints that are not an issue for some of the rejected sites. For example, the allocated site at Land South of Grigg Lane (HO2-174) has fairly poor access to a primary school, play space and greenspace (by foot). There is also potential for effects on local wildlife sites and species that would need to be addressed.
- 12.9.8 Rejected sites HO-152 and HO-153 are isolated from the urban area and have poor access to local services and facilities (by foot). There is also greater potential for effects on the character of the countryside. Therefore, the SA findings support the rejection of these sites.
- 12.9.9 To the North West of the settlement, sites HO-24 and HO-65 could also have a negative effect on the character of the countryside. Whilst these sites are not particularly poorly related in terms of access to facilities (by foot), they are generally further away from services/facilities than the allocated options.
- 12.9.10 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.
- 12.9.11 Some of the rejected sites perform very similarly to the allocated sites, for example HO-131, HO-132 are very similar to HO-134 and HO-135. However, the allocated sites are considered to be better related to the settlement.

12.10 Lenham

Site ID	Site name	Allocated?
HO-11	The Old Goods Yard, Headcorn Road	No
HO-46	Land at Ham Lane	No
HO-48	Land at Glebe Gardens (10 dwellings)	Housing
HO3-195	Land r/o Loder Close, Ham Lane	No
HO3-202	Land off Old Ham Lane	No
HO3-209	Land between Robins Avenue and Hollywood Road	No
HO3-219	Lenham Cricket Pitch, Ham Lane	No
HO3-221	Grove Paddock, Ashford Road	No
HO3-264	Land south of Old Ashford Road, Tanyard Farm	No
HO3-297	Land S of Old Ashford Rd E of Tanyard Fm	No
HO3-301	Land at Kilwood Meadow Old Ham Lane Lenham	No
MX-2	The Old Goods Yard, Headcorn Road	No
MX-3	8 Faversham Road	No
HO-47 MX-11	Land parcel A at Tanyard Farm, Old Ashford Road (155 dwellings)	Housing
MX-12	Land parcel B at Tanyard Farm, Old Ashford Road	No
ED-14	Land at Lenham Quarry, Sandway	No

The Council's reasons for selecting these sites

- 12.10.1 Lenham is identified as a rural service centre and as such, has the key services and community facilities expected of one. The village performs best in terms of education facilities, with a primary school and nursery school located on the same site, and as the only village to have a secondary school within the village boundary. Transport links to Maidstone town centre and other retail and employment centres by bus and rail are good. There is a local aspiration for housing development in the village to sustain the thriving village centre and local businesses in general. The need for housing is centred on young people to ensure long term sustainability.
- 12.10.2 The settlement hierarchy places the rural service centres below the Maidstone urban area. They are categorised as the most sustainable rural settlements as they have an appropriate level of services, facilities and infrastructure to serve the surrounding villages. As such, the rural service centres are capable of receiving a significant amount of housing development and appropriately scaled employment opportunities.
- 12.10.3 A total of 165 dwellings are proposed for allocation in Lenham, to be delivered at two sites (HO47 and HO48). These sites are located adjacent to the existing settlement boundary and as such, has good access to the services and facilities available in Lenham.
- 12.10.4 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 and does not conform to the spatial strategy. The exception is MX-3 which is considered too small for an allocation.
- 12.10.5 There are no employment sites proposed for allocation in Lenham. The employment site submitted is considered too far removed from the village. However, employment sites proposed at the other rural service centres and in Maidstone urban area provide local employment opportunities.

Summary of SA findings

- 12.10.6 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.

12.10.7 For example, rejected site HO-11 lies closer to the train station and a bus stop, primary school and other facilities compared to MX-11 and HO48, but it is further away from a medical hub. HO-11 is also close to Ancient Woodland, whilst MX-11 in particular has a greater potential for negative impacts on the AONB. HO-11 is partially brownfield, whilst the allocated sites are fully greenfield.

12.10.8 The SA findings suggest that rejected site HO-11 performs comparably to the allocated sites.

12.11 Marden

Site ID	Site Name	Allocated?
HO-27	Land north of Howland Road (44 dwellings)	Housing
HO-35	Land at Dairy Lane, Chainhurst	No
HO-45	Land at Marden Cricket and Hockey Club, Stanley Road (124 dwellings)	Housing
HO-47	The MAP Depot, Goudhurst Road	Consented
HO-59	The Parsonage, land south of Marden (144 dwellings)	Housing
HO-73	Land at Stanley Farm (85 dwellings)	Housing
HO-84	Land at Prospect House, Hunton Road	No
HO-110	Chapel Field, Plain Road	No
HO-115	Copper Lane Pasture, Copper Lane	No
HO-149	Land east of South Road	No
HO-151	Church Farm, Maidstone Road	No
HO2-161	Land to the west of Goudhurst Road	No
HO3-197	Pattenden Farm	No
HO3-235	Land at Maidstone Road	No
HO3-246	Land South of the Parsonage (50 dwellings)	Housing
ED-4	Land adjacent to Wheelbarrow Industrial Estate, Pattenden Lane	Employment
ED-8	Wickham Field, Pattenden Lane	No
ED-11	Land to the south of Claygate Distribution, Pattenden Lane	Employment

Reasons for selecting these sites

12.11.1 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. This has to be balanced with the desire to ensure local people have access to affordable housing. Public transport connections to Maidstone town centre are less frequent and require improvement. Flooding is an issue in Marden.

12.11.2 The settlement hierarchy places the rural service centres below the Maidstone urban area. They are categorised as the most sustainable rural settlements as they have an appropriate level of services, facilities and infrastructure to serve the surrounding villages. As such, the rural service centres are capable of receiving a significant amount of housing development and appropriately scaled employment opportunities.

12.11.3 A total of 447 dwellings are proposed for allocation in Marden, to be delivered across five sites. These sites are all located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Marden.

12.11.4 With the exception of HO3-197, the rejected sites are located within the open countryside, are divorced from Marden village, and in some cases have been rejected due to serious flood risk. Development at these locations is considered unacceptable and does not conform to the spatial strategy. HO3-197 has been rejected due to flood risk.

12.11.5 Two sites are proposed for employment in Marden, which will provide local employment opportunities. ED-8 has been rejected due to the adverse impact it would have on residential amenity.

Summary of SA findings

12.11.6 Considered as a whole, the allocated sites generally perform better than the rejected sites across the range of sustainability criteria. 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.

12.11.7 Despite being located in close proximity to Marden, the SA findings demonstrate that site HO-151 presents additional constraints. The delivery of a substantial number of houses (500) may have adverse effects on the existing landscape which is characterised as open and rural in character. The SA findings demonstrate that the development of new housing on sites HO2-161 and HO3-197 is also unsuitable as parts of the sites lie within flood zones 2 and 3.

12.11.8 The SA findings suggest that rejected site HO-149 performs comparably to the allocated housing sites. However, the council consider that potential effects on adjacent heritage assets and an eastward extension to the village would be unacceptable.

12.11.9 The SA findings suggest that rejected site ED-8 performs comparably to the allocated employment sites. However, this rejected site is considerably smaller than the allocated employment sites.

12.12 Staplehurst

Site ID	Site Name	Allocated?
HO-14	Land at Millfield House, Headcorn Road	No
HO-15	Land off Headcorn Road	No
HO-39	Land at Iden Park, Cranbrook Road	No
HO-61	Land adjoining Fishers Oast, Fishers Farm	No
HO-71	Land north of Marden Road (Hen and Duckhurst Farm) (250 dwellings)	Housing
HO-81	Land at Sweetlands Lane	No
HO-100	Fishers Farm, Fishers Road (400 dwellings)	Housing
HO-102	Land at Bletchingly Farm, Pristling Lane	No
HO-106	Rectory Fields, Frittenden Road	No
HO-114	Land to the south of Oliver Road	Consented
HO-122	Land south of Marden Road	No
HO-147	Land rear of The Bell Inn, High Street	Consented
HO-160	The Grange, George Street	No
HO2-171	Land at George Street	No
HO3-190	Land Rear of Station Newsagents (known as Braemar)	No
HO3-240	South of Marden Road, Staplehurst	No
HO3-259	Land at Henhurst Farm	No
HO3-260	Land north of Henhurst Farm (60 dwellings)	Housing
HO3-274	Duckhurst Farmyard, Clapper Lane	No
HO3-275	Baldwins Farm, Marden Road, Staplehurst	No
HO3-283	Land at Lodge Road	No
MX-5	Woodford Farm, Maidstone Road	No
MX-7	Duckhurst Farm, Clapper Lane	No
ED-7	Weald Gardens, Maidstone Road	No

Reasons for selecting these sites

- 12.12.1 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. Local aspirations for Staplehurst express a need for improvement to highways infrastructure in line with any new large scale housing developments.
- 12.12.2 The settlement hierarchy places the rural service centres below the Maidstone urban area. They are categorised as the most sustainable rural settlements as they have an appropriate level of services, facilities and infrastructure to serve the surrounding villages. As such, the rural service centres are capable of receiving a significant amount of housing development and appropriately scaled employment opportunities.
- 12.12.3 A total of 710 dwellings are proposed for allocation in Staplehurst, to be delivered across two large sites and one smaller site. These sites are located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Staplehurst.
- 12.12.4 The majority of 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. These sites are generally divorced from Staplehurst village and development at these locations is considered unacceptable and does not conform to the spatial strategy.
- 12.12.5 Although HO3-190 is within the village, it been rejected due to the small scale of the site and its relationship with adjoining uses. HO3-240 has been rejected as it has not been demonstrated that current foul water and drainage problems can be resolved. HO3-283 would lead to an unacceptable loss of employment land.
- 12.12.6 There are no employment sites proposed for allocation in Staplehurst. The employment and mixed use sites submitted are considered to be too far removed from the village. However, employment sites proposed at the other rural service centres and in Maidstone urban area provide local employment opportunities.

Summary of SA findings

- 12.12.7 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.
- 12.12.8 The SA findings indicate that a number of site options are located in close proximity to Local Wildlife Sites within and around Staplehurst. The SA indicates that allocated site HO-71 performs comparatively to a series of unallocated sites (HO-39, 122, 147 and MX-7) in terms of their proximity to Local Wildlife Sites. However, the allocated site is considered to be better related to the settlement.

12.14 Boughton Monchelsea

Site ID	Site Name	Allocated?
HO-40	Monchelsea Farm, Cock Street	No
HO-63	Hubbards Lane and Haste Hill Road (20 dwellings)	Housing
HO-99	Boughton Mount, Boughton Lane (25 dwellings)	Housing
HO-120	Hubbards Lane	
HO-112	Boughton Lane, Loose (75 dwellings)	Housing
HO2-172	Land at Heath Road	
HO3-200	Land adjacent to Forge House, Beresford Hill	No
HO3-212	Green Lane	No
HO3-215	Land north of the Limes	No
HO3-217	Land opposite the Limes	No
HO3-220	Land at Hubbards Lane (8 dwellings)	Housing
HO3-234	Land at Church Street (40 dwellings)	Housing
HO3-245	Lyewood Farm, Green Lane (25 dwellings)	Housing
HO3-251	Boughton Garage, Cock Street	No
HO3-269	Land west of Gandy's Lane	No

The Council's reasons for selecting these sites

- 12.14.1 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.
- 12.14.2 The settlement hierarchy places the larger villages below the rural service centres. They are categorised as being sustainable rural settlements that have a level of services and facilities to provide for day-to-day needs of local communities. As such, the larger villages are capable of receiving a limited amount of housing development.
- 12.14.3 A total of 193 dwellings are proposed for allocation in Boughton Monchelsea, to be delivered across six housing sites. With the exception of HO3-220, 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. HO3-220 has been accepted by Councillors as an exception to the preferred spatial development hierarchy as a proposed allocation for 8 units to go forward to Reg. 18 Consultation at the meeting of the Strategic Planning Sustainability and Transportation Committee on 18 August 2015.
- 12.14.4 Eight sites have been rejected. HO-40 and HO-99, whilst brownfield sites, are considered to be unsustainable due to their separation from Boughton Monchelsea village. HO-120 has been rejected due to the harmful impact on the character of the area.

Summary of SA findings

- 12.14.5 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.
- 12.14.6 However, HO-99, which was 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.

12.15 Coxheath

Site ID	Site Name	Allocated?
HO-43	Land at Heathfield, Heath Road (110 dwellings)	Housing
HO-54	Land to the north of Heath Road	No
HO-62	Land at Forstal Lane (195 dwellings)	Housing
HO-119	Land at Linden Farm, Stockett Lane (74 dwellings)	Housing
H03-198	Yelton at Heath Road	No
HO3-201	Land adjacent to Woodview, Heath Road	No
HO3-203	78 Heath Road	No
HO3-248	Herts Farm	No
HO3-256	North of Heath Road (Olders Field) (MX-4) (75 dwellings)	Housing
MX-4	Land north of Heath Road	No
MX2-16	Land at Clockhouse Farm, Heath Road (72 dwellings)	Housing

The Council's reason's for selecting these sites

- 12.15.1 Coxheath is identified as a larger village. 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 does not have a train station but it 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 in comparison with the other rural service centres, which affords good access to a number of secondary schools and other facilities. Coxheath centre is not designated as a Conservation Area.
- 12.15.2 A total of 506 dwellings are proposed for allocation in Coxheath, to be delivered across five housing sites. These sites are all located adjacent to the existing settlement boundary and as such, have good access to the services and facilities available in Coxheath.
- 12.15.3 Alternative site options (HO54, MX4, HO248) have been rejected because of the risk of coalescence with neighbouring settlements. Development at these locations is considered unacceptable and does not conform to the spatial strategy.
- 12.15.4 Site HO3-201 is adjacent to ancient woodland with no physical separation on the ground, whilst HO3-203 has unsatisfactory access.

Summary of SA findings

- 12.15.5 The selection of the preferred site allocations broadly reflects the findings of the SA.
- 12.15.6 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.
- 12.15.7 Coxheath does not have good links to a train station, but is generally well serviced by local facilities and bus services.
- 12.15.8 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.
- 12.15.9 In addition, some of the rejected sites present greater environmental constraints such as ancient woodland (HO3-201), landscape character (HO3-201, H03-248) and noise (HO3-203, HO3-248).

- 12.15.10 MX4 contains Ancient Woodland and the County Ecologist has identified that there is potential for significant impacts on wildlife. This site is also more poorly located in terms of access to a secondary school compared to MX2-16.

12.16 Hollingbourne (Eyhorne Street)

Site ID	Site Name	Allocated?
HO-13	Woodside, Firs Lane	No
HO-58	South of Eyhorne Street	No
HO-96	East of Eyhorne Street	Housing
HO-138	Musket Lane	No
HO-141	West of Eyhorne Street	Housing
ED-6	Waterside Park, Ashford Road	No
ED-12	Woodcut Farm, Ashford Road	No
HO3-189	Land adjacent the Windmill PH, Eyhorne Street	Housing
HO3-247	Coutams Hall, Eyhorne Street	No
HO3-249	Grove Mill Cottage, Eyhorne Street	No
HO3-308	Land west of Eyhorne Street North of Millennium Green	No

The Council's reasons for selecting these sites

- 12.16.1 Hollingbourne (Eyhorne 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.
- 12.16.2 The settlement hierarchy places the larger villages below the rural service centres. They are categorised as being sustainable rural settlements that have a level of services and facilities to provide for day-to-day needs of local communities. As such, the larger villages are capable of receiving a limited amount of housing development.
- 12.16.3 A total of 39 dwellings are proposed for allocation in Hollingbourne (Eyhorne Street), to be delivered across three housing sites. 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.
- 12.16.4 Eight housing sites have been rejected. HO-58 and HO-138, HO3-247 would negatively impact on adjacent heritage assets, whilst HO-13 is located in the open countryside and is divorced from the village centre. HO3-249 would have unacceptable impacts on amenity, whilst HO3-308 would extend built development of Eyhorne Street unacceptably into the open countryside and would cause harm to its character and appearance.

Summary of SA findings

- 12.16.5 The SA findings suggest that there are some accessibility issues with all of the housing sites in and around Hollingbourne. As discussed above, certain facilities such as 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.
- 12.16.6 Generally, the allocated sites perform better than the rejected site options in terms of accessibility.
- 12.16.7 There are potential impacts on Listed Buildings and Conservation Areas associated with both the rejected and allocated sites.

12.17 Sutton Valence

Site ID	Site Name	Allocated?
HO-64	South Lane	No
HO-92	North of Redic House	No
HO-94	Warmlake Business Park, Maidstone Road	No
HO-104	Valence Industrial Estate, Headcorn Road	No
HO2-170	Four Wents Orchard, Chartway Street	No
MX-6	The Oaks, Maidstone Road	No
HO3-193	Whole site - Southfield Stables, South Lane	No
HO3-194	Area A - Southfield Stables, South Lane	No
HO3-196	Land at Wind Chimes, Chartway Street	No
HO3-199	Land at Tumbers Hill	No
HO3-216	Brandy's Bay, South Lane (40 dwellings)	Housing
HO3-227	Land North East of Old Belringham Hall	No
HO3-232	Land at Barchams, Wind Chimes and East Went	No
HO3-244	South Belringham, South Lane	No
HO3-250	Land at The Oaks, Maidstone Road	No
HO3-267	West of South Lane	No
HO3-284	Forsham House, Forsham Lane	No

The Council's reasons for selecting these sites

- 12.17.1 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.
- 12.17.2 The settlement hierarchy places the larger villages below the rural service centres. They are categorised as being sustainable rural settlements that have a level of services and facilities to provide for day-to-day needs of local communities. As such, the larger villages are capable of receiving a limited amount of housing development.
- 12.17.3 Forty dwellings are proposed for allocation in Sutton Valence at one site (HO3-216).
- 12.17.4 Sites HO3-284, HO3-194, HO3-193, HO3-267, HO3-244, HO-64 and HO2-170 are all divorced from the village centre and are located in the open countryside, and development would also intrude into the undeveloped gap between the upper and lower sections of Sutton Valence. Development at these locations is considered unacceptable and does not conform to the spatial strategy.

Summary of SA findings

- 12.17.5 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.

12.18 Yalding

Site ID	Site Name	Allocated?
HO-75	Land at Teiseside Nurseries, Lees Road	No
HO-98	Land at Vicarage Road	Housing
HO-150	Land to the north of Vicarage Road	No
HO3-191	2 Orchard Cottages, Lughorse Lane	No
HO3-276	Cheveny Farm, Vicarage Road	No
HO3-277	Wards Moat, Vicarage Road	No
HO3-293	New Barn Farm, Yalding Hill	No
HO3-305	Land South of Kenward Road Yalding	No
HO3-304	Land north of Kenward Road Yalding	No
ED2-17	Former Syngenta Works, Hampstead Lane	Mixed use

The Council's reasons for selecting these sites

- 12.18.1 Yalding is identified as a larger village; and as such contains a number of key services and facilities. Retail and health care opportunities are not as strong as those in rural service centres but Yalding does have a local shop, post office and GP surgery. 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 in Yalding.
- 12.18.2 The settlement hierarchy places the larger villages below the rural service centres. They are categorised as being sustainable rural settlements that have a level of services and facilities to provide for day-to-day needs of local communities. As such, the larger villages are capable of receiving a more limited amount of housing development.
- 12.18.3 A total of 265 dwellings are proposed for allocation in Yalding, to be delivered across one housing site and one mixed use site. The 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.
- 12.18.4 Eight sites have been rejected. HO-150 is located adjacent to the existing settlement boundary, however development of this site would result in a significant loss of valued woodland. HO-75 is located within the open countryside and is divorced from Yalding village. Development at this location is considered unacceptable by the Council and does not conform to the spatial strategy. Sites HO3-191, HO3-304 and HO3-305 would extend the built form of the settlement too far into the countryside with negative effects upon landscape and/or the setting of the Conservation Area. Sites HO3-293 and HO3-276 are poorly related to the village and have access issues, whilst HO3-277 would result in the loss of woodland and impacts on an adjacent heritage asset.

Summary of SA findings

- 12.18.5 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.
- 12.18.6 All site options also contain 'best and most versatile' agricultural land (with the exception of HO3-277).

12.18.7 The site options each have their own specific constraints as outlined below. However, allocated site HO-98 is closer to a medical/GP and primary school compared to the majority of rejected sites and therefore performs more favourably in this respect.

- HO-75 falls within flood risk zone 2/3.
- HO-150 poses the risk of adverse effects on sensitive landscape settings.
- Site HO3-293 has lower capacity to accommodate landscape change compared to the allocated site.
- HO3-276 contains a listed building.
- HO-98 is adjacent to the Conservation Area

12.18.8 Allocation of Employment land ED2-17 is in keeping with the dispersed strategic approach to employment provision. However, this site lies adjacent to a Scheduled Ancient Monument, the setting of a Listed Building and green belt land. Furthermore, 36.4% of the site is located within flood risk Zone 3b, which could restrict development potential.

12.19 Countryside

Site ID	Site Name	Allocated?
HO-1	Horseshoes Lane Langley	No
HO-9	Puddledock, Caring Lane, Thurnham	No
HO-12	Westfield Sole Road, Boxley	No
HO-16	Green Lane Cottages, Green Lane, Langley	No
HO-17	Ashford Drive, Kingswood	No
HO-19	Dingley Dell, Heath Road, East Farleigh	No
HO-23	Gore Court, Church Road, Otham	No
HO-26	Rochester Meadow, Old Chatham Road	No
HO-28	West of Wentways, Warmlake Road, Chart Sutton	No
HO-34	North of Pleasant Valley Lane, East Farleigh	No
HO-37	Highwoods Farm Packing Shed, Otham	No
HO-38	Holly Farm, Otham	No
HO-42	The Walled Gardens, Teston	No
HO-44	Vicarage Field, Linton	No
HO-51	Hockers Farm, Detling	No
HO-52	Hockers Farm 2, Detling	No
HO-53	Hockers Farm 3, Detling	No
HO-56	Herts Farm, Old Loose Hill, Loose	No
HO-57	The Old Quarry, Well Street, Loose	No
HO-80	12 Caring Lane, Thurnham	No
HO-85	Moons Farm, Gallants Lane, East Farleigh	No
HO-87	Forge Lane and Chapel Lane, Bredhurst	No
HO-88	Hazelene Nursery, Dean Street	No
HO-90	South of M20 and west of Hockers Lane, Detling	No
HO-91	Hockers Lane Operational Depot, Detling	No
HO-97	Dean Street and Lower Road, East Farleigh	No
HO-111	Redwall Farmhouse, Linton	No
HO-116	South of Detling	No
HO-117	North of Detling	No
HO-118	North or Horish Wood, Detling	No
HO-124	Bow Hill, Wateringbury	No

HO-125	East of Hockers Lane, Detling	No
HO-130	4 Malthouse Cottages, Dean Street	No
HO-136	Blind Lane and Dunn Street Road, Bredhurst	No
HO-143	Dean Street, East Farleigh	No
HO-145	Cleaveland, Chart Road, Chart Sutton	No
HO-146	West of Sindals Lane and north of Westfield Sole Road	No
HO-148	The Acre, Eastwood Road, Ulcombe	No
HO-154	Broomfield Park	No
HO-159	Bensted Close, West Street, Hunton	No
HO2-162	17 Hockers Lane, Detling	No
HO2-163	Oakdene Farm, Leeds Road, Langley	No
HO2-164	Heath Road and Gallants Lane, East Farleigh	No
HO2-165	Barn Meadow, The Street, Ulcombe	No
HO2-168	College Farm, Ulcombe Hill	No
HO2-169	Jarrak Barn, Caring Lane, Thurnham	No
HO2-175	Green Lane, Langley	No
HO2-176	Whippet Meadow, Detling	No
HO2-177	Top Meadow, Detling	No
HO2-178	New Cut Road and Bearsted Road	No
HO2-179	Upper Horseshoe Farm, Dean Street	No
HO3-205	Land at Beechen Bank, off Lordswood Lane	No
HO3-208	Land Adjacent to Charlford Avenue, Kingswood	No
HO3-210	Land at Butlers Farm, Horseshoes Lane, Langley	No
HO3-218	Eaglesham, Marley Road, Harrietsham	No
HO3-222	Land at Home Farm Oast, Lenham Heath	No
HO3-228	Land at Kingswood, Charlesford Avenue, Ulcombe	No
HO3-233	Dickley Court	No
HO3-236	Yew Tree House, Upper Leeds, Leeds	No
HO3-237	Land at the Old Forge, Chartway Street	No
HO3-241	Woodford Farm, Maidstone Road (MX-5)	No
HO3-242	Land sth of Lenham Road, Platts Heath	No
HO3-252	Oakdene Farm, Maidstone Road	No
HO3-253	Land next to the Old Cyder House, Teston Corner	No
HO3-255	Land at Bottle Screw Hill	No
HO3-257	Land to the North of Langley	No
HO3-258	Land to the West of Young and Partners, Plough Wents Road	No
HO3-263	Keepers Farm, Old Ham Lane, Lenham	No
HO3-265	Land at Belmont, New Road, Langley	No
HO3-270	Bentlettes Scrap Yard, Laddingford (10 dwellings)	Housing
HO3-273	Adjacent Ivans Field, Chart Sutton	No
HO3-279	Knoll House/Ransoms/Tower House, A229	No
HO3-281	Land at rear of Peg Tile Cottage, Goudhurst Road, Marden	No
HO3-285	Frith Cottage, Dean Street, East Farleigh	No
HO3-287	Highlands Kennels, Chartway Street	No
HO3-288	Durrants Farm, Hunton	No
HO3-289	Lower Gallants Farm, East Farleigh	No
HO3-290	Pleasant Valley Farm, East Farleigh	No
HO3-291	Rear of Barker Cottages, New Cut, East Farleigh	No
HO3-292	St Helens Lane, East Farleigh	No
HO3-296	Land at Lested Lane, Chart Sutton	No
HO3-298	Land adj Turgis Close, Langley	No
HO3-299	Land west of Ledian Farm	No
HO3-302	Land between Forge Lane and Chapel Lane (rear of Green Court)	No
HO3-303	Land east of Gandy's Lane Boughton Monchelsea	No

HO3-307	Land rear of 127 Hockers Lane Thurnham	No
HO3-311	Land adj. Eden Lodge Pye Corner Ulcombe	No
ED-2	Maidstone Market, Detling Industrial Estate	No
ED-3	Detling Airfield Industrial Estate	No
ED-5	Hill Farm, Linton Hill	No
ED2-16	Rough Shave Wood, Ulcombe	No
ED2-18	Westfield Sole Road	No
MX-8	Ledian Farm, Leeds	Consented

The Council's reasons for rejecting these sites

- 12.19.1 All rejected sites lie outside of the settlements identified in the settlement hierarchy and are therefore considered unsustainable.
- 12.19.2 Bentletts Scrapyard Claygate Road Laddingford (HO3-270) was allocated as Councillors considered the environmental benefits of removing the existing commercial vehicle scrapyard use and improving the setting of the listed building on the site and securing ecological enhancement were of overriding weight.

Summary of SA findings

- 12.19.3 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.
- 12.19.4 Most of these sites are greenfield and contain agricultural land. However, the majority of sites have good access to natural greenspace.

13 GYPSY AND TRAVELLER SITE ALTERNATIVES

13.1 Background

13.1.1 The Council is required by the National Planning Policy Framework (NPPF) (more specifically the Planning Policy for Travellers Sites, 2012 [as amended in 2015]) 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.

13.1.2 The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 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.

13.1.3 There are various sites where this need could be met. Appraisal of the sustainability implications of each option is an important step in allocation of the most appropriate sites.

13.2 What are the reasonable alternatives?

13.2.1 Gypsy and traveller site options were appraised at various stages of the plan making process. Prior to the draft Plan Consultation in March 2014, the Council identified a long list of site options from the following sources.

- Unauthorised developments and sites with temporary consent;
- Call for sites, December 2012 - January 2013.

13.2.2 In total, 48 sites came forward for consideration. However, 9 sites were not considered to be reasonable alternatives as they had pending planning applications. These sites are listed in **Table 13.1** below.

Table 13.1: 'Unreasonable' site options

Discounted sites
Maplehurst Paddock, Frittenden Road
Pear Paddock, Symonds Lane, Yalding
Pear View, Symonds Lane, Yalding
Orchard Farm Nursery Plot 2, Chartway Street, Sutton
Land adj Horseshoe Paddock, Lucks Lane, Chart Sutton
Greenfields, Stilebridge Lane, Linton
Kwana, Cross Drive, Kingswood
The Mellows, Marley Road, Harrietsham
Oak Tree Farm / The Pond, Lenham Road

13.2.3 After discounting these sites, the Council generated a list of 39 'reasonable' site options that were appraised through the SA.

13.2.4 Following the draft Plan Consultation, the Council continued to consider how it could meet identified Gypsy and Traveller needs. Further site options were identified from the following sources:

- Sites previously considered as candidates for the potential public Gypsy and Traveller site;

- Sites submitted as potential Gypsy and Traveller Locations (Call for Sites 2014);
- Rejected housing, employment and mixed use sites from 2013 and 2014 SHLAA and SEDLAA; and
- Existing permanent Gypsy and Traveller Sites with possible potential for additional pitches.

13.2.5 These additional site options were appraised through the SA and an interim SA report was published for consultation in October 2015.

13.2.6 The full appraisal findings for each site that has been appraised are set out in **Technical Appendix C**.

13.3 Why has the preferred approach been selected?

13.3.1 The Council has allocated 16 sites for Gypsies and Travellers. The sites proposed for allocation have been shaded green in **Table 13.2**, which contains the full list of reasonable site options.

Table 13.2: Site options for Gypsy and Traveller and Travelling Showpeople pitches

Site ID	Site name
GT1	Congelow Farm
GT2	Greengates (plot 1), Lenham Road
GT3	Greengates (plot 2), Lenham Road
GT4	Hawthorn Farm, Pye Corner, Ulcombe
GT5	Cherry Gardens, Collier Street
GT6	Home Farm, Sweetlands Lane
GT3-9	Acers Place / Land adjoining Greengates
GT3-10	Quarter Paddocks, Bletchenden Road
GT3-11	The Chances, Lughorse Lane, Hunton
GT3-12	Ash Tree Place / Catchment cottages
GT3-13	Little Boarden, Boarden Lane
GT3-15	Perfect Place, Park Wood Lane
GT3-16	The Vine, Green Hill Lane, Ulcombe
GT3-17	Green Tops, Symonds Lane, Yalding
GT3-20	The Stables / Land east of Maplehurst Lane
GT3-21	Land rear of The Meadows (plots 1-10),
GT3-22	The Stables, Wagon Lane, Yalding
GT3-23	Stilebridge Stableyard, Stilebridge Lane
GT3-24	Plot 3 The Meadows, Lenham Road
GT3-25	Franks Bridge, Smarden Road
GT3-26	Orchard Place, Benover Road, Collier Street
GT3-27	Lindfield Farm, Willow Lane, Paddock Wood
GT3-28	The Paddock, Detling Hill, Thurnham
GT3-31	Land rear of Brickyard Cottages, Redwall Lane
GT3-33	The Three Sons, Hampstead Lane, Nettlestead
GT3-34	Eight Acres, Tilden Lane, Marden
GT3-36	Huntsman's Stables, Maidstone Road
GT3-37	Land at Cherry Tree Farm, West Wood Road
GT3-38	Land at Squirrel Wood, Rumstead Lane

Site ID	Site name
GT3-39	Flips Hole, South Street Road, Stockbury
GT3-40	The Ash, Yelsted Road, Stockbury
GT3-41	Fairhaven, Queen Street, Yalding
GT3-42	Hertsfield Farm, Staplehurst Road, Marden
GT3-43	Plot 5, Land at Lughorse Lane, Hunton
GT3-44	Oak Lodge, Tilden Lane, Marden
GT3-45	Land rear of The Meadows (plot 13)
GT3-46	Green Acres, Wagon Lane
GT3-47	Park Wood Stables, Park Wood Lane
GT3-49	Land east of Water Lane, Water Lane
Possible site 33	Land north of Haste Hill Road
Possible site 34	Land south of the old Barn House
Possible site 35	Land north of Green Lane, Laburnam Cottage
Possible Site 36	Land north of Green Lane, south of Lyewood
Possible Site 43	Land north of Heath Road, Parsonage Farm
Possible Site 46	Land north of Parsonage Farm
Possible Site 47	Land north of Church Lane, n. of South St
Possible Site 48	Land south of Church Lane, jct. South Street
Possible Site 65	Land at Dean Street
Possible Site 66	Land at Hurst Road
Possible Site 67	Land off Dean Street
Possible Site 74	Monchelsea Farm
Possible Site 78	Manor Farm
Possible Site 81	Land adjacent to The Nook
Possible Site 84	Land adj Gallants Lane
Possible Site 86	Land at Gallants Lane
Possible Site 87	Land at Lower Rd, Farleigh Green
Possible Site 97	Land at Chart Sutton, Chart Sutton
Possible Site 98	Land at Tyland Lane
Possible Site 101	The Stumps, Lenham Road
Possible Site 107	Land south Tumblers Hill
Possible Site 108	Land south Ploughwents Road
Possible Site 110	Garages off Grasslands
GT3 50	Land Kingswood Farm
GT3 51	Five Acres, Tilden Lane
GT3 J2	Blossom Lodge Stocket Lane
HO3 208	Land adjacent Charlesford Avenue
HO3 210	Butlers Farm, Horseshoes Lane
HO3 218	Eaglesham, Marley Road
HO3-198	Land adjoining `Yelton` at Heath Road, Coxheath
HO3-281	Land at rear of Peg Tile Cottage
HO3-274	Duckhurst Farmyard, Clapper Lane, Staplehurst
HO3-291	Rear of Barker Cottages, New Cut, East Farleigh
ED14	Sandway Quarry
ED2 - 16	Rough Shave Wood
4	Fairview, Osborne Drive

Site ID	Site name
5	Little Acre, Chart Hill Road
7	Peacock Farm, Chart Hill Road
8	Chart View, Chart Hill Road
9	Chart Hill Paddock, Chart Hill Road
42	Mulberry Farm, East Street
57	The Kays, Heath Road
59	Plum Tree Farm, Park Road
80	Blue Bell Farm, George Street
81	The Paddocks, George Street
84	Kilnwood Farm, Old Ham Lane
109	Near Neverend Farm, Pye Corner
115	Roydon Farm, Pye Corner
125	Emmett Hill Nursery, Emmett Hill Lane
167	Cobnut Tree Place (plot 1), Church Hill
168	Greenacre (plot 5), Church Hill
170	Four Oakes (plot 2), Church Hill
173	Granada, Lenham Road
186	Orchard Farm Nursery Plot 1

The Councils reasons for selecting these sites

- 13.3.2 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. 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.
- 13.3.3 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.

Summary of SA findings

- 13.3.4 Most of the Gypsy and Traveller site options (including allocated sites) perform very poorly in terms of access to local services and public transport. 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.
- 13.3.5 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.

14 BROAD LOCATIONS FOR HOUSING GROWTH

14.1 Background

14.1.1 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.

14.1.1 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.

14.1.2 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.

14.1.3 The appraisal of strategic alternatives for housing growth (detailed in Section 10 of this report) compares the strategic effects of allocating these three broad locations compared to the following alternatives (*at different levels of housing growth*):

- *H2 / H4 - A new settlement to the south east of the Urban Area;*
- *H5 - A higher level of dispersed development at Rural Service Centres (instead of a broad location at Lenham).*

14.1.4 In this respect, it is not considered necessary to undertake further appraisal at this strategic level. However, 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.

14.2 What are the reasonable alternatives?

Discussion of alternatives

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

14.2.2 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*)⁸⁰. It is therefore considered that there are no reasonable alternatives to these two broad locations.

⁸⁰ The Borough Council revisited all sites within the built up areas which were identified in the Urban Capacity Studies (2002 and 2009), the Employment Land Review (2013) and the Town Centre Study (2010). All sites put forward through these exercises have been included in the SHLAA or broad locations unless:

- they have been implemented;
- they have planning permission;
- there is no landowner interest (despite contact from the Borough Council);
- they are not deliverable.

Extensive 'call for sites' opportunities have been held:

- SHLAA 2009/SSA: May/June 2008;
- Strategic sites: 11 May – 15 Jun 2012;
- SHLAA/SEDLAA 2013: 7 Dec – 25 Jan 2013.

All sites put forward through these exercises have been included in the SHLAA or broad locations if they are suitable, available and achievable.

- 14.2.3 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.
- 14.2.4 The council have dismissed further alternative broad locations for housing in other locations for the following reasons.
- a) Further broad locations in areas where SHLAA sites have been rejected at the **edge of Maidstone urban area** are not considered to be reasonable because it is considered further development would have an unacceptable negative effect on:
 - i) landscapes of high sensitivity or good or very good condition (as identified in the Maidstone Landscape Character Assessment 2012, and 2014) including the Kent Downs Area of Outstanding Natural Beauty and its setting; and the valleys of the River Medway, Loose and Len which are all designated as areas of Local Landscape Value;
 - ii) the multi-functional green wedges identified in the draft Green and Blue Infrastructure Strategy which seek to protect and enhance landscape, biodiversity and sustainable transport; protect areas liable to flooding and prevent the coalescence of development and retain the identity of neighbourhoods;
 - iii) the coalescence of Maidstone with:
 - Medway Gap to the west (protected in the adopted Tonbridge and Malling LDF);
 - Boughton Monchelsea to the south;
 - Loose to the south;
 - Coxheath to the south;
 - Otham to the east;
 - Detling to the north.
 - b) Development at a **new settlement south east of Maidstone** has been dismissed as an undeliverable approach and is therefore not considered to be suitable as a longer term broad location for growth. Furthermore, the preferred strategic approach already allocates a significant amount of housing to the South East of the Urban Area and further growth would put pressure on existing infrastructure.
 - c) Further broad locations in areas where SHLAA sites have been rejected at the edge of **Harrietsham** rural service centre are not considered to be reasonable because it is considered further development would have an unacceptable negative impact on the North Downs Area of Outstanding Natural Beauty and its setting, as well as landscape of high or very high sensitivity or good condition (as identified in the Maidstone Landscape Character Assessment 2012). Development to the south is also constrained by the M20. The capacity of rejected SHLAA sites is also not sufficient to support a significant amount of housing at a broad location.
 - d) Further broad locations in areas where SHLAA sites have been rejected at **Marden** rural service centre are not considered to be reasonable because it is considered further development would have an unacceptable negative impact on landscape of high sensitivity or good condition (as identified in the Maidstone Landscape Character Assessment 2012). The capacity of rejected SHLAA sites is also not sufficient to support a significant amount of housing at a broad location.
 - e) Further broad locations in areas where SHLAA sites have been rejected at **Staplehurst** rural service centre are not considered to be reasonable because it is considered further development would have an unacceptable negative impact

on landscape of high sensitivity or good condition (as identified in the Maidstone Landscape Character Assessment 2012). The capacity of rejected SHLAA sites is also not sufficient to support a significant amount of housing at a broad location.

- f) Larger villages have a more limited range of services than the rural service centres and are not considered appropriate as broad locations for larger scale development. The capacity of rejected SHLAA sites is also not sufficient to support a significant amount of housing at some settlements.

14.2.1 In light of the reasons listed above, 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. 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.

14.2.2 One further alternative that was considered by the Council is to take a 'dispersal' approach to housing needs that would otherwise be delivered through a broad location from growth (i.e. 1500 dwellings split across the rural service centres). This is a reasonable approach as there is sufficient land capacity to deliver further growth in this way (see section 10).

The Reasonable Alternatives

14.2.3 As discussed above, the Council did not consider there were any reasonable alternative broad locations to Invicta Barracks and the Town Centre. However, two further possible locations have been identified as potential broad locations for housing development outside the Maidstone Urban Area.

Reasonable alternative	Rationale
<p>1. Lenham:</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>2. Headcorn:</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>

- 14.3 Why has the preferred approach been selected?**
- 14.3.1 As discussed above the Council has proposed to establish three broad locations at this stage in the plan preparation process for future housing growth.
- 14.3.2 **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.
- 14.3.3 **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.
- 14.3.4 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.
- 14.3.5 **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.
- 14.3.6 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. The SA findings also suggest that Lenham performs slightly better across the range of sustainability objectives compared to Headcorn.
- 14.3.7 The full appraisal findings can be found in **appendix V**.

15 ALTERNATIVES FOR SUSTAINABLE TRANSPORT

15.1 Background

15.1.1 The Issues and Options stage of the DPD preparation process involved evidence gathering through public consultation exercises called *Café Conversations* in February 2006 and a series of special events held for stakeholders including the Local Strategic Partnership, partnership organisations, local developers, local businesses and the Youth Forum.

Subsequently, 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:

15.2 What are the reasonable alternatives?

15.2.1 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.

15.3 Why has the preferred approach been selected?

15.3.1 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.

15.3.2 The Council's 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.

15.3.3 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.

15.3.4 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.

15.3.5 The appraisal findings for each option are presented in full in **Appendix VI**.

16 OTHER LOCAL PLAN ISSUES

16.1.1 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.

16.1.2 This includes Policies to address the following issues:

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

16.1.3 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'.

16.2 Alternatives for sustainable construction

16.2.1 The Council identified three alternative approaches covering 'sustainable construction', which were appraised and presented in the interim SA Report in March 2015. These were as follows.

- 1 Rely on current Building Regulations
- 2 Apply stringent targets
- 3 Set standards that mirror Building Regulations

16.2.2 These alternatives are no longer deemed to be 'reasonable' as the Government has made it clear that the standards for energy should be delivered through Building Regulations.

16.2.3 The Council's proposed approach to sustainable design is set out in DM2, outlining a reliance on national standards to deliver energy efficiency and other housing standards. There is a more stringent standard for water efficiency, but this is evidence based and reflects water resource issues in the region. The viability of development is unlikely to be affected, and in any case, the policy takes this into consideration. The requirement to achieve BREEAM 'Very Good' will also help to drive improvements in the sustainability performance of non-residential development in Maidstone.

**PART 3: WHAT ARE THE APPRAISAL FINDINGS AND
RECOMMENDATIONS AT THIS CURRENT STAGE?**

17 APPRAISAL METHODOLOGY

- 17.1.1 Section 18 presents an appraisal of the draft Local Plan (for Regulation 19 consultation).
- 17.1.2 The appraisal identifies and evaluates ‘likely significant effects’ on the baseline / likely future baseline associated with the plan, drawing on the sustainability topics and issues identified through scoping (see Part 1) as a methodological framework.
- 17.1.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy measures under consideration. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline.
- 17.1.4 In light of this, where likely significant effects are predicted this is done with an accompanying explanation of the assumptions made.⁸¹ In many instances it is not possible to predict likely significant effects, but it is possible to comment on the merits of the draft plan approach in more general terms.
- 17.1.5 It is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations.⁸² So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for ‘cumulative’ effects is also considered.⁸³ These effect ‘characteristics’ are described within the appraisal as appropriate.

18 APPRAISAL FINDINGS

- 18.1.1 The appraisal of the draft plan is set out below within 18 separate tables – one for each of the sustainability objectives.
- 18.1.2 To give the appraisal ‘added structure’, each policy within the draft plan is assigned one of the following symbols in-line with predicted ‘broad implications’. It is important to note that these symbols are not used to indicate significant effects. Where significant effects have been identified, these are highlighted in the text as follows. **‘Significant positive impacts / significant negative impacts.’**

↗	Positive implications.
↔	No implications.
↘	Negative implications.
?	Uncertain implications.

- 18.1.3 **Table 18.1** shows the name of each of the policies appraised within this SA report.

⁸¹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pageld=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁸² Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

⁸³ In particular, there is a need to take into account the effects of the Local Plan acting in combination with the equivalent plans prepared for neighbouring authorities. Furthermore, there is a need to consider the effects of the Local Plan in combination with the ‘saved’ policies from the [Old Local Plan].

Table 18.1: draft Local Plan Policies

Policy Number	Policy Name
Spatial Strategy	
SS1	Maidstone Borough spatial strategy
Broad spatial policies	
SP1	Maidstone urban area
SP2	Maidstone urban area: north west strategic development location
SP3	Maidstone urban area: south east strategic development location
SP4	Maidstone town centre
SP5	Rural Service Centres
SP6	Harrietsham Rural Service Centre
SP7	Headcorn Rural Service Centre
SP8	Lenham Rural Service Centre
SP9	Marden Rural Service Centre
SP10	Staplehurst Rural Service Centre
SP11	Larger villages
SP12	Boughton Monchelsea Larger Village
SP13	Coxheath Larger Village
SP14	Eyborne Street (Hollingbourne) Larger Village
SP15	Sutton Valence Larger Village
SP16	Yalding Larger Village
SP17	Countryside
Housing Site Allocations	
H1	Housing allocations
Open Space Allocations	
OS1	Strategic open space allocations
Broad locations for housing growth	
H2	Broad locations for housing growth
Gypsy and Traveller site allocations	
GT1	Gypsy and Traveller site allocations
Retail and mixed use site allocations	
RMX1	Retail and mixed use site allocations
Employment site allocations	
EMP1	Employment allocations

Policy Number	Policy Name
DM Policies	
DM1	Principles of good design
DM2	Sustainable design
DM3	Historic and natural environment
DM4	Development on brownfield land
DM5	Air quality
DM6	Non-conforming issues
DM7	External lighting
DM8	Residential extensions, conversions and redevelopment within the built up area
DM9	Residential premises above shops and businesses
DM10	Residential garden land
DM11	Housing mix
DM12	Density of housing development
DM13	Affordable housing
DM14	Local needs housing
DM15	Nursing and care homes
DM16	Gypsy, Traveller and Travelling Showpeople accommodation
DM17	Town centre uses
DM18	District centres, local centres and local shops and facilities
DM19	Signage and shop fronts
DM20	Economic development
DM21	Retention of employment sites
DM22	Open space and recreation
DM23	Community facilities
DM24	Sustainable transport
DM25	Public transport
DM26	Park and ride sites
DM27	Parking Standards
DM28	Renewable and low carbon energy schemes
DM29	Electronic communications
DM30	Mooring facilities and boat yards
Development management policies for the town centre	
DM31	Primary shopping frontages

Policy Number	Policy Name
DM32	Secondary shopping frontages
DM33	Leisure and community uses in the town centre
Development management policies for the countryside	
DM34	Design principles in the countryside
DM35	Conversion of rural buildings
DM36	Rebuilding and extending dwellings in the countryside
DM37	Change of use of agricultural land to domestic garden land
DM38	Accommodation for agricultural and forestry workers
DM39	Live-work units
DM40	New agricultural buildings and structures
DM41	Expansion of existing businesses in rural areas
DM42	Holiday caravan and camp sites
DM43	Caravan storage in the countryside
DM44	Retail units in the countryside
DM45	Equestrian development
Delivery Framework	
ID1	Infrastructure delivery

18.2 SA Objective 1: To ensure that the residents of Maidstone have the opportunity to live in a well-designed, sustainably constructed, decent and affordable home

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗	↗	↗	↗	↗	↗	↔	↗	↔	↗

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↗	↔	↗	↔	↔	↔	↗	↗	↔	↗	↔	↗	↗	↗	↗	↔	↔	↔	↔	↔	↔	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery	
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↗

Commentary

- 18.2.1 Policy SS1 identifies the requirement for delivering 18,560 dwellings across the borough over the plan period. Policy H1 allocates a range of housing sites for development, helping to deliver a significant amount (8,707 dwellings) of this housing need. Policy H 2 sets out the longer term direction of housing provision towards the end of the plan period (2031 onwards), namely at three broad locations (Town Centre, Invicta Barracks and Lenham).
- 18.2.2 The implementation of these policies in conjunction with policies DM 11, DM 12, DM 13 and DM 14 will help to deliver an appropriate mix of housing that meets local needs, including for affordable housing. Given that this level of housing delivery seeks to deliver the full objectively assessed housing need, it predicted that these policies will have a **significant positive effect** on the baseline. In the absence of the plan, housing would still be likely to come forward, but in a less coordinated manner.
- 18.2.3 Policies SP1 and SP 4 will support the development of residential accommodation in the town centre and urban area and policies SP5 and SP12 provide for housing needs in rural service areas and larger villages.
- 18.2.4 A number of the Development Management policies have positive implications. The design and construction of accessible new homes, built to high standards is supported through policies DM 1, DM 2 and DM 34. The implementation of policy DM 9 should also help to restrict the loss of existing residential premises above shops.
- 18.2.5 Policy DM 2 ought to help to improve the sustainability performance of new houses by requiring homes to be more water efficient (which also saves energy). The standards for energy are consistent with Building Regulations Part L and therefore no effects are predicted, because this is a requirement anyway. The policy is not likely to have an effect on viability of housing, as it is a requirement that higher water efficiency standards are 'technically feasible and viable'.
- 18.2.6 Policy DM 11 sets out the need to deliver a sustainable mix of house sizes, types and tenures across new developments and within existing housing areas. The policy highlights that accommodation profiles detailed in the Strategic Housing Market Assessment (SHMA) will be used to inform developers to determine which house sizes need to be delivered in urban and rural areas, across market and affordable housing sectors. Implementation of this policy will help to improve the mix of dwelling sizes and tenures within Maidstone over the plan period. Furthermore, delivery of policy DM 39 should contribute towards delivering a mix of housing types that meets changing lifestyle needs through the development of live-work units over the plan period.
- 18.2.7 The delivery of policies DM 13, DM 14 and ID 1 will help to increase affordable housing provision, which is a key issue for the Borough. In particular, the implementation of DM 13 and DM 14 seeks to provide appropriate levels of affordable housing provision in specific locations to meet identified local need. Affordable housing is identified as the number one priority for infrastructure development in policy ID1.

- 18.2.8 The implementation of policy DM 16 should help to contribute to the provision of Gypsy and Traveller pitches. Although the allocated sites are some way off delivering fully identified needs (187 permanent Gypsy and Traveller plots and 11 plots for travelling showpeople), the Council has undertaken a comprehensive review of potential site options and is committed to meeting needs. Policy GT1 allocates 41 pitches, which should help to meet the needs for these social groups. However, some sites that are allocated are in areas with poor access to services. This is somewhat contradictory to policy DM 16, which states that sites should be granted permission that have good access to schools and other social infrastructure (but perhaps symptomatic of the shortage of suitable sites to meet identified needs).
- 18.2.9 Although the spatial strategy states that provision will be made to meet the identified need for pitches, suitable sites are yet to be identified. Nevertheless, a positive effect is predicted as the Plan takes a step in the right direction.
- 18.2.10 Collectively, the Development Management Policies are predicted to have a **significant positive effect** on the baseline in relation to this SA objective.

18.3 SA Objective 2: To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↔	↔	↔	↔?	↔	↗	↔	?	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↗	↔	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

Commentary

- 18.3.1 There is risk of flooding on land at several allocated employment sites (Former Syngenta, Barradale Farm, Wheelbarrow Industrial Estate, South of Claygate). However, the impacts are not anticipated to be significant as the areas of greatest risk would be avoided through careful site layout and compatible uses would be sought.
- 18.3.2 The majority of new residential development would not be located in areas at risk of flooding. However, a number of allocated sites are within close proximity to flood zones 2, 3a or 3b. For the larger strategic sites such as Langley Park and South of Sutton Road, it will be possible to mitigate this issue through site layout (i.e. avoiding/excluding these areas). This will be more difficult at smaller allocations such as 'Ulcombe and Millbank' and 'South of Grigg Lane'. However, these two sites also contain small areas at risk of flooding so should similarly be possible to mitigate. Allocated housing in Yalding will also be located away from the areas at greatest risk of flooding; however, this settlement has a history of flooding.
- 18.3.3 Policy DM 1 seeks to ensure that inappropriate new development within areas at risk from flooding is avoided and/or design measures are secured to mitigate potential impacts.
- 18.3.4 Policy DM 22 sets out the need for new development to deliver appropriate open space provision, including natural and semi natural areas of open space. This could contribute to the aims of this objective given the flood storage potential of green spaces.
- 18.3.5 Policy DM 30 highlights that proposals for mooring facilities will be permitted provided that there is no loss of flood plain or land raising. The implementation of this policy should help to ensure that flood risk is considered for relevant proposals that come forward over the plan period.
- 18.3.6 Policy DM 16 highlights that planning permission for Gypsy and Traveller and Travelling Showpeople accommodation will only be granted if a site is not located in an area at risk of flooding. This should have positive implications in terms of minimising the risk of flooding for future accommodation.
- 18.3.7 Policy DM 3 incorporates numerous measures that aim to protect the natural environment, which should help to preserve the flood management functions of natural areas. The policy also highlights the potential for designing public open space that incorporates sustainable urban drainage principles. This would further contribute towards ensuring that the risk of flooding is reduced in the medium and long term.
- 18.3.8 Collectively the policies should have a **minor significant positive effect** on the baseline in relation to this SA objective as there is potential for new development to help improve surface water management. However, it will be necessary to carefully site and design development in areas that fall within areas at higher risk of flooding.

18.4 SA Objective 3: To improve the health and well-being of the population and reduce inequalities in health

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗↘	↗	↔	↗	↗	↗↘	↗	↗	↗↘	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↔	↗	↔	↗	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↗	↔	↔	↔	↔	↗	↗	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↗	↔	↔	↗	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗

Commentary

- 18.4.1 As set out in policy SS 1, most of the housing and employment development would be concentrated in the Maidstone Urban Area, which contains the main concentrations of deprived areas in the Borough. Therefore, the Local Plan could help to reduce the 'inequality gap' between these areas and the more affluent parts of the borough. The main rural service centres would also be supported with more modest increases in housing and employment growth, which could benefit residents in these areas too. However, there is potential for negative effects on the health and wellbeing of communities in the urban area due to the potential for increased congestion and poorer air quality associated with housing and employment growth. Policies in the Local Plan that seek to encourage sustainable modes of transport (DM 24 - DM26), and to improve the road networks to support new development should help to mitigate these impacts to an extent, but the impacts are unclear at this stage.
- 18.4.2 Policy H 1 includes a number of allocations for housing that will be required to provide or contribute to (where necessary) open space and local health facilities and services. This would help to ensure benefits for the health and well-being of the local population by enhancing access to local health facilities as a result of new development. It should also increase the opportunities for the local population to partake in recreational activities; although some residents may prefer that open space remains in its current form.
- 18.4.3 In terms of access to open / play space from new developments, sites allocated in some areas are not ideally located. For example in Lenham, the town centre and Harrietsham, most of the allocated sites are not within 'reasonable walking distance. Whilst this might not present an issue at each individual site, collectively, there may be a need to enhance provision in these areas. This should be determined through an assessment of need as identified in the detailed site policies for policy H1.
- 18.4.4 Policy EMP 1 will support an increase in job opportunities, which would have an indirect knock-on positive impact on the health of communities. The development of the medical campus at Newnham Park (RMX 1) should also provide better access to specialised healthcare in the borough.
- 18.4.5 Several of the Development Management policies have been judged to have a positive effect on the baseline associated to this SA objective. For example, the implementation of policies DM 24 and DM 25 should help to ensure that access to key services (including health care facilities) via public transport and sustainable modes of travel are enhanced. Furthermore, delivery of policy DM 23 could enhance access to appropriate community facilities within Maidstone Borough by requiring new development to deliver new community facilities where existing facilities are insufficient.
- 18.4.6 Policy DM 15 ought to have a positive effect on health by ensuring there is sufficient provision of nursing and care homes to meet the needs of the population.
- 18.4.7 The delivery of open space and recreational provision within Maidstone Borough (which is required as part of DM 22) could also have positive health impacts by providing the facilities for people to partake in physical activity. Conversely, development could lead to the loss of locally valued open space, which could have negative implications for communities that use these areas. Policy OS1 is positive in this respect as it seeks to protect and enhance strategic open space.
- 18.4.8 The implementation of policies SP 17 and DM 3 should both help to ensure the countryside and natural environment within Maidstone is protected from the adverse effects of new development. This would contribute towards ensuring that these areas are accessible to the local population to enjoy; which would have a positive effect on their health and well-being. Furthermore, policy DM 3 also highlights that development proposals within Maidstone will need to provide publicly accessible open space as part of the overall green and blue infrastructure and layout of a site.

- 18.4.9 Policy DM 32 allows for the use of town centre units for community facilities, which could include health facilities in accessible locations.
- 18.4.10 Collectively the policies should have a **significant positive impact** on the baseline in relation to this SA objective. However, some communities could suffer from increased congestion and environmental quality issues if the effects of increased vehicular activity in the urban area are not fully mitigated. Some communities may also consider that increased development could erode the character of their settlements and damage valued open / green space; which could affect feelings of wellbeing for some people.

18.5 SA Objective 4: To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗	↗	↗	↔	↗	↗	↔	↗	↗	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↗	↔	↗	↗	↗	↗	↗	↔	↗	↗	↗	↗	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↗	↔	↗

Commentary

- 18.5.1 The majority of proposed strategic housing and employment site allocations would lead to development either within or in close proximity to Lower Super Output Areas (LSOAs) that are within the 20% or 40% most deprived nationally. The delivery of new residential, economic development and associated open space and community facilities ought to help to tackle social exclusion within these areas by enhancing access to affordable decent housing, employment opportunities and community facilities.
- 18.5.2 Policy EMP 1 should lead to an increase in job opportunities within the urban area and around some of the rural settlements. This would have a knock-on positive impact in terms of reducing poverty through access to employment, provided that the jobs created match the aspirations and skills/qualifications of those seeking employment. A number of the Development Management policies also have positive implications. Deprivation is an issue within some areas of Maidstone (*particularly within Maidstone Urban Area*). The protection of district and local centres and existing retail units (DM 18) and the delivery of sufficient community facilities as part of new residential development (DM 23) should help protect vital local economic and social provision. Furthermore, the retention of employment sites (DM 21) will allow for employment uses to continue to be provided on these sites.
- 18.5.3 By encouraging improvements in public transport provision within Maidstone, policy DM 25 may help to reduce levels of social exclusion for those who may not be able to travel by other means.
- 18.5.4 Policy DM 24 highlights the need to deliver transport improvements to support the growth proposed by the Local Plan through effectively managing and enhancing the Borough's transport infrastructure by promoting sustainable travel choices. In particular, the policy identifies the need to ensure that the transport network provides inclusive access for all users. The delivery of this policy should help reduce social exclusion by improving access to community facilities and employment opportunities for all, particularly through improvements to public transport provision.
- 18.5.5 Policy DM 20 aims to support economic development throughout Maidstone over and beyond the plan period. Implementation of Policy DM 20 will therefore also assist to improve access to employment opportunities, which will have a positive effect in terms of tackling social exclusion.
- 18.5.6 The delivery of Policies DM 10, DM 13 and DM 14 in combination will help to ensure that residents of Maidstone have the opportunity to live in decent and affordable housing through delivering a mix of house types, sizes and tenures throughout the Borough. This will have a positive effect in terms of tackling social exclusion within Maidstone. Policy DM 16 sets out measures to control the delivery of permanent planning permissions and allocation of sites for Gypsy and Traveller pitches. The delivery of this policy should help to tackle social exclusion through meeting the housing needs of this specific group. Policy GT 1 is somewhat contradictory to policy DM 16 as it allocates a number of pitches (albeit a very small number) in areas that have poor access to social infrastructure. However, these sites are already established.
- 18.5.7 Policy ID 1 sets out the need to deliver improved infrastructure (including the provision of open space, health, education, social services and affordable housing) alongside residential development over the plan period, which will have a positive effect in terms of tackling social exclusion in the medium and long term.
- 18.5.8 Collectively the policies should have a **significant positive effect** on the baseline in relation to this SA objective.

18.6 SA Objective 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

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗	↕	↕	↕	↗	↕	↕	↗	↗	↕

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↗	↕	↕	↗	↕

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↕	↗	↕	↗

Commentary

- 18.6.1 The Local Plan requires all sites within the north west and south east strategic housing locations to provide or contribute to (as proven necessary) educational facilities and services. Kent County Council are seeking the provision of a two form entry primary school within the south east strategic location, with Langley Park identified as a potential location. Land East of Hermitage Lane is also identified as a potential location for a new one form school. Policy H 1 highlights that the transfer of land and/or contributions for primary education (subject to confirmation of need) would be required as part of delivering new development on these sites.
- 18.6.2 The delivery of new schools as part of new development in the north-west and south east strategic housing locations will help to ensure that there are sufficient schooling opportunities to match the level of growth planned within these two areas. This will have a positive effect on the baseline.
- 18.6.3 The availability of higher-skilled jobs, alongside targeted training and employment programmes can motivate and encourage people to improve their qualifications and skills levels⁸⁴. Therefore, the allocation of increased land for employment, particularly for specialist skilled jobs at Newnham Park, is likely to have a positive effect on the local labour force.
- 18.6.4 Policy DM 20 highlights the need to improve the skills of the local workforce by supporting further and higher education provision within Maidstone's urban area with a preference for a town centre location. The delivery of enhanced higher education provision within Maidstone's urban area will have a positive effect in relation to: enhancing opportunities for adult education; and increasing training opportunities.
- 18.6.5 Policy ID 1 sets out the need to deliver improved infrastructure (including the provision of educational facilities) alongside residential development over the plan period. The implementation of this policy will have a positive effect by addressing the delivery of sufficient educational facilities to meet the needs of the local population. This is also supported by policy DM 23. The need to deliver sufficient educational provision is addressed in more detail within the strategic site allocations policies (H 1) and in policies DM 20 and DM23.
- 18.6.6 Collectively the Spatial Policies and Development Management Policies should have **positive implications** in relation to this SA objective.

⁸⁴ UK Commission for Employment and Skills (2009) Towards Ambition 2020: skills, jobs, growth – Expert advice from the UK Commission for Employment and Skills. [online] available at: <http://www.ukces.org.uk/assets/ukces/docs/publications/towards-ambition-2020-skills-jobs-growth.pdf>

18.7 SA Objective 6: To reduce crime and the fear of crime

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗	↗	↗	↔	↗	↗	↔	↗	↗	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗?	↔	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↔	↔	↔	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

Commentary

- 18.7.1 No significant effects are expected to arise from the broad spatial policies or the allocation of the strategic sites within the Local Plan. However, positive implications are anticipated (through policies SS1, H1, H2, RMX1 and EMP1 in particular) as a result of improved access to decent housing and employment opportunities, particularly in areas of need. These factors are recognised as key determinants in reducing offending rates⁸⁵.
- 18.7.2 By emphasising the need for proposals for new development to create a safe and secure environment and incorporate adequate security measures and features to deter crime, policy DM 1 (in conjunction with policy DM 7 regarding lighting) should help to ensure that safe and secure environments are provided for those occupying or passing through new developments.
- 18.7.3 Policies SP 4, SP5, DM 31 and DM 32 could have a positive impact on the sustainability baseline by helping to ensure that town and village centres remain vibrant and attractive. Where possible, natural surveillance in town centres should be encouraged by encouraging an appropriate mix of night and daytime uses.
- 18.7.4 Policy DM 22 can help to secure play spaces for children and teenagers, whilst OS1 safeguards strategic open space. This can act as a diversionary activity to crime and anti-social behaviour. Design and siting of facilities is important to ensure that areas do not become a magnet for anti-social behaviour and increased fear of crime.
- 18.7.5 The implementation of these policies should have **positive implications** in relation to this SA objective.

⁸⁵ Ministry of Justice (2013) Transforming Rehabilitation: a summary of evidence on reducing reoffending. [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/243718/evidence-reduce-reoffending.pdf

18.8 SA Objective 7: To create and sustain vibrant, attractive and clean communities

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↔	↔	↗	↗	↗	↗	↗	↗	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↔	↔	↗	↗	↗	↔	↔	↔	↔	↗	↔	↗	↗	↔	↗	↔	↔	↗	↔	↗	↗	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↗	↔	↔	↔	↗	↗	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗

Commentary

- 18.8.1 Current planning legislation for England emphasises the need to engage fully with the local community (a sub-objective for SA objective 7) when planning for new development. Through the plan making process, local people are provided with numerous opportunities to engage in the development of Local Plans. Local people are also provided with the opportunity to influence decisions on planning applications through the development management process.
- 18.8.2 The delivery of a number of policies within the Local Plan will have a positive effect in terms of creating and sustaining a vibrant community. Policies DM23, SP 5 and ID 1 both set out the need to deliver sufficient community facilities throughout Maidstone Borough. Policies DM 24 and DM 25 also aims to facilitate the delivery of public transport improvements to support the growth proposed by the Local Plan, which should ensure that a transport network is provided that enhances access to community facilities and job opportunities throughout the local area.
- 18.8.3 The implementation of policy DM 20 should contribute towards ensuring that sufficient job opportunities are delivered in Maidstone in the short, medium and long term. The policy also identifies the importance of enhancing the vitality and viability of Maidstone town centre and maintaining the hierarchy of retail centres. This will further contribute towards delivering vibrant communities.
- 18.8.4 The delivery of Policies H1, H2, DM 11, DM 13, DM 14 and DM 16 in combination will help to ensure that residents of Maidstone Borough have the opportunity to live in decent and affordable housing through delivering a mix of house types, sizes and tenures throughout the Borough. This will also contribute towards enhancing community vibrancy throughout the Borough.
- 18.8.5 The Local Plan requires that all sites within the north west and south east strategic housing locations provide or contribute to (as proven necessary) educational facilities and services, local health facilities and services and community facilities. This will help to ensure that key community facilities and services are accessible to existing and new residential areas in these parts of Maidstone.
- 18.8.6 Provided development comes forward on the site, the implementation of Newnham Park will also deliver employment opportunities in the area towards the north of the Borough. The delivery of employment opportunities in this area will further contribute towards creating and sustaining a vibrant community within Maidstone.
- 18.8.7 Policy DM 22 sets out the need to create open space as part of new development and Policy DM 23 sets out the importance of retaining/enhancing social facilities essential to any new development. The implementation of these policies would encourage integration amongst the local community and ensure that sufficient community facilities are retained/delivered.
- 18.8.8 Policy DM27 ought to have a positive effect on the street scene by ensuring that development is suitably served by adequate parking.
- 18.8.9 The implementation of the Development Management policies in combination with the strategic site allocations policies should have **positive implications** in relation to this SA objective.

18.9 SA Objective 8: To improve accessibility to all services and facilities

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗	↗	↗	↗	↗	↗	↔	↗	↗	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↔	↗	↗	↔	↔	↔	↔	↔	↔	↗	↔	↗	↔	↗	↗	↗	↔	↗	↗	↗	↗	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↗	↗	↗	↔	↔	↔	↗	↗	↗	↔	↔	↔	↔	↔	↗	↔	↗	↔	↔	↗	↔	↗

Commentary

- 18.9.1 The Local Plan requires that strategic housing locations provide or contribute to (as proven necessary) educational facilities and services, local health facilities and services and community facilities. This should help to ensure that key community facilities and services are accessible to existing and new residential areas in these parts of Maidstone in the medium and long term.
- 18.9.2 However, development in settlements that are at some distance from the nearest secondary school (e.g. Headcorn, Yalding, Staplehurst, Marden) does not promote active modes of travel to school such as walking and cycling.
- 18.9.3 The Local Plan aims to focus development (housing and economic) within the Maidstone Urban Area and to a lesser extent within the Rural Service Centres. This should help to minimise journey times and distances and ensure that key community services, employment opportunities and housing are accessible for people living within and close to Maidstone Town Centre. In particular, policy DM 24 sets out the need to develop an Integrated Transport Strategy (prepared by the Council and its partners), with the aim of improving accessibility across the Borough and to the Town Centre. Policy DM 4 supports the development of brownfield land. This should also help to focus development into urban areas that are already well served by facilities and services.
- 18.9.4 Whilst policy DM 24 seeks to enhance cycle provision across the borough, a large number of the allocated sites are poorly located to existing cycle routes. Individual mitigation and enhancement measures identified for housing sites do consider access onto sites via bicycle. For larger allocations, there are also clauses seeking to enhance links to cycle routes beyond the site boundary. Whilst these measures are positive (*and would have wider community benefits*), it would be useful to include such provisions at employment and mixed use sites too; where cycling provision is not considered as explicitly in the corresponding appendices to policy EMP1.
- 18.9.1 Policies SP 1 and SP 4 seek to locate development in accessible town centre and urban locations and improve transport links in the town centre. Policies SP 5 and SP12 will also help to ensure that rural service centres and larger villages are still supported by local services. Policy DM 24 also highlights that the council and its partners will promote sustainable travel choices by prioritising walking, cycling, public transport, car sharing and car clubs and sets out the need to ensure transport network provides inclusive access for all users; including in rural areas. The implementation of this policy will have a positive effect on the baseline by improving accessibility to key services and facilities through sustainable methods of transport.
- 18.9.2 Policy DM 1 outlines the design principles of proposals which include creating designs and layouts that are accessible to all, maximising opportunities for linkages to local services. Policy DM 22 seeks to achieve open space standards for communities, and to ensure that housing development contributes towards achieving these standards. Policy DM 23 highlights that the adequate provision of community facilities is an essential component of new residential development.
- 18.9.3 Policies DM 25 and DM 26 support the delivery of public transport provision as part of new development and the provision of park and ride facilities. The delivery of these policies should encourage people to use sustainable methods of transport in the short, medium and long term. Policies DM 21 and DM 18 aim to ensure that in the delivery of new development within the Borough, people have continued access to the work place and local amenities whilst ensuring their vitality and viability will not be harmed.

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- 18.9.4 Policies DM 31 and DM 32 could help to ensure that retail remains focused in the town centres, which are more accessible by public transport. Policy DM 17 also seeks to allow appropriate leisure development in town centres.
- 18.9.5 Policy SP 17 highlights that development outside of Maidstone Urban Area and the rural service centres will be limited to the provision or improvement of community facilities and services where there is a proven local need. The implementation of this policy should lead to the delivery of accessible key services and facilities within rural areas of Maidstone.
- 18.9.6 In terms of allocating sites for Gypsy and Traveller pitches and Travelling Showpeople, policy DM 16 highlights that planning permission will only be granted for these uses where local services (in particular schools and health facilities) are accessible from the site preferably on foot, bicycle or on public transport. However it is noted that policy GT 1 allocates a number of additional pitches on sites that have poor access to services (although these sites are already occupied). A comprehensive list of potential sites has already been appraised through the SA, with the findings suggesting that the majority of these are very poorly related to services. Therefore, in order for the effective application of policy DM 16 further sites will need to be identified.
- 18.9.7 Policy DM 3 sets out the need to ensure that new development incorporates measures that positively contribute to the improvement of accessibility of natural green space within walking distance of housing, employment, health and educational facilities.
- 18.9.8 Policy DM 23 sets out the need to deliver sufficient community infrastructure (including health, education, social services, libraries and transport) as part of new residential, business and retail development within Maidstone. This would help to ensure that these key services and facilities are accessible as part of new development within Maidstone in the medium to long term.
- 18.9.9 By supporting live-work units and the expansion of rural businesses, policies DM 39 and DM 41 should both help to support the rural economy, whilst at the same time reducing the need to commute to places of work outside of the rural service centres.
- 18.9.10 Policy DM 15 supports the development of nursing and care homes in the confines of defined settlement boundaries. This ought to ensure that such facilities are accessible by public transport, walking and cycling. This effect could be enhanced by encouraging and prioritising new developments that maximise accessibility to sustainable and active modes of travel.
- 18.9.11 Collectively, it is considered that the Local Plan is likely to have a **significant positive impact** on the baseline position.

18.10 SA Objective 9: To encourage increased engagement in cultural activity across all sections of the community in the Borough

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↔	↗	↗	↗	↔	↔	↔	↔	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↗	↔	↗	↗	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

Commentary

- 18.10.1 A number of policies seek to protect community and cultural assets / facilities throughout the borough. DM 3 seeks to avoid damage to and inappropriate development within or adjacent to cultural heritage assets. Policies SP 5 and SP12 aim to protect and retain community facilities where possible. The protection of such assets should help to maintain interest and engagement with activities associated with these assets and facilities.
- 18.10.2 Several policies in the Local Plan also seek to enhance the provision of community facilities. In particular, DM 23 highlights the need to provide adequate community facilities as part of new residential development (as deemed necessary). This ought to have a positive effect on the baseline by encouraging increased engagement in community activities. This is particularly relevant for strategic housing sites which have the potential to enhance existing service provision in areas of need.
- 18.10.3 The supporting text for Policy DM 17 also highlights that the council will promote cultural facilities within the town centre. This should help to improve opportunities for engagement in cultural activities in Maidstone Town Centre, which can be accessed by a wide range of communities across the Borough.
- 18.10.4 Policies DM 3 and DM 22 highlight the importance of protecting and enhancing the natural environment. This could help to ensure that there are greater opportunities to make use of open space for community activities such as fayres, music events and celebrations.
- 18.10.5 Collectively the policies should have **positive implications** in relation to this SA objective. However, it is not considered that the impacts would have a significant impact on the baseline position because engagement in cultural activities is also influenced by other factors.

18.11 SA Objective 10: To improve efficiency in land use

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↗	↗	↗	↘	↔	↔	↘	↔	↘

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↔	↔	↗	↗	↔	↔	↔	↗	↗	↘?	↔	↗	↔	↔	↔	↔	↗	↔	↗	↗	↔	↔	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↔	↔	↔	↔	↗	↗	↔	↔	↔	↔	↔	↔	↗	↔	↗	↔	↔	↔	↔	↔

Commentary

- 18.11.1 Allocation of development sites towards the north-west, south-east and on land at Newnham Park will lead to the delivery of new development on greenfield land and land with grade 2 and 3 of the agricultural land classification. Most of the land allocated for development around the rural centres will also involve some loss of Grade 3 agricultural land, some of which is on Grade 3a and some on Grade 3b. Whilst much of this is not currently used for specific agricultural purposes, there will still be a **significant negative effect** on the baseline as this loss would be widespread and permanent. However, greenfield site development will be expected to meet the requirements of DM22, which does include a standard for allotments. This will mitigate the loss of agricultural land to an extent, but there would still be a net loss in 'best and most agricultural land'. It is also worth noting that developer contributions will be prioritised for affordable housing and transport, which could mean that open space provision is not always secured where viability is an issue.
- 18.11.2 Conversely, a number of policies in the Local Plan will have **positive implications**. For example, the Local Plan aims to focus development (housing and economic) at Maidstone Urban Area and the Rural Service Centres. This approach will ensure that opportunities for urban regeneration in Maidstone Urban Area and the Rural Service Centres are realised in the short term. However, in the long term, the amount of previously developed land is likely to be reduced and there is likely to be a need to release further Greenfield land to accommodate any future growth in population.
- 18.11.3 A number of policies in the plan incorporate measures that will help to ensure new development improves efficiency in land use. For example, Policy DM 4 favours brownfield development. Policy DM12 encourages appropriate housing density in housing growth areas, though not at the expense of good design. Policy SP 17 highlights that proposals will be supported which facilitate the efficient use of the Borough's significant agricultural land and soil resources provided any adverse impacts on the appearance and character of the landscape can be appropriately mitigated. Policy DM 3 sets out a range of measures that aim to protect and enhance areas of natural value within Maidstone. Policy DM28 requires that agricultural land is returned to its former use/condition after being decommissioned from use for low carbon infrastructure.
- 18.11.4 Through Policy DM 17, a town centre first approach will be implemented which restricts out of town employment uses. The delivery of this measure should lead to economic development in areas with the highest proportion of previously developed land. Policies SP 1 and SP4 further support these principles, and will help to remediate land through support for infill development.
- 18.11.5 Policy SP 4 allows for infilling and small scale development of sites (allocated in the Local Plan) which will help to utilise existing space. The delivery of Policies DM 20 and DM 21 should also encourage continued use of existing employment and retail areas, therefore reducing the need to develop elsewhere. These policies encouraging development in existing built up areas of the Borough. Policies that encourage the occupation of underused premises are also positive by reducing the need for new development (DM 8, DM 9).
- 18.11.6 Policies DM 31 and DM 32 also encourage the re-use of existing retail units in the town centres, which will discourage out of town shopping in new retail units, whilst DM 41 supports the expansion of existing businesses in rural areas. Policy DM 10 could be restrictive to some householders wishing to extend their property. This could prevent them living in a house that meets their needs and might increase the need for new houses on greenfield land. The effects are not predicted to be significant.

18.12 SA Objective 11: To reduce road congestion and pollution levels and ensure air quality continues to improve

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗	↔	?	↔	?	?	↔	?	?	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↗	↗	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↔	↔	↗	↔	↔	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery	
Broad Implications	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔

Commentary

- 18.12.1 Overall, the Local Plan directs new development (including residential and employment generating development) towards Maidstone Urban Area and to a lesser extent the Rural Service Centres. This will help to ensure that in the main, new development is delivered in accessible locations that are well associated with existing jobs, key services and facilities. In turn, this is likely to reduce the distance and need to travel, which would have a positive effect on maintaining and improving air quality through reducing greenhouse gas emissions.
- 18.12.2 Traffic congestion is one of the greatest challenges facing Maidstone, with impacts particularly felt on the main radial approaches to the town centre and junctions 5, 6 and 7 of the M20 at peak times. Policy DM 24 sets out a range of measures that should help to tackle traffic congestion problems and improve air quality within and surrounding Maidstone. The implementation of this policy should contribute towards a **significant positive effect** on the baseline associated with SA objective 11. The policy sets out the need to manage traffic congestion and enhance local air quality, promote sustainable travel choices, manage the provision of car parking so that it balances the needs of local residents, the economy and the environment and ensure that the transport network provides inclusive access for all.
- 18.12.3 The delivery of this policy will be supported by the Integrated Transport Strategy, which Maidstone Borough Council is preparing, alongside a range of partners including Kent County Council. However, the delivery of new development towards the north west and south east of Maidstone Urban Area and at Newnham Park would increase the amount of traffic within and around these areas (which are within or near to AQMAs). This could potentially have a **negative effect** on the baseline associated with this SA objective by increasing traffic congestion within these areas. Policies H 1, RMX 1 and EMP 1 set out a range of traffic control measures to be secured at strategic sites, which should help to avoid and where possible reduce the impacts of traffic congestion. Furthermore, policy DM 24 requires that development must demonstrate that the impact of trips is mitigated including consideration of how mitigation measures could be secured before development is occupied.
- 18.12.4 Policy DM 5 should have positive implications, as it will help to manage the air quality implications of new development in Air Quality Management Areas (for example by supporting electric vehicle charging facilities). DM 5 should, coupled with the proposed Low Emission Strategy, ensure that future development does not adversely affect air quality, and where possible help to enhance the existing baseline position.
- 18.12.5 Standards for sustainable design are set out within Policy DM 2. The policy seeks higher standards of water efficiency for residential and non-residential development, as well as meeting BREEAM 'very good'. The implementation of this policy will help to reduce the amount of greenhouse gas emissions associated with new development. However, this is unlikely to affect local air quality standards.
- 18.12.6 Policy SP 17 supports the development of improved community facilities and services within the countryside, which should help to ensure that air quality in these areas is maintained through reducing the need to travel by private vehicle.

- 18.12.1 In terms of allocating sites for Gypsy and Traveller pitches and Travelling Showpeople, policy DM 16 highlights that planning permission will only be granted for these uses where local services, in particular schools and health facilities, are accessible from the site preferably on foot, by cycle or on public transport. This should help to ensure that sites are delivered in accessible locations that reduce the need to travel long distances in order to access key community facilities and services. However it is noted that policy GT 1 allocates a number of additional pitches on sites that have poor access to services by means other than the private car (although these sites are already occupied).
- 18.12.2 Through Policy DM 3, the Local Plan highlights the need to protect and enhance the natural environment within Maidstone. In turn, this could have a positive effect on maintaining air quality within the Borough as vegetation (particular certain species of trees) can help to regulate air quality⁸⁶. Furthermore, Policy DM 3 sets out the need to ensure that new development positively contributes to the improvement of accessibility of natural green space within walking distance of housing, employment, health and education facilities. The implementation of this measure would reduce the reliance on the private vehicle when accessing natural greenspace. Provided that people are willing to change their habits, this could have a positive effect on reducing traffic congestion and maintaining air quality.
- 18.12.3 Policy DM 25 supports the delivery of public transport provision, which should lead to a reduction in the need for cars on the road, with greater and more accessible public transport facilities becoming available. Furthermore, Policy DM 26 promote the provision of designated park and ride sites. Delivery of park and ride facilities could help to reduce congestion issues within built up areas of Maidstone. An increase in public transport usage could help to improve air quality by reducing traffic levels in Maidstone.
- 18.12.4 Policies DM 21 and DM 18 highlight the need for new development to protect existing employment sites and district/local centres. The implementation of these policies should help to ensure that accessible employment opportunities and key services in district/local centres are maintained. This could have an indirect positive effect on maintaining air quality through reducing the need for people to travel in order to access employment opportunities and key services. Furthermore, Policy DM 1 specifically emphasises the importance of addressing air pollution issues in designing new development. Policies DM 39 and DM 41 should help to further reduce the need to travel from rural areas to access employment as they support the expansion of rural business and live / work units.
- 18.12.5 Supporting retail development to meet the needs of rural communities could also help to reduce the number of necessary car trips.
- 18.12.6 Overall, the Local Plan should have a **positive effect** in terms of managing and mitigating congestion and air quality issues. It will be critical to manage increased traffic moving in and out of the urban area, but the plan strategy seeks to tackle these issues and actually improve the situation that would arise without the plan in place. However many of the positive impacts are dependent on a willingness by residents and visitors to undertake more journeys by modes other than the private vehicle.

⁸⁶ Beckett, K.P. et al (2000) Effective Tree Species for Air Quality Management. [online] at: http://eprints.soton.ac.uk/159959/1/Effective_Tree_Species.pdf

18.13 SA Objective 12: To address the causes of climate change and ensure that the Borough is prepared for its impacts

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↔	↔	↗	?	?	↗	↔	↔	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↔	↗	↗	↔	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↔	↔	↔	↗	↔	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery	
Broad Implications	↗	↗	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔

Commentary

- 18.13.1 Overall, the Local Plan directs new development (including residential and employment generating development) towards Maidstone Urban Area and the Rural Service Centres. This will help to ensure that new development is delivered in accessible locations that are well associated with existing jobs, key services and facilities. This ought to reduce the distance and need to travel; which should have a positive effect on reducing greenhouse gas emissions resulting from travelling in and around Maidstone.
- 18.13.2 The Local Plan highlights that new developments will need to incorporate measures to help mitigate and adapt to the impacts of climate change. Policy DM2 sets out requirements for residential and non-residential development to achieve increased standards water efficiency, which will reduce carbon emissions from new development. Though improved energy and water efficiency can affect costs, viability is considered as part of DM2, so effects in this respect are unlikely to be significant. The priority afforded to the delivery of low carbon infrastructure and sustainable design is low in the infrastructure plan, so it is unlikely that higher water efficiency standards will be achieved where viability is an issue. On balance, the policy will still have positive implications, but the effect will be less significant.
- 18.13.3 Policy DM7 requires that external lighting is the '*minimum required to meet its purpose*'. This will ensure that energy efficiency is considered for this aspect of development.
- 18.13.4 Policy DM 24 sets out a range of transport management measures that should help to improve air quality within and surrounding Maidstone. The policy sets out the need to manage traffic congestion and enhance local air quality, promote sustainable travel choices and ensure that the transport network provides inclusive access for all. Policy DM 5 sets out a range of measures to manage development that could adversely affect air quality in Maidstone over the plan period. Policy DM 6 also sets out the need to avoid development that would create noxious uses or that would generate volumes of traffic unsuitable for the local area. The delivery of these policies should help to reduce greenhouse gas emissions resulting from new development across the Borough and through the use of the private vehicle.
- 18.13.5 Policy SP 17 supports the development of improved community facilities and services within the countryside, which should help to reduce greenhouse gas emissions that emanate from travelling by vehicle to access these services.
- 18.13.6 In terms of allocating sites for Gypsy and Traveller pitches and Travelling Show people, policy DM 16 highlights that planning permission will only be granted for these uses where local services, in particular schools and health facilities, are accessible from the site preferably on foot, by cycle or on public transport. This should also help to ensure that sites are delivered in accessible locations that reduce the need to travel long distances in order to access key community facilities and services. In turn this should contribute towards reducing greenhouse gas emissions resulting from travelling long distances to access key services and facilities. However it is noted that policy GT 1 allocates a number of additional pitches on sites that have poor access to services by means other than the private car (although these sites are already occupied).

- 18.13.7 The Local Plan requires strategic sites within the north west and south east housing locations to provide or contribute to (as proven necessary) educational facilities and services, local health facilities and services and community facilities. This will help to ensure that key community facilities and services are accessible to existing and new residential areas in these parts of Maidstone in the medium and long term. In turn, this will contribute towards reducing greenhouse gas emissions emanating from travelling by vehicle to access these facilities and serves. However, there is likely to be an increase in emissions associated with construction and new residential properties. It is also unclear whether strategic developments will be built to exemplary levels of sustainability standards. It is clear in policies ID1 and DM 28 that development of low carbon energy schemes through community infrastructure funding is not a priority.
- 18.13.8 Policies DM 25 and DM 26 will encourage increased use of public transport and policy DM 18 should reduce the need to travel by seeking better access to services in local and town centres. In combination, these policies should help to achieve a reduction in carbon emissions from transport, provided that people are willing to change their behaviours and adopt alternative modes of transport to the private vehicle.
- 18.13.9 Policy DM 27 supports the use of private cars by ensuring that adequate parking is provided at new developments. Though the policy could lead to continued car use, it does take account of public transport availability.
- 18.13.10 By promoting the enhancement and connectivity of habitats, Policy DM3 ought to help improve resilience to the impacts of climate change for both species and habitats. Policy OS1 and DM22 in combination will help to ensure that open space and green infrastructure is protected and enhanced, which ought to have positive effects in terms of resilience to the effects of climate change (for example; areas of cooling, managing flood risk, increasing habitat range and connectivity).

18.14 SA Objective 13: To conserve and enhance the Borough’s biodiversity and geodiversity

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	?	↔	↔	↗	↗↘	?	↗	?	↗?	↗

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↗	↗	↗	↔	↔	↔	↔	↔	↗	↔	↔	↔	↗	↔	↗	↔	↔	↔	↔	↗	↔	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↔	↗	↔	↗	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗

Commentary

- 18.14.1 New development that is delivered within Maidstone over the plan period is likely to place additional pressure on existing areas of biodiversity and geodiversity value throughout the Borough through increased demand for land and the likely increase in the population over and beyond the plan period. However, by focusing new development within the Maidstone Urban Area and Rural Service Centres, this should help to ensure that overall, the most sensitive biodiversity and geodiversity assets located in the rural areas of the Borough are better protected.
- 18.14.2 A concentration of development in the Mansfield Urban Area could lead to an increase in recreational activity within the North Downs Woodlands (Boxley Warren) SAC but that It can be considered that provided funding continues at an appropriate level to ensure existing measures in place are suitably maintained (such as fencing, gateways etc., and entrance points) that the modest contribution to additional visitors that Maidstone will contribute should remain manageable through the existing arrangements and no likely significant effect would result.
- 18.14.3 Detailed site appraisals identify that there is the potential for **cumulative impacts** on wildlife habitats and species at a number of locations in the Borough:
- South East of the urban area, the scale of development could put pressure on Bicknor Wood.
 - North West of the urban area, the scale of development could put pressure on Oakenwood.
- 18.14.4 Therefore, policies H 1, EMP 1 and RMX 1 have the potential to have a negative effect on wildlife habitats and species.
- 18.14.5 Having said this, the Local Plan also incorporates a range of policy measures which should help to ensure that biodiversity and geodiversity assets are protected from adverse effects resulting from new development. Indeed, the potential for enhancement is also possible, and a number of clauses in the appendices to the site specific policies seek to secure habitat creation and enhancement as part of development.
- 18.14.6 The overarching policy within the Local Plan that sets out the need to avoid/mitigate any adverse effects on local biodiversity and geodiversity assets is Policy DM 3. The implementation of this policy (*in combination with specific requirements for site allocations*) should have a **significant positive effect** on the baseline associated with SA objective 13. The policy incorporates a range of measures including:
- to enhance, extend and connect designated sites for importance for biodiversity;
 - to avoid damage to and inappropriate development within or adjacent to internationally, nationally and locally designated sites of importance for biodiversity and local BAP priority habitats;
 - development proposals will be expected to be supported by an initial survey of on-site assets. Where harm to protected species and habitats is unavoidable, developers must ensure that suitable mitigation measures are implemented; and
 - new development proposals are expected to provide new public open space, which should be designed as part of the overall green and blue infrastructure and layout of a site, taking advantage of the potential benefits including enhanced wildlife.

- 18.14.7 The implementation of this policy should help to ensure that the Borough's biodiversity and geodiversity is protected and enhanced in the short and medium term. In the long term, demands for more space for new development are likely to lead to increased pressures on areas of biodiversity/geodiversity value.
- 18.14.8 The Kent Area of Outstanding Natural Beauty (AONB) contains a wide range of natural habitats and biodiversity. Policy SP 17 highlights that the distinctive nature of the Kent Downs AONB and its setting will be rigorously protected and maintained. Policy DM 1 also highlights that account should be taken of the Kent Downs AONB Management Plan when considering any development. The implementation of these policies should therefore have a positive effect in terms of protecting the natural habitats and biodiversity located within the AONB. This is also reflected in the spatial approach which directs development south of the AONB.
- 18.14.9 Policy DM 14 highlights that in terms of delivering local needs housing, new development that could adversely affect ecological designations will need to demonstrate that the need for new development outweighs the purpose for which any ecological designation is made.
- 18.14.10 Policy DM 22 provides the opportunity for biodiversity to be enhanced with the provision of open space required for the development of 10 residential units or more. The policy also includes the possibility of enhancing biodiversity when dealing with applications to develop existing open space. The policy adds there should be regard for the maintenance and conservation of wildlife habitats.
- 18.14.11 Policy DM 4 states that proposals for new development on brownfield land will be permitted - provided that the site is not of high environmental value. Policy DM 34 also highlights that the design of new development in the countryside should not result in unsympathetic change to the character of a rural lane which is of nature conservation importance. The delivery of these policies will make some contribution towards protecting the Borough's biodiversity over the plan period.
- 18.14.12 On balance, the delivery of the Local Plan is likely to have **a significant positive effect** on the baseline in relation to this SA objective.

18.15 SA Objective 14: To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↗	↗	↗	↗	?	↗	↘?	↘?	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↔	↗	↗	↗	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↗	↗	↔	↔	↔	↗	↔	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↔	↗	↗	↔	↗	↗	↔	↗	↔	↗	↗	↔	↗	↗	↔	↗	↔	↔	↔	↗

Commentary

- 18.15.1 New development that is delivered within Maidstone over the plan period is likely to place additional pressure on existing areas of landscape and historic value and open space located throughout Maidstone through increased demand for land and the likely increase in the population within the Borough. Policies H 1, EMP 1 and RMX 1 for example allocate a number of sites in proximity to heritage features and also in areas of 'moderate' or 'high' landscape sensitivity. Although development at most individual sites is unlikely to have a significant effect on the character of settlements and landscapes, the combination of sites being developed in some locations is likely to have a **significant negative effect** on landscape character.
- 18.15.2 For example, development at numerous sites in Harrietsham and Lenham could have a **cumulative negative effect** on views towards and out of these settlements. There are a number of sites where development would be in an area of 'low' capacity to accommodate landscape change. However, the scale of development at these sites is relatively small:
- housing development in Headcorn under H1 (46) – 48 dwellings
 - housing development in Headcorn under H1(44) – 55 dwellings
 - housing development in Staplehurst under policy H1(56) - 60 dwellings;
 - housing development in Boughton Monchelsea at 'Lyewood Farm' under policy H1(61) - 25 dwellings;
 - housing development in Hollingbourne under H1(65) -15 dwellings.
- 18.15.3 The Local Plan aims to focus the majority of new development within the Maidstone Urban Area and Rural Service Centres at appropriate densities (DM12), which should help ensure that areas of the most sensitive landscape and historic value located in the rural areas (particularly to the North) of the Borough are protected. The Local Plan also incorporates a range of policy measures, which should help to ensure that areas of landscape and historic value and open space are protected from potential adverse effects resulting from new development.
- 18.15.4 The overarching policy within the Local Plan that sets out the need to avoid/mitigate any adverse effects on the historic and natural environment is Policy DM 3. The implementation of this policy should have a **significant positive effect** on the baseline associated with SA objective 14. The policy incorporates a range of measures that requires new development to:
- contribute towards protecting historic and landscape character, heritage assets and their settings;
 - avoid damage to and inappropriate development within or adjacent to cultural heritage assets;
 - protect and enhance the character, distinctiveness, diversity and quality of Maidstone's landscape and townscape through careful, sensitive management and design of development;

- to appraise the value of the Borough's historic environment through the provision of heritage assessments to take full account of any past or present heritage assets connected with the development and associated sites.
- 18.15.5 The policy also requires public open space to be designed as part of the overall green and blue infrastructure of a site. The implementation of this policy should help to ensure that the Borough's landscape and historic assets are protected and enhanced in the short and medium term.
- 18.15.6 Policy SP 17 requires new development to protect and maintain the Kent Downs Area of Outstanding Natural Beauty and the extent and openness of the Metropolitan Green Belt. The implementation of this policy should help to ensure that new development is avoided or appropriate mitigation measures secured within these areas.
- 18.15.7 In terms of allocating sites for Gypsy and Traveller pitches and Travelling Showpeople, policy DM 16 highlights that the development of new sites should not lead to any harm on the landscape and rural character of the area, especially the Kent Downs AONB and the openness of the Metropolitan Green Belt.
- 18.15.8 Policy ID 1 sets out the need to deliver sufficient community infrastructure (including open space) as part of new residential, business and retail development within Maidstone. Policy DM 1 highlights the need to ensure any proposed development would take into account Conservation Area appraisals, Character Area assessments and the Kent Downs AONB Management Plan. Policy DM 1 also highlights the need for the design of new development to respect and enhance the local, natural and historic character of the Borough.
- 18.15.9 The Development Management policies identified for the countryside set out a number of measures which emphasise the importance of minimising the impact of buildings and structures on the character and appearance of the countryside. Policy DM 34 highlights that new development in the countryside should not adversely affect heritage assets and the landscape character of the local area. Policy DM 31 emphasises that new agricultural buildings on agricultural land will only be allowed if the character and appearance of the countryside is maintained. Policy DM 37 does not allow a change in use of agricultural land to domestic garden land if it would be harmful to the character and appearance of the countryside. Policy DM 42 highlights the importance of guarding against the location of holiday caravans/tents that would be an intrusive feature on the landscape.
- 18.15.10 There are a significant number of Listed Buildings in the town centre, as well as the wider area being part of several Conservation Areas. Delivery of policies DM 31 and DM 32 should help ensure that the town centre remains the focus of retail. This will help to ensure that the townscape is vibrant and attractive and that Listed Buildings are well maintained.
- 18.15.11 Policy DM 22 would be likely to have a positive impact on the baseline by ensuring that there is no net loss of open space where it is required.
- 18.15.12 In addition to the DM policies identified above, site specific policies included within the Local Plan (For example H1, EMP1) also incorporate a series of measures which should have a positive effect in terms of conserving and enhancing the Borough's heritage. These include:

- The need for certain submissions for new development to include the necessary landscape surveys with a detailed mitigation scheme.
- The need for certain submissions to include an appropriate archaeological survey and detailed mitigation measures.
- Measures to reduce any impacts on the setting of Kent Downs AONB.
- The need for submissions for development to mitigate the potential impact on the setting of listed buildings at allocated sites.
- The need for landscape buffering.
- Restricting the height of buildings.

18.15.13 On balance, the Local Plan is likely to have mixed impacts on the countryside, open space and historic environment. The scale and location of development will affect the character of both urban and rural areas, which constitutes a **cumulative negative impact**. However, mitigation and enhancement measures should ensure that impacts are minimised and in some instances are positive.

18.16 SA Objective 15: To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport	
Broad Implications	↗	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery		
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

Commentary

- 18.16.1 The Local Plan does not include spatial policies relating to waste management. However, it is noted that the development of policies for waste management is the responsibility of the Kent County Council through the Minerals and Waste Local Plan.
- 18.16.2 The Development Management policies provide an opportunity to ensure that new development supports the waste collection regime in Maidstone. This can be achieved by ensuring that there is adequate storage space for increasing amounts of recycling (and potential receptacles). Policy DM1 (Principles of Good Design) includes a policy clause that seeks to ensure that developments take these issues into account.
- 18.16.3 Development should also be designed so that waste receptacles do not create an amenity issue on collection days and so that collection vehicles can service properties effectively. These issues are not explicitly mentioned in the Local Plan with reference to waste, but policy DM 1 does seek to ensure that the development manages vehicular access to the site and to manage amenity impacts.
- 18.16.4 Policies that enable the extension of residential dwellings are positive (Policies DM 8 and DM 36), as they reduce the need for new dwellings and the associated raw materials and waste needed to construct them. Preserving existing retail units in town and local centres also helps to reduce the need for new buildings.
- 18.16.5 The allocation of Gypsy and Traveller sites will allow the Local Waste Collection Authority to better plan for the collection and disposal of waste arising from sites that may otherwise have been unauthorised. This will help to reduce fly-tipping and unmanaged storage of waste.
- 18.16.6 In combination, the Local Plan policies are unlikely to have a significant effect on the baseline. However, it can be assumed that the effects would generally be positive.

18.17 SA Objective 16: To achieve sustainable water resources management

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↔	↔	↔	↔?	↔?	↔	↔	↔	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport	
Broad Implications	↔	↗	?	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗

Commentary

- 18.17.1 Growth planned within the Local Plan will lead to an increase in the demand for water resources within Maidstone. According to the Environment Agency, there is less water available per person in the South East than in many Mediterranean Countries⁸⁷. Furthermore, Maidstone is located in an area of water scarcity. The Infrastructure Delivery Plan prepared alongside the Local Plan indicates that sewerage and wastewater facilities will need to be delivered within the Maidstone Urban Area and the Rural Service Centres to support the main areas identified for growth in the Local Plan.
- 18.17.2 Policy DM 2 sets out a requirement for residential development to achieve the optional higher water efficiency standard in the Building Regulations (For residential development), and to achieve maximum water efficiency credits for BREEAM for non-residential development. These requirements are likely to have a **significant positive effect** on water resources by reducing the need for abstraction.
- 18.17.3 Policy ID 1 sets out the need for new developers of residential, business and retail uses in Maidstone to contribute towards the delivery of new infrastructure within the Borough, which includes utilities. The implementation of this policy should help to ensure that contributions are sought from developers that will help to ensure sustainable management of water resources in the medium to long term. However, investment in utilities is not identified as a priority in this policy.
- 18.17.4 Policy DM 3 highlights that the council will *'Control pollution to protect ground and surface water where necessary and mitigate against the deterioration of water bodies and adverse impacts on Groundwater Source Protection Zones, and/or incorporate measures to improve the ecological status of water bodies as appropriate'* Furthermore, the justification for policy DM 3 highlights that the council will continue to work with the Environment Agency and other bodies to help achieve the goals of the Water Framework Directive. The inclusion of these measures should contribute towards ensuring that adverse impacts on the quality of water resources are avoided.
- 18.17.5 A significant amount of the growth planned within the Local Plan is due to take place on the strategic site locations towards the north west and south east of Maidstone Urban Area and at Newnham Park. As highlighted above, the delivery of new growth will lead to an increase in the demand for water resources within Maidstone. However, policies DM 2 and DM 3 incorporate measures that should help ensure that new development in these locations delivers more sustainable water resource management.
- 18.17.6 Collectively the policies should have a **significant positive effect** on the baseline in relation to this SA objective.

⁸⁷ Environment Agency (2005). *Water for the future: Managing water in the South East of England* [online] available at: http://www.environment-agency.gov.uk/static/documents/Research/waterressesummary_2005304.pdf

18.18 SA Objective 17: To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↔	↗	↔	↔	↗	↔	↔	↔	↔	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↔	↗	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41: Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery	
Broad Implications	↗	↗	↔	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

Commentary

- 18.18.1 Focusing growth in areas that are well served by local infrastructure ought to ensure that new development is served by sufficient capacity on the gas and electricity networks.
- 18.18.2 Policies DM 2 and DM 28 are the overarching policies within the draft Local Plan that address the need to increase energy efficiency and the proportion of energy generated from renewable sources in the Borough. DM 28 is unlikely to have a significant positive effect, as it puts the onus on energy developments to demonstrate that there will be no unacceptable impacts on a range of factors.
- 18.18.3 Energy efficiency is covered briefly under policy DM2. Whilst there are requirements for non-residential development to achieve BREEAM 'very good' for energy efficiency (which is positive); residential development would be covered by requirements in Building Regulations and thus the effects of this policy would be insignificant.
- 18.18.4 Implementation of certain site allocations within the Local Plan (set out within Policies HS 1 and EMP 1) could help to promote a higher standard of construction as part of new development on sites located within north west and south east Maidstone and at Newnham Park. Furthermore, Policy DM 24 along with all of the site allocations incorporate measures that should help to ensure that sustainable transport provision is delivered as part of new development within Maidstone. This will have an indirect positive effect on increasing energy efficiency within Maidstone through decreasing the reliance on the private vehicle, provided that people are willing to adopt alternative modes of transport.
- 18.18.5 Policies that aim to reduce the need to travel and mode of transport (DM 24, DM 25, DM 26) should collectively reduce the energy demand from transport (subject to the caveat above). There is likely to be little effects upon energy demand or renewable energy development from any of the other Development Management policies.
- 18.18.6 There is perhaps an opportunity to identify 'opportunity areas' for the development of renewable and low carbon energy schemes as part of a Development Management policy or SPD. This would provide greater certainty to developers about where developments would be more acceptable and would encourage an increase in installed capacity.
- 18.18.7 Policy ID1 concerns the delivery of infrastructure to support development over the plan period. The facilitation of low carbon energy schemes does not appear to be included in the indicative list of factors for prioritising Section 106 contributions.
- 18.18.8 The Plan seeks to achieve a balance between environmental constraints and the development of low carbon energy schemes. However, whilst the plan is unlikely to have negative effects, it does not set out a strategy that would lead to an improvement in the baseline position in the absence of the plan. Therefore, the overall effects on energy / low carbon schemes is predicted to be negligible.

18.19 SA Objective 18: To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough

Spatial Policies	SS 1: Spatial Strategy	SP 1-SP4 Maidstone town centre, urban area & strategic development	SP 5 - SP16: Rural service centres and larger villages	SP 17: Countryside	H 1: Housing Allocations	H2: Future Allocations for housing growth	OS1: Strategic open space allocations	RMX 1: Retail and Mixed use allocations	EMP 1: Employment allocations	GT 1: Gypsy and Traveller allocations
Broad Implications	↗	↗	↗	↗	↗	↗	↗	↗	↗	↔

DM Policies	DM 1: Principles of good design	DM 2: Sustainable Design Standards	DM 3: Historic and Natural Environment	DM 4: Development on Brownfield Land	DM 5: Air Quality	DM6: Non-conforming issues	DM 7: External Lighting	DM8: Residential Extensions	DM 9: Residential premises above shops	DM 10: Residential Garden Land	DM 11: Housing mix	DM12: Housing Density	DM 13: Affordable housing	DM 14: Local needs housing	DM15: Nursing and Care Homes	DM 16: G&T accommodation	DM 17 / DM18: Town & district centre uses	DM 19: Signage and Shop Fronts	DM 20: Economic Development	DM 21: Retention of Employment Sites	DM 22: Open Space and Recreation	DM 23 Community Facilities	DM 24 : Sustainable Transport
Broad Implications	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔	↗	↗	↔	↔	↗	↗	↗	↗	↔	↔	↗

DM Policies	DM25: Public Transport	DM 26: Park and Ride Sites	DM27 Parking standards	DM 28: Renewable and Low Carbon Energy Schemes	DM 29: Electronic communications	DM 30: Mooring facilities and boat yards	DM31 : Primary Shopping Frontages	DM 32: Secondary shopping frontages	DM 33: Leisure and community uses in town centres	DM 34: Design Principles in the Countryside	DM 35: Conversion of rural buildings	DM 36: Rebuilding and extending dwellings	DM 37: Change of agricultural land to domestic garden	DM 38: Accommodation for rural workers	DM 39: Live-work units	DM 40: New agricultural buildings and structures	DM 41 : Expansion of existing businesses in rural areas	DM 42: Holiday caravan and camp sites	DM 43: Caravan storage in the countryside	DM 44: Retail units in the countryside	DM 45: Equestrian development	ID1: Infrastructure Delivery
Broad Implications	↗	↗	↔	↗	↗	↗	↔	↔	↔	↔	↗	↔	↔	↗	↔	↗	↗	↔	↔	↗	↗	↗

Commentary

- 18.19.1 Maidstone's population is predicted to increase by around 29,000 up to 2026, which constitutes a 19% growth in population. A key trend predicted is that the population will age, which will lead to a reduction in the proportion that are of working age or younger. Such a trend could potentially have a negative effect upon economic growth and the competitiveness of the Borough. However, the Draft Local Plan incorporates a range of policies that aim to boost economic growth within Maidstone.
- 18.19.2 Overall, it is expected that the plan will result in **significant positive effects** in terms of sustainable (long term) economic growth. The updated Employment Land Review highlighted that there is a net requirement for 208,030 square metres of floorspace for 2011-2031 . This includes 39,830m² office space, 20,290m² industrial, 49,911m² warehousing and 98,000m² medical. The allocation of sites for employment use over the plan period (within policy EMP 1) should help to ensure that this requirement is met. In particular, Policy DM 20 highlights that the council is committed to supporting and improving the economy of the Borough and providing for the needs of businesses, which will be achieved through allocating sites for economic purposes.
- 18.19.3 Through Policy SP 17, the Local Plan aims to support the development, growth and diversification of rural economic development provided it is of a scale and location which maintains or enhances the value and character of the local countryside. The Local Plan highlights that agriculture remains an important influence within Maidstone, and is reliant on the large amount of high grade and versatile agricultural land located throughout the Borough. The Policy highlights the need to protect the Borough's significant agricultural land and soil resources, which should ensure that agriculture remains a key part of Maidstone's economy.
- 18.19.4 Policy DM 2 emphasises the need for new development to incorporate sustainable design and development. The policy highlights that reduced standards can be sought from developers if it can be demonstrated on the grounds of viability or feasibility that the above standards are unattainable. The inclusion of this measure will have a positive effect on sustaining economic growth in Maidstone as it would ensure that new development is not restricted by unrealistic construction standards in the immediate term. However, in the longer term, developments of poorer quality may not be as attractive to the market.
- 18.19.5 The Local Plan, particularly through the delivery of policy DM 24, aims to promote the use of sustainable travel within Maidstone by prioritising walking, cycling, public transport, car sharing and car clubs. The Draft Local Plan also directs new employment growth towards the Maidstone Urban Area and the rural service centres. The inclusion of these measures will have an indirect positive effect on sustaining economic growth within the Borough through enhancing access to employment opportunities for all.
- 18.19.6 The delivery of new housing (through the implementation of Policies H 1, H 2, DM 14 and DM 15) should help to ensure that job opportunities are provided in the house building sector within Maidstone in the short and medium term.

- 18.19.7 Larger site allocations proposed within the Draft Local Plan incorporate a range of measures that should contribute towards the delivery of economic growth. In particular, the proposed site allocation at Junction 7 (Newnham Park) is a particular opportunity to provide a hub for medical related businesses, to attract high value, knowledge intensive employment and businesses to boost the local economy. The policy also proposes retail uses on the site. The delivery of the proposed uses on this site would have a **significant positive effect** in terms of increasing employment uses located within this part of Maidstone.
- 18.19.8 In terms of the other site allocations, the following merits have been identified as particularly beneficial:
- *Bridge Nursery* – the policy highlights the requirement to provide appropriate community and health facilities (subject to confirmation of need). Delivery of these services should contribute towards providing jobs in this part of Maidstone.
 - *Langley Park* – the policy highlights the need for new development to provide appropriate shopping and community facilities within the site. Delivery of these services should contribute towards providing jobs in this part of Maidstone.
- 18.19.9 The delivery of policy DM 18 should help to ensure that the vitality and viability of existing district and local centres and existing local convenience shops and facilities are protected over and beyond the plan period. This should have a positive effect in terms of maintain the economic role of existing district and local centres within Maidstone. Furthermore, policy DM 33 sets out measures to control the development of class D2 (assembly and leisure) uses within Maidstone and aims to ensure that these uses are delivered over the plan period without impacting on the vitality and viability of existing centres.
- 18.19.10 The need to fully utilise existing employment sites is outlined within policy DM 21. The retention of employment sites should have a positive effect in terms of ensuring an appropriate supply of employment land to provide for high and stable employment levels. Policies DM 25 and DM 26 encourage the delivery of sustainable methods of transport as part of new development. In combination with DM 24, the delivery of these policies should help to ensure that employment opportunities are accessible to the local labour force in the short, medium and long term.
- 18.19.11 The delivery of policies DM 40, DM 35, DM 38, DM 42, DM 44 and DM 45 should help to control the delivery of new development so that the economic role of the countryside is maintained particularly in relation to agricultural uses, retail uses in rural areas and equestrian related development.
- 18.19.12 Overall, it is anticipated that the implementation of the policies will have a **significant positive effect** on the baseline associated with SA objective 18.

19 CONCLUSIONS AT THIS STAGE

19.1 Conclusions

The following table presents a summary of the key impacts and recommendations presented within Section 18. These recommendations will be taken into account when finalising the plan (alongside appraisal findings more generally, and consultation responses received as part of the current consultation).

Measures that could be taken to monitor the effects of the plan have also been suggested in this table. At the current stage (i.e. within the SA Report), there is only a need to present measures *envisaged* concerning monitoring.

Table 19.1: Summary of sustainability impacts

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 significant positive effect .	Allocating more housing sites in the short term would 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 significant positive effect 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. Site specific policies also seek to ensure that that greenfield development achieves <i>no net increase or a net decrease</i> in rates of run-off, which should have further benefits.	New development in the floodplain. Development permitted contrary to advice by the Environment Agency on flood risk. % of developments implementing SUDS.
Health	Improved access to health facilities and open space should be achieved for most communities, having a significant positive effect on the baseline position. However, there is potential for negative effects on some communities if levels of congestion and reduced air quality increase due to urban concentration.	The Local Plan seeks to minimise potential congestion and air quality issues, in part through the preparation of an Integrated Transport Strategy.	% of residents that consider their health to be good. Distance travelled to services.

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Poverty	<p>There should be a reduction in social exclusion and poverty, particularly within the most deprived parts of Maidstone. This would constitute a significant positive effect.</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 significant negative effect.</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	<p>New development should help to improve the provision and / or enhancement of education facilities. This is a significant positive effect.</p>	<p>Seek to improve access schools from Gypsy and Traveller sites.</p>	<p>Number of schools that are at capacity / surplus.</p> <p>Pupils achieving grades A-C.</p>
Crime	<p>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.</p>	<p>No measures identified.</p>	<p>Levels of crime in town centres.</p> <p>Crime rates per 1000 population.</p>
Vibrant Community	<p>Improved access to community facilities in new developments. Impacts are not considered to be significant though.</p>	<p>No measures identified.</p>	<p>Loss / gain of community facilities.</p>
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 significant positive effect 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 were 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>

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
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 significant negative effect.</p> <p>However, there should be a decreased amount of previously developed land left derelict, which is a significant positive effect.</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 significant negative effect.</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>
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 positive effect on the baseline.</p> <p>However, growth <i>per se</i>, is likely to generate an increased overall level of greenhouse gas emissions.</p>	<p>No measures identified.</p>	<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>	<p>The Plan seeks to mitigate potential negative effects on biodiversity through site specific and more general development management policies.</p>	<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 significant negative effect.</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 effects to ensure that they are not significant.</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 significant positive effects. 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.</p> <p>Development could present the opportunity to improve drainage and sewerage networks through infrastructure upgrades. This would lead to significant positive effects.</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>
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>	<p>No measures identified.</p>	<p>New installed renewable energy capacity.</p> <p>Total energy consumption.</p>

Sustainability Objectives	Summary of effects	Mitigation and enhancement	How could the effects be monitored?
Economy	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 significant positive effect on the economy.	The Plan is predicted to have positive effects. No recommendations to enhance these effects have been identified.	Total amount of additional floorspace by type. Unemployment rate.

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

20 PLAN FINALISATION, ADOPTION AND MONITORING

20.1 Plan finalisation and adoption

20.1.1 The Council has 'Published' a draft Local Plan in-line with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (so that final representations can be made on the soundness of the Plan). Following consultation on the draft Plan, it is the intention that the Plan will be 'Submitted' for Examination in Public (EiP). The Council will also submit a summary of issues raised (if any) through representations at the Publication stage so that these can be considered by the Government appointed Planning Inspector who will oversee the EiP. At the end of the EiP, the Inspector will judge whether or not the Plan is 'sound'.

20.1.2 Assuming that the Inspector does not request that further work be undertaken in order to achieve soundness, it is expected that the Plan will be formally adopted by the Council in 2017. At the time of adoption an SA 'Statement' must be published that sets out (amongst other things):

- How this SA findings and the views of consultees are reflected in the adopted Plan, *i.e. bringing the story of 'plan-making / SA up to this point' up to date; and*
- Measures decided concerning **monitoring**.

20.2 Monitoring

20.2.1 At the current stage (i.e. within the SA Report), there is only a need to present measures *envisaged* concerning monitoring. As such, **Table 19.1** suggests measures that might be taken to monitor the effects (in particular the negative effects) highlighted by the appraisal of the draft plan (see Part 3 of this SA Report).



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