STRATEGIC PLANNING AND INFRASTRUCTURE COMMITTEE MEETING

Date: Monday 9 November 2020
Time: 6.30 pm
Venue: Remote Meeting - The public proceedings of the meeting will be broadcast live and recorded for playback on the Maidstone Borough Council website.

Membership:

Councillors D Burton (Chairman), Clark, English, Garten, Mrs Grigg (Vice-Chairman), McKay, Munford, Parfitt-Reid and Spooner

The Chairman will assume that all Members will read the reports before attending the meeting. Officers are asked to assume the same when introducing reports.

AMENDED AGENDA Page No.

1. Apologies for Absence
2. Notification of Substitute Members
3. Urgent Items
4. Notification of Visiting Members
5. Disclosures by Members and Officers
6. Disclosures of Lobbying
7. To consider whether any items should be taken in private because of the possible disclosure of exempt information.
8. Minutes of the Meeting Held on 7 October 2020
9. Presentation of Petitions (if any)
10. Question and Answer Session for Members of the Public
11. Questions from Members to the Chairman (if any)
12. Committee Work Programme
13. Reports of Outside Bodies
14. Otham Parish Neighbourhood Plan Regulation 16

Issued on Monday 2 November 2020 **Continued Over/:**

Alison Broom

Alison Broom, Chief Executive

MAIDSTONE Borough Council

15. Maidstone Local Plan Review Regulation 18 Preferred Approaches Public Consultation Document

16. **Urgent Update - Item 15 - Appendix 2: Sustainability Appraisal of Spatial Approaches** **304 - 442**

INFORMATION FOR THE PUBLIC

In order to ask a question at this remote meeting, please call **01622 602899** or email **committee@maidstone.gov.uk** by 5 p.m. one clear working day before the meeting (i.e. by 5 p.m. on Thursday 5 November 2020). You will need to provide the full text in writing.

If your question is accepted, you will be provided with instructions as to how you can access the meeting.

In order to make a statement in relation to an item on the agenda, please call **01622 602899** or email **committee@maidstone.gov.uk** by 5 p.m. one clear working day before the meeting (i.e. by 5 p.m. on Thursday 5 November 2020). You will need to tell us which agenda item you wish to comment on.

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Maidstone Borough Council

Sustainability Appraisal
Options for Spatial Strategy, Site Allocations and Garden Settlements

Draft report
Prepared by LUC
November 2020

Maidstone Borough Council

Sustainability Appraisal
Options for Spatial Strategy, Site Allocations and Garden Settlements

Project Number
10509

Version	Status	Prepared	Checked	Approved	Date
1.	First draft for client review	O. Dunham L. Meldrum J. Pearson K. Stenson	J. Pearson	J. Owen	18.09.2020
2.	Second draft, incorporating SA of housing quantum, additional spatial strategy options, and garden settlement options	O. Dunham S. Langer J. Pearson K. Stenson	J. Pearson	J. Owen	24.10.2020
3.	Third draft responding to client comments on v2	S. Langer J. Pearson	J. Pearson	J. Owen	02.11.2020

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GIS & Visualisation

Contents

Chapter 1
Introduction

1.1 Maidstone Borough Council (the Council) commissioned LUC in November 2018 to carry out a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) of their Local Plan Review. SA is an assessment process designed to consider and communicate the significant sustainability issues and effects of emerging plans and policies, including their alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.

Purpose of this report and the requirement to assess alternatives

1.2 National legislation, policy and guidance sets out the tests for identifying 'reasonable alternative' alternatives for consideration in plan preparation and SA, including as summarised below [underlined sections are LUC emphasis].

1.3 The 'SEA Regulations'[1] require the preparation of an environmental assessment report to inform the preparation of Local Plans. Regulation 12 (2) states that this report should "*identify, describe and evaluate the likely significant effects on the environment of implementing the Plan…and reasonable alternatives taking into account the objectives and the geographical scope of the plan.*" This part of Regulation 12 is interpreted to mean that alternatives are only reasonable if they are in conformity with the plan's objectives as defined by National Planning Policy and Guidance and are focussed on the plan area.

1.4 The NPPF states that *"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where*

[1] HM Government, Environmental Assessment of Plans and Programmes Regulations, 2004

significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."

1.5 Government Planning Practice Guidance on SEA and SA[2], includes the following:

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

1.6 As such, it is important that the SA process runs alongside the plan-making process and identifies and appraises the options being considered at each stage. This report serves to document the options appraisal work carried out to date and feed this back to the Council so that it can help to inform Local Plan development. It is important to note, however, that this report does not constitute the full 'environmental report' required to be produced by the SEA Regulations. That report will be prepared and consulted upon at a later stage in the plan-making process, prior to the plan's submission. Further information on the future stages of the SA process is provided in the 'Next steps' section at the end of this report.

Appraisal methodology

1.7 Reasonable alternative options considered in the preparation of the draft Local Plan have been appraised against the framework of sustainability objectives that was established in the 2019 SA Scoping Report. Each of the Local Plan options considered in this report is appraised in terms of its likely effect on the achievement of each of these 'SA objectives'.

1.8 The SA process requires the likely effects of Local Plan options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols set out in **Figure 1.1**. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. Where a potential positive or negative effect is uncertain, a question mark is added to the relevant effect (e.g. +? or -?) and the effect is colour coded as per the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

Figure 1.1: Key to symbols and colour coding used in the SA of the Maidstone Local Plan

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/- or ++/--	Mixed minor or significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely

[2] HM Government, Strategic environmental assessment and sustainability appraisal, last updated 16 July 2020

0	Negligible effect likely
?	Likely effect uncertain

1.9 Aspects of the methodology that were particular to appraisal of different types of Local Plan option (spatial strategy options; site allocation options) are described in the later, corresponding chapters of this report. Broadly speaking, the appraisal approach for each set of options was designed to be commensurate with the level of detail of the options being described. Thus, the appraisals of the spatial strategy options consisted of top-down consideration of the likely effects of different broad distributions of development across the Borough. The appraisals of the site options (both garden settlements and other sites) consisted of bottom-up consideration of the likely effects of the principle of developing land for a specified use within a defined site boundary. Reflecting the larger scale of and additional information available for the garden settlement site options, the Council supplied assumptions about what facilities and infrastructure would be likely to be provided on site, in contrast to the 'policy-off' appraisals carried out for the smaller site options.

Chapter 2
SA of options for the total amount of development

Identification of reasonable alternatives

2.1 A Strategic Housing Market Assessment (SHMA) for Maidstone Borough was prepared by Iceni Projects and Justin Gardner Consulting (published December 2019). It identifies a total housing requirement of 1,214 homes per year, which equates to 18,210 over the period 2022-2037. MBC also published a draft Strategic Housing Land Availability Assessment (SLAA) in September 2020. This identifies a known supply of 12,420 homes for the period 2022-2037 from the following sources:

- 9,702 homes from allocations in the current local plan and existing permissions (8,019 modelled supply to 2031 + 800 at the Invicta Barracks + 883 additional units at town centre opportunity sites).
- 2,718 units from windfall development.

2.2 When this total of 12,420 homes is deducted from the overall requirement of 18,210, it results in a balance to provide of 5,790 homes. The Local Plan Review seeks to provide sufficient land allocations to enable this quantum of development to come forward.

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

The following section includes an appraisal of the likely sustainability implications of delivering the total housing requirement identified above (i.e. 5,790 homes between 2022-2037).

Appraisal of the total amount of housing development

Table 2.1: Summary of SA scores for housing quantum

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

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

2.4 The housing quantum identified has been objectively calculated using the Standard Method as set out in the Planning Practice Guidance. It takes account of demographic trends and income to house price affordability ratios to determine an appropriate housing amount for the Borough. The local plan review intends to deliver the full quantum of the total objectively assessed housing need, result in significant positive effects in relation to this SA objective.

2.5 The policies for the quantum of affordable housing and tenure mixes are not yet known. Similarly, policies relating to the design of new homes have not been prepared at this stage. It is possible that when these are submitted for SA that there may be a change to this assessment.

Mitigation

2.6 No negative effects identified therefore no mitigation required.

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

2.7 Matters relating to access arise in general from the distribution of homes and design of development rather than the overall quantum proposed. This section of the SA relates solely to the total housing quantum and therefore it was not considered appropriate to appraise this against this SA objective.

Mitigation

2.8 Not applicable.

SA Objective 3: To strengthen community cohesion

2.9 The provision of the full objectively assessed need in accordance with the Standard Method as set out in the Planning Practice Guidance is intended to result in increased delivery of homes and an overall improvement in the affordability of housing. It is considered that should these objectives be achieved, there will be significant positive effects in relation to community cohesion, as the delivery of new homes will enable families and communities to grow.

2.10 Having said this, there may be some who hold negative views about new development, as it is likely to increase in localised traffic increases and demand on services and facilities, resulting in reduced community cohesion and subsequently minor negative effects are also identified. As such, mixed effects are anticipated overall.

2.11 It should be noted that once policies relating to the dwelling size mix and tenures are available, this may result in changes to this assessment.

Mitigation

2.12 Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that existing services and facilities do not feel additional pressure in the short term.

2.13 Ensuring that existing communities also receive sufficient development, investment and support for their services and facilities is also important for cohesion, rather than focussing all the attention on the new communities. In this regard, it is notable that current Community Infrastructure Levy (CIL)

arrangements in the Borough allow 15% or 25%[3] of CIL receipts from liable development in a local area to be spent on non-strategic infrastructure in the local community.

2.14 Large new communities should be planned and design-in community cohesion principles from the outset.

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

2.15 Matters relating to health and wellbeing are related to the location of homes in terms of access to opportunities to live healthier lifestyles and receive medical attention. This section of the SA relates solely to the total housing quantum and therefore it is not considered appropriate to appraise this against this SA objective.

Mitigation

2.16 Not applicable.

SA Objective 5: To facilitate a sustainable and growing economy

2.17 The SHMA sets out that the provision of the housing requirement calculated is projected to result in approximately 48,000 new residents in Maidstone and increase in the available workforce of 25,000 persons. This increase in the labour source is likely to lead to very positive economic benefits and as such significant positive effects are anticipated in relation to this SA objective.

Mitigation

2.18 No negative effects identified therefore no mitigation required.

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

2.19 Maidstone town centre is the main centre in the Borough and provides the most significant concentration of facilities, services and employment opportunities. The provision of additional homes in Maidstone Borough, regardless of their location, is likely to lead to an increase in the number of people accessing Maidstone town centre and therefore minor positive effects are anticipated in relation to this SA objective.

Mitigation

2.20 No negative effects identified therefore no mitigation required.

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

2.21 Matters relating to the need to travel and use of more sustainable forms of transport arise in general from the distribution of homes rather than the overall quantum proposed. This section of the SA relates solely to the total housing quantum and therefore it is not considered appropriate to appraise this against this SA objective.

Mitigation

2.22 Not applicable.

SA Objective 8: To conserve the Borough's mineral resources

2.23 Approximately half of the Borough is designated as Mineral Safeguarding Areas (MSAs) in the Kent Minerals and Waste Local Plan. The minerals include limestone, sandstone, river terrace deposits, silica sand and sub-alluvial river terrace deposits. In addition, there are six safeguarded minerals sites, at Lenham Quarry, Detling Quarry, Burleigh Farm Extension (Charing), Babylon tile Works , Allington Quarry and Allington Depot.

2.24 Although potential conflicts between housing sites and mineral resources will be determined by the distribution of housing, high incidence of mineral resources considered appropriate for safeguarding suggests that there is likely to be a degree of conflict between mineral resources and housing sites, albeit the extent of this is not known at this time. This is considered likely to result in the potential sterilisation of some mineral resources. As such, minor negative effects are anticipated in relation to this SA objective.

Mitigation

2.25 Consideration should be given to preparing Local Plan Review policies which seek to safeguard mineral resources through methods such as prior extraction and development phasing, and avoidance of developing on land with mineral resources. Such policies would reduce the potential for negative effects.

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

2.26 Maidstone Borough contains a mix of different soils. underlying soils give rise to a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 1, Grade 2 and Grade 4 .

[3] An area with a made neighbourhood plan in place is allocated 25% and those without a made neighbourhood plan are allocated 15%

2.27 The coverage of soils identified as Grade 1, 2 or 3 is significant, and appears to be over 75% on visual inspection of the relevant GIS data.[4]

2.28 Although potential conflicts between housing sites and good quality soil will be determined by the distribution of housing, high coverage of good quality soils suggests that there is likely to be a degree of conflict between these and housing sites. This is considered likely to result in the potential loss of these good quality soils. As such, minor negative effects are anticipated in relation to this SA objective. The likely effects on soils of different spatial distributions of development are separately considered in the appraisals of spatial strategy and site allocation options.

Mitigation

2.29 Consideration should be given to preparing Local Plan Review policies which seek to safeguard high quality soils through methods such as giving preference to brownfield sites and poorer quality agricultural land. Such policies would reduce the potential for negative effects.

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

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

2.31 Pressures related to the provision of water supply and wastewater treatment are key contributors to the current status and future status of water bodies in Kent.

2.32 The Kent Environment Strategy (2016) identifies Kent as one of the driest regions in England and Wales, and the household water use is above the national average. This is also the case for Maidstone, where water use is on average 164 litres per person per day (compared to the national average of 154). The Environment Agency classifies areas of England and Wales according to their water stress and Maidstone Borough falls within the South East Water supply area, which is classified as an area of 'serious water stress'.[5]

2.33 In combination with other pressures, abstractions for public water supply and discharges of wastewater are impacting on key Water Framework Directive supporting elements which are critical to attaining overall Good Status; this includes impact on hydrological regime, biological quality and physico-chemical quality . In reflection of this, source protection zones (SPZs), which are areas designated to protect groundwater sources used for public drinking water supply, have been designated primarily in a band running along the north-eastern boundary of Maidstone Brough Council area. Drinking Water Safeguard Zones have also been defined and cover almost all of the council area (apart from, in general, the area covered by the source protection zones). These are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. The protection and safeguarding zones demonstrate that whole borough is under pressure in relation to water quality.

2.34 Negative effects to available water resources and to water quality may arise if abstraction is increased to serve new development. As water quality is currently considered to be moderate in relation to ecology for most water courses in the catchment, there is potential for these effects to be significant, however it is possible that mitigation measures proposed in future iterations of the Local Plan Review may amend this appraisal outcome.

Mitigation

2.35 An updated water cycle study to assess the likely implications of growth proposed in the Local Plan Review and its likely implications for water demand and quality may allow the most significant effects to be identified and mitigated.

2.36 A rationalisation of current abstraction may be able to reduce the amount of water utilised.

2.37 Consideration should be given to waste water treatment distribution and capacity as improvements to this may help to reduce negative effects.

2.38 Water saving measures such as water efficient fittings and rainwater / grey water harvesting have the potential to reduce negative effects.

2.39 The inclusion of green and blue infrastructure and sustainable drainage systems in development to help prevent pollution of natural water sources and increase infiltration is recommended.

[4] The NPPF requires planning policies to recognise the benefits of the 'best and most versatile' agricultural land and, where significant development of agricultural land is demonstrated to be necessary, to prefer areas of poorer quality land. The best and most versatile land is defined as Grades 1, 2 and 3a of Natural England's Agricultural Land Classification (ALC) system but data to subdivide agricultural land into grades 3a and 3b were not available for Maidstone Borough therefore these grades were considered together.

[5] Environment Agency (2103) Water Stressed Areas – Final Classification

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

2.40 . Maidstone town is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20. The Council designated the wider urban area as an AQMA in 2008 due to elevated concentrations of Nitrogen Dioxide (NO2) at residential receptors in six areas of the Borough. However, in May of 2018 the AQMA within Maidstone was reconfigured to only follow the carriageways of the main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274. NO2 levels at some key locations near major roads and junctions remain above the EU Limit Value with no discernible downward trend.

2.41 The provision of new housing is, given existing travel patterns in Maidstone, likely to result in increased road traffic. This is likely to result in localised reductions in air quality as traffic levels increase and congestion increases. It is possible that there may also be increases in traffic within the AQMAs themselves given the attractiveness of Maidstone as a destination for borough residents and as such, negative effects are anticipated. These are subject to uncertainty this as it is not known how people will choose to travel or the route / form of transport that they will take.

Mitigation

2.42 Identification of allocations, development layouts and provision of sustainable travel opportunities to discourage use of the private car, especially petrol/diesel vehicles, and support a shift to zero/low pollution transport modes (e.g. walking, cycling, electric vehicles). Provision of green infrastructure alongside roads to help to reduce air quality issues associated with traffic from new development.

SA Objective 12: To avoid and mitigate flood risk

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

2.44 Large areas of the borough are designated as Flood Zone 2 or 3, and as having a 1:30 year risk of surface water flooding. There are also large areas of the borough which are identified as being at risk of ground water flooding.

2.45 Although the potential conflicts between areas which are identified as being at risk of flooding and housing will be affected by the distribution of housing rather than the overall quantum, and therefore cannot be assessed a total housing figure. There are some general principles which can be considered. Specifically, that there will be increased hardstanding as a result of new development which may result in increased localised flood risk. In addition, there may be increased provision of homes within Flood Zone 2, which although acceptable in accordance with the NPPF and planning practice guidance, still results in a greater risk of flooding to the general public.

2.46 As such, minor negative effects are anticipated from housing provision in relation to this SA objective.

Mitigation

2.47 Avoid development within Flood Zones 2 and 3, where appropriate and in accordance with the sequential and exception tests. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could be achieved through various mechanisms, such as S106 agreements.

SA Objective 13: To minimise the Borough’s contribution to climate change

2.48 Aspects to consider in relation to this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors depend on development management policies and cannot be assessed as part of the appraisal of a housing total.

2.49 Having said this, there are some general principles which arise from housing development which are relevant. These are considered below.

2.50 The process of development, including matters such as sourcing of construction materials, site clearance, construction activity, utility provision, waste transportation, employee transportation results in increased greenhouse gas emissions. Once that development is occupied, natural resources are utilised to generate electricity and heat, and products are made to make the homes liveable, which also, in turn, result in increased greenhouse gas emissions.

2.51 Furthermore, there will inevitably be an increase in the use of motorised vehicles to access the new homes provided, also resulting in increased greenhouse gas emissions.

2.52 It is therefore inevitable that delivery of new housing will result in increased carbon emissions and a potential for significant negative effects in relation to this SA objective.

Mitigation

2.53 Local plan review policies seeking to reduce greenhouse gas emissions from new development using design, energy efficiency and renewable energy are likely to help reduce negative effects.

2.54 In addition, the provision of a development distribution, development layout and public transport network that seeks to reduce greenhouse gas emissions by promoting use of sustainable forms of travel in accordance with the travel hierarchy published by the Energy Saving Trust would help to reduce negative effects.

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

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

2.56 Whilst the key effects relating to wildlife, habitats and species will arise from the specific distribution of housing development, there are some general principles which arise from housing development which are relevant. These are considered below.

2.57 The delivery of new homes can result in the loss of localised habitat and habitat fragmentation. Although a net gain in biodiversity is required by the NPPF, this is limited to the impacts on site, and there are wider impacts such as pet predation, increased traffic, increased pollution and demand for resources which are likely to have negative effects in relation to biodiversity.

2.58 The extent of the effects is not known at present however in recognition that MBC declared a biodiversity emergency in April 2019, it is considered that these have the potential to be significant negative.

Mitigation

2.59 Local Plan Review development management policies seeking to ensure that new development is undertaken in a manner that safeguards and strengthens existing priority habitats and all species would help to reduce negative effects.

2.60 In addition, the distribution, layout and design of development to integrate habitat and development in a manner which provides benefits to wildlife and opportunities for people to interact with it, for example, through the provision of green infrastructure are likely to reduce negative effects.

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

2.61 There are 41 Conservation Areas within the Borough. There is a cluster of 5 Conservation Areas in Maidstone Town Centre, 16 in the rest of the urban fringe and an additional 4 that straddle the urban/rural boundary. The remaining 16 are focused in the villages of the rural area. Each of these Conservation Areas contain a mixture of Listed Buildings. The Borough also contains 5 sites included on the Register of Historic Parks and Gardens[6].

2.62 Whilst the key effects relating to the Boroughs historic environment will arise from the specific distribution of housing development, there are some general principles which arise from housing development which are relevant. These are considered below.

2.63 Given that there is a large coverage of historic environment assets in the borough, including in and around existing urban areas which are likely to be attractive housing sites (given the other sustainability benefits that these may bring in terms of access to facilities and services) the delivery of housing is likely to affect heritage impacts as a result of development within them (this is most relevant for an area designation such as a conservation area) or within the setting of a heritage asset. Although less than substantial harm may be achieved in the significant majority (if not all) of cases, there is still the potential for some harm to occur. There may also be instances where substantial harm is considered appropriate.

2.64 As such negative effects are considered possible. The extent of these effects is unknown however given that designated historic environment assets are strongly protected by the NPPF and planning legislation, it is considered likely that these effects will be minor negative as a result of housing development in general. Although there is the potential to affect non-designated assets, the fact that these are not

[6] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf

designated is not considered likely to result in a more significant effect.

Mitigation

2.65 Local Plan Policies which protect designated and non-designated heritage assets, including their setting would help to reduce potential negative effects.

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

2.66 Just over a quarter of the Borough (the northern part) lies within the Kent Downs Area of Outstanding Natural Beauty (AONB). In addition, many parts of the rest of the Borough are designated as Landscapes of Local Value. The sensitivity of these designations and the wider landscape to development are set out in the Council's landscape capacity study.[7] This identifies that a substantial proportion of the Borough has high landscape sensitivity, with the greatest concentrations of land in these categories in the south and west of the Borough. Significant parts of the north and east of the Borough are of moderate landscape sensitivity. The main areas of low landscape sensitivity, all of which are relatively small, are located around Sandling (north-west of Maidstone urban area), between Boughton Monchelsea and Warmlake (south-east of Maidstone urban area) and between Sandway and Lenham Heath (in the east of the Borough).

2.67 Whilst the key effects relating to landscape impacts will arise from the specific distribution of housing development, there are some general principles which arise from housing development which are relevant. These are considered below.

2.68 The development of greenfield areas for new housing can result in a significant change in the interpretation and aesthetic of the immediate landscape. Given that the majority of the borough is identified as being high or very high sensitivity to landscape change, it is considered likely that negative effects will occur. The extent of these effects is unknown and therefore in accordance with the precautionary principle, significant negative effects are identified. However there is uncertainty about this as effects will be informed by the location, design, form and landscaping of new development.

Mitigation

Local Plan Review development management policies seeking to ensure that new development is undertaken in a manner that safeguards landscape character would help to reduce negative effects, for example avoiding the most sensitive areas.

[7] Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

Chapter 3
SA of initial spatial strategy options

Identification of reasonable alternatives

3.1 The spatial strategy options constitute a range of broad options for distributing the housing and economic development (including retail and leisure) needed to meet future growth within the Borough. No development site boundaries were identified at this level of plan-making

3.2 In spring 2020, the Council identified a set of three initial, high-level spatial strategy options. These options and the related SA findings are described in this chapter. In the summer of 2020, the Council further refined the spatial options under consideration and added information about the amount of development that would be provided at particular growth locations. The refined options and the related SA findings are described in **Chapter 4**.

3.3 The first column of **Table 3.1** lists the broad categories of location referred to in the spatial strategy options. The second column of the table lists the particular settlements or locations that fall within each of these broad categories and for which amounts of development were specified in the refined spatial strategy options. These growth locations provided the building blocks for defining a range of reasonable alternative spatial strategy options.

Table 3.1 Growth locations providing building block for spatial strategy options

Growth location category	Growth location name
Maidstone Urban Area	Maidstone Town Centre
Maidstone Urban Area	Maidstone Urban Area
Maidstone Urban Area	South of Maidstone Urban Area
Maidstone Urban Area	South West of Maidstone Urban Area
Maidstone Urban Area	South East of Maidstone Urban Area
Rural Service Centres & Larger Villages	Marden
Rural Service Centres & Larger Villages	Staplehurst

Growth location category	Growth location name
Rural Service Centres & Larger Villages	Headcorn
Rural Service Centres & Larger Villages	Lenham
Rural Service Centres & Larger Villages	Harrietsham
Rural Service Centres & Larger Villages	Boughton Monchelsea
Rural Service Centres & Larger Villages	Coxheath
Rural Service Centres & Larger Villages	Eyhorne St (Hollingbourne)
Rural Service Centres & Larger Villages	Sutton Valence
Rural Service Centres & Larger Villages	Yalding
Garden Settlements	North of M2/ Lidsing Urban Extension
Garden Settlements	Heathlands
Garden Settlements	North of Marden
Garden Settlements	Leeds-Langley Corridor
The Countryside	Smaller villages, hamlets and open countryside

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

3.5 The Council prepared a series of 'topic papers' to inform emerging policy options for the Local Plan Review as follows:

- Housing Strategy Topic Paper
- Economic Strategy Topic Paper
- Transport Infrastructure Topic Paper
- Social Infrastructure Topic Paper
- Retail and Leisure Strategy Topic Paper
- Environment Topic Paper

3.6 Four 'Spatial Approaches' were identified within the Council's topic papers, being high-level, alternative distributions of the housing and economic development needed during the Plan period. A number of these 'Spatial Approaches' were very similar to the three initial spatial strategy options outlined above. Where relevant, these topic papers were therefore used to inform assumptions about what would be likely to be provided under each spatial strategy option.

Appraisal of initial spatial strategy options

Initial spatial strategy options

3.7 The options at this stage were intended to be illustrative rather than definitive. These were subject to appraisal and the results provided to the Council to help inform further options development.

3.8 The initial spatial strategy options assessed at this stage are outlined below:

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

Appraisal of initial spatial strategy options

3.9 The findings of the SA of the spatial alternatives are described below by SA objective and summarised in **Table 3.2**.

- **Option RA1: Local Plan Review Continued** - no garden settlements, new residential and economic development allocations located according to the existing settlement hierarchy – Maidstone, Rural Service

Centres, Larger Villages and some potentially suitable sites in the Countryside.

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

Table 3.2 Summary of SA scores for initial spatial strategy options

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

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

3.10 Between 2017 and 2018, house prices in Maidstone have continued to increase. There has been an increase of 5.1%, which is greater than the Kent average. There has also been a decrease in the number of house sales in the Borough of 14%, which is also reflected in the Kent average. The house price to earnings ratio has increased from 10.30 in 2017 to 11.20 in 2018[8]. The SHMA (December 2019) calculated that the standard method would result in a need for 1,214 dwellings per annum from 2022. Over the Plan period, the population of the Borough is expected to grow by 28% with the strongest growth expected in those aged over 65. Overall, the total affordable housing need for the Borough equates to 38% of the total housing need and there is a need for different types of homes in both the market and affordable sectors. According to the SHMA, 52% of residents living in the rural areas of the Borough and 48% of residents within the urban areas of Maidstone are unable to afford market housing (without subsidy).

3.11 New development would be more widely distributed under option RA1 (Local Plan Review Continued) than under the other spatial strategy options as it is expected to be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, significant positive effects are expected as there is the potential for more people across the Borough to have the opportunity to live in a decent and affordable home compared to the other options. However, if these developments are of a smaller scale, they may not be as well placed to deliver affordable housing as part of the development mix, resulting in a minor negative effect as well.

3.12 Option RA1a (No Maidstone) is expected to provide sufficient housing primarily through the development of four garden settlements, with residual development at Rural Service Centres and Larger Villages. As such it is likely that most development will be within the rural areas of the Borough. Therefore, this option could result in one or more garden settlements and extensions to Rural Service Centres and Larger Villages providing affordable housing within these rural areas. However, garden settlements would entail the creation of relatively large settlements compared to smaller rural villages, and this option would not deliver housing at Maidstone. In addition, the creation of a garden settlement will require significant investment in new infrastructure, which may reduce the funds available to cross-subsidise the delivery of affordable homes from the sale of market housing and may divert investment from other parts of the Borough. Garden settlements can also take a long time to deliver, which means that homes, including affordable homes, would not be provided for in the early years of the plan period. However, housing attached to Rural Service Centres and Larger Villages could be delivered at a quicker pace than garden settlements. As a result, mixed significant positive and significant negative effects are considered likely for this option.

3.13 Since option RA2a (Maidstone + 4 Garden Settlements) is focused primarily on the town centre, urban extensions of Maidstone and four garden settlements, the rest of the Borough would not benefit from significant amounts of additional housing thereby creating minor negative effects for these existing communities, and continuing to exacerbate the current higher rural housing price pattern. Given that Maidstone is the primary focus in the Borough of existing infrastructure, services and facilities, there may be less need to cross-subsidise further investment, allowing for greater funding for affordable housing provision resulting in significant positive effects. However, the standard of infrastructure and service provision in Maidstone town centre is currently relatively poor, therefore a decision may need to be made about the extent to which market housing delivery is used to support improvement of this offer rather than delivering affordable housing. Town centre sites are likely to be brownfield and these can be relatively costly to develop compared to greenfield sites, if demolition of existing structure and hard standing is required, and even more so if remediation of contaminated land is needed. The development of four garden settlements will require significant investment in new infrastructure, which may reduce the funds available to cross-subsidise the delivery of affordable homes from the sale of market housing and may divert investment from other parts of the Borough. Garden settlements can also take a long time to deliver, which means that homes, including affordable homes, would not be provided for in the early years of the plan period. Therefore, uncertainty is attached to these potential significant positive effects.

Mitigation

3.14 The quality of homes provided under any of the options could be ensured through suitable policies in the Local Plan Review relating to, for example, room sizes, sustainable design and construction, lifetime homes standards, and energy efficiency. In addition, for larger developments, it may be possible to introduce design codes for developers to adhere to, ensuring not only the resource efficiency of homes,

[8] Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf

but also space and access requirements, lighting, and their style and character to complement the local vernacular.

3.15 The provision of affordable housing can be achieved through various mechanisms, such as S106 agreements. Larger developments are generally more likely to be able to deliver affordable homes on site.

Conclusion

3.16 Option RA1 (Local Plan Review Continued) performs most strongly against this SA objective, primarily it would be delivering most development where services and facilities already exist, thereby ensuring that there is the greatest potential for delivering affordable homes alongside market housing. In addition, it would allow the additional affordable housing to be delivered where the greatest need for it exists – the rural area. However, options RA1a and RA2a offer considerable potential in the longer term assuming that investment in new infrastructure, services and facilities would allow enough headroom to also cross-subsidise the provision of affordable homes.

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

3.17 The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area[9]. As the County town and the dominant settlement in the Borough, Maidstone itself has a much wider range and number of services and facilities than elsewhere in the Borough. For example, outside of Maidstone, Lenham is the only Rural Service Centre or Larger Village that has a secondary school.

3.18 The five Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst all provide a good range of services which serve both the village and the surrounding hinterland. All provide a nursery and primary school; a range of shops (including a post office); a doctor's surgery; at least one place of worship, public house, restaurant and community hall as well as open space provision[10].

3.19 The five Larger Villages of Boughton Monchelsea, Coxheath, 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[11].

3.20 In 2017, Maidstone Borough saw the biggest net inward migration of pre-school age children of all the districts in Kent, with the equivalent of a new primary school required to serve these children. Currently, there is capacity for non-selective and selective sixth form capacity in the short and medium term, however there will be a deficit throughout the Plan period in the Borough and across the County. In addition, forecasts indicate that Reception and total primary school rolls will continue to rise across the Plan period and will result in an overall deficit of places from 2022-23. Future pressure is also anticipated within the town centre of Maidstone[12].

3.21 New development would be more widely distributed under option RA1 (Local Plan Review Continued) as it would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, a significant proportion of new development would be focused on Maidstone town, where there is good access to existing higher order services. Development at the Rural Service Centres and Larger Villages would also help to support the viability of services in these settlements, although residents living in these settlements would not have the range of services and facilities provided by the town of Maidstone. This option is therefore expected to have mixed significant positive effects and minor negative effects on this SA objective. According to the Council's Transport Infrastructure Topic Paper, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[13], all of which will improve the accessibility of more residents to key services and facilities through the expansion of different modes of transport.

3.22 Option RA1a (No Maidstone) is expected to provide additional social infrastructure alongside housing within the garden settlements and to a lesser extent in the Rural Service Centres and Larger Villages. The garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development

[9] Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf
[10] Maidstone Borough Local Plan. Adopted 25 October 2017
[11] Maidstone Borough Local Plan. Adopted 25 October 2017
[12] Kent County Council (2019) Commissioning Plan for Education Provision in Kent 2019-2023 [online] available at: https://democracy.kent.gov.uk/documents/s88604/KCP%202019%20-%202023%20_Cabinet%20Committee%20-%20FINAL%20PW.pdf)
[13] Maidstone Borough Council, Transport Infrastructure Topic Paper

and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, it aims to minimise the transport impact on the existing network by creating high quality large developments with high levels of sustainable travel and trip internalisation.[14] Garden settlements provide the potential to create more self-sustaining communities, thereby ensuring access to essential services and facilities to all residents of the garden settlement, although evidence elsewhere suggests that this can be difficult to achieve[15]. If successful, this would have positive implications for residents of the garden settlements, and any communities in surrounding areas that are in need of these services and facilities. However, the additional social infrastructure that will be provided by garden settlements may not provide easy access for existing residents of the Borough as the four potentially suitable locations for garden settlements may not be in areas that are in need of additional social infrastructure. In addition, garden settlements can take a long time to deliver, which means that additional social infrastructure may not be provided in the early years of the plan period but only once the garden settlement reaches a size large enough to support them. Furthermore, concentrating investment in services and facilities at garden settlements may mean that existing services and facilities, particularly in the Rural Service Centres and Larger Villages, may attract less investment and support from new development. However, as this option would also provide residual development within the Rural Service Centres and Larger Villages, some investment would still be available. Therefore, mixed significant positive and significant negative effects with uncertainty are expected for this option.

3.23 Option RA2a (Maidstone + 4 Garden Settlements) would have a similar effect as option RA1 (Local Plan Review Continued) as it would have the same transport infrastructure improvements. In addition, development under this scenario would likely include major new public transport infrastructure investment as part of the plan to revitalise the town centre.[16] This would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. On the other hand, this option also aims to provide four garden settlements, all of which would be relatively remote from Maidstone urban area. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, the garden settlements would aim to minimise the transport impact on the existing network by creating high quality large developments with high levels of sustainable travel and trip internalisation.[17] Garden settlements provide the potential to create more self-sustaining communities, thereby ensuring access to essential services and facilities to all residents of the garden settlement, although evidence elsewhere suggests that this can be difficult to achieve[18]. If successful, this would have positive implications for residents of the garden settlements, and any communities in surrounding areas that are in need of these services and facilities. However, the additional social infrastructure that will be provided by garden settlements may not provide easy access for existing residents of the Borough as the four potentially suitable locations for garden settlements and these locations may not be in areas that are in need of additional social infrastructure. In addition, garden settlements can take a long time to deliver, which means that additional social infrastructure may not be provided in the early years of the plan period but only once the garden settlement reaches a size large enough to support them. Furthermore, concentrating investment in services and facilities at one or more garden settlements may mean that existing services and facilities, particularly in the rural service centres and larger villages, may attract less investment and support from new development. Overall, mixed significant positive and minor negative effects with uncertainty are expected.

Mitigation

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

3.25 In selecting a preferred spatial option, it will be important not only to ensure that new development is well provided with services and facilities, but that existing services and facilities, particularly in the rural service centres and larger villages, receive investment and support to maintain their viability.

[14] Maidstone Borough Council, Transport Infrastructure Topic Paper
[15] Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, and ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report

[16] Maidstone Borough Council, Transport Infrastructure Topic Paper

[17] Maidstone Borough Council, Transport Infrastructure Topic Paper
[18] Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, and ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report

Conclusion

3.26 Option RA1 (Local Plan Review Continued) performs most strongly against this SA objective, primarily because it would be delivering development where services and facilities already exist, thereby ensuring that there is the greatest potential for easy access to, and support for, key services and facilities. While option RA2a (Maidstone + 4 Garden Settlements) would also deliver development within the town centre, it would provide four garden settlements which would have uncertain effects in the short term but offers considerable potential for positive effects in the longer-term, assuming investment in new infrastructure, services and facilities would be provided. Option RA1a (No Maidstone) performs least well.

SA Objective 3: To strengthen community cohesion

3.27 Community cohesion is influenced by the range of jobs, services and facilities available to residents, the integration of different sectors of the community, and between new and existing communities. It has many links with other SA objectives.

3.28 Option RA1 (Local Plan Review Continued) is expected to strengthen community cohesion across communities in the Borough through support for and potentially increased provision of social infrastructure, green space and related, increased social interaction. However, as this option aims to provide development within the rural areas of the Borough as well as the urban areas there may be opposition to additional development within the smaller villages if this changes the character of the villages and places pressure on services and facilities and increases traffic. Therefore, mixed significant positive and minor negative effects are expected for this option.

3.29 Option RA1a (No Maidstone) is expected to develop new community cohesion through increased provision of social infrastructure and green space within the garden settlements, and to a lesser extent in the Rural Service Centres and Larger Villages themselves. Garden settlements can be designed from the outset to achieve community cohesion although in practice, a true sense of community cohesion can take a long time to achieve, especially when such developments are only partly completed. As this option has the potential to provide up to three large developments and some smaller developments within rural areas of the Borough, there may be opposition to additional development within the smaller villages, particularly those closest to the large new garden settlements. Therefore, mixed significant positive and significant negative effects are expected for this option.

3.30 Option RA2a (Maidstone + 4 Garden Settlements) is expected to strengthen community cohesion through increased provision of social infrastructure, green space and related, increased social interaction. Also, this option would provide development within the urban area of Maidstone, where existing communities may oppose further densification of the urban area. It may also lead to less investment in, and support for, more rural communities. On the other hand, this option aims to provide four garden settlements, three of which would be located within the rural areas of the Borough. Garden settlements can develop new community cohesion through increased provision of social infrastructure and green space within the garden settlements themselves. Garden settlements can be designed from the outset to achieve community cohesion although in practice, a true sense of community cohesion can take a long time to achieve, especially when such developments are only partly completed. As this scenario has the potential to provide three garden settlements within the rural areas of the Borough there may be opposition to additional development within the smaller villages, particularly those in closest proximity. It may also lead to a diversion of investment in communities elsewhere in the Borough, particularly in rural villages, although some residents may welcome less in the way of development and change. As such, it may result in less development in rural communities that do not wish to see the character of their villages change too dramatically. Therefore, mixed effects are expected.

Mitigation

3.31 Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that existing services and facilities do not feel additional pressure in the short term.

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

3.33 Large new communities should be planned and design-in community cohesion principles from the outset.

Conclusion

3.34 Each of the options is expected to strengthen community cohesion through increased provision of social infrastructure and green space. However, each of them is expected to have mixed effects in relation to this SA objective as it is likely there will be opposition to additional development at rural settlements and the further densification of the urban area.

3.35 The effect on community cohesion will differ, depending upon whether the focus is on the new or the existing community. Overall, option RA1 (Local Plan Review Continued) performs best because it is most likely to meet the needs of the greatest number of communities.

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

3.36 Maidstone Borough (69.2%) has a higher percentage of adults who consider themselves physically active than nationally (66.3%) but is just below the Kent average (69.8%)[19]. However, with regard to health inequalities, the Maidstone urban wards of Park Wood, Shepway South and High Street contain the highest levels of deprivation in the Borough and rank in the top 10% in Kent. The most deprived Lower Super Output Areas (LSOA) in Maidstone are clustered within the inner urban area, and the least deprived LSOAs are located on the edge of the urban area and in the rural hinterland[20].

3.37 Maidstone contains 425 hectares of greenspace, 30 large parks, 80 Neighbourhood greenspaces, 68 play areas, 700 allotment plots across 12 sites and 4 Green Flag parks. Overall, there is more publicly accessible, managed open space within the urban wards compared to the rural wards of the Borough[21].

3.38 Option RA1 (Local Plan Review Continued) would continue to allocate services to existing settlements, in line with the settlement hierarchy. This would likely provide additional social infrastructure and green space to areas throughout the Borough. However, as previously stated, the urban area includes the most deprived neighbourhoods in the Borough and would be most in need of investment. In addition, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[22], thereby improving health and wellbeing of residents by improving active travel options. Overall, minor positive effects are expected.

3.39 Option RA1a (No Maidstone) is expected to have significant positive implications for this SA objective as garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, as a principle of garden settlements, it is expected that additional green space will be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. At the time of appraisal of the initial spatial strategy options there were four potential locations for garden settlements, all of which are relatively remote from Maidstone urban area, one of the Borough's most deprived areas. Instead, garden settlements would lie in the rural areas, as would the residual development that would be provided within the Rural Service Centres and Larger Villages. Since these development locations would not provide additional social infrastructure and green space for the parts of the Borough in greatest need, this option was judged to have a minor negative effect in relation to SA4: Health but with uncertainty due to the specific locations of the garden settlements being unknown.

3.40 Option RA2a (Maidstone + 4 Garden Settlements) is expected to have significant positive effects in relation to this SA objective as it aims to revitalise the town centre, which is within the urban area where the highest levels of deprivation are within the Borough. Development within the urban area would provide additional homes, economic opportunities, social infrastructure and green space. In addition, this scenario would seek to deliver modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[23], thereby improving health and wellbeing of residents by improving active travel options. In addition, this option, like option RA1a (No Maidstone), would provide four garden settlements which could provide greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. In addition, as a principle of garden settlements, it is expected that additional green space would be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. The four potential locations for garden settlements, lie in the rural areas and as such would not provide additional infrastructure for the urban area. Therefore, this option also has an uncertain minor negative effect as the specific location of these settlements are unknown.

Mitigation

3.41 It is recommended that the areas of deprivation, and specifically health deprivation, are mapped out within the Borough. In addition, understanding why those areas are deprived and aiming to provide specifically what is lacking in those areas is crucial. Providing additional green space and

[19] Public Health England (2020) Maidstone Local Authority Health Profile 2019 [online] available at: https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000110.html?area-name=maidstone
[20] Ibid
[21] Maidstone Borough Council (2017) Maidstone's Parks & Open Spaces – 10 Year Strategic Plan 2017-2027 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf
[22] Maidstone Borough Council, Transport Infrastructure Topic Paper
[23] Maidstone Borough Council, Transport Infrastructure Topic Paper

active travel routes alongside the rest of the development would also improve health and wellbeing.

Conclusion

3.42 Options RA1a (No Maidstone) and RA2a (Maidstone + 4 Settlements) are expected to have significant positive effects on this SA objective as garden settlements create opportunities for new patterns of infrastructure provision and more development within the urban area could reduce the amount of deprivation. Option RA1 (Local Plan 2017 continued) is also expected to have positive effects, however they are minor as the potential development from this scenario is more widely dispersed.

SA Objective 5: To facilitate a sustainable and growing economy

3.43 From the seven local authorities surrounding Maidstone, 49% of the total commuting flows are workers coming into Maidstone Borough. There is a higher proportion of workers commuting out to Tonbridge and Malling (58%) and all London metropolitan boroughs (83%) compared to the proportion of workers commuting in from these locations. Medway has the highest proportion of workers commuting into Maidstone (65%). Overall, Maidstone has a negative net commuting flow[24]. Maidstone has shown steady growth in the number of businesses from 2011 to 2017 and there has been an increase of 7,000 additional jobs created between 2011 and 2016[25].

3.44 Option RA1 (Local Plan Review Continued) would aim to provide extensions to existing successful rural business sites, new business sites at strategic motorway junctions, new office development as part of mixed use residential, retail and office developments within Maidstone town centre and a further allocation at the Kent Medical Campus[26]. As such, significant positive effects are expected against this option as it would provide economic opportunities throughout the Borough, aiding many different communities.

3.45 Option RA1a (No Maidstone) would provide most employment development as a percentage of any development within the garden settlements with minor positive effects in relation to this SA objective. However, the location of any chosen garden settlement will have implications for the type of B-use considered most appropriate. For example, a settlement close to the strategic road network would be preferable for B8 uses requiring larger vehicular access. Garden settlements in less accessible locations would be more broadly suited towards B2 uses. The lack of locational flexibility of a garden settlement-focussed approach to employment development would have minor negative effects. Additionally, garden settlements would not be expected to come forwards for development immediately after Local Plan Review adoption and experience elsewhere suggests that attracting investment in employment uses can take some time[27], although it can be achieved[28]. In recognition of this, this option would seek to allocate a range of employment sites outside of the garden settlements to ensure choice in the short to medium term. Overall, mixed positive and negative effects would be expected as this scenario would increase the diversity of economic opportunities but not necessarily in appropriate locations or at the right time.

3.46 Option RA2a (Maidstone + 4 Garden Settlements) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, this option would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space nearby rail links to and from London would also be encouraged which would attract business to the town centre.[29] These factors would result in significant positive effects in relation to SA5: Economy. This option would, however, require the Council to revisit assumptions on mixed-use development in the town centre, increasing the percentage of office provision on each site. Like option RA1a (No Maidstone), the economic development at garden settlements under option RA2a (Maidstone + 4 Garden Settlements) would have mixed effects in relation to SA5: Economy for the reasons described under option RA1a (No Maidstone). Overall, mixed significant positive and minor negative effects are expected for this option.

Mitigation

3.47 A diversity of economic development could be encouraged under any spatial strategy option through suitable policies in the Local Plan.

3.48 If garden settlements are preferred, it will be particularly important to provide an attractive planning and financial regime to attract early investment. In addition, a range of other

[24] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports
[25] Ibid
[26] Maidstone Borough Council, Economic Strategy Topic paper
[27] Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, also ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report, and Nathaniel Lichfield & Partners (October 2013) Cambourne Retail and Employment Study
[28] See, for example, Cranbrook in Devon (https://www.local.gov.uk/local-growth-local-people)
[29] Maidstone Borough Council, Economic Strategy Topic paper

employment allocations are likely to be needed outside of the garden settlements, to ensure choice is available in the short to medium term and to accommodate the varied locational requirements of different industries.

Conclusion

3.49 Option RA1 (Local Plan Review Continued) would provide the most balanced economic opportunities for the Borough although Option RA2a (Maidstone + 4 Garden Settlements) would offer much needed economic development near public transport links and therefore also deliver significant positive economic effects. The economic benefits of economic development at garden settlements under options RA1a (No Maidstone) and RA2a (Maidstone + 4 Garden Settlements) are less certain, particularly in the short term.

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

3.50 Maidstone town centre is home to the predominant concentration of shops, jobs, services and facilities in the Borough. No other settlements in the Borough have such an offer. Town centres are experiencing increased strain from out-of-centre and out-of-town competition, as well as on-line alternatives. These issues are also now being exacerbated by COVID-19[30]. Therefore, retaining the vitality and viability of Maidstone town centre is an important sustainability objective for the Borough.

3.51 Option RA1 (Local Plan Review Continued) would aim to provide new office development as part of mixed use residential, retail and office developments within Maidstone town centre[31]. Allocations rolled forward from the Local Plan 2017 and increased occupation of currently vacant stock would provide more than the required retail floorspace to 2037. Any new allocations, if needed for choice in the market, would use the 'town centre first' approach – in Maidstone town centre, then urban edge, then out of centre, subject to sequential impact assessment[32]. This option would also see maintenance of the existing Local Plan Transport Strategy with various benefits for the town centre, such as increased bus service frequency along radial routes into the town centre, a new bus station, and parking management. Overall, these factors would provide significant positive effects in relation to this SA objective. However, this option could provide development within the rural centres thereby steering footfall away from the town centre, also resulting in minor negative effects.

3.52 Option RA1a (No Maidstone) would be creating new local centres through the development of garden settlements as they aim to create self-sustaining communities, thereby steering footfall away from the Maidstone town centre. Residual development within the Rural Service Centres and Larger Villages would have the same effect although to a lesser extent. However, Maidstone town centre would still provide a range of higher order jobs, services and facilities not provided for by garden settlements or Rural Service Centres, and some additional demand for these is still likely to be created for these by this option. The ease of accessing these town centre services from the garden settlements would depend on the locations of those new settlements and the quality of their transport links to the town centre. Therefore, mixed minor negative and minor positive effects are expected for this SA objective.

3.53 Option RA2a (Maidstone + 4 Garden Settlements) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, it would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space near to rail links to and from London would also be encouraged which would help to attract business to the town centre.[33] Therefore, this option would provide significant positive effects against this SA objective. However, as this option would also aim to provide four garden settlements located throughout the Borough it would be creating new local centres through the development of garden settlements as they aim to create self-sustaining communities thereby steering footfall away from the Maidstone town centre. Therefore, minor negative effects are also expected.

Mitigation

3.54 Ensure that transport connections to the town centre are made available and attractive so that all residents can readily access the town centre, thereby sustaining the vibrancy and vitality of the area.

Conclusion

3.55 Options RA1 (Local Plan Review Continued) and RA2a (Maidstone + 4 Garden Settlements) both have the potential for significant positive effects on Maidstone town centre by directing significant development to that location, particularly option RA2a (Maidstone + 4 Garden Settlements), so that minor negative effects would also occur. Option RA1a (No Maidstone) would perform least well as the garden

[30] Centre for Cities (2020) High Streets [online] Available at: https://www.centreforcities.org/high-streets/
[31] Maidstone Borough Council, Economic Strategy Topic paper
[32] Maidstone Borough Council, Retail and Leisure Strategy Topic paper
[33] Maidstone Borough Council, Economic Strategy Topic paper

settlements would create new local centres that would compete with Maidstone town centre.

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

3.56 Maidstone town centre is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20, as well as to/from the M2 & M25. The constrained nature of the town centre has contributed to peak period congestion and the designation of the wider urban area as an AQMA. Rail links across the Borough are comparatively poor, with Maidstone currently having no direct service to the City of London (although there is a proposed Thameslink extension) and a slow journey into London Victoria. Bus services within the urban area are largely focused around serving the town centre and hospital. Many outlying suburban and rural communities are afforded a more limited level of service that does not provide a convenient travel option for many potential users[34]. In addition to issues with road capacity, rail capacity on the North Kent line is also stretched and is likely to be over-capacity in the near future. The Network Rail Kent Area Route Study also highlights capacity issues with the railways in Kent and states that the number of passengers using the railway across the route has increased substantially in recent years and further growth is forecast – up to 15% growth in passenger numbers between 2011 and 2024 and 47% up to 2044. Routes into London are particularly busy, with little capacity to operate additional services[35].

3.57 New development under option RA1 (Local Plan Review Continued) it would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, it is expected to have significant positive effects for this SA objective as there is a higher probability that existing transport hubs and routes will be accessible from new development. This option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[36], all of which will improve the existing sustainable modes of transport. However, it is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. Furthermore, currently a high proportion of the Borough's residents drive to work[37] so the uptake of more sustainable travel options may face resistance. Therefore, significant negative effects are also expected.

3.58 Option RA1a (No Maidstone) aims to minimise transport impact on the existing network through the creation of high-quality large developments with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas[38]. This option presents opportunities for new patterns of infrastructure provision and for the creation of an integrated community. This option would be likely to provide a greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. However, in the short term, garden settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would not be provided for in the early years of the plan period. Furthermore, research of practical experience elsewhere[39] has concluded that garden settlements can become car dependent and create more traffic for the local roads as many residents drive to and from cities to work. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. In addition, as residual development would be provided within Rural Service Centres and Larger Villages under this option, it is likely that existing public transport options would continue to be overcapacity. Therefore, mixed minor positive and significant negative effects are expected against this option.

3.59 Maidstone town centre development under Option RA2a (Maidstone + 4 Garden Settlements) would deliver the same beneficial transport infrastructure measures as option RA1 (Local Plan Review Continued). In addition, this option would also include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.[40] The infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. The garden settlement development component of this option would aim to minimise

[34] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf
[35] Network Rail (2018) South East Route: Kent Area Route Study [online] Available at: https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf
[36] Maidstone Borough Council, Transport Infrastructure Topic paper
[37] NOMIS method of travel to work (2011) Maidstone Borough [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=cell&cols=rural_urban
[38] Maidstone Borough Council, Transport Infrastructure Topic paper
[39] Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality
[40] Maidstone Borough Council, Transport Infrastructure Topic paper

transport impact on the existing network through the creation of high-quality large developments with high levels of sustainability and trip internalisation, as well as improved sustainable transport options for surrounding areas. This presents opportunities for new patterns of infrastructure provision and for the creation of an integrated community. The development of four garden settlements under this option would have similar effects on sustainable travel and congestion as described for option RA1a (No Maidstone) above, therefore, significant negative effects are also expected.

Mitigation

3.60 Ensure that public transport and active travel connections are created and enhanced at the same time housing and economic development is being undertaken. This could be done through various mechanisms, such as S106 agreements.

Conclusion

3.61 Although options RA1 and RA2a achieved the same SA score, option RA2a is judged to perform slightly more sustainably than RA1, primarily as it is assumed to include major new public transport infrastructure investment as part of the plan to revitalise the town centre. As such is the most sustainable of the three options against this SA objective. Spatial option RA1 (Local Plan Review Continued) and RA1a (No Maidstone) are also expected to improve public transport and active travel but not to the same extent. In addition, it is likely that additional housing and economic development will continue to stretch roads and rail that are over capacity in locations where the options do not provide enhanced transport infrastructure.

SA Objective 8: To conserve the Borough's mineral resources

3.62 Around half of the Borough is covered by Mineral Safeguarding Areas (MSAs) designated in the Kent Minerals & Waste Local Plan. The minerals include limestone, sandstone, river terrace deposits, silica sand and sub-alluvial river terrace deposits[41].

3.63 Option RA1 (Local Plan Review Continued) would have the most dispersed growth for the Borough, therefore it could have the highest probability of developing within an MSA. Each of the growth locations it sets out lies within an MSA. Overall, it is likely that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

3.64 Option RA1a (No Maidstone) is expected to have negative effects on this SA objective as two of the four potential locations for garden settlements are located within an MSA. Overall, it is possible that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

3.65 Option RA2a (Maidstone + 4 Garden Settlements) would focus some development within the town centre and urban area of the Borough. There are no MSAs within the town centre of Maidstone, however within the urban area there are small portions in the south-western sections that are designated as MSAs. In addition, the three rural locations for the garden settlements lie within an MSA. As such, significant negative effects with uncertainty are expected as the exact location of development is unknown at this stage.

Mitigation

3.66 It is recommended that delivery of housing and economic development in MSAs is phased, such that mineral resources can be recovered prior to construction, where economically viable. All other matters being equal, sites that would not result in the sterilisation of mineral resources should be preferred (e.g. when choosing a location for a new garden settlement).

Conclusion

3.67 Each of the options is likely to have significant negative effects as there is a possibility for mineral resources within MSAs to be sterilised by development.

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

3.68 Maidstone Borough contains a mix of different soils. To the north of Maidstone, bands of Upper, Middle and Lower Chalk run in a south-east to north-west direction forming the North Downs. Shallow soils are found over the dry valleys of the dip slope, with other areas supporting well drained

[41] Kent County Council (2015) Kent Minerals and Waste Local Plan 2013-2030: Maidstone Borough Council – Mineral Safeguarding Areas [online] Available at: https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1

calcareous fine silty soils over chalk. The second distinct geological region is Gault Clay. Soils range in the Gault Clay Vale from the calcareous chalk soils to the north through to heavier clays and a mix of clay and sandy soils where they meet the Greensand to the south. The underlying soils give rise to a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 1, Grade 2 and Grade 4[42].

3.69 The dispersed growth under option RA1 (Local Plan Review Continued) could result in development within Grades 1, 2, or 3 agricultural land. However, as this option would provide development according to the existing settlement hierarchy, it is likely that some development under this option will be provided on brownfield sites in Maidstone urban area and to a lesser extent in the Rural Service Centres and Larger Villages, thereby avoiding agricultural land. As such, mixed minor positive and significant negative effects with uncertainty are expected.

3.70 Option RA1a (No Maidstone) would provide a large proportion of its development at four large new garden settlements. Each of the garden settlement locations lies within Grade 3 agricultural land, with two of the potential locations also partially within Grade 2. It is uncertain whether the Grade 3 agricultural land is 3a or 3b, as such, there is the potential for new development to harm the Borough's best and most versatile soils. Therefore, under the precautionary principle, uncertain significant negative effects are identified.

3.71 Option RA2a (Maidstone + 4 Garden Settlements) would provide development within the town centre of Maidstone which is almost entirely classified as urban. However, the garden settlement locations for this option lie within Grades 2 and 3. Depending on where the development would take place it could be located within high quality agricultural land. As such, a mixed minor positive and significant negative effect is expected with uncertainty.

Mitigation

3.72 All other matters being equal, give preference to sites that would avoid development within Grades 1 to 3a agricultural land.

Conclusion

3.73 Option RA1 (Local Plan Review Continues) and Option RA2a (Maidstone + 4 Garden Settlements) perform the best against this SA objective as they would provide development within the town centre and wider urban area of Maidstone which are almost entirely classified as urban rather than agricultural land. However, they both have the potential to have negative effects on this objective as Option RA1 could provide development throughout the rest of the Borough which could result in Grades 1, 2 and 3 agricultural land being lost and the garden settlements of Option RA2a are likely to be within Grades 2 and 3 agricultural land. Option RA1a (No Maidstone) would have negative implications for this SA objective as all development under this option could be within the best and most versatile agricultural land.

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

3.74 Kent is one of the driest regions in England and Wales[43]. Water use in the Borough is high by both national and international standards, and some water bodies in Maidstone are failing to meet the Water Framework Directive objective of 'good status'[44]. These issues could be exacerbated by additional housing and economic growth, coupled with climate change. Pressures, including the projected increase in population, related to the provision of water supply and wastewater treatment are key contributors to the current status and future status of water bodies in Kent. There may also be an increased risk of urban run-off that could affect water quality; this is already evident in parts of the catchment. There is also an increased risk of over-abstraction of water resources.

3.75 Option RA1 (Local Plan Review Continued) would provide additional housing, economic development and infrastructure which could put the region under additional water stress. It is likely that water resources will become overstretched under this option. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand.

3.76 Option RA1a (No Maidstone) would provide one or more large settlements that would be in need of large amounts of water and as the Borough is currently having issues with high water uses this scenario would worsen the situation. Therefore, significant negative effects are expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. Garden settlements offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be

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

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

[44] AECOM (2017) Kent Water for Sustainable Growth Study

possible with some of the other options, which means that the option also receives a minor positive effect.

3.77 Option RA2a (Maidstone + 4 Garden Settlements) would concentrate development within the town centre which is already developed and contains impermeable surfaces. Additional development in this area could increase the amount of pollution in urban runoff, which is already an issue for the catchment the Borough is within. In addition, additional development would intensify the water stress within the region. Therefore, significant negative effects are expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. In addition, with the development of four garden settlements there will be the need for large amounts of water, however, garden settlements offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the other options, which means that the option also receives a minor positive effect.

Mitigation

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

Conclusion

3.79 Each of the options are expected to have negative effects on this SA objective as water resources in the Borough are already suffering from high levels of water use, therefore any development without water efficiency measures will worsen the situation. Of all the options, option RA1a (No Maidstone) and RA2a (Maidstone + 4 Garden Settlements) probably offer the best opportunity to design-in water efficiency and wastewater management from the outset in an integrated and comprehensive way.

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

3.80 Maidstone town centre is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20. The Council designated the wider urban area as an AQMA in 2008 due to elevated concentrations of Nitrogen Dioxide (NO_2) at residential receptors in six areas of the Borough. However, in May of 2018 the AQMA within Maidstone was reconfigured to only follow the carriageways of the main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274. NO_2 levels at some key locations near major roads and junctions remain above the EU Limit Value with no discernible downward trend[45].

3.81 New development under option RA1 (Local Plan Review Continued) would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, it is expected to have significant negative effects on this SA objective as it would continue travel patterns that have developed over time, including significant car use, particularly in the more rural areas. Currently a high proportion of the Borough's residents drive to work, and the uptake of more sustainable travel options is limited[46]. It is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. However, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[47], all of which will improve the existing sustainable modes of transport, and potentially air quality, resulting in a minor positive effect.

3.82 Option RA1a (No Maidstone) is expected to result in a small increase in traffic congestion within the Rural Service Centres and Larger Villages due to the residual development located at these locations. Most development under this option would be directed to four new garden settlements, which seek to minimise transport impact on the existing network through the creation of high-quality large development with high levels of sustainability and trip internalisation and provide improved sustainable transport options for surrounding areas[48]. This option therefore presents opportunities for new patterns of infrastructure provision and for the creation of a self-sustaining community. A principle of garden settlements is to provide

[45] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf
[46] NOMIS method of travel to work (2011) Maidstone Borough [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=cell&cols=rural_urban
[47] Maidstone Borough Council, Transport Infrastructure Topic paper
[48] Maidstone Borough Council, Transport Infrastructure Topic paper

green infrastructure and, particularly where this involves tree planting, this would help to absorb and disperse air pollutants. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. As it is likely that garden settlements will be masterplanned, the incorporation of environmentally, climate and water sensitive planning and reduction of the need to travel by car through good site layout and promotion of walking, cycling and public transport is likely. However, garden settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would be unlikely to be provided in the early years of the plan period. Furthermore, research of practical experience elsewhere has shown that, despite original intentions, garden settlements can become car dependent and create more traffic for the local roads as many residents drive to and from cities to work[49]. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. In the case of the garden settlements, car journeys into Maidstone could go through the AQMA. Therefore, mixed minor positive and significant negative effects are expected for this option.

3.83 Development in the Maidstone urban area under option RA2a (Maidstone + 4 Garden Settlements) would be accompanied by the same transport infrastructure provision as option RA1 (Local Plan Review Continued). It would additionally include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.[50] These transport improvements would benefit a large proportion of the population of the Borough since 70% of the Borough live within the urban area of Maidstone, and there would be greater opportunities to use more sustainable modes of transport including walking and cycling for everyday journeys, reducing the effects on air quality. As such, it would have significant positive effects on this SA objective. The development of four garden settlements under this option would have similar effects on transport and air quality as described for option RA1a (No Maidstone) above, therefore significant negative effects are expected from that component of the option. Overall, significant positive and significant negative effects are expected.

Mitigation

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

Conclusion

3.85 Option RA2a (Maidstone + 4 Garden Settlements) performs best against this SA objective as this option aims to significantly improve public transport and infrastructure in the Maidstone urban area which would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone and currently experience high levels of air pollution. However, for options RA2a (Maidstone + 4 Garden Settlements) and RA1a (No Maidstone), while the development of garden settlements offers the opportunity to design-in sustainable modes from the start, experience elsewhere suggests that car use will still dominate. Option RA1 (Local Plan Review Continued) is also expected to improve public transport and active travel, particularly in Maidstone urban area, but not to the same extent as option RA2a.

SA Objective 12: To avoid and mitigate flood risk

3.86 Flood risk within Maidstone is concentrated in the southern and south-western part of the Borough. The primary source of fluvial flood risk in the catchment is the River Medway[51]. The main source of surface water flood risk is heavy rainfall overloading highway carriageways and paved areas, drains and gullies but other sources of flooding were associated with blockages and high-water levels impeding free discharge from surface water drains and gullies[52]. The risk of flooding is likely to be intensified due to climate change.

3.87 Option RA1 (Local Plan Review Continued) would provide additional housing, economic development and additional infrastructure in line with the existing settlement hierarchy. As such, it is possible development will be located

[49] Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality
[50] Maidstone Borough Council, Transport Infrastructure Topic paper
[51] Maidstone Borough Council and JBA Consulting (2016) Level 1 Strategic Flood Risk Assessment – Addendum Report [online] Available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0015/132810/CC-005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf
[52] Ibid

within Flood Zones 2 and 3 although this is unlikely as proposals for development within these areas of higher flood risk would have to satisfy the sequential and exception tests, as relevant. In addition, the creation of more impermeable surfaces creates additional flood risk as it is likely that greenfield land will be developed within the more rural areas of the Borough. Overall, significant negative effects are expected.

3.88 Option RA1a (No Maidstone) would provide four new large garden settlements and three of the four potential locations are within or within close proximity to Flood Zones 2 and 3. In addition, the creation of more impermeable surfaces create additional flood risk as it is likely that greenfield land will be developed on for each of the large settlements thereby reducing the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems (SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

3.89 Option RA2a (Maidstone + 4 Garden Settlements) would direct a significant amount of development to Maidstone town. Although some sites within the urban area would already be developed and hence contain impermeable surfaces, others at the urban edge would be on greenfield sites, effects on surface water infiltration would be mixed. The River Medway runs through Maidstone town centre and has a history of flooding, which could increase due to climate change. Additional development in this area would potentially be exposed to higher levels of fluvial flood risk and could also increase the amount of urban runoff, which is already an issue for the catchment. Options RA2a would also develop four new garden settlements. The effects of these are described under option RA1a above and would be mixed significant negative and minor positive. Overall, this scenario could have mixed significant negative effect and minor positive effects on this SA objective.

Mitigation

3.90 Avoid development within Flood Zones 2 and 3, where appropriate and in accordance with the sequential and exception tests. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could be achieved through various mechanisms, such as S106 agreements.

Conclusion

3.91 As each option aims to provide additional development throughout the Borough of Maidstone, it is likely that the increased amount of impermeable areas will reduce the infiltration capacity and flood retention provided by greenfield land. However, options RA1a and RA2a would perform the best against this SA objective as the garden settlement/s would be masterplanned to employ SuDS and environmentally, climate and water sensitive planning through the incorporation of design codes. However, garden settlements would result in the development of greenfield land and three of the four potential locations include Flood Zone 2 and 3 land.

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

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

3.93 Option RA1 (Local Plan Review Continued) would provide additional housing, economic development and additional infrastructure associated with both across the Borough in accordance with the settlement hierarchy. As such, this development could increase greenhouse gas emissions through the higher number of private vehicles on the road and amount of energy generated from new housing and economic development. Therefore, significant negative effects are expected.

3.94 Option RA1a (No Maidstone) would provide four large new garden settlements that offer the opportunity to create energy efficient development and operations, through the promotion of an integrated network of sustainable modes of transport for internal journeys, and the incorporation of energy efficiency and renewable and low carbon energy into settlement design, for example by incorporation of district heating schemes. However, as has already been described, experience to date indicates that garden settlements tend to generate significant car journeys, despite best intentions at the planning and design stage. In addition, as previously stated, it is likely that residual development within Rural Service Centres and Larger Villages will utilise the existing transport infrastructure which is already overstretched. As such, mixed

minor positive and significant negative effects with uncertainty are expected.

3.95 One element of option RA2a (Maidstone + 4 Garden Settlements) would concentrate development within and adjoining Maidstone town. There is a greater opportunity in the urban area, particularly the town centre, to use sustainable modes of transport for a variety of journeys, given the concentration of a range of jobs, services and facilities. However, car use is currently high, and could increase with additional development, thereby increasing greenhouse gas emissions. There may be less opportunity to incorporate larger scale energy efficiency and renewable energy networks within an already highly developed urban area than at large new masterplanned developments on greenfield sites. In addition, this option would provide four large garden settlements. For the reasons already described above for option RA1a (No Maidstone). Overall, significant mixed negative and significant positive effects with uncertainty are expected from this option.

Mitigation

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

Conclusion

3.97 Each of the options are expected to have negative effects on this SA objective as development requires energy use in its construction and occupation. However, option RA2a (Maidstone + 4 Garden Settlements) offers the greatest opportunities to incorporate, from the outset, integrated sustainable transport networks, and energy efficiency and renewable energy networks in large new, planned settlements as well as the considerable opportunity to promote sustainable modes of transport in and close to the concentration of services and facilities available at Maidstone town centre.

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

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

3.99 Each option has the potential to adversely affect biodiversity. Option RA1 (Local Plan Review Continued), which would distribute development according to the existing settlement hierarchy represents a more dispersed approach to development than the other options. Much of the development would be likely to be on greenfield land and could be on or within close proximity to biodiversity assets or disrupt the Borough's ecological networks, although this is uncertain until development sites are allocated. Overall, a significant negative effect with uncertainty relating to the location and design of development is expected for this SA objective.

3.100 Option RA1a (No Maidstone) would provide large new garden settlements at four potential locations, three of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural areas and it is likely that development will occur on greenfield land therefore this option could have significant negative effects with uncertainty as the exact location for the garden settlements is yet to be determined. The majority of garden settlements to be provided by this option lie within or close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. However, garden settlements are expected to provide additional green space thereby offering the opportunity to create additional wildlife habitat and biodiversity net gain. There is also the opportunity to link up habitats within biodiversity opportunity areas. Therefore, minor positive effects are also expected against this option.

3.101 Option RA2a (Maidstone + 4 Garden Settlements) is expected to have mixed effects on this SA objective. A Maidstone-focused approach is likely to increase the potential for development on brownfield land rather than greenfield land compared to the other options, particularly option RA1a (No Maidstone), therefore minor positive effects are expected. Although, there are less biodiversity designations within Maidstone urban area, minor negative effects are also expected because sections of the urban area lie within a Biodiversity Opportunity Area, Ancient Woodland and Local Wildlife Sites. These negative effects are subject to uncertainty relating to the location and design of development is expected for this SA objective. In addition, this option would provide four new garden settlements with the effects described under option RA1a (No Maidstone) above. Overall, mixed minor negative (with uncertainty) and minor positive effects are expected.

Mitigation

3.102 Avoidance of development in areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan policy should be put in place to ensure biodiversity net gain is achieved on each development site or losses are offset elsewhere within the Borough where this is not feasible.

Conclusion

3.103 Option RA2a (Maidstone + 4 Garden Settlements) is expected to be the best performing option as it concentrates development within the town centre of Maidstone which has the least amount of biodiversity designations compared to the potential development locations of the other options. However, each of the other scenarios are expected to perform negatively as they each could adversely affect biodiversity designations and networks. However, options RA2a (Maidstone + 4 Garden Settlements) and Ra1a (No Maidstone) offer opportunities to plan green infrastructure and biodiversity net gain on a settlement-wide scale, as part of the masterplanning of new garden settlements.

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

3.104 There are 41 Conservation Areas within the Borough. There is a cluster of 5 Conservation Areas in Maidstone Town Centre, 16 in the rest of the urban fringe and an additional 4 that straddle the urban/rural boundary. The remaining 16 are focused in the villages of the rural area. Each of these Conservation Areas contain a mixture of Listed Buildings. The Borough also contains 5 sites included on the Register of Historic Parks and Gardens[53].

3.105 Option RA1 (Local Plan Review Continued) is a dispersed option and therefore has the potential to adversely affect heritage assets as each existing settlement has an array of historic designations. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

3.106 Option RA1a (No Maidstone) proposes four locations for potential garden settlements, each of which are close to heritage assets. However, the masterplanning of large new developments such as garden settlements offers the opportunity to mitigate effects on heritage significance through appropriate site layout and design codes could provide mitigation through requirements for appropriate development design. In addition, this option would provide residual new development within Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

3.107 Option RA2a (Maidstone + 4 Garden Settlements) has the potential to have adverse effects on the Borough's heritage assets as the majority of Listed Buildings and Conservation Areas are within the town centre and urban area of Maidstone. In addition, this option includes development at four garden settlements and more dispersed residual growth, the potential effects of which are described under option RA1a (No Maidstone) above. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

Mitigation

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

Conclusion

3.109 Each of the options has the potential to have a negative impact on the historic environment, however as no heritage impact assessment has been conducted yet, the effects of each option are uncertain at this stage.

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

3.110 Just over a quarter of the Borough lies within the Kent Downs Area of Outstanding Natural Beauty (AONB). In addition, many parts of the rest of the Borough are designated as Landscapes of Local Value. The sensitivity of these designations and the wider landscape to development are set out in the Council's landscape capacity study[54]. This identifies that a substantial proportion of the Borough has high landscape sensitivity, with the greatest concentrations of land in these categories in the south and west of the Borough. Significant parts of the north and east of the Borough are of moderate landscape sensitivity. The main areas of low landscape sensitivity, all of which are relatively small, are

[53] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf

[54] Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

located around Sandling (north-west of Maidstone urban area), between Boughton Monchelsea and Warmlake (south-east of Maidstone urban area) and between Sandway and Lenham Heath (in the east of the Borough).

3.111 Option RA1 (Local Plan Review Continued) would distribute development according to the existing settlement hierarchy, therefore most development would be directed in or on the edges of Maidstone town, the Rural Service Centres and the Larger Villages. Development within existing settlements would have a lower risk of adversely affecting the landscape, although this would depend on the scale and massing of development. However, much development under this option could be on greenfield sites at the edge of settlements and a number of areas around the edge of Maidstone town, as well as around many of the Rural Service Centres and the Larger Villages have very high or high landscape sensitivity, creating the potential for significant negative effects. These are uncertain as the exact locations of development are unknown.

3.112 Option RA1a (No Maidstone) could result in the introduction of large urban developments at four potential locations, two of which are located within areas of valued landscape, one on the edge of the AONB and the other within a Landscape of Local Value. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and Garden Settlements it is likely that development would adversely affect the landscape as each potential development location lies within areas of very high to moderate landscape sensitivity. As such, significant negative effects are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely.

3.113 Option RA2a (Maidstone + 4 Garden Settlements) is more likely to avoid adverse effects on the landscape where development is concentrated within the built-up urban area but the option would also direct development to the edge of Maidstone town. However, even within the urban area some adverse effects on this SA objective could occur as there are three areas of Landscape of Local Value that run across the southern section of the urban area. In addition, two of the potential locations of the four garden settlements that would be developed under this option are located within areas of valued landscape, one on the edge of the AONB and the other within a Landscape of Local Value. While some development would be located within Maidstone urban area, it is possible that the four garden settlements will developed on greenfield sites, each of which has a very high to moderate landscape sensitivity. Overall, significant negative effects are expected. Again, uncertainty is attached to this SA objective as the exact location of development is currently unknown.

Mitigation

3.114 Avoidance of development within the areas of highest landscape sensitivity would provide the best mitigation. However, requirements for development site layouts and development design that seek to reduce adverse effects on the landscape should also be implemented via Local Plan policy and design codes for large scale developments.

Conclusion

3.115 Each of the options has the potential to have a significant negative effect on the landscape unless appropriate mitigation (see above) is implemented.

Chapter 4
SA of refined spatial strategy options

Identification of reasonable alternatives

4.1 The initial approaches identified in **Chapter 3** were intended to test the sustainability of different strategic, but potentially reasonable, approaches to growth across the borough. The approaches were constrained by potentially available land identified in the SLAA, and each would be expected to meet overall need. SLAA evidence showed that no individual area (Maidstone, any Rural Service Centre, Garden Settlements) could meet overall need on its own, and as such it was apparent that a blended approach with a mix of these geographies would be required to provide a consistent and sufficient land supply across the plan period.

4.2 Findings were taken from the first stage, to influence the identification of refined spatial strategy options to be tested in this phase:

- Maidstone had a generally high sustainability rating and was therefore proposed to be included in all scenarios. This could be higher or lower - Maidstone could be maximised (i.e. all potentially suitable sites used, and an aspirational target set for the regeneration of the town centre), or more modest targets could be included for this area.
- Garden Settlements are either on or off as policy choices. It was considered prudent by the Council in terms of risk management that the number of Garden Settlements be limited to 2 in the Local Plan Review.
- From the SLAA: some development will have to be directed to Rural Service Centres and Larger Villages. These demonstrate relative sustainability when compared to countryside sites. This growth will be “residual”, i.e. having regard to the growth allocated to Garden Settlements and Maidstone.

4.3 The assessment of reasonable alternative scenarios explores all combinations of 0, 1, or 2 garden settlements, and a higher or lower amount of growth in Maidstone town, which frames a residual amount of growth in Rural Service Centres and Larger Villages, as summarised in **Table 4.1**.

Table 4.1: Rationale for refined spatial strategy options

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

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

4.4 The refined spatial strategy options (termed ‘scenarios’ by the Council) are set out in **Table 4.2**. This shows the distribution of residential development, B-class uses (business and industrial), and A-class uses (retail and some services) that would be provided across various locations in the Borough. All existing Local Plan allocations would be carried through in all scenarios.

Table 4.2: Refined spatial strategy options

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

Appraisal of refined spatial strategy options

4.5 The findings of the SA of the refined spatial strategy options are described in the remainder of this chapter by SA objective and are summarised in **Table 4.3**.

4.6 As noted in the Methodology chapter, the appraisals of spatial strategy options comprised a top-down consideration of the likely effects of different broad distributions of development, in contrast to the bottom-up appraisals carried out for site options. This was commensurate with the stage in the plan-making process and ensured that different locational elements of the strategy options (Maidstone urban area; garden settlements; Rural Service Centres and Larger Villages) were appraised to similar levels of detail. More detailed appraisals of garden settlement and site options are presented later in the SA Report.

Table 4.3: Summary of SA scores for refined spatial strategy options

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

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

4.7 Between 2017 and 2018, house prices in Maidstone have continued to increase. There has been an increase of 5.1%, which is greater than the Kent average. There has also been a decrease in the number of house sales in the Borough of 14%, which is also reflected in the Kent average. The house price to earnings ratio has increased from 10.30 in 2017 to 11.20 in 2018[55]. The SHMA (December 2019) calculated that the standard method would result in a need for 1,214 dwellings per annum from 2022. Over the Plan period, the population of the Borough is expected to grow by 28% with the strongest growth expected in those aged over 65. Overall, the total affordable housing need for the Borough equates to 38% of the total housing need and there is a need for different types of homes in both the market and affordable sectors. According to the SHMA, 52% of residents living in the rural areas of the Borough and 48% of residents within the urban areas of Maidstone are unable to afford market housing (without subsidy).

4.8 New development would be more widely distributed under Scenario 1 (LP17 Continued) than under the other spatial strategy options as it is expected to be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). Given that Maidstone is the primary focus in the Borough of existing infrastructure, services and facilities, there may be less need to cross-subsidise further investment, allowing for greater funding for affordable housing provision. However, the standard of infrastructure and service provision in Maidstone town centre is currently relatively poor, therefore a decision may need to be made about the extent to which market housing delivery is used to support improvement of this offer rather than delivering affordable housing. Town centre sites are likely to be brownfield and these can be relatively costly to develop compared to greenfield sites, if demolition of existing structure and hard standing is required, and even more so if remediation of contaminated land is needed. Overall, significant positive effects are expected as there is the potential for more people across the Borough to have the opportunity to live in a decent and affordable home compared to the other options. However, some of these developments are of a smaller scale, such as Boughton Monchelsea and Eyhorne St (Hollingbourne) and as such, they may not be as well placed to deliver affordable housing as part of the development mix, resulting in a minor negative effect as well.

4.9 Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to have similar effects to Scenario 1 as these scenarios would also provide sufficient housing development throughout the Borough (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). However, development in and adjacent to Maidstone town and at some of the Rural Service Centres is reduced as this scenario would also provide two garden settlements at Heathlands, Lidsing and/or North of Marden and substantial development in the Countryside. As such, a substantial proportion of development will be within the rural areas of the Borough, thereby providing affordable housing within these rural areas. However, garden settlements would entail the creation of relatively large settlements compared to smaller rural villages. In addition, the creation of a garden settlement will require significant investment in new infrastructure, which may reduce the funds available to cross-subsidise the delivery of affordable homes from the sale of market housing and may divert investment from other parts of the Borough. Garden settlements can also take a long time to deliver, which means that homes, including affordable homes, would not be provided for in the early years of the plan period. However, this would be offset by quicker housing delivery at other locations under this scenario. As a result, mixed significant positive and significant negative effects are considered likely for this option.

4.10 Since Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden))are focused primarily on the town centre and urban area, urban extensions of Maidstone and one of three garden settlements, the rest of the Borough would be expected to have small amounts of additional housing thereby creating minor negative effects for these existing rural communities, and continuing to exacerbate the current higher rural housing price pattern. Scenarios 1 and 3a, b and c are expected to provide the same amount of housing and employment development in and around Maidstone town therefore, significant positive effects are expected for this scenario as well. In addition, the potential effects of the garden settlement are described under Scenario 2 above. However, compared to Scenario 2, this option would only develop one garden settlement compared to two, so the negative effects may not be as significant. Also, constraints in construction capacity and market demand may mean that it is possible to develop one new settlement more quickly than two at the same time. Therefore, minor negative effects with uncertainty are also expected.

[55] Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at: http://www.maidstone.gov.uk/__data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf

Mitigation

4.11 The quality of homes provided under any of the options could be ensured through suitable policies in the Local Plan Review relating to, for example, room sizes, sustainable design and construction, lifetime homes standards, and energy efficiency. In addition, for larger developments, it may be possible to introduce design codes for developers to adhere to, ensuring not only the resource efficiency of homes, but also space and access requirements, lighting, and their style and character to complement the local vernacular.

4.12 The provision of affordable housing can be achieved through various mechanisms, such as S106 agreements. Larger developments are generally more likely to be able to deliver affordable homes on site.

Conclusion

4.13 Scenario 1(LP17 Continued) performs most strongly against this SA objective, primarily because it would be delivering most development where services and facilities already exist, thereby ensuring that there is the greatest potential for delivering affordable homes alongside market housing. In addition, it should allow most affordable housing to be delivered where the greatest need for it exists – the rural area. However, scenarios 2a, b and c and 3a, b and c offer considerable potential in the longer term assuming that investment in new infrastructure, services and facilities would allow enough headroom to also fund the provision of affordable homes.

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

4.14 The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area[56]. As the County town and the dominant settlement in the Borough, Maidstone itself has a much wider range and number of services and facilities than elsewhere in the Borough. For example, outside of Maidstone, only Lenham has a secondary school. Maidstone town also provides a focus for employment in the Borough, as demonstrated by the fact that average commuting distances travelled by the Borough's residents generally increase with distance from Maidstone town[57].

4.15 The five Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst all provide a good range of services which serve both the village and the surrounding hinterland. All provide a nursery and primary school; a range of shops (including a post office); a doctor's surgery; at least one place of worship, public house, restaurant and community hall as well as open space provision[58].

4.16 The five Larger Villages of Boughton Monchelsea, Coxheath, 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[59].

4.17 In 2017, Maidstone Borough saw the biggest net inward migration of pre-school age children of all the districts in Kent, with the equivalent of a new primary school required to serve these children. Currently, there is capacity for non-selective and selective sixth form capacity in the short and medium term, however there will be a deficit throughout the Plan period in the Borough and across the County. In addition, forecasts indicate that Reception and total primary school rolls will continue to rise across the Plan period and will result in an overall deficit of places from 2022-23. Future pressure is also anticipated within the town centre of Maidstone[60].

4.18 New development would be more widely distributed under Scenario 1 (LP17 Continued) as it would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages). As such, a significant proportion of new development would be focused on Maidstone town, where there is good access to existing higher order services and to employment. Development at the Rural Service Centres and Larger Villages would also help to support the viability of services in these settlements, although residents living in these settlements would not have the range of services and facilities provided by the town of Maidstone. This option is therefore expected to have mixed significant positive effects and minor negative effects on this SA objective. According to the Council's Transport Infrastructure Topic Paper, this scenario aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[61], all of which will improve the accessibility of more residents to key services and facilities through the expansion of different modes of transport.

[56] Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf
[57] 2011 Census travel to work data
[58] Maidstone Borough Local Plan. Adopted 25 October 2017
[59] Maidstone Borough Local Plan. Adopted 25 October 2017
[60] Kent County Council (2019) Commissioning Plan for Education Provision in Kent 2019-2023 [online] available at: https://democracy.kent.gov.uk/documents/s88604/KCP%202019%20-%202023%20_Cabinet%20Committee%20-%20FINAL%20PW.pdf)
[61] Maidstone Borough Council, Transport Infrastructure Topic Paper

4.19 Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to provide additional social infrastructure alongside housing within the two garden settlements and to a lesser extent in Maidstone town, Rural Service Centres and Larger Villages. The garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, Scenario 2a, 2b, and 2c aim to minimise the transport impact on the existing network by creating high quality large developments with high levels of sustainable travel and trip internalisation.[62] This could partly be achieved by the planned provision of new employment space at the garden settlements (summarised under SA objective 5 below). Garden settlements therefore provide the potential, at least, to create more self-sustaining communities, thereby ensuring access to essential services, facilities and employment to residents of the garden settlement, although evidence elsewhere suggests that this can be difficult to achieve[63]. If successful, this would have positive implications for residents of the garden settlements. However, it is worth noting that all of the garden settlement locations are in areas of the Borough from which average commuting distances are currently relatively long (between 12 and 15km) and there is no guarantee that new residents of garden settlements would take up new jobs that are provided in those locations, creating a risk that some new residents may experience poor access to employment.

4.20 Service provision at the garden settlements could also benefit any nearby communities in surrounding areas, although the extent to which they are in need of these services and facilities will vary. New services and facilities at North of Marden garden settlement could serve the existing population of the adjacent Rural Service centre of Marden. The south-western part of the site is well related to the centre of Marden and if new services were concentrated there, could help to reinforce the existing service centre, although this layout could leave the northern and eastern parts of the garden settlement less well served. A similar situation exists for the Heathlands garden settlement site although the closest part of the site to Lenham Rural Service Centre is separated from the existing settlement by other site options. Also, service provision in the main part of the Heathlands site would be poorly related to its southern part because the M20 and Maidstone-Ashford railway line bisect the site. The Lidsing garden settlement is least well related to existing service centres in Maidstone Borough, although residential suburbs of Gillingham and Chatham lie to the north-east and west.

4.21 In addition, garden settlements can take a long time to deliver, which means that additional social infrastructure may not be provided in the early years of the plan period but only once the garden settlements reach a size large enough to support them. Furthermore, concentrating investment in services and facilities at garden settlements may mean that existing services and facilities, particularly in the Rural Service Centres and Larger Villages, may attract less investment and support from new development. However, as these scenarios would also provide residual development within Maidstone town, Rural Service Centres and Larger Villages, some investment would still be available. Overall, mixed significant positive and significant negative effects with uncertainty are expected for scenarios 2a, 2b and 2c.

4.22 The development at Maidstone town under Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement (Heathlands)) and 3c (One Garden Settlement (Marden)) would have a similar effect as Scenario 1 as it would provide residential development close to the towns higher order services, facilities, and employment opportunities. Transport infrastructure improvements described for Scenario 1 would be enhanced under each Scenario 3 by addition of major new public transport infrastructure investment as part of the plan to revitalise the town centre.[64] This would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. On the other hand, this option also aims to provide a garden settlement in Heathlands and small amounts of development within the Rural Service Centres and Larger Villages. The potential effects of the garden settlement are described under Scenario 2a/b/c above. However, compared to Scenario 2a/b/c, this option would only develop one garden settlement compared to two, so the concentration of investment in services and facilities at garden settlements would be less pronounced compared to Scenario 2a/b/c. Therefore, mixed effects are expected.

Mitigation

4.23 Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that new development can develop a sense of community and that

[62] Maidstone Borough Council, Transport Infrastructure Topic Paper
[63] Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, and ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report
[64] Maidstone Borough Council, Transport Infrastructure Topic Paper

existing services and facilities elsewhere do not feel additional pressure in the short term.

4.24 In selecting a preferred spatial option, it will be important not only to ensure that new development is well provided with services and facilities, but that existing services and facilities, particularly in the rural service centres and larger villages, receive investment and support to maintain their viability.

Conclusion

4.25 Scenario 1 (LP17 Continued) performs most strongly against this SA objective, primarily because it would be delivering development where services and facilities already exist, thereby ensuring that there is the greatest potential for easy access to, and support for, key services and facilities. While scenarios 2a, b and c and particularly 3a, b and c would also deliver development within the town centre, they would also provide garden settlements which would have uncertain effects in the short term but offers considerable potential for positive effects in the longer-term, assuming investment in new infrastructure, services and facilities would be provided.

SA Objective 3: To strengthen community cohesion

4.26 Community cohesion is influenced by the range of jobs, services and facilities available to residents, the integration of different sectors of the community, and between new and existing communities. It has many links with other SA objectives.

4.27 Scenario 1 (LP17 Continued) is expected to strengthen community cohesion across communities in the Borough through support for and potentially increased provision of social infrastructure, green space and related increased social interaction. However, as this option aims to provide development within the rural areas of the Borough as well as the urban areas there may be opposition to additional development within the smaller villages if this changes the character of the villages and places pressure on services and facilities and increases traffic. Therefore, mixed significant positive and minor negative effects are expected for this option.

4.28 Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to develop new community cohesion through increased provision of social infrastructure and green space within the garden settlements, and to a lesser extent in Maidstone town, Rural Service Centres and Larger Villages. Garden settlements can be designed from the outset to achieve community cohesion although in practice, a true sense of community cohesion can take a long time to achieve, especially when such developments are only partly completed. As these options will provide two large developments and some smaller developments within rural areas of the Borough, there may be opposition to additional development within the smaller villages, particularly those closest to the large new garden settlements. Therefore, mixed significant positive and significant negative effects are expected for these options.

4.29 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) are expected to strengthen community cohesion through increased provision of social infrastructure, green space and related increased social interaction. Also, this option would provide development within the urban area of Maidstone, where existing communities may oppose further densification of the urban area. It may also lead to less investment in, and support for, more rural communities. On the other hand, Scenarios 3a, b and c aim to provide a garden settlement at Heathlands, Lidsing and Marden, each of which would be located within a rural area of the Borough. The potential effects of the garden settlement are described under Scenario 2 above. However, compared to Scenarios 2a, b and c, this option would only develop one garden settlement compared to two. This scenario may also lead to a diversion of investment in communities elsewhere in the Borough, particularly in rural villages, although some residents may welcome less in the way of development and change. As such, it may result in less development in rural communities that do not wish to see the character of their villages change too dramatically. Therefore, mixed minor positive and minor negative effects are expected.

Mitigation

4.30 Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that existing services and facilities do not feel additional pressure in the short term.

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

4.32 Large new communities should be planned and design-in community cohesion principles from the outset.

Conclusion

4.33 Each of the options is expected to strengthen community cohesion through increased provision of social infrastructure and green space. However, each of them is expected to have mixed effects in relation to this SA objective as it is likely there will be opposition to additional development at rural settlements and the further densification of the urban area.

4.34 The effect on community cohesion will differ, depending upon whether the focus is on the new or the existing

community. Overall, Scenario 1 (LP17 Continued) performs best because it is most likely to meet the needs of the greatest number of communities.

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

4.35 Maidstone Borough (69.2%) has a higher percentage of adults who consider themselves physically active than nationally (66.3%) but is just below the Kent average (69.8%)[65]. However, with regard to health inequalities, the Maidstone urban wards of Park Wood, Shepway South and High Street contain the highest levels of deprivation in the Borough and rank in the top 10% in Kent. The most deprived Lower Super Output Areas (LSOA) in Maidstone are clustered within the inner urban area, and the least deprived LSOAs are located on the edge of the urban area and in the rural hinterland[66].

4.36 Maidstone contains 425 hectares of greenspace, 30 large parks, 80 Neighbourhood greenspaces, 68 play areas, 700 allotment plots across 12 sites and 4 Green Flag parks. Overall, there is more publicly accessible, managed open space within the urban wards compared to the rural wards of the Borough[67].

4.37 Scenario 1 (LP17 Continued) would continue to allocate services to existing settlements, in line with the settlement hierarchy. This would likely provide additional social infrastructure and green space to areas throughout the Borough. However, as previously stated, the urban area includes the most deprived neighbourhoods in the Borough and would be most in need of investment. In addition, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[68], thereby improving health and wellbeing of residents by improving active travel options. Overall, minor positive effects are expected.

4.38 Scenarios 2a (Heathlands + North of Marden), Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to have significant positive implications for this SA objective as garden settlements present opportunities for new patterns of infrastructure provision. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. In addition, as a principle of garden settlements, it is expected that additional green space will be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. These scenarios would provide two garden settlements. As these garden settlements lie within the relatively less deprived rural areas of the Borough, the additional social infrastructure they provide would not be targeted to the parts of the Borough in greatest need, therefore these options were judged to also have a minor negative effect in relation to SA4: Health.

4.39 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) are expected to have significant positive effects in relation to this SA objective as it aims to revitalise the town centre, which is within the urban area where the highest levels of deprivation are within the Borough. Development within the urban area would provide additional homes, economic opportunities, social infrastructure and green space. In addition, this scenario would seek to deliver modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[69], thereby improving health and wellbeing of residents by improving active travel options. In addition, this option, like Scenarios 2a, b and c, would provide a garden settlement at Heathlands, Lidsing or Marden which could provide greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. In addition, as a principle of garden settlements, it is expected that additional green space would be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. As the garden settlement location is within a rural area it would not provide additional infrastructure for the urban area. Therefore, this option also has a minor negative effect.

Mitigation

4.40 It is recommended that the areas of deprivation, and specifically health deprivation, are mapped out within the Borough. In addition, understanding why those areas are deprived and aiming to provide specifically what is lacking in those areas is crucial. Providing additional green space and

[65] Public Health England (2020) Maidstone Local Authority Health Profile 2019 [online] available at: https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000110.html?area-name=maidstone
[66] Ibid
[67] Maidstone Borough Council (2017) Maidstone's Parks & Open Spaces – 10 Year Strategic Plan 2017-2027 [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf
[68] Maidstone Borough Council, Transport Infrastructure Topic Paper
[69] Maidstone Borough Council, Transport Infrastructure Topic Paper

active travel routes alongside the rest of the development would also improve health and wellbeing.

Conclusion

4.41 Scenarios 2a, b and c and 3a, b and c are expected to have significant positive effects on this SA objective as garden settlements create opportunities for new patterns of infrastructure provision and more development within the urban area could reduce the amount of deprivation. Scenario 1 is also expected to have positive effects, however they are minor as the potential development from this scenario is more widely dispersed.

SA Objective 5: To facilitate a sustainable and growing economy

4.42 From the seven local authorities surrounding Maidstone, 49% of the total commuting flows are workers coming into Maidstone Borough. There is a higher proportion of workers commuting out to Tonbridge and Malling (58%) and all London metropolitan boroughs (83%) compared to the proportion of workers commuting in from these locations. Medway has the highest proportion of workers commuting into Maidstone (65%). Overall, Maidstone has a negative net commuting flow[70]. Maidstone has shown steady growth in the number of business from 2011 to 2017 and there has been an increase of 7,000 additional jobs created between 2011 and 2016[71].

4.43 Scenario 1 (LP17 Continued) would aim to provide extensions to existing successful rural business sites, new business sites at strategic motorway junctions, new office development as part of mixed use residential, retail and office developments within Maidstone town centre and a further allocation at the Kent Medical Campus.[72] As such, significant positive effects are expected against this option as it would provide economic opportunities throughout the Borough, aiding many different communities.

4.44 Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) would provide substantial employment development (121,566m^2 of 'B' space) within the garden settlements as follows:

- Heathlands – The location lies close to the strategic road network, between the M20 and A20, and would therefore be particularly well suited to B8 uses requiring larger vehicular access, although the closest motorway junction is some distance away.
- North of Marden – The location is not close to the strategic road network and would therefore be harder to access by road, although it does benefit from proximity to Marden rail station.
- Lidsing - This location at the junctions of the M2 and A278 is very well placed for access to the strategic road network and like Heathlands, well suited to B8 uses requiring larger vehicular access.

4.45 More generally, the lack of locational flexibility of a garden settlement-focussed approach to employment development would have negative effects in relation to this SA objective. Additionally, garden settlements would not be expected to come forwards for development immediately after Local Plan Review adoption and experience elsewhere suggests that attracting investment in employment uses can take some time[73], although it can be achieved[74]. In recognition of this, this option would seek to allocate a range of employment sites outside of the garden settlements to ensure choice in the short to medium term. Overall, mixed minor positive and minor negative effects would be expected as these scenarios would increase the diversity of economic opportunities but not necessarily in appropriate locations or at the right time.

4.46 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, this option would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space nearby rail links to and from London would also be encouraged which would attract business to the town centre.[75] These factors would result in significant positive effects in relation to SA5: Economy. This option would, however, require the Council to revisit assumptions on mixed-use development in the town centre, increasing the percentage of office provision on each site. Like Scenario 2a, b and c, the economic development at Heathlands, Lidsing and Marden garden settlements under this option would have

[70] Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports
[71] Ibid
[72] Maidstone Borough Council, Economic Strategy Topic paper
[73] Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, also ATLAS (April 2016) North Hertfordshire New Settlement Study Final Report, and Nathaniel Lichfield & Partners (October 2013) Cambourne Retail and Employment Study
[74] See, for example, Cranbrook in Devon (https://www.local.gov.uk/local-growth-local-people)
[75] Maidstone Borough Council, Economic Strategy Topic paper

mixed effects in relation to SA5: Economy. Overall, mixed significant positive and minor negative effects are expected for this option.

Mitigation

4.47 A diversity of economic development could be encouraged under any spatial strategy option through suitable policies in the Local Plan.

4.48 If garden settlements are preferred, it will be particularly important to provide an attractive planning and financial regime to attract early investment. In addition, a range of other employment allocations are likely to be needed outside of the garden settlements, to ensure choice is available in the short to medium term and to accommodate the varied locational requirements of different industries.

Conclusion

4.49 Scenario 1 would provide the most balanced economic opportunities for the Borough although Scenarios 3a, b and c would offer much needed economic development near public transport links and therefore also deliver significant positive economic effects. The economic benefits of economic development at garden settlements under Scenarios 2a, b and c and 3a, b and c are less certain, particularly in the short term.

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

4.50 Maidstone town centre is home to the predominant concentration of shops, jobs, services and facilities in the Borough. No other settlements in the Borough have such an offer. Town centres are experiencing increased strain from out-of-centre and out-of-town competition, as well as on-line alternatives. These issues are also now being exacerbated by COVID-19.[76]Therefore, retaining the vitality and viability of Maidstone town centre is an important sustainability objective for the Borough.

4.51 Scenario 1 (LP17 Continued) would aim to provide new office development as part of mixed use residential, retail and office developments within Maidstone town centre.[77] Allocations rolled forward from the Local Plan 2017 and increased occupation of currently vacant stock would provide more than the required retail floorspace to 2037. Any new allocations, if needed for choice in the market, would use the 'town centre first' approach – in Maidstone town centre, then urban edge, then out of centre, subject to sequential impact assessment.[78] This option would also see maintenance of the existing Local Plan Transport Strategy with various benefits for the town centre, such as increased bus service frequency along radial routes into the town centre, a new bus station, and parking management. Overall, these factors would provide significant positive effects in relation to this SA objective. However, this option would also provide smaller amounts of residential and retail development at the Rural Service Centres and Larger Villages, thereby steering footfall away from the town centre, also resulting in minor negative effects.

4.52 Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) would be creating new local centres through the development of new garden settlements that aim to create self-sustaining communities, potentially steering some footfall away from Maidstone town centre. Although residents of a new garden settlement at Lidsing would be more likely to travel to Chatham town centre than Maidstone town centre. Residual residential development under these scenarios within Maidstone urban area, the Rural Service Centres and Larger Villages would have the same effect although to a lesser extent. These scenarios would also provide employment and retail development within Maidstone town centre. Although the total amounts would be less than under Scenario 1 or Scenario 3, it would still enhance Maidstone town centre's range of jobs, services and facilities, helping to ensure that they continue to be of a higher order than those available in garden settlements or Rural Service Centres, with positive effects on this SA objective. Accessing Maidstone town centre services from the three garden settlement locations is not particularly easy as all lie some distance from it. Overall, mixed minor negative and minor positive effects are expected for this SA objective.

4.53 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, this scenario would also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space near to rail links to and from London would also be encouraged which would help to attract business to the town centre.[79] Therefore, this option would provide significant positive effects against this SA objective. However, as this option would also aim to provide a garden settlement at Heathlands, Lidsing or Marden it would be

[76] Centre for Cities (2020) High Streets [online] Available at: https://www.centreforcities.org/high-streets/
[77] Maidstone Borough Council, Economic Strategy Topic paper
[78] Maidstone Borough Council, Retail and Leisure Strategy Topic paper
[79] Maidstone Borough Council, Economic Strategy Topic paper

creating a new local centre thereby steering footfall away from the Maidstone town centre. Therefore, minor negative effects are also expected.

Mitigation

4.54 Ensure that transport connections to the town centre are made available and attractive so that all residents can readily access the town centre, thereby sustaining the vibrancy and vitality of the area.

Conclusion

4.55 Scenario 1 (LP17 Continued) and Scenarios 3a, b and c all have the potential for significant positive effects on Maidstone town centre by directing significant residential, business and retail development to that location. Scenarios 2a, b and c would perform least well as the two garden settlements would create new local centres that would compete with Maidstone town centre, although it would still provide substantial business and employment development at Maidstone town centre.

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

4.56 Maidstone town centre is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20, as well as to/from the M2 & M25. The constrained nature of the town centre has contributed to peak period congestion and the designation of the wider urban area as an AQMA. Rail links across the Borough are comparatively poor, with Maidstone currently having no direct service to the City of London (although there is a proposed Thameslink extension) and a slow journey into London Victoria. Bus services within the urban area are largely focused around serving the town centre and hospital. Many outlying suburban and rural communities are afforded a more limited level of service that does not provide a convenient travel option for many potential users[80]. In addition to issues with road capacity, rail capacity on the North Kent line is also stretched and is likely to be over-capacity in the near future. The Network Rail Kent Area Route Study also highlights capacity issues with the railways in Kent and states that the number of passengers using the railway across the route has increased substantially in recent years and further growth is forecast – up to 15% growth in passenger numbers between 2011 and 2024 and 47% up to 2044. Routes into London are particularly busy, with little capacity to operate additional services[81].

4.57 New development under Scenario 1 (LP17 Continued) would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages). As such, it is expected to have significant positive effects for this SA objective as there is a higher probability that existing transport hubs and routes will be accessible from new development. This option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[82], all of which will improve the existing sustainable modes of transport. However, it is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. Furthermore, currently a high proportion of the Borough's residents drive to work[83] so the uptake of more sustainable travel options may face resistance due to ingrained travel habits. Significant negative effects are therefore also expected.

4.58 The garden settlements developed under Scenario 2a (Heathlands + North of Marden) would seek to minimise their impact on the existing transport network through the creation of high-quality, large development with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas.[84] This option presents opportunities for new patterns of infrastructure provision and for the creation of an integrated community. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution, including to transport infrastructure, than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. However, the two garden settlements at Heathlands and North of Marden could take a long time to deliver, which means that additional sustainable transport infrastructure would not be provided for in the early years of the plan period. Furthermore, research of practical experience elsewhere[85] has concluded that garden settlements can become car dependent and

[80] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf
[81] Network Rail (2018) South East Route: Kent Area Route Study [online] Available at: https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf
[82] Maidstone Borough Council, Transport Infrastructure Topic paper
[83] NOMIS method of travel to work (2011) Maidstone Borough [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=cell&cols=rural_urban
[84] Maidstone Borough Council, Transport Infrastructure Topic paper
[85] Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality

create more traffic for the local roads as many residents drive to and from cities to work. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. In addition, as residual development would be provided within Maidstone town, Rural Service Centres and Larger Villages under this option, it is likely that existing public transport options would continue to be overcapacity. Therefore, mixed minor positive and significant negative effects are expected for this option.

4.59 The garden settlements developed under Scenario 2b (Heathlands + Lidsing) would seek to minimise their impact on the existing transport network through the creation of high-quality, large development with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas.[86] However, the potential effects described under Scenario 2a would also be felt here. Therefore, mixed minor positive and significant negative effects are expected for this option.

4.60 Scenario 2c (North of Marden + Lidsing) would seek to minimise their impact on the existing transport network through the creation of high-quality, large development with high levels of sustainability and trip internalisation and improved sustainable transport options for surrounding areas.[87] However, the potential effects described under Scenario 2a would also be felt here. Therefore, mixed minor positive and significant negative effects are expected for this option.

4.61 Maidstone town centre development under Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would deliver the same beneficial transport infrastructure measures as Scenario 1. In addition, this option would also include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.[88] The infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. The garden settlement development component of this option would have similar effects on sustainable travel and congestion as described for Scenarios 2a, b and c above, therefore, significant negative effects are also expected.

Mitigation

4.62 Ensure that public transport and active travel connections are created and enhanced at the same time housing and economic development is being undertaken. This could be done through various mechanisms, such as S106 agreements.

Conclusion

4.63 Each of Scenario 3 performs most sustainably against this SA objective as its planned improvements to existing public transport and infrastructure serving Maidstone town centre would benefit a large proportion of the population of the Borough, since 70% of the Borough live within the urban area of Maidstone. The sustainable transport effects of the garden settlements component of this spatial strategy option and of Scenarios 2a, b and c are more uncertain and potentially negative, particularly in the short term. Scenario 1 and each of Scenario 2 are also expected to improve public transport and active travel but not to the same extent. Although Scenario 1 has the same SA score as Scenarios 3a, b and c for this SA objective, its positive effects, although significant, are not expected to be as great as those for each of Scenario 3. In addition, it is likely that additional housing and economic development will continue to stretch roads and rail that are over capacity under all scenarios.

SA Objective 8: To conserve the Borough's mineral resources

4.64 Around half of the Borough is covered by Mineral Safeguarding Areas (MSAs) designated in the Kent Minerals & Waste Local Plan. The minerals include limestone, sandstone, river terrace deposits, silica sand and sub-alluvial river terrace deposits[89].

4.65 Scenario 1 (LP17 Continued) would have the most dispersed growth for the Borough, therefore it could have the highest probability of developing within an MSA. Each of the growth locations it sets out lies within an MSA. Overall, it is likely that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral

[86] Maidstone Borough Council, Transport Infrastructure Topic paper
[87] Maidstone Borough Council, Transport Infrastructure Topic paper
[88] Maidstone Borough Council, Transport Infrastructure Topic paper
[89] Kent County Council (2015) Kent Minerals and Waste Local Plan 2013-2030: Maidstone Borough Council – Mineral Safeguarding Areas [online] Available at: https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1

could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

4.66 Scenario 2a (Heathlands + North of Marden) is expected to have negative effects on this SA objective as both of the two potential locations for garden settlements are located within MSAs and Heathlands also contains a safeguarded mineral and waste site. It is likely that this scenario would provide housing and economic development within MSAs, sterilising the mineral deposits. As such, significant negative effects are expected.

4.67 Scenario 2b (Heathlands + Lidsing) is expected to have negative effects on this SA objective as one of the two potential locations for garden settlements (Heathlands) is located within an MSA and contains a safeguarded mineral site. It is likely that this scenario would provide housing and economic development within MSAs, sterilising the mineral deposits. As such, significant negative effects are expected.

4.68 Scenario 2c (North of Marden + Lidsing) is expected to have negative effects on this SA objective North of Marden garden settlement is are located within an MSA. It is likely that this scenario would provide housing and economic development within MSAs, sterilising the mineral deposits. As such, significant negative effects are expected.

4.69 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would focus some development within the town centre and urban area of the Borough. There are no MSAs within the town centre of Maidstone, however within the urban area there are small portions in the south-western sections that are designated as MSAs. In addition, each scenario would provide a garden settlement, Scenario 3b would provide one at Heathlands which lies within a safeguarded mineral and waste site and MSA. Scenario 3c is also expected to be located within an MSA. As such, significant negative effects are expected for both scenarios. Scenario 3a would provide a garden settlement in Lidsing which is not located within a MSA, therefore negligible effects are expected.

Mitigation

4.70 It is recommended that delivery of housing and economic development in MSAs is phased, such that mineral resources can be recovered prior to construction, where economically viable. All other matters being equal, sites that would not result in the sterilisation of mineral resources should be preferred (e.g. when choosing a location for a new garden settlement).

Conclusion

4.71 Each of the options is likely to have significant negative effects as there is a possibility for mineral resources within MSAs to be sterilised by development.

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

4.72 Maidstone Borough contains a mix of different soils. To the north of Maidstone bands of Upper, Middle and Lower Chalk run in a south-east to north-west direction forming the North Downs. Shallow soils are found over the dry valleys of the dip slope, with other areas supporting well drained calcareous fine silty soils over chalk. The second distinct geological region is Gault Clay. Soils range in the Gault Clay Vale from the calcareous chalk soils to the north through to heavier clays and a mix of clay and sandy soils where they meet the Greensand to the south. The underlying soils give rise to a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 1, Grade 2 and Grade 4[90].

4.73 The dispersed growth under Scenario 1 (LP17 continued) could result in development within Grades 1, 2, or 3 agricultural land and on other greenfield land. However, development will be provided in Maidstone town centre and urban area which would avoid agricultural land. As such, mixed minor positive and significant negative effects with uncertainty are expected, the uncertainty relating to the exact locations that would be developed.

4.74 Scenario 2a (Heathlands + North of Marden) would provide a large proportion of its development at two large new greenfield garden settlements at Heathlands and North of Marden. The North of Marden garden settlement location lies within Grades 2 and 3 agricultural land and the extent of Grade 2 land is such that it is unlikely that its development could be avoided. The Heathlands garden settlement location lies within Grade 3 agricultural land. It is uncertain whether the Grade 3 agricultural land is 3a or 3b, as such, there is the potential for new development to harm the Borough's best and most versatile soils in both locations. Residual development would be dispersed across urban extensions to Maidstone town and at Rural Service Centres, Larger Villages and in the Countryside. Overall, significant negative effects are identified. However, some development would also be directed to Maidstone town centre and urban area, which would avoid agricultural land, therefore minor positive effects are also expected.

4.75 Scenario 2b (Heathlands + Lidsing) would provide a large proportion of its development at two large new greenfield

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

garden settlements at Heathlands and Lidsing. Each of the garden settlement locations lies within mostly Grade 3 agricultural land, It is uncertain whether the Grade 3 agricultural land is 3a or 3b, as such, there is the potential for new development to harm the Borough's best and most versatile soils. Residual development would be dispersed across urban extensions to Maidstone town and at Rural Service Centres, Larger Villages and in the Countryside. Therefore, under the precautionary principle, uncertain significant negative effects are identified, the uncertainty relating to the exact locations that would be developed. However, some development would also be directed to Maidstone town centre and urban area, which would avoid agricultural land, therefore minor positive effects are also expected.

4.76 Scenario 2c (North of Marden + Lidsing) would provide a large proportion of its development at two large new greenfield garden settlements at North of Marden and Lidsing. The North of Marden garden settlement location lies within Grades 2 and 3 agricultural land and the extent of Grade 2 land I such that it is unlikely that its development could be avoided. The Lidsing location only contains Grade 3 agricultural land. It is uncertain whether the Grade 3 agricultural land is 3a or 3b, as such, there is the potential for new development to harm the Borough's best and most versatile soils. Residual development would be dispersed across urban extensions to Maidstone town and at Rural Service Centres, Larger Villages and in the Countryside. Overall, significant negative effects are identified. However, some development would also be directed to Maidstone town centre and urban area, which would avoid agricultural land, therefore minor positive effects are also expected.

4.77 Like Scenario 1, Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would focus development within the town centre and wider urban area of Maidstone, thereby avoiding agricultural land. However, for each scenario development would also take place in urban extensions to Maidstone town, which is mostly Grades 1 and 2 agricultural land. Each garden settlement is located within Grade 3 agricultural land and furthermore the garden settlement located at Marden would also lie partially within Grade 2 agricultural land. The extent of Grade 2 land is such that it is unlikely that its development could be avoided. It is uncertain whether the Grade 3 agricultural land is 3a or 3b, as such, there is the potential for new development to harm the Borough's best and most versatile soils in both locations. Depending on where the development would take place it could be located within high quality agricultural land. As such, a mixed minor positive and significant negative effect is expected with uncertainty.

Mitigation

4.78 All other matters being equal, give preference to brownfield sites, followed by greenfield sites that would avoid development within Grades 1 to 3a agricultural land.

Conclusion

4.79 All of the scenarios would provide development within the town centre and urban area of Maidstone, thereby avoiding greenfield and higher quality agricultural land, resulting in minor positive effects. However, they all have the potential to have significant negative effects on this objective as all of them could result in Grades 1, 2 and 3a agricultural land being lost. Scenario 1 would provide development throughout the rest of the Borough. Scenarios 2a, b and c and 3a, b and c provide for greenfield garden settlements that would be likely to be within Grade 3 (and in the case of North of Marden, also some Grade 2) agricultural land. All options include development at the edges of Maidstone town and smaller settlements, most of which are likely to be greenfield.

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

4.80 Kent is one of the driest regions in England and Wales[91]. Water use in the Borough is high by both national and international standards, and some water bodies in Maidstone are failing to meet the Water Framework Directive objective of 'good status'[92]. These issues could be exacerbated by additional housing and economic growth, coupled with climate change. Pressures, including the projected increase in population, related to the provision of water supply and wastewater treatment are key contributors to the current status and future status of water bodies in Kent. There may also be an increased risk of urban run-off that could affect water quality; this is already evident in parts of the catchment. There is also an increased risk of over-abstraction of water resources.

4.81 Scenario 1 (LP17 Continued) would provide additional housing, economic development and infrastructure which would be likely to put the region's water resources and water quality under additional stress. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand.

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

[92] AECOM (2017) Kent Water for Sustainable Growth Study

4.82 Scenario 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and Scenario 2c (North of Marden + Lidsing) would have similar effects to Scenario 1 for the same reasons. In addition, these options would result in substantially more development for B-use employment than Scenario 1 and depending on the particular business activities, this could result in significant additional use of water resources and/or wastewater discharges. Therefore, significant negative effects are expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. None of the garden settlement locations is within groundwater source protection zone 1. The garden settlements developed under these options offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the other options, which means that the scenarios also receive a minor positive effect.

4.83 Scenario 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would concentrate development within the town centre which is already developed and contains impermeable surfaces. Additional development in this area could increase the amount of pollution in urban runoff, which is already an issue for the catchment the Borough is within. In addition, additional development would intensify the water stress within the region, similarly to the other options. In addition, this option would result in substantially more development for B-use employment than Scenario 1 (although not quite as much as Scenario 2a, b and c) and depending on the particular business activities, this could result in significant additional use of water resources and/or wastewater discharges. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. In addition, with the development of a garden settlement, there will be the need for large amounts of water, however, garden settlements offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the other options, which means that the scenario also receives a minor positive effect.

Mitigation

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

Conclusion

4.85 Each of the options are expected to have negative effects on this SA objective as water resources in the Borough are already suffering from high levels of water use, therefore any development without water efficiency measures will worsen the situation. Of all the options, Scenarios 2a, b and c and 3a, b and c probably offer the best opportunity to design-in water efficiency and wastewater management from the outset in an integrated and comprehensive way, due to their inclusion of entirely new garden settlements.

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

4.86 Maidstone town centre is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20. The Council designated the wider urban area as an AQMA in 2008 due to elevated concentrations of Nitrogen Dioxide (NO_2) at residential receptors in six areas of the Borough. However, in May of 2018 the AQMA within Maidstone was reconfigured to only follow the carriageways of the main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274. NO_2 levels at some key locations near major roads and junctions remain above the EU Limit Value with no discernible downward trend[93].

4.87 New development under Scenario 1 (LP17 Continued) would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, and Larger Villages). As such, it is expected to have significant negative effects on this SA objective as it would continue travel patterns that have developed over time, including significant car use, particularly in the more rural areas. Currently a high proportion of the Borough's residents drive to work, and the uptake of

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

more sustainable travel options is limited[94]. It is less likely that this option will provide significant new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. However, this option aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW)[95], all of which will improve the existing sustainable modes of transport, and potentially air quality, resulting in a minor positive effect.

4.88 Scenarios 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) are expected to result in a small increase in traffic congestion within the Rural Service Centres and Larger Villages due to the residual development located at these locations. Most development under these options would be directed to new garden settlements, which seek to minimise transport impact on the existing network through the creation of high-quality large development with high levels of sustainability and trip internalisation and provide improved sustainable transport options for surrounding areas[96]. These options therefore present opportunities for new patterns of infrastructure provision and for the creation of a self-sustaining community. A principle of garden settlements is to provide green infrastructure and, particularly where this involves tree planting, this would help to absorb and disperse air pollutants. Garden settlements, in common with other large greenfield sites, would be likely to provide a greater infrastructure contribution than comparable brownfield sites due to the higher site preparation costs of the latter. They might also provide a greater contribution than comparable non-garden settlement greenfield sites if they are able to access Government funding reserved for this class of development and/or mechanisms are put in place to capture land value uplift in line with garden settlement principles. As it is likely that garden settlements will be masterplanned, the incorporation of environmentally sensitive planning and reduction of the need to travel by car through good site layout and promotion of walking, cycling and public transport is likely. However, garden settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would be unlikely to be provided in the early years of the plan period. Furthermore, research of practical experience elsewhere has shown that, despite original intentions, garden settlements can become car dependent and create more traffic for the local roads as many new residents drive to and from cities to work[97]. The study found that it is likely that the garden settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. Car journeys into Maidstone town from any of the three garden settlements would be likely to pass through the AQMA. The North of Marden garden settlement (part of scenarios 2a and 2c) offers greater potential for longer distance journeys to be taken by rail rather than road due to its proximity to Marden rail station, which offers frequent peak services to central London via Tonbridge and Sevenoaks. In addition, Scenarios 2a, 2b and 2c would result in substantially more development for B-use employment than Scenario 1 and depending on the particular business activities and amounts of associated road traffic movements and energy use from operations, this could result in significant additional air pollution emissions. Overall, mixed minor positive and significant negative effects are expected for these options.

4.89 Development in the Maidstone urban area under Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would be accompanied by the same transport infrastructure provision as Scenario 1. It would additionally include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures.[98] These transport improvements would benefit a large proportion of the population of the Borough since 70% of the Borough live within the urban area of Maidstone, and there would be greater opportunities to use more sustainable modes of transport including walking and cycling for everyday journeys, reducing the effects on air quality. As such, it would have significant positive effects on this SA objective. The development of a garden settlement under each of the scenarios would have similar effects on transport and air quality as described for Scenario 2 above, therefore significant negative effects are expected from that component of the option. In addition, this option would result in substantially more development for B-use employment than Scenario 1 (although not quite as much as Scenario 2) and depending on the particular business activities and amounts of associated road traffic movements and energy use from operations, this could result in significant additional air pollution emissions. Overall, significant positive and significant negative effects are expected.

[94] NOMIS method of travel to work (2011) Maidstone Borough [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=cell&cols=rural_urban
[95] Maidstone Borough Council, Transport Infrastructure Topic paper
[96] Maidstone Borough Council, Transport Infrastructure Topic paper
[97] Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality
[98] Maidstone Borough Council, Transport Infrastructure Topic paper

Mitigation

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

Conclusion

4.91 Scenarios 3a, b and c perform best against this SA objective as this option aims to significantly improve public transport and infrastructure in the Maidstone urban area which would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone and currently experience high levels of air pollution. However, for Scenarios 2a, b and c and 3a, b and c, while the development of garden settlements offers the opportunity to design-in sustainable modes from the start, experience elsewhere suggests that car use will still dominate. Scenario 1 is also expected to improve public transport and active travel, particularly in Maidstone urban area, but not to the same extent as each Scenario 3.

SA Objective 12: To avoid and mitigate flood risk

4.92 Fluvial flood risk within Maidstone is concentrated in the southern and south-western part of the Borough, as well as in Maidstone town centre. The primary source of fluvial flood risk in the catchment is the River Medway[99]. The main source of surface water flood risk is heavy rainfall overloading highway carriageways and paved areas, drains and gullies but other sources of flooding were associated with blockages and high-water levels impeding free discharge from surface water drains and gullies[100]. The risk of flooding is likely to be intensified due to climate change.

4.93 Scenario 1 (LP17 Continued) would provide additional housing, economic development and additional infrastructure in line with the existing settlement hierarchy. As such, there is a risk that development will be located within Flood Zones 2 and 3, for example in Maidstone town centre and around the Rural Service Centres in the south of the Borough, Marden, Staplehurst, and Headcorn, although proposals for development within these areas of higher flood risk would have to satisfy the sequential and exception tests, as relevant. In addition, the creation of more impermeable surfaces creates additional flood risk as it is likely that greenfield land will be developed within the more rural areas of the Borough. Overall, significant negative effects are expected, with uncertainty relating to the specific development locations that will come forward and the avoidance and mitigation that may be available within sites.

4.94 Scenario 2a (Heathlands + North of Marden) would provide two new large garden settlements at Heathlands and North of Marden. Although neither of these locations includes significant areas within Flood Zones 2 or 3, a substantial part of the Heathlands and North of Marden locations have relatively high groundwater flood risk. It is likely that greenfield land will be developed for each of the large settlements, thereby reducing the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems (SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

4.95 Scenario 2b (Heathlands + Lidsing) would provide two new large garden settlements at Heathlands and Lidsing. Although neither of these locations includes significant areas within Flood Zones 2 or 3, a substantial part of the Heathlands location has relatively high groundwater flood risk. It is likely that greenfield land will be developed for each of the large settlements, thereby reducing the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems (SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

4.96 Scenario 2c (North of Marden + Lidsing) would provide two new large garden settlements at North of Marden and Lidsing. Although neither of these locations includes significant areas within Flood Zones 2 or 3, a substantial part of the North of Marden location has relatively high groundwater flood risk. It is likely that greenfield land will be developed for each of the large settlements, thereby reducing

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

[100] Ibid

the value of infiltration provided by greenfield land. However, as a principle of garden settlements, it is expected that additional green infrastructure will be provided which would help to intercept heavy rainfall, increase infiltration and reduce the risk of surface water flooding. In addition, as garden settlements are large scale new developments, it is more likely that a masterplanned approach will be employed, making it easier to provide green infrastructure that incorporates strategic scale sustainable drainage systems (SuDS). Overall, this option would have a mixed significant negative and minor positive effect on this SA objective.

4.97 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would direct a significant amount of development to Maidstone town. Although some sites within the urban area would already be developed and hence contain impermeable surfaces, others at the urban edge would be on greenfield sites, therefore effects on surface water infiltration would be mixed. The River Medway runs through Maidstone town centre and has a history of flooding, which could increase due to climate change. Additional development in this area would potentially be exposed to higher levels of fluvial flood risk and could also increase the amount of urban runoff, which is already an issue for the catchment. These scenarios would also develop a new garden settlement at Heathlands, Lidsing or Marden. The effects of these are described under Scenario 2 above and overall, this scenario would have mixed significant negative and minor positive effects on this SA objective.

Mitigation

4.98 Avoid development within Flood Zones 2 and 3, where appropriate and in accordance with the sequential and exception tests. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could be achieved through various mechanisms, such as S106 agreements.

Conclusion

4.99 As each option aims to provide additional development throughout the Borough of Maidstone, it is likely that the increased amount of impermeable areas will reduce the infiltration capacity and flood retention provided by greenfield land. For example, each option would provide development around the settlement of Headcorn which lies within and is surrounded by Flood Zones 2 and 3. Therefore, development would have to be located to the north east of the settlement to be located out of the flood zones. However, Scenarios 2a, b and c and 3a, b and c would perform the best against this SA objective. Although the garden settlements provided under these scenarios would also result in the development of greenfield land, they would be likely to be masterplanned to employ SuDS and environmentally, climate and water sensitive planning through the incorporation of design codes.

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

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

4.101 Scenario 1 (LP17 Continued) would provide additional housing, economic development and additional infrastructure in accordance with the settlement hierarchy. As such, this development could increase greenhouse gas emissions through the higher number of private vehicles on the road and amount of energy generated from the construction and occupation of new housing and economic development. Therefore, significant negative effects are expected. However, distributing development in line with the existing settlement hierarchy would mean that a significant proportion of new development would be focused on Maidstone town, where there is good access to existing higher order services and to employment, reducing the need to travel and transport related carbon emissions. Therefore, a minor positive effect is also expected.

4.102 Scenario 2a (Heathlands + North of Marden), 2b (Heathlands + Lidsing), and 2c (North of Marden + Lidsing) would provide two large new garden settlements that offer the opportunity to create energy efficient development and operations, through the promotion of an integrated network of sustainable modes of transport for internal journeys, and the incorporation of energy efficiency and renewable and low carbon energy generation into settlement design, for example by incorporation of district heating schemes. However, as has already been described, experience to date indicates that garden settlements tend to generate significant car journeys, despite best intentions at the planning and design stage. In this regard, it is notable that all of the garden settlement locations are in areas of the Borough from which average commuting distances are currently relatively long (between 12 and 15km) and there is no guarantee that new residents of garden settlements would take up new jobs that are provided in those locations, so that a proportion of new residents are likely to travel long distances to work with many of these journeys being by car with associated carbon emissions. The

proximity of the North of Marden location to a rail station with frequent peak services to central London should reduce the emissions associated with long distance commuting for that garden settlement relative to the other two locations. In addition, as previously stated, it is likely that residual development within Rural Service Centres and Larger Villages will utilise the existing transport infrastructure which is already overstretched. Overall, mixed minor positive and significant negative effects with uncertainty are expected for Scenarios 2a, 2b, and 2c.

4.103 One element of Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) would concentrate development within and adjoining Maidstone town. There is a greater opportunity in the urban area, particularly the town centre, to use sustainable modes of transport for a variety of journeys, given the concentration of a range of jobs, services and facilities. Major new public transport infrastructure investment as part of the plan to revitalise the town centre[101] would support modal shift. However, car use is currently high, and could increase with additional development, thereby increasing greenhouse gas emissions. There may be less opportunity to incorporate larger scale energy efficiency and renewable energy networks within an already highly developed urban area than at large new masterplanned developments on greenfield sites. In addition, each scenario under this option would provide one large garden settlement with effects similar to those already described above for Scenarios 2a/b/c. Overall, mixed significant negative and significant positive effects with uncertainty are expected from this option.

Mitigation

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

Conclusion

4.105 Each of the options are expected to have negative effects on this SA objective as development requires energy use in its construction and occupation. However, Scenarios 3a, b and c offer the opportunities to incorporate, from the outset, integrated sustainable transport networks, and energy efficiency and renewable energy networks in a large new planned settlement as well as the considerable opportunity to promote sustainable modes of transport in and close to the concentration of services and facilities available at Maidstone town centre. It is therefore judged to be the most sustainable option in relation to this SA objective.

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

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

4.107 Each option has the potential to adversely affect biodiversity. Scenario 1 (LP17 Continued) which would distribute development according to the existing settlement hierarchy represents a more dispersed approach to development than the other options. Much of the development would be likely to be on greenfield land and could be on or within close proximity to biodiversity assets or disrupt the Borough's ecological networks, although this is uncertain until development sites are allocated. Overall, a significant negative effect with uncertainty relating to the location and design of development is expected for this SA objective.

4.108 Scenario 2a (Heathlands + North of Marden) would provide two large new garden settlements at Heathlands and North of Marden, both of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural areas and it is likely that development will occur on greenfield land. The two garden settlements to be provided by this option are close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. In addition, the garden settlement at North of Marden would be located close to and within the relevant Impact Risk Zone of Marden Meadows SSSI and would overlap with Bridgehurst Wood Ancient Woodland. The Heathlands garden settlement location overlaps several Local Wildlife Sites and areas of Ancient Woodland. Therefore, significant negative effects are identified for this option. Conversely, garden settlements are expected to provide additional green space thereby offering the opportunity to create additional wildlife habitat and biodiversity net gain. There is also the opportunity to link up habitats within biodiversity opportunity areas.

[101] Maidstone Borough Council, Transport Infrastructure Topic Paper

Therefore, minor positive effects are also expected against this option.

4.109 Scenario 2b (Heathlands + Lidsing) would provide two large new garden settlements at Heathlands and Lidsing, both of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural areas and it is likely that development will occur on greenfield land. The two garden settlements to be provided by this option are close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. In addition the location for Lidsing garden settlement overlays an area of Ancient Woodland and the relevant SSSI Impact Risk Zone for Medway Estuary and Marshes SSSI. The Heathlands garden settlement location overlaps several Local Wildlife Sites and areas of Ancient Woodland. Therefore, significant negative effects are identified for this option. However, positive implications come with garden settlements, which were described above under Scenario 2a. Therefore, minor positive effects are also expected against this option.

4.110 Scenario 2c (North of Marden + Lidsing) would provide two large new garden settlements at Lidsing and North of Marden, both of which are within the rural area of the Borough. The majority of the Borough's biodiversity designations lie within the rural areas and it is likely that development will occur on greenfield land. The two garden settlements to be provided by this option are close to Local Wildlife Sites, Ancient Woodland and Biodiversity Opportunity Areas. In addition, the garden settlement at the North of Marden would be located close to and within the relevant Impact Risk Zone of Marden Meadows SSSI and would overlap with Bridgehurst Wood Ancient Woodland. The location for Lidsing garden settlement overlays an area of Ancient Woodland and the relevant SSSI Impact Risk Zone for Medway Estuary and Marshes SSSI. Therefore, significant negative effects are identified for this option. However, positive implications come with garden settlements, which were described above under Scenario 2a. Therefore, minor positive effects are also expected against this option.

4.111 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) are expected to have mixed effects on this SA objective. A Maidstone-focused approach is likely to increase the potential for development on brownfield land rather than greenfield land compared to the other options, particularly Scenarios 2a/b/c, therefore minor positive effects are expected. Although, there are less biodiversity designations within Maidstone urban area, minor negative effects are also expected because sections of the urban area lie within a Biodiversity Opportunity Area, Ancient Woodland and Local Wildlife Sites. In addition, the scenarios under this option would provide one new garden settlement with effects similar to those already described above for Scenarios 2a/b/c. However, positive implications come with garden settlements, which were described above under Scenario 2a. Overall, mixed minor negative and minor positive effects are expected.

Mitigation

4.112 Avoidance of development in areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan policy should be put in place to ensure biodiversity net gain is achieved on each development site or losses are offset elsewhere within the Borough where this is not feasible. Where development would be within an established zone of influence of a designated biodiversity sites, policy should require contribution to any established mitigation scheme.

Conclusion

4.113 Both Scenarios 1 and 3a, b and c are expected to concentrate development within the town centre of Maidstone which has the least amount of biodiversity designations compared to the potential development locations of the other options. However, Scenarios 2a, b and c and 3a, b and c provide opportunities to plan green infrastructure and biodiversity net gain on a settlement-wide scale, as part of the masterplanning of new garden settlements. As such, Scenarios 3a, b and c are expected to be the best performing option overall against this SA objective. However, each of the scenarios are expected to perform negatively as they each could adversely affect biodiversity designations and networks. For example, for each option, new development is to be provided around the settlement of Headcorn, which lies adjacent to the River Beult, SSSI.

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

4.114 There are 41 Conservation Areas within the Borough. There is a cluster of 5 Conservation Areas in Maidstone Town Centre, 16 in the rest of the urban fringe and an additional 4 that straddle the urban/rural boundary. The remaining 16 are focused in the villages of the rural area. Each of these Conservation Areas contain a mixture of Listed Buildings. The Borough also contains 5 sites included on the Register of Historic Parks and Gardens[102].

4.115 Scenario 1 (LP17 Continued) is a dispersed option and therefore has the potential to adversely affect heritage assets

[102] Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at: https://www.maidstone.gov.uk/__data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf

as each existing settlement has an array of historic designations. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

4.116 Scenario 2a (Heathlands + North of Marden) proposes two locations for potential garden settlements at Heathlands and North of Marden, each of which are close to heritage assets. In addition, the Heathlands location contains two areas of archaeological potential and a variety of listed buildings and is adjacent to (and slightly overlapping) Chilston Park, a grade II Registered Park and Garden. However, the master planning of large new developments such as garden settlements offers the opportunity to mitigate effects on heritage significance through appropriate site layout and design codes could provide mitigation through requirements for appropriate development design. In addition, this option would provide residual new development within Maidstone Town Centre, Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

4.117 Scenario 2b (Heathlands + Lidsing) proposes two locations for potential garden settlements at Heathlands and Lidsing, each of which are close to heritage assets. In addition, the Heathlands location contains two areas of archaeological potential and a variety of listed buildings and is adjacent to (and slightly overlapping) Chilston Park, a grade II Registered Park and Garden. However, positive implications come with garden settlements, which were described above under Scenario 2a. In addition, this option would provide residual new development within Maidstone Town Centre, Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

4.118 Scenario 2c (North of Marden + Lidsing) proposes two locations for potential garden settlements at North of Marden and Lidsing, each of which are close to heritage assets. However, positive implications come with garden settlements, which were described above under Scenario 2a. In addition, this option would provide residual new development within Maidstone Town Centre, Rural Service Centres, almost all of which include a Conservation Area with a collection of Listed Buildings, which could be adversely impacted by additional development. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage

4.119 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) have the potential to have adverse effects on the Borough's heritage assets as the majority of Listed Buildings and Conservation Areas are within the town centre and urban area of Maidstone. In addition, this option includes development at one garden settlement, at Lidsing, Heathlands or Marden, and more dispersed residual growth, the potential effects of which are described under Scenario 2 above. Overall, effects are uncertain as the exact locations of development and the relative sensitivity to development of the historic environment at different growth locations under consideration are unknown at this stage.

Mitigation

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

Conclusion

4.121 Each of the options has the potential to have a negative impact on the historic environment, however as no heritage impact assessment has been conducted yet, the effects of each option are uncertain at this stage.

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

4.122 Just over a quarter of the Borough lies within the Kent Downs Area of Outstanding Natural Beauty (AONB). In addition, many parts of the rest of the Borough are designated as Landscapes of Local Value. The sensitivity of these designations and the wider landscape to development are set out in the Council's landscape capacity study.[103] This identifies that a substantial proportion of the Borough has high landscape sensitivity, with the greatest concentrations of land in these categories in the south and west of the Borough. Significant parts of the north and east of the Borough are of moderate landscape sensitivity. The main areas of low

[103] Jacobs for Maidstone Borough Council (2015) Maidstone Landscape Capacity Study

landscape sensitivity, all of which are relatively small, are located around Sandling (north-west of Maidstone urban area), between Boughton Monchelsea and Warmlake (south-east of Maidstone urban area) and between Sandway and Lenham Heath (in the east of the Borough).

4.123 Scenario 1 (LP17 Continued) would distribute development according to the existing settlement hierarchy, therefore most development would be directed in or on the edges of Maidstone town, the Rural Service Centres and the Larger Villages. Development within existing settlements would have a lower risk of adversely affecting the landscape, although this would depend on the scale and massing of development. However, much development under this option could be on greenfield sites at the edge of settlements and a number of areas around the edge of Maidstone town, as well as around many of the Rural Service Centres and the Larger Villages which have very high or high landscape sensitivity, creating the potential for significant negative effects. These are uncertain as the exact locations of development are unknown.

4.124 Scenario 2a (Heathlands + North of Marden) would result in the introduction of large urban developments at North of Marden and Heathlands in the form of new garden settlements. The Heathlands location lies within areas of both high and low landscape sensitivity, while the entirety of the North of Marden location lies within areas of high landscape sensitivity. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and garden settlements it is likely that development would adversely affect the landscape as each potential development location lies within areas of very high to moderate landscape sensitivity. As such, significant negative effects are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely which could mitigate effects in these developments.

4.125 Scenario 2b (Heathlands + Lidsing) would result in the introduction of large urban developments at Lidsing and Heathlands in the form of new garden settlements. Lidsing lies on the edge of the AONB and is mainly within an area of moderate landscape sensitivity. The Heathlands location lies within areas of both high and low landscape sensitivity. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and garden settlements it is likely that development would adversely affect the landscape as each potential development location lies within areas of very high to moderate landscape sensitivity. As such, significant negative effects are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely which could mitigate effects in these developments.

4.126 Scenario 2c (North of Marden + Lidsing) would result in the introduction of large urban developments at Lidsing and North of Marden in the form of new garden settlements. Lidsing lies on the edge of the AONB and is mainly within an area of moderate landscape sensitivity. The entirety of the North of Marden location lies within areas of high landscape sensitivity. In addition, the majority of Rural Service Centres and Larger Villages are within close proximity to or within Landscape of Local Value and the Kent Downs AONB. As this option would direct development to Rural Service Centres, Larger Villages and garden settlements it is likely that development would adversely affect the landscape as each potential development location lies within areas of very high to moderate landscape sensitivity. As such, significant negative effects are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as garden settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely which could mitigate effects in these developments.

4.127 Scenarios 3a (One Garden Settlement Approach (Lidsing)), 3b (One Garden Settlement Approach (Heathlands)) and 3c (One Garden Settlement Approach (Marden)) is more likely to avoid adverse effects on the landscape where development is concentrated within the built-up urban area but the option would also direct development to the edge of Maidstone town. However, even within the urban area some adverse effects on this SA objective could occur as there are three areas of Landscape of Local Value that run across the southern section of the urban area. In addition, Scenario 3a would provide a garden settlement at Lidsing which lies on the edge of the Kent Downs AONB and within an area of moderate landscape sensitivity. For Scenarios 3b and 3c, the garden settlement at Heathlands would partly lie within an area of high landscape sensitivity while the garden settlement at Marden would lie entirely within an area of high landscape sensitivity. Overall, significant negative effects are expected. Again, uncertainty is attached to this SA objective as the exact location of development is currently unknown.

Mitigation

4.128 Avoidance of development within the areas of highest landscape sensitivity would provide the best mitigation. However, requirements for development site layouts and

development design that seek to reduce adverse effects on the landscape should also be implemented via Local Plan policy and design codes for large scale developments.

Conclusion

4.129 Each of the options has the potential to have a significant negative effect on the landscape unless appropriate mitigation (see above) is implemented.

Chapter 5
SA of garden settlement options

5.1 In addition to the appraisals of the spatial strategy options set out in **Chapter 3** and **Chapter 4**, this SA also appraises the Council's reasonable alternative options for new garden settlements. This chapter describes the three options and provides an appraisal of how each of these options is considered to perform against the SA framework, identifying the likely significant effects.

Identification of reasonable alternatives

5.2 The Council's site identification and selection process is detailed in its (draft) Strategic Land Availability Assessment (SLAA). This formed the basis for the identification of the reasonable alternative garden settlement options that were subject to SA at this stage.

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

5.4 The stage one garden settlement suitability assessment[104] used the suitability criteria in the SLAA, information from relevant Kent County Council and MBC specialists. The stage 1 report concluded the following:

- Three locations (namely Binbury Park, North of Staplehurst and Pagehurst Farm) were unsuitable;
- While the Leeds-Langley corridor location was identified as being potentially suitable, after discussion with landowners it became clear that a co-ordinated garden settlement would not come forward before greater certainty around the delivery of a future Leeds-Langley route was established;
- Three potentially suitable sites were identified (namely North of the M2 / Lidsing, Heathlands, and North of Marden).

5.5 These three sites were subject to Stantec's second stage assessment[105], which considered deliverability matters

[104] Stantec on behalf of Maidstone Borough Council (April 2020) Maidstone Garden Communities Suitability Assessment Final Draft

[105] Stantec on behalf of Maidstone Borough Council (August 2020) Maidstone Garden Communities Deliverability and Viability Assessment Final Draft

including potential viability. The conclusion of the second stage assessment was that each of the three garden settlement sites have the potential to be deliverable. These three sites are therefore considered to be reasonable alternative garden settlement options as they are considered as having sufficient potential to be achievable in principle. These three sites have been subject to SA, as reported below.

5.6 In order to inform this SA, MBC provided a summary of the three different garden settlement options, including development quantum, design form and the key elements of anticipated policy requirements relating to employment and infrastructure provision. This summary is set out in **Table 5.1**.

Table 5.1: Anticipated provision at each garden settlement option

Garden settlement	Anticipated policy compliant provision
North of Marden	■ 1,750-2,000 houses (1,300 in plan period) ■ Employment at 1:1 job to house ratio ■ Station improvements, including enhanced pedestrian & cycle permeability to/from Marden Village ■ Road junction improvements towards Maidstone ■ Nursery ■ 2 form entry (FE) primary school ■ New health centre ■ 1 community facility ■ 50% open space ■ 1 Local Centre ■ 2 neighbourhood centres
Lidsing	■ 2,100-2,400 houses (1,100 in plan period) ■ 20Ha business park ■ New arm to M2 J4, improved N Dane Way link ■ Improvements to existing bus services ■ 2-3 form entry primary school ■ GP facility ■ Community facility ■ 50% open space ■ Village centre & local centre network
Heathlands	■ 5,000 houses (1,600 in plan period) ■ Employment at 1:1 job to house ratio ■ New train station ■ Improved buses linking to Lenham, Charing & Ashford ■ A20 corridor cycle route upgrade linking to destinations outside the site ■ Nursery ■ 2 x 3 form entry Primary schools ■ 2 Community centres ■ Potentially GP surgery in longer term ■ 50% open space ■ New district centre & local centre network ■ Comprehensive review of wastewater treatment works (WwTW) ■ Aspiration that the site contributes to a new M20 junction

Approach to appraisal of garden settlement options

5.7 As set out in **Appendix A** of this report, a series of detailed site assessment criteria were developed to inform the appraisal of the likely effects of potential development sites, including potential garden settlement options. This includes different site assessment criteria for residential and employment uses The detailed assessment criteria and associated assumptions in relation to residential uses are outlined in **Table A1** and the detailed site assessment for employment uses are outlined in **Table A2**, both in **Appendix A**.

5.8 The assessments undertaken using the detailed site assessment criteria used a GIS based approach which considered the distance of the relevant site boundary to various items recorded in the GIS database. For example, access to services and facilities (SA2) was assessed by considering distance to existing facilities such as GP surgeries, bus and rail stops whereas health (SA4) was assessed by considering intersection with or the distance to areas which may negatively impact health such as air quality management areas or areas identified as having high levels of

noise. As set out in **Appendix A**, there is not a one to one relationship between the site assessment criteria and the SA objectives. In many cases, a number of different criteria have been used to inform the significance of the likely effect of site options on an SA objective. The rules used to consolidate scores against multiple criteria into a single significance score are set out in the tables.

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

5.10 The appraisal of garden settlement options takes the potential sustainability advantages outlined above into account by relying on the Council's assessment of what the options are likely to be able to provide in terms of social infrastructure provision and other positive sustainability features, as set out in **Table 5.1**. However it is important to note that at the time of appraisal, the local plan process was at an early stage and therefore the preferred garden settlement option(s) had not been selected and detailed allocation policies had not yet been drafted. Once Local Plan site allocation policies are drafted, site assessment scores will be revisited, to reflect the Local Plan's site-specific policy requirements. In addition, once a complete draft of the Local Plan has been produced, discussion of the performance of the plan as a whole will also take account of the mitigation offered by development management policies and regulatory mechanisms external to the plan.

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

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

5.13 The appraisal of the garden settlement options were subject to a number of difficulties and limitations, as follows.

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

5.14 If additional, relevant evidence becomes available at later stages of plan-making, the SA will draw on this as appropriate.

Appraisal findings for garden settlement options

5.15 The findings of the appraisal of garden community options are set out in **Table 5.2**, following the format set out in **Chapter 1**. The following text then describes the reasons for the appraisal findings.

Table 5.2: SA results for garden settlement options

	SA objective															
Garden settlement option	SA1 Housing	SA2 Services & Facilities	SA3 Community	SA4 Health	SA5 Economy	SA6 Town Centre	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA11 Air Quality	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
North of Marden	N/A	-	+/--?	++/-	+?	0	+?	-	--	-	?	-	--	--	--?	--
Lidsing	N/A	+	+/-?	++/--	++?	0	-?	0	--	-	?	-	--	--	--?	--
Heathlands	N/A	-	+/--?	++/--	+?	0	+?	--	--	-	?	--	--	--	--?	--

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

5.16 SA objective 1: Housing was scoped out of the appraisal of garden settlement options. Performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver the right types and tenures of housing at prices that people can afford, as well as addressing the needs of specialist groups. These factors do not depend on the location of the garden settlements and information on expected affordable housing provision, provision for specialist groups, or housing design was not provided by the Council for the options. As such, these factors will instead be taken into account by the SA through appraisal of Local Plan policies on the total quantum of housing to be provided, the mix of housing types and tenures, affordable housing requirements, and design.

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

5.17 The potential effects of the garden settlement options in relation to SA objective 2: Services and facilities were tested by analysis of their proximity to essential services and facilities, and to employment. Access to open space was considered under SA objective 4: Health and not repeated here. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

5.18 Effects anticipated in relation to each of the garden settlement options are quite varied. The Lidsing option is well related to existing urban areas at the Medway Towns Conurbation (including the district centre at Hempstead Valley) and also proposes significant employment provision and new services, thereby resulting in more positive sustainability effects. The Land North of Marden and Heathlands options are more remote and do not offer an equivalent provision of employment. More detail is provided in comments below.

5.19 For the North of Marden garden settlement, the southwestern part of this site is close to Marden and this results in these facilities being within a distance which could facilitate access by walking, including a primary school and GP surgery. However, the railway has a very significant segregating effect and, as identified in the Stantec Deliverability and Viability Assessment, an attractive and direct walking route will be required to make best use of this close proximity. The information in table 5.1 indicates that the council would require this matter to be resolved as part of the design of the garden settlement and / or planning mitigation. For those areas further away from the rail station, it is likely that distances to even the furthest boundary will still be within 5km and cycling is likely to be a feasible transport option, subject to overcoming the segregating effect of the railway. The site is also adjacent to a relatively large employment area, the Wheelbarrow/Pattenden Lane Industrial Estate (although this has little scope to expand), which would be within a suitable distance so as to make walking and cycling feasible travel options, subject to provision of appropriate routes.

5.20 In terms of new provision, the Stantec Deliverability and Viability Assessment and the information provided by the council in **Table 5.1**. set out that the North of Marden garden settlement would include a new primary school, nursery and health centre. In addition, new neighbourhood and local centres and a new area of employment are proposed within the site. The council policy requirements is that this settlement should deliver a ratio of 1 job to 1 house.

5.21 As set out in the Stantec Deliverability and Viability Assessment, and information provided by the council in **Table 5.1**, no secondary school provision is anticipated to be provided at North of Marden. It is not made clear where secondary age pupils living in the settlement will attend school in any of the reports and in any case, there are no secondary schools within a distance which would facilitate access by active transport. As such, this is likely to lead to commuting off-site on a daily basis to access secondary school provision.

5.22 In summary, a number of facilities and services would be required to be provided within the settlement at Land North of Marden including primary school, nursery, a community facility and health provision. These are proposed within a network of neighbourhood and local centres. The location of these throughout the new settlement will need sensitive distribution to facilitate access by more sustainable modes such as walking and cycling, given the size of the site. It would be possible to achieve walking distances of approximately 1km to a central location for the whole site, and a denser provision of houses within the more central area could reduce this distance further. In addition, there are existing services and facilities at Marden which the new settlement can potentially utilise. New employment of 1 job: 1 house will be required by the council. This being the case, some people may choose to work away from the site, and even if this ratio is achieved, there are likely to be some residents who would have to find employment outside the settlement and surrounding area. Opportunities to work at the adjacent employment area exist, but the Stantec report sets out that there is little room for expansion here. As such it is anticipated that there will be significant commuting off site and out of the area. Average commuting distances from this area are currently over 14km, and therefore relatively long for the borough, which is likely to be the case due to strong rail links to London. In addition there will be a need to travel off site for secondary age pupils. Marden rail station has approximately four services in the peak times, which becomes an approximate half hourly frequency during the day. The

Stantec Deliverability and Viability Report Assessment sets out that although this is likely to be used by new residents, the extent to which it will be has not been determined. The Stantec assessment indicates significant increase in motorised vehicle traffic on the surrounding network. These things considered, it is likely that the development of a garden settlement at North of Marden is likely to lead to significant commuting off site to access services and facilities. This is likely to lead for some, to a dependence on private cars or at worst, an inability to readily access services, facilities and employment. The provision of some day to day facilities and services in the settlement will limit this, but only to a certain extent, resulting in minor negative effects overall in relation to this SA objective.

5.23 Residents and employees in the Lidsing garden settlement option are likely to look to use existing services and facilities in the Medway Towns Conurbation, to its immediate north and within the Medway Council area. It is important to note that the area of the Medway Towns Conurbation immediately surrounding this site is largely residential and does not offer a significant provision of facilities. In accordance with the detailed site assessment, other than schools, the site is too far from existing facilities to encourage access by walking to these, however distances are likely to mean that cycling is a feasible option. The information provided by the council in **Table 5.1** sets out that a number of facilities would be provided within the site including a GP surgery, primary school and a community centre. A network of village / local centres is also envisaged, whereby some services will be provided. Given the size of this site, it is likely that central provision would place almost all proposed homes within 800m of these new facilities and services, which is likely to encourage access by sustainable modes. The provision of facilities at Lidsing would also help to reduce access distances for the surrounding, established residential areas. This could have positive sustainability effects but is dependent on sufficient capacity being provided to accommodate nearby, existing residents and suitable route connections. For secondary school provision, the Stantec Deliverability and Viability Assessment sets out that either a new secondary school will be provided within the proposed settlement or in an area near the proposed settlement, to the north (within Medway). However, this is not an anticipated requirement in the information provided by the council in **Table 5.1** and has therefore not been assumed by the SA. The proposals for Lidsing also include significant provision of employment land, which according to the Stantec Deliverability and Viability assessment would provide an appropriate mix to meet the local market requirements, and would provide significant employment opportunities (over the 1 job : 1 house ratio sought by MBC), allowing good opportunity for residents of the settlement to work there too – although it must be noted that people will not always choose such live / work patterns. In accordance with the above, the proposed facilities and services within the Lidsing site are considered likely to enhance access to essential services and facilities compared to the current situation, for the residents of the proposed homes and the surrounding area. Occupants of the new settlement will still need to leave the site to access some higher order services and employment opportunities, however due to the relative proximity to the Medway Towns Conurbation and Maidstone, it is considered likely that these journeys would be shorter than would be the case from the other garden settlement options and therefore walking and cycling are likely to be more viable options for these off-site trips. In accordance with the above, minor positive effects are likely in relation to this SA objective.

5.24 In relation to the Heathlands garden settlement, the area close to the western boundary of this site is within 800m of existing GP surgeries and primary schools in Lenham, which may facilitate travel on foot for those in this part of the settlement. For the majority of the site, the distance is too great to facilitate walking as a way to access these facilities. This said, the size of the site is such that travel by bicycle is likely to be a feasible option, particularly given the improvement to cycle infrastructure along the A40 corridor, as set out in **Table 5.1**. The site is also in an area of the Borough from which average commuting distances are long relative to other parts of the Borough (over 14km), reflecting the strong rail links to London.

5.25 The proposed centre at Heathlands will provide opportunities for employment and service provision, and this will provide opportunities for residents to access these by more sustainable means of travel. The information provided by the council in **Table 5.1** indicates that a GP surgery may be provided in the longer term, and whilst the timing of this is unclear, once established, this will allow residents to access facilities closer to home, which in general supports the use of sustainable travel modes. Given that the Heathlands site is larger than the other garden communities it would be appropriate to consider that the services and facilities provided here would be to a higher order than within the other options, although this is yet to be designated by policy and so does not form part of the consideration under this SA. It should also be noted that despite the provision of services and facilities within Heathlands, it will still be the case that there will be a need for residents and employees in this new settlement to access higher order services and employment opportunities at larger and more established centres, certainly during the establishment of the garden settlement and to a lesser extent, even once the centre has been built out and occupied.

5.26 The information provided by the council in **Table 5.1** and the Stantec Deliverability and Viability Assessment indicates that secondary aged pupils will be accommodated at Lenham Secondary School and that no provision is expected on site.

Lenham secondary school is over 1km from the nearest boundary of the site and given the site is approx. 2.3km from western to eastern boundary, this is likely to lead to a dependency on cycling, public transport or private car as this is not likely to be an attractive distance to walk for the majority of pupils from the site. The information provided by the council in **Table 5.1** sets out that this garden settlement would be required to deliver employment provision equivalent of 1 job to 1 house, however it cannot be assumed that people will choose to work in the same settlement that they live. This is an important consideration given that the average commuting distance from this area is over 14km, which reflects the strong rail links with London. The Stantec Deliverability and Viability assessment identifies that the majority of residents would travel to Maidstone and Ashford to access employment. While the council envisages a new rail station which would link to Lenham, Charing, Ashford and destinations further afield, and bus services, to provide access to the surrounding settlements, there will still be a need to travel to these settlements. Although there will be options to utilise public transport, the distance travelled is not likely to encourage the use of active travel and this will result in some residents utilising the private car. For this reason Heathlands is considered likely to result in minor negative effects in relation to SA objective 2: Services and facilities.

Mitigation

5.27 The potential negative effects resulting from the Land North of Marden option could potentially be reduced by preparing a sustainable travel strategy to demonstrate how services and facilities will be accessed by public transport, particularly rail.

5.28 The site at Lidsing could potentially be considered more sustainable if more information was provided about the location, deliverability and timing of the proposed secondary school and the specific provisions for active travel and public transport.

5.29 The potential negative effects identified in relation to the Heathlands site could potentially be mitigated by the development of a sustainable travel strategy, demonstrating the likely use of sustainable modes of travel to access services and facilities.

5.30 For all options which are likely to involve provision of secondary school places off site, consideration should be given to school buses as a way to help ensure access to schools is made by more sustainable travel modes and reduces the use of private cars.

SA Objective 3: To strengthen community cohesion

5.31 Although SA objective 3: Community was scoped out of the appraisal of residential site options, it is scoped in for the garden settlements as there are some general principles that will arise from garden settlement principles which have potential to affect community cohesion. Garden settlements are, by their nature, intended to be new self-sustaining settlements which offer employment, facilities and services for the community they create. For example, the information provided by the council in **Table 5.1** sets out that all garden settlement options will include at least one local centre and at least one community facility, as well as other facilities which are anticipated to generate a sense of community, such as primary schools. It is considered that all garden settlement options will therefore result in minor positive effects in relation to this SA objective because the nature of the settlements will facilitate the creation of new communities.

5.32 However, there is also a risk that the development of a large scale development will result in concerns from local communities in relation to construction impacts, increased traffic and increased demand for local services that may not have sufficient capacity to accommodate this. These are discussed for each option below.

5.33 The North of Marden site is a large site, and it is indeed larger than Marden itself, and would therefore be likely to change the identity of Marden. There is uncertainty about whether this will be viewed negatively as some existing residents may, for example, welcome increased custom for existing business and the new facilities provided by the garden settlement. In addition, the Stantec report sets out that the designs of this settlement seek to achieve an area of green space in order to segregate the new settlement from Marden. This may result in the new settlement being considered as a place in its own right, rather than an extension to Marden, which could be viewed either positively or negatively by existing residents of Marden. The Stantec Deliverability and Viability Assessment indicates that traffic volumes could increase significantly (threefold in the AM peak) as a result of this option and there are also likely to be demands on existing services and facilities in Marden. It is not clear to what extent the residents of the new settlement would utilise these but some level is expected and this could be seen negatively if it reduces the capacity available to existing communities, for example availability of GPs, or train seats. In light of the above, significant negative effects are anticipated for the North of Marden option in addition to the minor positive effects identified for all options. The negative effects are uncertain as individuals are likely to have different views about new development, which may be either positive, negative or mixed.

5.34 As set out in the Stantec Deliverability and Viability Assessment, the Lidsing option is likely to result in increased traffic as a result of both the development itself, and the proposed new arm to Junction 4 of the M2 (which is an element of the transport package associated with this settlement option). This has particular implications for roads

within Gillingham due to the redistribution of traffic and increased use of roads here to access the new junction arm. This may cause friction with the existing communities, but on the other hand the enhanced access to the M2 may be seen as a positive change. The potential for erosion of identity of the existing, adjacent communities is less than for the other two options because most of the nearby residents are already living in the larger, urban Medway Towns conurbation, rather than, for example, a discrete rural settlement which is more likely to be dominated by such a scale of development. It is recognised that Bredhurst village is close to the site (within 100m of the boundary) but the segregating effect of the M2 is likely to reduce such effects. As such, minor negative effects are also anticipated here in addition to the minor positive effects identified for all options. As for the other options, there is uncertainty about these effects for the reasons described for the North of Marden option.

5.35 The Heathlands option is a large development relative to the existing settlements of Lenham Heath and Lenham and would therefore be likely to change the identity of these. The Stantec Deliverability and Viability Assessment identifies that there are likely to be significant new vehicle trips as a result of this site, at least 1,600 new trips in the AM peak. Due to the lack of on-site provision, the Heathlands option is likely to result in greater pressure on services in Lenham, particularly GP facilities and secondary school provision and on one hand this may result in some community friction, but on the other planning contributions may enlarge and / or improve these facilities, which could be viewed positively. There is uncertainty about whether the settlement will be viewed negatively as some existing residents may, for example, welcome increased custom for existing business and the new facilities provided by the garden settlement. Overall, significant negative effects are anticipated for this option in addition to the minor positive effects identified for all options, largely due to the scale of change that this option represents. The negative effects are uncertain as individuals are likely to have different views about new development, which may be either positive, negative or mixed.

Mitigation

5.36 Performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver development that integrates well with existing neighbourhoods, that meets the needs of specific groups, that will benefit both new residents and existing ones, that is designed to provide spaces for informal interaction, and that is designed to reduce crime and the fear of crime. In order to reduce the potential for negative effects, development management policies and site-specific requirements set out in allocation policies should seek to ensure community involvement occurs throughout the process of planning garden settlements and to ensure the community created within the settlements are able to influence their local environment, such as through setting up an appropriate local governance structure or community trust. They should also seek to address any deficits in the capacity of local infrastructure that could be exacerbated by new demand from garden settlement residents.

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

5.37 The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of noise pollution) or positive (e.g. access to open space) effects on health and well-being. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

5.38 In accordance with the information provided by the council in **Table 5.1**, all garden settlement options are anticipated to include at least 50% open space. This is likely to increase opportunities for residents and employees in the garden settlements to engage in activities related to a healthier lifestyle such as outdoor sports and recreation and enjoyment of the natural world than would otherwise be the case. This is likely to result in significant positive effects for all garden settlement options in relation to this SA objective.

5.39 Small areas of the option North of Marden are affected by rail noise. Mixed effects are therefore anticipated for this option, including the significant positive effects identified in relation to open space above, and minor negative effects in relation to the potential noise effects.

5.40 In relation to the Lidsing option, this site is severely affected by high noise levels, due to its proximity to the M2. As such, this option is anticipated to result in mixed effects, noting the significant positive effects to arise from open space provision, significant negative effects are also anticipated arising from noise levels.

5.41 In relation to the Heathlands option, there is a wastewater treatment works within the site. The information provided by MBC in **Table 5.1** sets out that this will be subject to a comprehensive review, although it is not clear at this stage what the result of this would be. In addition, there is an inert landfill site within the site at Shepherds Farm Quarry. The Heathlands option also experiences high noise levels due to its proximity to the M20 and A20. It is possible that the effects of high noise and / or odour may result in a lower quality of life and at worst, compound health conditions. Mixed effects are therefore anticipated for this option, including the significant positive effects identified in relation to open space above, and significant negative effects in relation to the potential noise and odour effects.

Mitigation

5.42 In order to mitigate potential negative effects from noise, the development management or site allocation policies for the options allocated should seek to specifically address noise issues. The same is recommended for odour matters where these are likely to arise, specifically, in the Heathlands site. In this regard, it should be noted that noise and air pollution generally reduce very quickly with increasing distance from the source, therefore on the North of Marden and Heathlands options it may be possible to avoid effects by appropriate site layouts. For the Lidsing option, it may be more appropriate to address noise at the source using suitable screening (e.g. acoustic barriers and planting). It may also be possible to use trees and shrubs as a natural barrier to air pollution.

5.43 The inclusion of community facilities designed to accommodate activities related to healthcare and healthy lifestyles (for example new parent groups or exercise classes) would help to facilitate healthy lifestyles. While community spaces are proposed, this design / management principle could be included in local plan policies.

SA Objective 5: To facilitate a sustainable and growing economy

5.44 All of the garden community options propose significant areas of land for economic uses and the information provided by MBC summarised in **Table 5.1** sets out an ambition of 1 job for every house. Should this be achieved, this will provide businesses with opportunities to find space to allow them to function. As such, all garden settlement options are considered likely to result in positive economic effects.

5.45 It is important to note however that, as set out in the Stantec Deliverability and Viability Assessment, only the Lidsing proposal currently includes sufficient employment provision to achieve this, as a 20Ha business park is proposed which would provide space for at least 2,675 jobs. In addition the report concludes that the mix of employment would appear to meet local needs, and that the location is likely to be attractive for employment, given the proximity to the M2 and proposed junction improvement. As such, this option is considered likely to result in significant positive effects in relation to this SA objective. The Stantec assessment sets out that the proposals for Land North of Marden include sufficient employment provision to provide for approximately 1,000 jobs, and those for Heathlands currently proposes sufficient employment provision for around 850 jobs. These are significantly less than the Lidsing option and the Council's 1:1 job to house target and as such, only minor positive effects are anticipated at these settlements in relation to this SA objective.

5.46 There is uncertainty about these effects as the provision of employment requires the market to be able to support it in the locations proposed.

Mitigation

5.47 In order to increase positive sustainability effects in relation to the economy, further clarification should be provided in relation to the type and provision of employment land at the North of Marden and Heathlands garden settlement options in order to achieve the target 1:1 job to house ratio.

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

5.48 As none of the garden settlements are proposed in or close to Maidstone Town Centre, and in the absence of evidence suggesting otherwise, negligible effects are considered likely in relation to SA objective 6: Maidstone town centre. This said, if evidence becomes available setting out the likely relationship of the garden settlements to Maidstone, for example the amount of expenditure within the town centre that is likely to arise from the garden community options, then this finding may be reviewed.

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

5.49 The effects of site allocations in relation to SA objective 7: Sustainable travel will partly depend on reducing the need to travel by ensuring that the garden settlements provide essential services and facilities and employment as part of their overall development package. These factors have been appraised under SA objective 2: Services and facilities. In addition, access to open space has been appraised under SA objective 4: Health. These factors are not repeated here. Instead, the appraisal for SA objective 7 considers access to public transport facilities. This builds on the GIS-based findings in relation to the site assessment criteria set out in **Appendix A** by considering other factors taken from the wider evidence base available for the garden settlements.

5.50 For the North of Marden option, it has been noted in relation to the appraisal of SA objective 2: Services and facilities that whilst there will be provision of new services and facilities as part of this settlement, and that whilst there are some services in Marden which are likely to be used by residents here, there will always be a need to travel out of this settlement to access higher order services and more employment opportunities. In terms of encouraging sustainable travel and reducing congestion, the southwestern corner of the site is adjacent to Marden rail station and proposals include a new link across the railway so as to make

access to the station possible. This provides good potential for trips to be made using rail, thereby reducing the dependence and attractiveness of motorised private cars. As such, minor positive effects are considered likely in relation to this SA objective. As such, significant negative effects are anticipated in relation to this SA objective.

5.51 The Lidsing garden settlement proposes a number of services and facilities within the site and a significant amount of employment. This is likely to reduce the need for residents of this settlement to travel, compared to the other options. Having said this, there will always be a need to travel out of this settlement to access higher order services and more employment opportunities. These factors have been appraised under SA objective 2: Services and facilities. In terms of encouraging sustainable travel, the proposal includes the creation of a new arm on Junction 4 of the M2. This is the key access strategy for the site and is likely to encourage use of private motorised vehicles over other modes. In terms of public transport, at present it is proposed to extend an existing bus route to increase access to Hempstead, which will form an orbital route linking Lordswood and Hempstead via the new settlement, thereby increasing route choice for the surrounding areas. However, Hempstead is predominantly a residential area rather than one that offers significant services and facilities. Due to the proximity of Lidsing to the Medway Towns conurbation, it is likely that cycling may also be a feasible option, although this will be dependent upon the provision of direct and attractive cycle routes. It is considered that on balance the proximity to the M2 and enhanced access to this is likely to facilitate use of private cars and therefore minor negative effects are anticipated from Lidsing in relation to this SA objective.

5.52 In relation to the Heathlands option, whilst this will provide employment, facilities and services within the settlement, there will always be a need to travel out of this settlement to access higher order services and more employment opportunities. The information provided by MBC summarised in **Table 5.1** sets out that a new railway station will be provided on the South East line as part of this settlement, and improvements to the A40 cycling route will also be provided to enhance cycle accessibility to surrounding destinations. These new infrastructure provisions are considered likely to facilitate the use of sustainable methods of travel for journeys offsite, resulting in minor positive effects in relation to this SA objective.

5.53 Uncertainty is recorded against each of the findings in relation this SA objective because the findings are based on the potential for sustainable travel which may potentially be delivered due to the various existing context and proposed infrastructure in relation to transport. The manner by which people will travel will be informed the timing of the provision of new infrastructure, its location, design and final routing, public awareness, journey time and cost of parking at the destination. It is therefore possible that future detail of these matters may change the SA findings.

Mitigation

5.54 Negative effects in relation to all garden settlement options could potentially be reduced if transport strategies were provided to demonstrate the likely use of sustainable modes of travel, particularly ensuring that public transport and active travel connections were created or enhanced as appropriate, in advance of or early in the delivery of housing development. Showcase public transport routes using attractive vehicles, high frequency services and appropriate road priority should be considered to support modal shift.

5.55 Local plan policies and development allocation policies should stipulate requirements for development forms that reduce distance between homes, employment and key destinations to facilitate walking and cycling and also require that walking and cycling provision is of high quality, is attractive and direct in order to facilitate use of sustainable modes and reduce use of private motorised vehicles.

SA Objective 8: To conserve the Borough's mineral resources

5.56 Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either sterilise future mineral extraction or delay delivery of housing until extraction is complete and land has been remediated (note that only one Mineral Consultation Area is defined in Kent and it is not in Maidstone Borough). Allocating development close to active mineral extraction sites could result in negative effects on amenity due to noise, vibration, dust, and road traffic associated with extraction. Potential negative effects in relation to SA objective 8: Minerals were identified based on the proximity of development sites to relevant mineral resources. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

5.57 The Land North of Marden site intersects Mineral Safeguarding Areas for River Terrace Deposits. The intersection is approximately a fifth of the site, but this largely occurs at the centre of the site. The development of this options is therefore likely to lead to the conflicts set out above, and minor negative effects are anticipated in relation to this SA objective.

5.58 The Lidsing site does not intersect with any Mineral Safeguarding Area or Safeguarded Mineral Site and therefore negligible effects are anticipated in relation to this option.

5.59 Regarding the Heathlands option, the Shepherds Farm Quarry is an active mineral extraction site located in the north-eastern corner of the site area. The Burleigh Farm extraction site is adjacent to the boundary of the site, and a safeguarding area for this site extends east of this. In addition, approximately three quarters of the site is designated as a Mineral Safeguarding Area, for numerous resources including Limestone, Sandstone, Silica Sand (construction sands) and Sub Alluvial River Terrace. The development of this option is likely to result in conflicts in relation to development and mineral-related activities. The development of this garden settlement option is considered likely to result in significant negative effects in relation to SA objective 8: Minerals.

Mitigation

5.60 The potential negative effects in relation to mineral resources could be avoided by ensuring that where allocation of sites overlaying mineral resources cannot be avoided, those resources are recovered prior to construction, where economically viable.

5.61 At Land North of Marden, consideration should be given as to whether it is appropriate to consider removal of the mineral resources as part of or prior to the construction of the garden settlement.

5.62 For Heathlands in particular, development management policies and site allocation policies should set out a clear framework for the relationship between development and existing / planned mineral extraction activities in order to avoid conflicts (such as nuisance), should the mineral extraction and development occur simultaneously.

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

5.63 Brownfield (as opposed to greenfield) site allocations were assumed to have a positive effect in relation to this SA objective, although it is recognised that accommodating garden settlements on only previously developed land is unlikely, fewer negative sustainability implications are likely to arise from the use of more previously developed land than greenfield. Potential loss of higher quality agricultural land to development was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

5.64 All garden settlement options are on land classified as grade 3 (or better) agricultural land:

- The North of Marden option is largely grade 3 but includes areas of grade 2 in the centre and eastern tip of the site;
- The Lidsing Option sits entirely within grade 3 land;
- For the Heathlands option, a grade 2 area covers a band along the southern part of the site, approximately a quarter of the site in total (the remainder is grade 3).

5.65 The development of all options area would therefore result in a loss of important agricultural soil resources.

5.66 In addition, all options are identified as greenfield sites by MBC officers. Their development would therefore result in the loss of greenfield land.

5.67 The loss of greenfield land and land which is of high agricultural quality occurs for all options and is likely to arise in significant negative effects in relation to this SA objective.

Mitigation

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

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

5.69 Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies. Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local WwTWs or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual garden settlement options.

5.70 Development could affect water quality in drinking water resources during construction or occupation. Source protection zones (SPZs) are areas designated to protect groundwater sources used for public drinking water supply. They relate to the risk of contamination of the water source from various activities, this increases as the distance between the source of contamination and the groundwater abstraction point decreases. Drinking Water Safeguard Zones are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. Site options were

appraised in relation to these zones. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

5.71 All of the garden settlement options scored minor negative in relation to this SA objective because they each intersect with a drinking water safeguard zone (surface water) and/or SPZ 2 or 3.

5.72 The entirety of the North of Marden option is within a surface water drinking water safeguarding zone but is not within an SPZ or groundwater drinking water safeguard zone.

5.73 The entirety of the Lidsing option falls within SPZ 3 but is not within any other water protection or safeguarding areas.

5.74 Approximately two fifths of the Heathlands site is within SPZ 3, the remainder being outside any other water protection or safeguarding areas.

Mitigation

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

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

5.76 . Maidstone town is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20. The Council designated the wider urban area as an AQMA in 2008 due to elevated concentrations of Nitrogen Dioxide (NO_2) at residential receptors in six areas of the Borough. However, in May of 2018 the AQMA within Maidstone was reconfigured to only follow the carriageways of the main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274. NO_2 levels at some key locations near major roads and junctions remain above the EU Limit Value with no discernible downward trend[106].

5.77 As discussed under SA objective 2: Services and facilities and SA objective 7: Sustainable travel, development of each of the garden settlement options has the potential to result in increased vehicular traffic and the related emissions have the potential to worsen local air quality. It is not possible with the evidence available at this stage to determine whether any of the garden settlement options will result in air pollution that significantly exacerbates issues in an existing air quality management area or would be likely to increase pollution levels above acceptable limits elsewhere. As such, effects are uncertain in relation to this SA objective. Once a preferred spatial approach has been selected, it is anticipated that transport and air quality modelling will be undertaken. This will be used to inform an appraisal against this SA objective in future iterations of the SA.

SA Objective 12: To avoid and mitigate flood risk

5.78 Residential development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. The Government's Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of Flood Zone 1 and 2 but would require an exception test in flood zone 3a and is unsuitable in flood zone 3b. Surface water flooding occurs when intense rainfall overwhelms drainage systems. Groundwater flood risk can occur via permeable superficial deposits (PSD) (these generally occur in the flood plain, and can be mistaken for fluvial flooding), via high spring flows, and via high bedrock groundwater levels. Garden settlement options were appraised in relation to related flood risk zones. Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design.

5.79 The appraisal of garden settlement options in relation to this SA objective follows the findings of the detailed site assessment criteria as set out in **Appendix A**, but taking into account that as large areas of development, the effects are likely to be defined by the amount of intersection with these areas, as a small amount of intersection can most likely be overcome by site specific design, whereas a larger amount of intersection is likely to affect the site in a more significant manner, for example by more severely limiting the opportunities for development within it.

5.80 Small areas of the North of Marden option are identified as flood zone 2 and other areas are identified as being at risk of 1 in 30 or 1 in 100 years surface water flooding. In addition approximately a fifth of the site is identified as having ground water flooding levels within 0.25m-0.5m of the surface.

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

5.82 Small areas within the Heathlands option are both within flood zone 3 and subject to a 1 in 30 year surface water flood risk, and in approximately a third of the site (running east-west

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

through the centre) ground water flood risk is identified as being near the surface or within 0.5m of it.

5.83 All garden settlement options therefore have small areas which are identified as being at risk of flooding, however in the North of Marden and Lidsing options, most of the site areas are free from such risk. Minor negative effects are therefore anticipated from these options in relation to this SA objective. In contrast, approximately a third of the Heathlands site is at high risk of groundwater flooding. As such, significant negative effects are anticipated at the Heathlands site in relation to this SA objective.

Mitigation

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

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

5.85 Garden settlement options were appraised against SA objective 13: Climate change in relation to travel-related carbon emissions by reference to the appraisals for SA objectives 2, 4 and 7 on access to services, employment, open space, and public transport. Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the garden settlements and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies.

5.86 For the North of Marden garden community option, commentary in relation to SA objective 2: Services and facilities and SA objective 7: Sustainable travel identifies that there is likely to be out-commuting from this settlement to access employment and higher order services. The site is currently in a location which has high average commuting distances (over 14km), which suggests that residents of this garden settlement option who work off site would have a similar average commuting distance. Although Marden rail station is adjacent to the site, which is likely to facilitate the use of rail, there is still considered likely to be a need for long distance trips by private car. These journeys will result in greenhouse gas emissions. As such, significant negative effects in relation to this SA objective are anticipated.

5.87 As set out in the commentary for the appraisal of this option against SA objective 7: Sustainable travel, the Lidsing garden community option proposes new motorway infrastructure (specifically a new arm on Junction 4 of the M2). This is considered likely to increase travel by private vehicle on the motorway network, thereby leading to increased greenhouse gas emissions. Significant negative effects in relation to this SA objective are therefore anticipated.

5.88 For the Heathlands garden community option, as described in the commentary in relation to the appraisals of SA objective 2: Services and facilities and SA objective 7: Sustainable travel, it is considered likely that the development of this settlement will result in travel out of the settlement to access employment and higher order services. The site is currently in a location which has high average commuting distances (over 14km), which suggests that residents of this garden settlement option who work off site would have a similar average commuting distance.

5.89 Although a new rail station and cycling improvements to wider destinations are proposed as part of this settlement, there is still considered likely to be a need for long distance trips by private car. These journeys will result in greenhouse gas emissions. As such, significant negative effects in relation to this SA objective are anticipated.

Mitigation

5.90 Mitigation in relation to the potential negative effects identified by the SA of site options has already been discussed under SA objectives 2, 4 and 7 above.

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

5.91 Garden settlement options were appraised against SA 14: Biodiversity Development by consideration of their proximity to designated wildlife sites and habitats and related zones within which impacts on internationally and nationally designated sites may occur. Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity of those sites, for example through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. More detailed appraisal of potential effects on habitats and species on or adjacent to the potential development sites is not appropriate to this strategic level of assessment but will take place once specific proposals are developed and submitted, as part of the development management process. Further details on the approach to

appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

5.92 The North of Marden site intersects with an area of Ancient woodland at Bridgehurst wood, in the south eastern corner of the site. There is also an area of Traditional Orchard priority habitat in the centre of the site. The site also intersects with Impact Risk Zones relevant to the proposed scale and location of development. These are primarily related to the potential effects of rural residential or large non-residential development on Marden Meadows SSSI, approximately 500m east of the site boundary, and on the River Beult SSSI, approximately 1.8km north of the site boundary. The site is also within Impact Risk Zones for certain industrial processes which may cause air pollution. Ponds and Pasture at Wanshurst Green is a Local Wildlife site, approximately 150m from the eastern edge of this option. Loss of or disturbance to the ancient woodland and priority habitat within it, and upon neighbouring designations has the potential to result in significant negative effects from this settlement in relation to this SA objective.

5.93 The Lidsing site does not intersect with any international, national or local designations. However there is an area of ancient woodland within it and several areas of ancient woodland adjacent to the site. In addition, there is a small area of Deciduous Woodland priority habitat within the north-east margin. The site is also within Impact Risk Zones for certain industrial processes which may cause air pollution – due to the sensitivity of the Purple Hill SSSI, just over 1km to the east. The northern margin of the site is also within an Impact Risk Zone for rural residential development associated with the Medway Estuary and Marshes SSSI. Loss of ancient woodland within the site boundary and disturbance from this settlement on neighbouring designations has the potential to result in significant negative effects in relation to this SA objective.

5.94 There are several local wildlife sites within the Heathlands site, including Bull Heath Pit, Pasture and Ponds at Lenham Forstal and Parts of Lenham Heath & Chilston Park. There are also areas of ancient woodland within the site at New Pond Shore, Round Wood, Tainter Field Shaw and Wheatgratten Wood. Areas of various types of priority habitat also exist within the site. Until the potential impacts on these sites has been assessed in detail and mitigation developed and included in development management or site allocation policies, a precautionary approach is considered appropriate. Due to the potential for development of Heathlands to affect these local designations, significant negative effects are considered likely in relation to this SA objective.

Mitigation

5.95 Any option that overlaps an area of priority habitat, locally designated wildlife site or area of ancient woodland should consider sensitive design and masterplanning to help ensure compliance with statutory and NPPF requirements for biodiversity conservation. Additionally, Local Plan policy should be put in place to ensure biodiversity net gain is achieved on each development site or losses are offset elsewhere within the Borough where this is not feasible.

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

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

5.97 The proximity tests used in this SA are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of separate evidence in the form of a historic environment sensitivity study or similar they are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas. Further details on the approach to appraisal of garden settlement options against this SA objective are provided in **Appendix A**.

5.98 All garden settlement options were identified as having significant negative effects with uncertainty, because they intersect with or are within close proximity to least one designated heritage asset.

5.99 At North of Marden, there are no designated heritage assets within the site, however there are clusters of grade II listed buildings at St Ann's Green to the northeast, Wanshurst Green to the southeast and Marden to the south. The Church of St Michael and all Angels is a grade I listed building, which lies in Marden, approximately 140m south of the site boundary. It is associated with an area of archaeological potential. The Marden Conservation Area also lies to the south of the site. The potential for setting impacts on these listed buildings is considered to result in potential significant

negative effects, however this is uncertain because site specific design and mitigation may overcome some impacts.

5.100 There are no designated heritage assets within the site option at Lidsing but there are 10 grade II listed buildings approximately 200m to the east of the site at Bredhurst and Kelmsley Street. In addition, there is an archaeological priority area associated with Bredhurst Church. The development of this option has the potential to detrimentally affect the setting of these assets. As such, significant negative effects are considered likely in relation to this SA objective. However as with the other options this is uncertain because site specific design and mitigation may overcome some impacts.

5.101 At Heathlands there are 12 listed buildings within the site, all of which are Grade II listed apart from Royton Manor, which is Grade II*. In addition, the Chilston Park Registered Park and Garden lies adjacent to the southwestern boundary of this option. The potential for direct and setting impacts on these listed buildings is considered to result in potential significant negative effects, however as with the other options this is uncertain because site specific design and mitigation may overcome some impacts.

Mitigation

5.102 Avoidance of development that could result in harm to the significance of heritage assets, including their setting, would provide the best mitigation. Judgements on whether garden settlements are likely to be able to avoid such effects would best be informed by a historic environment sensitivity study or similar evidence. Where residual risks are likely, it may be possible to avoid significant negative effects via site-specific requirements in relation to site layout and development design.

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

5.103 The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of garden settlement options in relation to SA objective 16: Landscape. Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils. Further details on the approach to appraisal of site options against this SA objective are provided in **Appendix A**.

5.104 Unless an area is already urban in nature, the creation of a new garden community will have a significant effect on local landscape character. Some areas are more sensitive to landscape change due to factors such as their visibility from the surrounding area and general character.

5.105 The North of Marden area falls entirely within the Staplehurst and Low Weald landscape character area, which is of high sensitivity to change. Due to this high sensitivity, significant negative effects are anticipated to arise in relation to this SA objective.

5.106 The Lidsing option almost entirely falls into the Bredhurst and Stockbury Downs character area, which is considered to have moderate sensitivity, which would equate to minor negative effects in relation to this SA objective. However, the Stantec Deliverability and Viability report highlights that development of a small amount of land within the North Downs AONB would be required for the new arm of junction 4 of the M2 that would form part of this option. On this basis, a significant negative effect in relation to SA objective 16 (landscape) is identified, until such time as evidence is available to suggest that landscaping mitigation would avoid a significant landscape impact.

5.107 The Heathlands site falls into three different landscape character areas, including East Lenham Vale in the northern part of the site, which is of high sensitivity, Lenham Heath Farmlands, which are of low sensitivity, and Chilston Parklands which are of high sensitivity. Overall, the area is considered of high sensitivity to change and therefore, significant negative effects are anticipated to arise from the development of the Heathlands site in relation to this SA objective.

Mitigation

5.108 Avoidance of development within the areas of highest landscape sensitivity to development would provide the best mitigation. However this will be difficult to achieve for North of Marden and Heathlands given the high level of intersection with highly sensitive landscape character areas. In these sensitive areas, Local Plan policy requirements for development site layouts and development design that seek to reduce adverse effects on the landscape could be implemented to mitigate potential negative effects. For the Lidsing option, it may be possible to avoid significant effects from the motorway junction improvement via appropriate landscaping.

Chapter 6
SA of site allocation options

6.1 In addition to the appraisal of the spatial strategy options set out in **Chapter 3** and **Chapter 4**, the Council's reasonable alternative residential and employment site allocation options were also appraised. This chapter describes which options have been considered and which options are considered to be reasonable and unreasonable. The chapter then goes on to appraise the reasonable options against the SA framework, identifying each option's likely significant effects using the site assessment criteria set out in **Appendix A**.

Identification of reasonable alternatives

6.2 The Council's site identification and selection process is detailed in its (draft) Strategic Land Availability Assessment (SLAA). The purpose of the SLAA was to identify the future supply of land for housing, economic, retail and leisure purposes. The Council was not in a position to analyse potential of Gypsy & Traveller site allocations at this time as it was still establishing the need.

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

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

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

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

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

6.8 The SLAA process outlined above formed the basis for the Council's identification of the reasonable alternative residential and employment sites that were subject to SA at this stage. Broadly speaking, sites were only discounted as reasonable alternatives for the SA if the SLAA determined that constraints would prevent any development on the site or if they were promoted a use for which there was no identified need.

6.9 The reasonable alternative sites that were subject to SA are listed in **Table 6.1** (residential sites) and **Table 6.3** (employment sites). To avoid potential bias, information on the development uses for which the sites should be appraised and their likely development capacity were provided by the Council rather than being based on any such information provided by site promoters.

Approach to appraisal of site options

6.10 Each residential site option was appraised using the detailed assessment criteria and associated assumptions outlined in **Table A1** in **Appendix A**. Each employment site option was appraised using the detailed assessment criteria and associated assumptions outlined in **Table A2** in **Appendix A**. As set out in these tables, there is not a one to one relationship between the site assessment criteria and the SA objectives. In many cases, a number of different criteria have been used to inform the significance of the likely effect of site options on an SA objective. The rules used to consolidate scores against multiple criteria into a single significance score are set out in the tables.

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

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

6.13 At this stage of plan-making, individual site options were appraised on a 'policy off' basis, i.e. based on existing conditions and without taking into account opportunities to mitigate potential negative effects by, for example, providing new social infrastructure, by development design that seeks to minimise effects, or by site layouts that avoid sensitive environmental receptors within the site boundary. This serves to highlight potential effects on the environment and potential gaps in existing services, facilities and sustainable transport links. It also provides a more consistent basis for assessment than reliance on indicative site masterplans or offers of infrastructure provision that some site promoters may have made because this information is not available for all site options. Consideration by the SA of any proposed site layouts would also be inappropriately detailed in light of the relatively high level of detail contained in a Local Plan. Once Local Plan site allocation policies are drafted, site assessment scores will be revisited, to reflect the Local Plan's site-specific policy requirements. In addition, once a complete draft of the Local Plan has been produced, discussion of the performance of the plan as a whole will also take account of the mitigation offered by development management policies and regulatory mechanisms external to the plan.

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

6.15 Appraisal scores relying on intersection with areas of environmental sensitivity such as flood zones or areas of ecological value were independent of the proportion of the site intersecting with the sensitive area. As such the assessment scores were designed to highlight potential adverse effects and flag these for closer examination of the potential for avoidance or mitigation of negative effects by the Council before allocation. For example, the potential for a significant negative effect may be identified for SA objective 14: Biodiversity as a result of a small part of a site option falling within a designated wildlife site or containing valued habitat. This is potentially significant in the context of national policy protection for designated sites and requirements for biodiversity net gain and also serves to highlight that the Council should consider whether habitat loss could be avoided by a minor amendment to the site allocation boundary or by a site-specific policy requirement to avoid development in/ enhance the area of valued habitat.

6.16 The site options appraisals were subject to a number of difficulties and limitations, as follows.

- The appraisal of site options was not able to draw on a heritage impact assessment. In the absence of such evidence, the proximity tests used in the SA were intended to provide a basis for screening for the potential for adverse effects on the historic environment. Distances used were based on professional judgement and intended to be precautionary. Longer screening distances were used for site options outside of existing settlements to reflect typically longer sightlines in rural as opposed to urban areas.
- No digital data were available to confirm the location of Regionally Important/Local Geological Sites so these were excluded from the appraisal.
- The Council's Landscape Capacity Study (2015) formed the basis of the SA of residential sites vs. SA objective 16: Landscape. However, some landscape character areas were scoped out of the 2015 study. A small number of site options intersected with these character areas and in these cases the SA used sensitivity ratings from an earlier (2013) landscape study.

6.17 If additional relevant evidence becomes available at later stages of plan-making, the SA will draw on this as appropriate.

Appraisal findings for residential site options

6.18 The sites that were considered by the Council to be reasonable alternatives for residential development (including mixed use with a residential component) are listed in **Table 6.1** by unique site identification number, along with key site attributes provided by the Council.

6.19 **Table 6.2** summarises the likely effects of the residential site options in relation to each of the SA objectives that was scoped-in for the site appraisals.

6.20 These tables are followed by a description for each SA objective of the approach to site appraisal, the broad pattern of findings, and the potential for mitigation.

Table 6.1: Reasonable alternative site options considered for residential (including mixed) use

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
1	Land Adj Brhemar Garage	0.9	Residential	16	FALSE	0	Within	the Countryside	Countryside	Brownfield
2	The Homestead	1.2	Residential	22	FALSE	0	Within	the Countryside	Countryside	Brownfield
5	Land Adj to Dingly Dell	1.3	Residential	17	FALSE	0	Within	the Countryside	Countryside	Brownfield
7	The Paddocks, Staplehurst	2.6	Residential	49	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
8	Bassetts Bungalow, Marden	0.8	Mixed	19	0	0	Adjacent to	North of Staplehurst GS	Larger Villages	Greenfield
9	116 to 120 Week St	0.0	Mixed	2	38	19	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
10	Bydews Place Site 1 ACK	0.7	Residential	16	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Mixed
11	Bydews Place Site 2 ACK	0.2	Residential	5	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
12	Land at Forsham House	0.6	Residential	11	FALSE	0	Within	the Countryside	Countryside	Greenfield
13	Land at Chartway Sutton	1.6	Residential	30	FALSE	0	Within	the Countryside	Countryside	Greenfield
15	KIA site, Ashford Road	3.8	Residential	69	FALSE	0	Within	the Countryside	Countryside	Mixed
16	Fir Tree Farm and Norton Lea (North)	58.5	Residential	1245	FALSE	0	Within	South East of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
17	Land East of Maidstone Road, Headcorn	3.7	Residential	42	0	0	Potentially Adjacent to	Headcorn	Rural Service Centres	Greenfield
18	Land rear of Beech House	0.3	Residential	5	FALSE	0	Within	the Countryside	Countryside	Greenfield
19	Land at Lenham Rd, Headcorn	4.7	Residential	47	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
21	Land at Southways, Sutton Valence	0.6	Residential	12	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
27	Land at George Street	2.3	Residential	43	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
29	Court Lodge Farm	13.3	Residential	126	0	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
34	Land at George St, Staplehurst	2.8	Residential	52	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
37	Land ro The Gables, Staplehurst	1.6	Residential	31	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
48	Plot off S side Forge Ln, E. Farleigh	6.3	Residential	133	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
50	Army Hut Farm Stables, Stockett Ln, East Farleigh	5.2	Residential	88	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Brownfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
53	12-14 Week St	0.1	Mixed	3	81	41	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
54	Chainhurst	3.5	Residential	66	FALSE	0	Within	the Countryside	Countryside	Greenfield
55	Victoria's Cabaret Club	0.3	Residential	6	FALSE	0	Within	the Countryside	Countryside	Brownfield
56	Orchard House, Clapper Ln, Staplehurst	1.5	Residential	29	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Brownfield
57	Land at Oak Farm Gardens, Headcorn	0.9	Residential	6	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
58	Green Lane Farm	2.3	Mixed	31	531	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
59	Fellinpits, Beltring	39.4	Residential	748	FALSE	0	Within	the Countryside	Countryside	Greenfield
60	Land at Rush Farm, Staplehurst	1.0	Residential	18	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
64	Land South of Marden Rd, Staplehurst	4.6	Residential	88	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
65	Land at Lodge Rd, Staplehurst	4.2	Mixed	34	3964	0	Within	Staplehurst	Rural Service Centres	Greenfield
70	Land at Willow Wood	0.8	Residential	17	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Brownfield
71	Marley Rd, Harrietsham	2.6	Residential	37	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
73	Bearstead Golf Course	0.9	Residential	19	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
77	Teiside Nurseries, Laddingford	2.7	Residential	12	FALSE	0	Within	the Countryside	Countryside	Mixed
78	Haven Farm	2.8	Residential	41	375	413	Adjacent to	Sutton Valence	Larger Villages	Greenfield
79	Land South of Heath Road	1.1	Residential	21	FALSE	0	Within	the Countryside	Countryside	Greenfield
80	Land west of Loder Close and Westwood Close	2.0	Residential	38	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield
81	Land off Lenham Road	2.1	Residential	40	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
82	Land rear of Firenze	4.6	Residential	87	FALSE	0	Within	the Countryside	Countryside	Greenfield
83	Land at Hartley Dene	1.9	Residential	37	FALSE	0	Within	the Countryside	Countryside	Mixed
84	Land off Heath Road	1.7	Residential	33	FALSE	0	Within	the Countryside	Countryside	Greenfield
86	Elsfield Cottages, Ashford Road	0.0	Residential	1	FALSE	0	Within	the Countryside	Countryside	Mixed
88	Land south of Ashford Road	0.4	Residential	8	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
90	Land adjacent to Bridgehurst Oast	1.1	Residential	20	0	0	Potentially Adjacent to	Marden	Rural Service Centres	Greenfield
91	Teston Field	4.3	Residential	82	FALSE	0	Within	the Countryside	Countryside	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
93	Land at Linden Farm	0.5	Residential	9	FALSE	0	Adjacent to	Coxheath	Larger Villages	Greenfield
94	Land South of Tumblers Hill	0.9	Residential	16	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
95	Land at Halfe Yoke	2.2	Residential	46	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
98	Land south of Ashford Rd, Harrietsham	5.0	Residential	96	0	0	Potentially Adjacent to	Harrietsham	Rural Service Centres	Brownfield
101	Land south of A20, Harrietsham	3.2	Residential	60	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
102	Ringles Nursery & Ringles Gate, Headcorn	15.6	Residential	133	0	0	Potentially Adjacent to	Headcorn	Rural Service Centres	Mixed
104	Gowan Park, Kingswood	1.0	Residential	19	FALSE	0	Within	the Countryside	Countryside	Mixed
105	Land at junction of Vicarage Lane & Lower Rd, East Farleigh	6.8	Residential	130	FALSE	0	Within	the Countryside	Countryside	Greenfield
107	Land adjacent to Westholme, Sutton Valance	1.0	Residential	19	FALSE	0	Within	North of Sutton Valence	Larger Villages	Greenfield
108	Land at South Lane, Sutton Valance	2.1	Residential	39	FALSE	0	Potentially Adjacent to	Sutton Valence	Larger Villages	Greenfield
109	Land south of Orchard End	1.3	Residential	24	FALSE	0	Within	the Countryside	Countryside	Greenfield
112	Sutton Valance Group GP Practice	0.5	Residential	4	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Brownfield
114	Land at and Adjacent to home Farm	2.6	Residential	49	0	0	Adjacent to	Staplehurst	Rural Service Centres	Brownfield
115	Farm and Yard at Boughton Mount Farm	5.9	Residential	125	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Mixed
117	Land at Loose Court Farm Cottage	3.9	Residential	84	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
118	Gibbs Hill Farm	0.6	Residential	9	0	0	Adjacent to	Headcorn	Rural Service Centres	Brownfield
119	North of Thorn View	6.1	Residential	84	0	0	Adjacent to	Pagehurst Farm Garden Settlement	New Settlements	Greenfield
120	Rowan House Farm and Fairview (Broomfield Park)	38.9	Residential	738	FALSE	0	Within	the Countryside	Countryside	Mixed
122	The Orchard Land adjacent to White Cottage	1.2	Residential	18	FALSE	0	Adjacent to	Boughton Monchelsea	Larger Villages	Greenfield
124	Old Goods Yard phase 2	1.3	Residential	25	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield
125	Old Goods Yard phase 3	2.2	Residential	42	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield
128	Land at Westfield Sole Rd, Ledsing	0.3	Residential	5	FALSE	0	Adjacent to	Medway Urban Area	Edge of Maidstone Urban Extension	Brownfield
129	Land Rear of Bearstead Rd	5.4	Residential	114	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
130	Land adjacent to Ivans Field, Chart Sutton	2.7	Residential	50	FALSE	0	Within	the Countryside	Countryside	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
131	M W Wickham Estate	2.3	Residential	44	FALSE	0	Within	the Countryside	Countryside	Greenfield
132	Knoll House & Tower House, Staplehurst	2.1	Residential	40	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
133	Land NE of Old Belringham Hall	0.8	Residential	14	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
134	Baldwins Farm	4.6	Residential	88	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
135	South of Ashford Rd, Bearstead	2.1	Residential	45	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
136	Land N of West St, Harrietsham	3.5	Residential	66	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
137	Land South of Marden Rd, Staplehurst	6.1	Residential	116	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
140	Land at Squerryes Oast, Otham	0.7	Residential	8	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
141	Eastwood Rd, Ulcombe	0.9	Residential	18	FALSE	0	Within	the Countryside	Countryside	Greenfield
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	20	334	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
144	34- 35 High Street, Maidstone	0.1	Mixed	2	56	28	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
145	Len House	1.1	Mixed	29	531	265	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
146	Maidstone East	1.6	Mixed	65	1573	787	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
147	Gala Bingo and Granada House	0.4	Mixed	71	201	100	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
148	Maidstone Riverside	6.9	Mixed	650	5149	2574	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
149	Maidstone West	2.1	Mixed	130	1035	517	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
150	Mill St Car Park	0.4	Mixed	15	358	179	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
151	Mote Rd	0.3	Mixed	84	2000	0	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
152	Royal British Legion Social Club	0.3	Mixed	4	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
156	Danebury	0.2	Residential	3	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
157	Harrietsham Rectory	0.3	Residential	5	0	0	Adjacent to	Harrietsham	Rural Service Centres	Brownfield
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	114	2778	1389	Within	the Countryside	Countryside	Greenfield
159	Yalding Hill	0.4	Residential	7	FALSE	0	Within	the Countryside	Countryside	Brownfield
161	Bell Farm, Harrietsham	8.3	Residential	126	0	0	Potentially Adjacent to	Harrietsham	Rural Service Centres	Greenfield
162	Land north of Headcorn	15.6	Residential	275	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
167	North & West of Leeds	98.3	Mixed	1359	23097	1000	Within	Junction 8 Garden Settlement	New Settlements	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
168	Land at Forge Lane	4.9	Mixed	68	1158	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	0	5363	0	Within	the Countryside	Countryside	Greenfield
171	Land adjoining Homewell House	0.4	Residential	7	FALSE	0	Within	North of Sutton Valence	Larger Villages	Greenfield
172	Land at Sutton Rd	10.9	Residential	139	FALSE	0	Within	South East of Maidstone Urban Extension	Maidstone Urban Area	Greenfield
173	Durrants Farm	3.1	Residential	59	FALSE	0	Within	the Countryside	Countryside	Greenfield
174	Land South of Sutton Road	9.1	Residential	185	FALSE	0	Within	South East of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
175	Land at Vicarage Road Yalding	1.0	Residential	20	FALSE	0	Adjacent to	Yalding	Larger Villages	Greenfield
176	Land North and South of Ashford Rd	23.2	Mixed	320	5444	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
177	Land between Lower St & George St	6.5	Mixed	90	1530	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
178	Land South of Warmlake Road	10.5	Residential	199	FALSE	0	Within	the Countryside	Countryside	Greenfield
179	Land at Westerhill	0.7	Mixed	33	2806	0	Adjacent to	Coxheath	Larger Villages	Greenfield
180	Land west of Otham Road	7.1	Residential	135	FALSE	0	Within	the Countryside	Countryside	Greenfield
182	Invicta Park Barracks	47.1	Residential	1002	FALSE	0	Within	Invicta Barracks	Edge of Maidstone Urban Extension	Brownfield
184	Brickfields Farm and Rosemount	14.3	Residential	272	0	0	Adjacent to	Staplehurst	Rural Service Centres	Mixed
185	Otham Glebe, Church Road	2.2	Residential	27	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
186	Land at Headcorn Road Staplehurst	9.3	Residential	132	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	89	1508	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
188	Land at Old Ashford Road Lenham	28.8	Residential	437	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Greenfield
189	Land north of Ashford Road Harrietsham	1.5	Residential	28	FALSE	0	Within	the Countryside	Countryside	Greenfield
191	Land adjacent to South Lane Sutton Valence	0.3	Residential	5	FALSE	0	Within	the Countryside	Countryside	Greenfield
192	Land adjacent to Headcorn Road Sutton Valence	0.6	Residential	10	FALSE	0	Within	the Countryside	Countryside	Greenfield
193	Land East of Upper Street Langley	6.0	Mixed	83	1406	0	Adjacent to	South of Leeds	New Settlements	Greenfield
195	Waterside Park	16.2	Mixed	224	3814	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
196	Land at Willow Farm	2.3	Residential	45	FALSE	0	Within	the Countryside	Countryside	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
197	Golf Course Car Park Staplehurst	0.8	Residential	8	FALSE	0	Within	the Countryside	Countryside	Brownfield
198	Staplehurst Golf Course	20.0	Residential	227	FALSE	0	Within	the Countryside	Countryside	Greenfield
199	Old Cricket Ground Loose	1.5	Residential	32	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
200	Land at former cricket field, Loose	2.3	Residential	49	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
201	Land at Inkstand Cattery and Stables Lenham	1.3	Residential	21	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Mixed
202	Land at Forstal Lane Coxheath	4.7	Residential	89	FALSE	0	Within	Coxheath	Larger Villages	Mixed
203	Land at Bydews Place Tovil	2.7	Residential	47	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
204	South of Eyhorne Street Hollingbourne	0.6	Residential	11	FALSE	0	Adjacent to	Eyhorne St (Hollingbourne)	Larger Villages	Greenfield
206	Summer Place Caring Lane Bearsted	0.1	Residential	2	FALSE	0	Within	the Countryside	Countryside	Greenfield
207	Ledian Farm	1.7	Mixed	24	409	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	6	101	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
210	Land at Newlyn's Farm, Sutton Valence	1.7	Residential	31	FALSE	0	Within	the Countryside	Countryside	Mixed
211	Wheelers Lane Linton	0.2	Residential	4	FALSE	0	Within	the Countryside	Countryside	Greenfield
212	Land at the Grange Staplehurst	6.9	Residential	130	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Mixed
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	142	0	0	Potentially Adjacent to	North of Staplehurst GS	Larger Villages	Mixed
216	Rochester Meadow	2.1	Residential	39	FALSE	0	Within	the Countryside	Countryside	Greenfield
220	Land at Bydews Farm	27.3	Residential	366	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
222	Land at Henhurst Farm, Staplehurst	16.3	Residential	309	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
224	Land West of Lenham	18.6	Residential	275	0	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
225	Tanglewood Loose	1.0	Residential	19	FALSE	0	Adjacent to	Coxheath	Larger Villages	Mixed
226	Land north of Staplehurst - Garden village	109.3	Mixed	1658	0	1000	Within	North of Staplehurst GS	Larger Villages	Greenfield
227	Land South of Green Lane, Boughton Monchelsea	2.9	Residential	50	FALSE	0	Adjacent to	Boughton Monchelsea	Larger Villages	Greenfield
228	Land to North West View, Staplehurst	1.0	Residential	18	FALSE	0	Within	the Countryside	Countryside	Greenfield
229	Land at Stanley Farm Staplehurst	2.1	Residential	32	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
231	Land at Lested Farm Chart Sutton	28.2	Residential	534	FALSE	0	Within	the Countryside	Countryside	Mixed
233	Land west of Chart Corner Plough Wents Road Junction Chart Sutton	0.8	Residential	16	FALSE	0	Within	the Countryside	Countryside	Greenfield
234	west of North St, Barming site submission	8.6	Residential	182	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
235	Land at Boughton Lane Maidstone	9.8	Residential	69	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
236	Fairview Farm (North Parcel)	10.6	Residential	200	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Greenfield
239	Land to south Shangri-La, Langley	0.8	Mixed	12	198	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
240	Banky Meadow, Bearstead	3.5	Residential	75	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
244	Land at Iden Park, Staplehurst	3.2	Residential	21	0	0	Adjacent to	Staplehurst	Rural Service Centres	Greenfield
245	Land north of the M2 lidsing - urban extension	135.3	Mixed	1974	33564	1000	Within	Lidsing Urban Extension	Edge of Maidstone Urban Extension	Greenfield
246	Land rear of Appletree House, Bearstead	1.2	Residential	25	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
247	Land south of Court Lodge Road Harrietsham	4.3	Residential	82	0	0	Adjacent to	Harrietsham	Rural Service Centres	Greenfield
248	Land north & south of Kenward Road Yalding	9.9	Residential	160	FALSE	0	Adjacent to	Yalding	Larger Villages	Greenfield
250	Land rear of Butlers Farm Langley	3.6	Mixed	49	838	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
251	Land at Heath Road Coxheath	0.2	Residential	4	FALSE	0	Within	Coxheath	Larger Villages	Brownfield
252	Land rear of Lavender Cottage, Langley	1.0	Mixed	14	235	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
254	Land to South of Cotuams Hall Hollingbourne	0.7	Residential	9	FALSE	0	Adjacent to	Eyhorne St (Hollingbourne)	Larger Villages	Greenfield
255	Land east of Yew Tree House Leeds	0.5	Mixed	7	112	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
257	Land at junction of Heath Road & Dean Street Coxheath	1.0	Residential	20	FALSE	0	Within	the Countryside	Countryside	Greenfield
262	Land at Fant Farm Maidstone	12.2	Residential	260	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
263	Land west of Ledian Farm, Leeds	1.4	Mixed	19	322	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
265	Land at Abbey Farm Tovil	31.0	Residential	527	FALSE	0	Within	South West of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
266	Land North of Ware Street Bearstead	4.2	Residential	67	FALSE	0	Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
269	Land east of Copper Lane Marden	3.1	Residential	59	0	0	Potentially Adjacent to	Marden	Rural Service Centres	Greenfield
270	Land at Pested Bars Road, Boughton Monchelsea (option 1)	43.5	Residential	463	FALSE	0	Within	South of Maidstone Urban Extension	Edge of Maidstone Urban Extension	Greenfield
271	Fir Tree Farm and Norton Lea (South)	22.8	Residential	432	FALSE	0	Within	North of Sutton Valence	Larger Villages	Unknown
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	0	41023	0	Within	the Countryside	Countryside	Mixed
274	South of Leeds	104.4	Mixed	1443	24528	1000	Adjacent to	South of Leeds	New Settlements	Unknown
279	Langley Heath - Strategic Settlement	98.4	Mixed	1360	23114	1000	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	9	188	0	Within	the Countryside	Countryside	Brownfield
287	Underlyn Lane	1.3	Mixed	0	4127	0	Within	the Countryside	Countryside	Greenfield
288	Hill Farm Linton-Coxheath	5.7	Residential	107	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Greenfield
289	Heathlands Garden Community	373.3	Mixed	5161	87733	2500	Within	Heathlands	New Settlements	Greenfield
291	Bridge Farm Water Lane	4.2	Residential	90	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield
292	Land at Old Ashford Rd, Lenham	14.5	Residential	138	0	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
294	Land to East of Jubilee Cottages, Sutton Valence	2.8	Residential	53	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Greenfield
295	Land north of Copper Lane, Marden	3.9	Residential	74	0	0	Potentially Adjacent to	Marden	Rural Service Centres	Greenfield
296	Astor Hever	2.4	Residential	45	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
297	Bearstead Library	0.1	Mixed	1	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
298	Dorothy Lucy Centre	0.7	Residential	16	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
299	Maidstone AEC	0.1	Mixed	3	74	37	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
302	Oakwood Overflow Car Park	0.2	Residential	3	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
303	IS Oxford Rd	0.9	Mixed	14	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
304	Land east of Hunton Rd, Chainhurst	0.3	Residential	6	FALSE	0	Within	the Countryside	Countryside	Greenfield
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	42	1020	510	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
306	Land South of Gore Court, Otham	2.1	Residential	45	FALSE	0	Potentially Adjacent to	Maidstone Urban Area (Outer)	Maidstone Urban Area	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
307	Land N Marden Rd E of Clapper Lane, Staplehurst	1.4	Residential	27	0	0	Potentially Adjacent to	Staplehurst	Rural Service Centres	Greenfield
308	58 Church St, Boughton Monchelsea	0.9	Residential	16	FALSE	0	Adjacent to	Boughton Monchelsea	Larger Villages	Greenfield
309	Strategic Expansion of Marden	134.1	Mixed	1854	31511	1000	Within	North of Marden	New Settlements	Greenfield
310	Land north of Mote Rd, Headcorn	7.2	Residential	116	0	0	Adjacent to	Headcorn	Rural Service Centres	Greenfield
312	Land north of Heath Rd, Coxheath	10.2	Residential	193	FALSE	0	Adjacent to	Coxheath	Larger Villages	Greenfield
314	East of Albion Rd, Marden	2.1	Residential	39	0	0	Adjacent to	Marden	Rural Service Centres	Greenfield
316	Binbury Park, Detling	191.0	Mixed	2113	0	1500	Within	Binbury Park	New Settlements	Mixed
317	Langley Heath	2.0	Mixed	27	458	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
318	Pagehurst Farm	82.1	Mixed	1134	0	500	Within	Pagehurst Farm Garden Settlement	New Settlements	Greenfield
320	Beaux Aires Farm	43.0	Mixed	476	0	0	Adjacent to	Binbury Park	New Settlements	Greenfield
322	Lughorse Lane, Yalding	1.1	Residential	21	FALSE	0	Adjacent to	Yalding	Larger Villages	Greenfield
324	The Grange Ashford Road	0.6	Residential	8	0	0	Potentially Adjacent to	Lenham	Rural Service Centres	Brownfield
326	Land at Amsbury Wood, Hunton	4.4	Residential	83	FALSE	0	Adjacent to	Coxheath	Larger Villages	Greenfield
327	Land at Hockers Farm, Detling	1.0	Residential	19	FALSE	0	Within	the Countryside	Countryside	Greenfield
328	Land at 59 Linton Rd, Loose	0.5	Residential	10	FALSE	0	Within	the Countryside	Countryside	Brownfield
329	Land at Sapphire Kennels, Sutton Valence	0.5	Residential	9	FALSE	0	Within	the Countryside	Countryside	Brownfield
330	Land at Seeburg, Bredhurst	1.1	Mixed	16	269	0	Within	Lidsing Urban Extension	Edge of Maidstone Urban Extension	Brownfield
331	Land south of the Lodge, Yalding	3.9	Residential	73	FALSE	0	Adjacent to	Yalding	Larger Villages	Brownfield
332	Fairview Farm (South Parcel)	10.4	Residential	198	FALSE	0	Potentially Adjacent to	Coxheath	Larger Villages	Greenfield
333	Land at Old Ham Lane, Lenham - Kilnwood	9.7	Residential	184	FALSE	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
334	Land at Old Ham Lane, Lenham - Old Goods Yard	0.4	Residential	7	FALSE	0	Adjacent to	Lenham	Rural Service Centres	Brownfield
335	Fir Tree Farm and Norton Lea (South)	52.8	Residential	501	FALSE	0	Adjacent to	Sutton Valence	Larger Villages	Unknown

Table 6.2: SA results for residential site options

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
1	Land Adj Brhemar Garage	0.9	Residential	16	--	-	--	-	0	-	-	0	-	0	--?	--
2	The Homestead	1.2	Residential	22	-	+	0	-	0	--	-	0	-	-	--?	--
5	Land Adj to Dingly Dell	1.3	Residential	17	-	+	--	-	-	--	-	0	-	-	--?	-
7	The Paddocks, Staplehurst	2.6	Residential	49	--	0	0	+	-	--	-	--	-	0	--?	--
8	Bassetts Bungalow, Marden	0.8	Mixed	19	--	-	0	--	-	--	-	-	--	-	-?	--
9	116 to 120 Week St	0.0	Mixed	2	+	+	--	++	0	0	-	0	+	0	--?	0
10	Bydews Place Site 1 ACK	0.7	Residential	16	-	+	0	-	-	--	-	0	-	--	--?	--
11	Bydews Place Site 2 ACK	0.2	Residential	5	-	+	0	-	-	--	-	0	-	--	--?	--
12	Land at Forsham House	0.6	Residential	11	--	0	0	-	-	--	-	-	-	0	--?	--
13	Land at Chartway Sutton	1.6	Residential	30	-	+	0	-	-	--	-	0	-	0	--?	-
15	KIA site, Ashford Road	3.8	Residential	69	--	+	0	+	0	--	-	--	-	-	-?	--
16	Fir Tree Farm and Norton Lea (North)	58.5	Residential	1245	-	-	0	-	-	--	-	--	-	0	--?	--
17	Land East of Maidstone Road, Headcorn	3.7	Residential	42	--	+	0	-	-	--	-	--	-	-	--?	--
18	Land rear of Beech House	0.3	Residential	5	-	+	0	-	-	--	-	0	-	0	--?	-
19	Land at Lenham Rd, Headcorn	4.7	Residential	47	-	+	0	-	-	--	-	--	-	0	--?	--
21	Land at Southways, Sutton Valence	0.6	Residential	12	-	+	0	-	-	--	-	0	-	0	--?	--
27	Land at George Street	2.3	Residential	43	--	+	0	+	0	--	-	--	-	-	--?	--
29	Court Lodge Farm	13.3	Residential	126	+	+	0	+	0	--	0	--	+	-	--?	--
34	Land at George St, Staplehurst	2.8	Residential	52	--	-	0	+	0	--	-	--	-	-	--?	--
37	Land ro The Gables, Staplehurst	1.6	Residential	31	-	+	0	-	-	--	-	-	-	--	--?	--
48	Plot off S side Forge Ln, E. Farleigh	6.3	Residential	133	-	+	0	+	-	--	-	0	-	0	--?	--
50	Army Hut Farm Stables, Stockett Ln, East Farleigh	5.2	Residential	88	-	+	--	-	-	--	-	--	-	--	-?	--
53	12-14 Week St	0.1	Mixed	3	+	+	--	++	0	0	-	0	+	0	--?	0
54	Chainhurst	3.5	Residential	66	--	0	0	-	-	--	-	-	--	--	--?	--
55	Victoria's Cabaret Club	0.3	Residential	6	--	+	--	+	0	--	-	0	-	-	-?	--
56	Orchard House, Clapper Ln, Staplehurst	1.5	Residential	29	--	+	0	-	0	-	-	-	-	--	--?	--

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
57	Land at Oak Farm Gardens, Headcorn	0.9	Residential	6	-	+	0	+	-	--	-	--	-	0	--?	--
58	Green Lane Farm	2.3	Mixed	31	-	+	0	-	-	--	-	0	-	-	--?	--
59	Fellinpits, Beltring	39.4	Residential	748	-	0	0	+	-	--	-	--	-	--	--?	--
60	Land at Rush Farm, Staplehurst	1.0	Residential	18	--	0	0	-	-	--	-	--	-	0	--?	--
64	Land South of Marden Rd, Staplehurst	4.6	Residential	88	-	+	0	-	-	--	-	-	-	-	--?	--
66	Land at Lodge Rd, Staplehurst	4.2	Mixed	34	--	+	0	+	0	--	-	--	-	--	0?	--
70	Land at Willow Wood	0.8	Residential	17	-	+	0	-	-	--	-	0	-	0	--?	--
71	Marley Rd, Harrietsham	2.6	Residential	37	-	+	0	+	0	--	-	0	-	--	--?	--
73	Bearstead Golf Course	0.9	Residential	19	--	+	0	-	0	--	-	0	-	-	--?	--
76	Teiside Nurseries, Laddingford	2.7	Residential	12	-	+	0	+	-	--	-	--	-	--	--?	-
78	Haven Farm	2.8	Residential	41	-	+	0	-	-	--	-	0	-	-	--?	0
79	Land South of Heath Road	1.1	Residential	21	-	+	0	-	-	--	-	0	-	--	--?	0
80	Land west of Loder Close and Westwood Close	2.0	Residential	38	-	+	0	+	0	--	-	-	+	-	-?	--
81	Land off Lenham Road	2.1	Residential	40	-	+	0	-	0	--	-	--	-	0	--?	--
82	Land rear of Firenze	4.6	Residential	87	--	-	0	-	-	--	-	-	-	0	--?	--
83	Land at Hartley Dene	1.9	Residential	37	--	+	0	-	0	--	-	--	-	-	--?	--
84	Land off Heath Road	1.7	Residential	33	-	+	0	-	-	--	-	0	-	-	--?	-
86	Elsfield Cottages, Ashford Road	0.0	Residential	1	--	-	0	+	-	--	-	--	-	-	--?	--
88	Land south of Ashford Road	0.4	Residential	8	-	+	0	+	-	--	-	0	-	-	--?	--
90	Land adjacent to Bridgehurst Oast	1.1	Residential	20	--	+	0	-	0	--	-	-	-	-	--?	--
91	Teston Field	4.3	Residential	82	--	+	0	-	0	--	-	--	-	-	--?	--
93	Land at Linden Farm	0.5	Residential	9	-	+	0	-	-	--	-	--	-	-	-?	--
94	Land South of Tumblers Hill	0.9	Residential	16	-	+	0	-	-	--	-	0	-	0	--?	--
95	Land at Halfe Yoke	2.2	Residential	46	-	+	0	+	-	--	-	-	-	0	--?	--
98	Land south of Ashford Rd, Harrietsham	5.0	Residential	96	-	-	0	-	0	--	-	--	-	--	--?	--
101	Land south of A20, Harrietsham	3.2	Residential	60	-	-	0	+	0	--	-	--	-	--	--?	--
102	Ringles Nursery & Ringles Gate, Headcorn	15.6	Residential	133	-	+	--	-	-	-	-	--	-	--	--?	--

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
104	Gowan Park, Kingswood	1.0	Residential	19	-	+	0	-	-	--	-	--	-	-	--?	-
105	Land at junction of Vicarage Lane & Lower Rd, East Farleigh	6.8	Residential	130	-	0	0	+	-	--	-	0	-	0	--?	--
107	Land adjacent to Westholme, Sutton Valance	1.0	Residential	19	-	+	0	-	-	--	-	0	-	-	-?	-
108	Land at South Lane, Sutton Valance	2.1	Residential	39	-	+	--	-	0	--	-	--	-	0	--?	--
109	Land south of Orchard End	1.3	Residential	24	-	+	0	-	-	--	-	0	-	-	--?	-
112	Sutton Valance Group GP Practice	0.5	Residential	4	-	+	--	-	0	-	-	--	-	0	--?	--
114	Land at and Adjacent to home Farm	2.6	Residential	49	--	+	--	-	0	-	-	--	-	-	--?	--
115	Farm and Yard at Boughton Mount Farm	5.9	Residential	125	-	+	--	--	-	--	-	0	-	0	--?	--
117	Land at Loose Court Farm Cottage	3.9	Residential	84	-	+	0	-	-	--	-	-	-	--	--?	--
118	Gibbs Hill Farm	0.6	Residential	9	-	+	--	-	0	-	-	--	-	-	--?	--
119	North of Thorn View	6.1	Residential	84	--	-	0	--	-	--	-	-	--	-	--?	--
120	Rowan House Farm and Fairview (Broomfield Park)	38.9	Residential	738	-	+	0	-	-	--	-	--	-	--	--?	-
122	The Orchard Land adjacent to White Cottage	1.2	Residential	18	-	+	--	-	-	--	-	0	-	0	--?	--
124	Old Goods Yard phase 2	1.3	Residential	25	-	+	0	+	0	--	0	-	0	--	--?	--
125	Old Goods Yard phase 3	2.2	Residential	42	-	+	0	+	0	--	0	--	0	-	--?	--
128	Land at Westfield Sole Rd, Ledsing	0.3	Residential	5	--	+	0	-	0	-	-	0	-	-	0?	-
129	Land Rear of Bearstead Rd	5.4	Residential	114	-	-	0	+	-	--	-	--	-	--	--?	--
130	Land adjacent to Ivans Field, Chart Sutton	2.7	Residential	50	--	+	0	-	-	--	-	0	-	-	--?	--
131	M W Wickham Estate	2.3	Residential	44	--	+	0	-	0	--	-	--	-	0	--?	--
132	Knoll House & Tower House, Staplehurst	2.1	Residential	40	--	+	0	+	0	--	-	--	-	-	--?	--
133	Land NE of Old Belringham Hall	0.8	Residential	14	-	+	0	-	0	--	-	0	-	0	--?	--
134	Baldwins Farm	4.6	Residential	88	--	+	0	-	0	--	-	0	-	--	--?	--
135	South of Ashford Rd, Bearstead	2.1	Residential	45	-	+	0	+	-	--	-	--	-	--	--?	--
136	Land N of West St, Harrietsham	3.5	Residential	66	-	+	0	+	-	--	-	--	-	--	--?	--
137	Land South of Marden Rd, Staplehurst	6.1	Residential	116	--	+	0	-	-	--	-	0	-	--	--?	--
140	Land at Squerryes Oast, Otham	0.7	Residential	8	-	+	0	+	-	--	-	--	-	--	--?	--
141	Eastwood Rd, Ulcombe	0.9	Residential	18	--	-	0	-	0	--	-	--	-	0	--?	--

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	20	-	+	0	-	-	--	-	--	-	-	--?	--
144	34- 35 High Street, Maidstone	0.1	Mixed	2	+	+	--	++	0	0	-	--	+	0	--?	0
145	Len House	1.1	Mixed	29	+	-	--	++	0	0	-	--	+	0	--?	0
146	Maidstone East	1.6	Mixed	65	+	0	--	++	0	0	-	--	++	0	--?	0
147	Gala Bingo and Granada House	0.4	Mixed	71	+	0	--	+	0	0	-	--	+	-	--?	0
148	Maidstone Riverside	6.9	Mixed	650	+	0	--	++	-	0	-	--	++	0	--?	--
149	Maidstone West	2.1	Mixed	130	+	0	--	++	-	0	-	--	+	0	--?	0
150	Mill St Car Park	0.4	Mixed	15	+	-	0	++	0	0	-	--	+	0	--?	0
151	Mote Rd	0.3	Mixed	84	+	-	0	+	0	0	-	-	+	-	--?	0
152	Royal British Legion Social Club	0.3	Mixed	4	0	-	--	-	0	0	-	0	-	-	0?	--
156	Danebury	0.2	Residential	3	+	+	0	+	0	0	-	0	+	0	0?	0
157	Harrietsham Rectory	0.3	Residential	5	-	-	0	+	0	--	-	0	-	0	--?	--
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	114	--	0	0	-	-	--	-	--	-	0	--?	--
159	Yalding Hill	0.4	Residential	7	-	+	0	-	0	--	-	-	-	-	--?	--
161	Bell Farm, Harrietsham	8.3	Residential	126	-	0	0	+	-	--	-	--	-	-	--?	--
162	Land north of Headcorn	15.6	Residential	275	-	-	0	+	-	--	-	--	-	--	--?	--
167	North & West of Leeds	98.3	Mixed	1359	-	0	0	-	-	--	-	--	-	--	--?	--
168	Land at Forge Lane	4.9	Mixed	68	-	+	0	-	-	--	-	0	-	0	--?	--
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	0	--	0	0	-	0	--	-	--	--	-	--?	--
171	Land adjoining Homewell House	0.4	Residential	7	--	-	0	-	-	--	-	0	-	0	--?	0
172	Land at Sutton Rd	10.9	Residential	139	-	+	0	-	-	--	-	0	-	--	-?	--
173	Durrants Farm	3.1	Residential	59	--	+	0	-	0	--	-	--	-	--	--?	--
174	Land South of Sutton Road	9.1	Residential	185	--	+	0	-	-	--	-	--	-	0	--?	--
175	Land at Vicarage Road Yalding	1.0	Residential	20	-	+	0	-	0	--	-	--	-	--	--?	--
176	Land North and South of Ashford Rd	23.2	Mixed	320	--	+	0	-	-	--	-	--	-	--	--?	--
177	Land between Lower St & George St	6.5	Mixed	90	-	+	0	-	-	--	-	-	-	--	--?	--
178	Land South of Warmlake Road	10.5	Residential	199	--	0	0	-	-	--	-	0	-	0	--?	--

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
179	Land at Westerhill	0.7	Mixed	33	-	+	0	-	-	--	-	0	-	-	--?	--
180	Land west of Otham Road	7.1	Residential	135	-	+	0	-	-	--	-	0	-	--	--?	--
182	Invicta Park Barracks	47.1	Residential	1002	+	-	--	++	-	-	-	--	+	--	--?	0
184	Brickfields Farm and Rosemount	14.3	Residential	272	--	0	0	+	-	-	-	--	-	-	--?	--
185	Otham Glebe, Church Road	2.2	Residential	27	-	+	0	+	-	--	-	--	-	--	--?	--
186	Land at Headcorn Road Staplehurst	9.3	Residential	132	-	+	0	-	-	--	-	--	-	-	--?	--
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	89	-	+	0	+	-	--	-	--	-	--	--?	--
188	Land at Old Ashford Road Lenham	28.8	Residential	437	-	0	0	-	-	--	0	--	-	--	--?	--
189	Land north of Ashford Road Harrietsham	1.5	Residential	28	--	+	0	+	-	--	-	--	-	--	--?	--
191	Land adjacent to South Lane Sutton Valence	0.3	Residential	5	-	-	0	-	0	--	-	0	-	0	--?	--
192	Land adjacent to Headcorn Road Sutton Valence	0.6	Residential	10	-	-	0	-	0	--	-	-	-	0	--?	--
193	Land East of Upper Street Langley	6.0	Mixed	83	-	+	0	-	-	--	-	--	-	-	--?	--
195	Waterside Park	16.2	Mixed	224	--	+	0	-	-	--	-	--	-	--	--?	--
196	Land at Willow Farm	2.3	Residential	45	--	0	0	+	0	--	-	--	-	0	--?	0
197	Golf Course Car Park Staplehurst	0.8	Residential	8	--	+	--	--	0	-	-	--	--	-	--?	--
198	Staplehurst Golf Course	20.0	Residential	227	-	+	--	-	-	--	-	--	-	--	--?	--
199	Old Cricket Ground Loose	1.5	Residential	32	-	+	0	-	-	--	-	-	-	--	--?	--
200	Land at former cricket field, Loose	2.3	Residential	49	-	+	0	--	-	--	-	0	-	-	--?	--
201	Land at Inkstand Cattery and Stables Lenham	1.3	Residential	21	-	+	--	+	0	-	0	--	0	--	--?	--
202	Land at Forstal Lane Coxheath	4.7	Residential	89	-	+	0	-	-	--	-	0	-	-	0?	--
203	Land at Bydews Place Tovil	2.7	Residential	47	-	+	0	-	-	--	-	0	-	--	--?	--
204	South of Eyhorne Street Hollingbourne	0.6	Residential	11	--	+	0	+	0	--	-	0	-	0	--?	--
206	Summer Place Caring Lane Bearsted	0.1	Residential	2	--	+	0	-	-	--	-	-	-	-	--?	--
207	Ledian Farm	1.7	Mixed	24	-	+	0	-	-	--	-	0	-	-	--?	--
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	6	-	+	0	-	-	--	-	0	-	0	--?	--
210	Land at Newlyn's Farm, Sutton Valence	1.7	Residential	31	-	+	0	-	-	--	-	0	-	0	--?	-
211	Wheelers Lane Linton	0.2	Residential	4	--	+	0	-	0	--	-	0	-	0	--?	--

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
212	Land at the Grange Staplehurst	6.9	Residential	130	--	-	0	+	0	-	-	--	-	--	--?	--
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	142	--	-	--	-	0	-	-	--	--	--	--?	--
216	Rochester Meadow	2.1	Residential	39	--	0	0	+	0	--	-	-	-	0	--?	0
220	Land at Bydews Farm	27.3	Residential	366	-	-	0	+	-	--	-	--	-	--	--?	--
222	Land at Henhurst Farm, Staplehurst	16.3	Residential	309	-	+	0	-	-	--	-	--	-	-	--?	--
224	Land West of Lenham	18.6	Residential	275	-	-	0	+	0	--	-	--	-	--	--?	--
225	Tanglewood Loose	1.0	Residential	19	-	+	0	-	-	--	-	--	-	0	--?	--
226	Land north of Staplehurst - Garden village	109.3	Mixed	1658	--	-	0	-	-	--	-	--	--	--	--?	--
227	Land South of Green Lane, Boughton Monchelsea	2.9	Residential	50	-	+	0	-	-	--	-	0	-	-	--?	--
228	Land to North West View, Staplehurst	1.0	Residential	18	--	-	0	-	0	--	-	-	--	0	--?	--
229	Land at Stanley Farm Staplehurst	2.1	Residential	32	-	+	0	-	-	--	-	--	-	0	--?	--
231	Land at Lested Farm Chart Sutton	28.2	Residential	534	--	+	0	-	-	--	-	--	-	--	--?	--
233	Land west of Chart Corner Plough Wents Road Junction Chart Sutton	0.8	Residential	16	--	+	0	-	0	--	-	0	-	0	--?	--
234	west of North St, Barming site submission	8.6	Residential	182	-	+	0	-	-	--	-	0	-	-	--?	--
235	Land at Boughton Lane Maidstone	9.8	Residential	69	-	+	0	-	-	--	-	0	-	-	--?	--
236	Fairview Farm (North Parcel)	10.6	Residential	200	-	+	0	-	-	--	-	0	-	--	--?	--
239	Land to south Shangri-La, Langley	0.8	Mixed	12	-	+	0	-	-	--	-	--	-	-	--?	--
240	Banky Meadow, Bearstead	3.5	Residential	75	-	+	0	-	-	--	-	--	-	-	--?	-
244	Land at Iden Park, Staplehurst	3.2	Residential	21	-	+	0	-	0	--	-	--	-	--	--?	--
245	Land north of the M2 lidsing - urban extension	135.3	Mixed	1974	-	+	0	-	0	--	-	--	-	--	--?	-
246	Land rear of Appletree House, Bearstead	1.2	Residential	25	-	+	0	-	-	--	-	--	-	-	--?	--
247	Land south of Court Lodge Road Harrietsham	4.3	Residential	82	-	-	0	+	0	--	-	0	-	-	--?	--
248	Land north & south of Kenward Road Yalding	9.9	Residential	160	-	+	0	+	-	--	-	--	0	--	--?	--
250	Land rear of Butlers Farm Langley	3.6	Mixed	49	-	+	0	-	-	--	-	0	-	0	--?	--
251	Land at Heath Road Coxheath	0.2	Residential	4	-	+	--	-	0	-	-	0	-	0	-?	-
252	Land rear of Lavender Cottage, Langley	1.0	Mixed	14	-	+	0	-	-	--	-	0	-	--	--?	--
254	Land to South of Cotuams Hall Hollingbourne	0.7	Residential	9	--	+	0	+	-	--	-	--	-	0	--?	--

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
255	Land east of Yew Tree House Leeds	0.5	Mixed	7	-	+	0	-	-	--	-	-	-	0	--?	--
257	Land at junction of Heath Road & Dean Street Coxheath	1.0	Residential	20	-	+	0	-	-	--	-	0	-	-	--?	-
262	Land at Fant Farm Maidstone	12.2	Residential	260	-	+	0	+	-	--	-	0	+	0	--?	--
263	Land west of Ledian Farm, Leeds	1.4	Mixed	19	-	+	0	-	-	--	-	0	-	0	--?	--
265	Land at Abbey Farm Tovil	31.0	Residential	527	-	-	0	-	-	--	-	--	-	--	--?	--
266	Land North of Ware Street Bearstead	4.2	Residential	67	-	+	0	+	-	--	-	--	-	-	--?	--
269	Land east of Copper Lane Marden	3.1	Residential	59	--	+	0	+	0	--	-	--	-	-	--?	--
270	Land at Pested Bars Road, Boughton Monchelsea (option 1)	43.5	Residential	463	-	+	0	-	-	--	-	--	-	--	--?	--
271	Fir Tree Farm and Norton Lea (South)	22.8	Residential	432	-	+	0	-	-	--	-	-	-	-	--?	0
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	0	--	-	0	-	0	--	-	--	--	0	--?	--
274	South of Leeds	104.4	Mixed	1443	-	+	0	-	-	--	-	--	-	--	--?	--
279	Langley Heath - Strategic Settlement	98.4	Mixed	1360	-	-	0	-	-	--	-	--	-	--	--?	--
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	9	--	+	--	+	0	--	-	0	-	-	-?	--
286	Underlyn Lane	1.3	Mixed	0	--	0	0	-	0	--	-	--	--	-	--?	--
288	Hill Farm Linton-Coxheath	5.7	Residential	107	-	+	0	-	-	--	-	0	-	-	--?	-
289	Heathlands Garden Community	373.3	Mixed	5161	-	-	0	+	-	--	-	--	-	--	--?	--
291	Bridge Farm Water Lane	4.2	Residential	90	--	+	--	+	-	--	-	--	-	0	--?	--
292	Land at Old Ashford Rd, Lenham	14.5	Residential	138	-	+	0	+	-	--	0	--	+	-	--?	--
294	Land to East of Jubilee Cottages, Sutton Valence	2.8	Residential	53	-	+	0	-	0	--	-	0	-	-	--?	--
295	Land north of Copper Lane, Marden	3.9	Residential	74	-	+	0	+	-	--	-	--	-	-	--?	--
296	Astor Hever	2.4	Residential	45	+	+	0	+	0	0	-	-	+	0	--?	0
297	Bearstead Library	0.1	Mixed	1	-	+	0	+	0	-	-	-	-	0	--?	0
298	Dorothy Lucy Centre	0.7	Residential	16	-	+	0	-	-	0	-	--	0	-	--?	0
299	Maidstone AEC	0.1	Mixed	3	+	-	--	++	0	0	-	--	+	0	--?	0
302	Oakwood Overflow Car Park	0.2	Residential	3	+	+	0	+	0	0	-	-	+	--	0?	0
303	IS Oxford Rd	0.9	Mixed	14	-	+	--	-	0	0	-	--	-	0	0?	0
304	Land east of Hunton Rd, Chainhurst	0.3	Residential	6	--	-	0	-	-	--	-	-	--	-	--?	--

Site ID	Site name	Site area (ha)	Use	Residential units	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	42	+	0	--	++	-	0	-	--	++	0	--?	0
306	Land South of Gore Court, Otham	2.1	Residential	45	-	+	0	-	-	--	-	-	-	-	--?	--
307	Land N Marden Rd E of Clapper Lane, Staplehurst	1.4	Residential	27	--	0	0	-	0	--	-	0	-	-	--?	--
308	58 Church St, Boughton Monchelsea	0.9	Residential	16	-	0	0	-	0	--	-	0	-	-	--?	0
309	Strategic Expansion of Marden	134.1	Mixed	1854	-	-	0	+	-	--	-	--	-	--	--?	--
310	Land north of Mote Rd, Headcorn	7.2	Residential	116	-	+	0	+	-	--	-	--	-	-	--?	--
312	Land north of Heath Rd, Coxheath	10.2	Residential	193	-	+	0	-	-	--	-	0	-	--	--?	--
314	East of Albion Rd, Marden	2.1	Residential	39	-	0	0	+	-	--	-	--	-	0	--?	--
316	Binbury Park, Detling	191.0	Mixed	2113	--	-	--	-	-	-	-	--	--	--	--?	--
317	Langley Heath	2.0	Mixed	27	-	+	0	-	-	--	-	-	-	--	--?	--
318	Pagehurst Farm	82.1	Mixed	1134	--	+	0	--	-	--	-	--	--	--	--?	--
319	Beaux Aires Farm	43.0	Mixed	476	--	+	0	-	0	--	-	--	--	--	--?	-
322	Lughorse Lane, Yalding	1.1	Residential	21	-	+	0	-	0	--	-	--	-	-	--?	--
324	The Grange Ashford Road	0.6	Residential	8	--	+	0	+	0	--	-	0	-	--	-?	--
326	Land at Amsbury Wood, Hunton	4.4	Residential	83	-	+	0	-	-	--	-	0	-	--	--?	-
327	Land at Hockers Farm, Detling	1.0	Residential	19	--	+	0	+	0	--	-	--	-	-	--?	--
328	Land at 59 Linton Rd, Loose	0.5	Residential	10	-	+	0	-	-	--	-	0	-	-	--?	--
329	Land at Sapphire Kennels, Sutton Valence	0.5	Residential	9	--	-	--	-	0	-	-	0	--	0	--?	--
330	Land at Seeburg, Bredhurst	1.1	Mixed	16	--	+	0	-	0	-	-	--	-	0	--?	-
331	Land south of the Lodge, Yalding	3.9	Residential	73	-	+	0	-	0	--	-	--	-	--	--?	--
332	Fairview Farm (South Parcel)	10.4	Residential	198	-	+	0	-	-	--	-	0	-	--	--?	--
333	Land at Old Ham Lane, Lenham - Kilnwood	9.7	Residential	184	-	-	0	+	0	--	-	--	-	--	--?	--
334	Land at Old Ham Lane, Lenham - Old Goods Yard	0.4	Residential	7	-	+	--	+	0	--	0	--	0	0	--?	--
335	Fir Tree Farm and Norton Lea (South)	52.8	Residential	501	-	+	0	-	-	--	-	0	-	-	--?	--

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

6.21 SA objective 1: Housing was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver the right types and tenures of housing at prices that people can afford, as well as addressing the needs of specialist groups. These factors do not depend on the location of the site and are taken into account by the SA through appraisal of any Local Plan policies such as the total quantum of housing to be provided, the mix of housing types and tenures, affordable housing requirements, and design.

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

6.22 The effects of residential site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities, and to employment. Access to open space was considered under SA objective 4: Health and not repeated here. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.23 Potential negative effects in relation to this SA objective were identified for the majority of residential site options, indicating that walking distances to existing, key services and facilities such as schools, GP surgeries, and service centres are relatively long and/or that the sites are in areas of the Borough from which commuting distances are relatively long. Most of the worst performing sites (significant negative effects) were in The Countryside or adjacent/potentially adjacent to Staplehurst. A smaller number of sites with significant negative effects were identified at Edge of Maidstone Urban Extensions, Larger Villages, adjacent to the outer part of Maidstone Urban Area, and at New Settlements.

6.24 Although significant positive effects were not identified for any site options, those appraised as likely to have minor positive effects were mainly within Maidstone Town Centre. A small number of other sites with minor positive effects were identified at Edge of Maidstone Urban Extension (Invicta Barracks), within Maidstone Urban Area, and adjacent to Lenham Rural Service Centre.

Mitigation

6.25 The potential negative effects identified by the SA of residential site options could be avoided by selecting sites within easy walking distance of existing key services and facilities where these have capacity or the potential exists to expand that capacity. Where this is not possible, it will be important to ensure that new development is well provided with services and facilities and that these are delivered at the same time as housing. In terms of access to employment, it is notable that existing residents of areas in the south and east of the Borough have relatively long commuting distances (more than 13 km on average). If residential site allocations are made in these areas, particular consideration should be given to provision of more local employment opportunities and improved connectivity of these area to sustainable transport networks.

SA Objective 3: To strengthen community cohesion

6.26 SA objective 3: Community was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to these SA objective relates to factors such as its ability to deliver development that integrates well with existing neighbourhoods, that meets the needs of specific groups, that will benefit both new residents and existing ones, that is designed to provide spaces for informal interaction, and that is designed to reduce crime and the fear of crime. These factors will be taken into account by the SA through appraisal of development management policies and site-specific requirements set out in allocation policies.

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

6.27 The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of noise pollution) or positive (e.g. access to open space) effects on health and well-being. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.28 Potential minor positive effects were identified in relation to this SA objective for most residential site options, indicating an absence of negative factors such being in an air quality management area or an area with high noise levels, combined with the presence of open space, sport and recreation facilities, or public rights of way within easy walking distance. Minor negative effects were, however, identified for a minority of sites. These were not located in particular categories of location (The Countryside, Maidstone Town Centre, etc) but rather were clustered around particular pollution hotspots, such as main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274.

Mitigation

6.29 The potential negative effects identified by the SA of residential site options could be avoided by selecting sites outside of air and noise pollution hotspots, such as close to the Borough's main roads and rail lines. In this regard, it should be noted that noise and air pollution generally reduce

very quickly with increasing distance from the source, therefore on large site allocations it may be possible to avoid effects by appropriate site layouts. It may also be possible to use trees and shrubs as a natural barrier to air pollution. Providing additional green space and active travel routes alongside development where this is currently lacking would help to improve positive effects of site allocations on health and wellbeing more widely.

SA Objective 5: To facilitate a sustainable and growing economy

6.30 Most factors relating to SA objective 5: Economy were scoped out of the appraisal of residential site options. Site options for employment use were the subject of a separate appraisal, guided by an amended version of the appraisal criteria for residential sites. The accessibility of residential sites to employment opportunities was addressed under SA objective 2. The exception is that potential negative effects were identified where allocation of a residential site would lead to loss of an existing employment use. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.31 Negligible effects were identified for most residential site options in relation to this SA objective, indicating that the site is not currently in employment use. Significant negative effects were identified for the remainder of the sites (approximately 16% of sites) as these are in existing employment uses which could be lost if the sites were allocated for residential use, with potential negative effects on the economy. Many of the affected sites were in Maidstone Town Centre, although significant numbers of such sites were also identified across the rest of the Borough.

Mitigation

6.32 The potential negative effects identified by the SA of residential site options could be avoided by ensuring that any site selected for change of use from employment to residential is surplus to local requirements for the particular type of employment space.

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

6.33 The allocation of residential development in or close to Maidstone town centre could have positive effects by providing more demand for nearby town centre uses or negative effects by preventing or resulting in the loss of existing town centre uses. The information was not available to appraise individual site allocations on this basis. Instead, the SA of the Local Pan in relation to SA objective 6: Town centre considered whether policies encourage an appropriate mix of residential, office, retail, leisure, and community uses, as well as other factors set out in the SA framework that are unrelated to residential site allocations. SA objective 6 was therefore scoped out from the appraisal of residential site options.

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

6.34 The effects of site allocations in relation to SA objective 7: Sustainable travel will partly depend on reducing the need to travel by ensuring that they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.35 Minor negative effects were identified for the majority of residential site options, indicating that the site is not within convenient walking distance of rail, bus and cycle facilities. Significant negative effects were identified for a small number of sites that are most remote from these transport facilities, these being at South of Maidstone Urban Extension, North of Staplehurst Garden Settlement, Pagehurst Farm Garden Settlement, and in The Countryside. In addition, significant positive effects were identified for a small number of sites, all but one of these (Invicta Barracks Edge of Maidstone Urban Extension) being in Maidstone Town Centre.

Mitigation

6.36 The potential negative effects identified by the SA of residential site options could be avoided by not allocating sites in locations poorly served by sustainable transport. If such sites are allocated, negative effects would be mitigated by ensuring that public transport and active travel connections were created or enhanced as appropriate, in advance of or early in the delivery of housing development.

SA Objective 8: To conserve the Borough's mineral resources

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

traffic associated with extraction. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of residential sites to relevant mineral resources. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.38 Minor negative effects were identified for the majority of residential site options, indicating that the site is within a Mineral Safeguarding Area or close to a Safeguarded Mineral Site. This is unsurprising given that limestone deposits extend in a broad band across the middle of the Borough while River Terrace Deposits are associated with the River Beult and other tributaries to the River Medway in the south of the Borough. The remainder of sites outside of these mineral resources scored negligible effects.

Mitigation

6.39 The potential negative effects identified by the SA of residential site options could be avoided by ensuring that where allocation of sites overlaying mineral resources cannot be avoided, those resources are recovered prior to construction, where economically viable.

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

6.40 Brownfield (as opposed to greenfield) site allocations were assumed to have a positive effect in relation to this SA objective. Potential loss of higher quality agricultural land to development was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.41 Significant negative effects were identified for the majority of residential site options in relation to this SA objective, indicating that the site was categorised by the Council as greenfield and/or contained some Grade 1 (excellent quality) or Grade 2 (very good quality) agricultural land. The remainder of sites scored minor negative or negligible. The main areas of the Borough containing Grade 1 or Grade 2 agricultural land are a broad band across the centre of the Borough around the periphery of Maidstone urban area in the west to Boughton Malherbe in the east, as well as in the river valleys in the south of the Borough. In addition, approximately 70% of the site options were classed as greenfield sites.

Mitigation

6.42 It would be difficult to avoid all of the potential negative effects identified by the SA of residential site options given the large proportion of site options affected but the effects could be mitigated by giving preference to brownfield sites and by considering whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of the best and most versatile agricultural land where this only occupies part of the site.

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

6.43 Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies. Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local WwTWs or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options.

6.44 Development could affect water quality in drinking water resources during construction or occupation. Source protection zones (SPZs) are areas designated to protect groundwater sources used for public drinking water supply. They relate to the risk of contamination of the water source from various activities, this increases as the distance between the source of contamination and the groundwater abstraction point decreases. Drinking Water Safeguard Zones are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. Site options were appraised in relation to these zones. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.45 Almost all of the residential site options scored minor negative in relation to this SA objective because the site is within a drinking water safeguard zone (surface water) and/or within Source Protection Zone 2 or 3. Most of the Borough, except for the northern edge in the North Downs is within a drinking water safeguard zone (surface water) and almost all of the rest is within Source Protection Zone 2 or 3. A small residual number of sites at Lenham scored a negligible effect as they lie outside of relevant water resource protection zones.

Mitigation

6.46 Given that almost all of the Borough is within relevant water resource protection zones it is not feasible to avoid these when allocating residential sites. Instead, the Council should work with the Environment Agency and water

companies to understand the particular water resource protection objectives for which these zones have been designated and to ensure that Local Plan policies for sites allocated within the zones place appropriate requirements on development to avoid contributing to drinking water protection objectives.

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

6.47 The proximity of sites to Air Quality Management Areas (AQMAs) does not robustly test the potential for such sites to generate road traffic through AQMAs. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.

SA Objective 12: To avoid and mitigate flood risk

6.48 Residential development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. The Government's Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of Flood Zone 1 and 2 but would require an exception test in flood zone 3a and is unsuitable in flood zone 3b. Surface water flooding occurs when intense rainfall overwhelms drainage systems. Groundwater flood risk can occur via permeable superficial deposits (PSD) (these generally occur in the flood plain, and can be mistaken for fluvial flooding), via high spring flows, and via high bedrock groundwater levels. Site options were appraised in relation to related flood risk zones. Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.49 The majority of residential site options were appraised as having significant negative effects in relation to this SA objective, indicating that part of the site was subject to one major or multiple minor forms of flood risk. These sites were distributed widely across the Borough. The main concentrations of sites subject to fluvial or surface water flood risk were along the valleys of the River Medway (e.g. in Maidstone town) and its tributaries (such as along the River Beult in the south of the Borough) while sites subject to higher levels of groundwater flood risk were concentrated in the M20 corridor in the north of the Borough and along the River Beult in the south. A significant minority of sites were assessed as having negligible effects and the remainder of sites as having minor negative effects.

Mitigation

6.50 The potential negative effects identified by the SA of residential site options would be most effectively avoided by not allocating sites within the relevant areas of higher flood risk, where appropriate in accordance with the sequential and exception tests. It is notable, however, that many of the site options only partially overlay such areas and the council could therefore consider whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of areas with higher flood risk. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could also help to mitigate flood risk.

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

6.51 Site options were appraised against SA 13: Climate change in relation to travel-related carbon emissions by reference to a basket of appraisal criteria used for SA objectives 2, 4 and 7 on access to services, employment, open space, and public transport. Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the residential site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A.**

6.52 The majority of residential site options were appraised as having minor negative effects in relation to this SA objective, reflecting a balance of negative rather than positive effects in relation to the wide range of criteria used. This broadly means that most site options are not within easy walking distance of key services, open space, and public transport or are in the more remote areas of the Borough in terms of average commuting distances. A relatively small number of more inaccessible sites were identified as having significant negative effects, these mainly being located in The Countryside or at potential garden settlements at North of Staplehurst, Binbury Park, and Pagehurst Farm. Three sites scored a significant positive effect, all of these being in Maidstone Town Centre.

Mitigation

6.53 Mitigation in relation to the potential negative effects identified by the SA of site options has already been discussed under SA objectives 2, 4 and 7 above.

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

6.54 Site options were appraised against SA 14: Biodiversity Development by consideration of their proximity to designated wildlife sites and habitats and related zones within which impacts on internationally and nationally designated sites may occur. Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity of those sites, for example through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.55 Approximately one third of residential site options were appraised as having significant negative effects, one third as having minor negative effects, and the remainder as having negligible effects in relation to this SA objective. Sites were mainly identified as having significant negative effects because they were close to/ within the impact risk zone of more than one category of designated wildlife site (internationally/ nationally designated; locally designated) or close to one of these categories and also within an area of Priority Habitat. Approximately 15% of all residential site options, however, were scored significant negative because they actually overlap with a locally designated wildlife site or area of ancient woodland, although the extent of overlap was very small in a number of instances.

Mitigation

6.56 If any of the site options that overlap a locally designated wildlife site or area of ancient woodland are taken forward for allocation, the Council should carefully consider whether (in some cases minor) changes to site boundaries are required to ensure compliance with statutory and NPPF requirements for biodiversity conservation. In terms of the other negative effects identified by the appraisal of site options, avoidance of development in areas with the potential to negatively affect areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan policy should be put in place to ensure biodiversity net gain is achieved on each development site or losses are offset elsewhere within the Borough where this is not feasible.

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

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

6.58 The proximity tests used in the SA of the Local Plan site allocations are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of separate evidence in the form of a historic environment sensitivity study or similar they are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.59 Almost all residential site options were identified as having significant negative effects with uncertainty, indicating that they are close to at least one designated heritage asset. Small numbers of sites scored minor negative with uncertainty due to being more distant from the nearest heritage asset, or negligible with uncertainty due to being relatively remote from any such assets.

Mitigation

6.60 Avoidance of development that could result in harm to the significance of heritage assets, including their setting, would provide the best mitigation. Judgements on whether residential site allocations in different areas of the Borough are likely to be able to avoid such effects would best be informed by a historic environment sensitivity study or similar evidence.

Where residual risks are likely, it may be possible to avoid significant negative effects via site-specific requirements in relation to site layout and development design.

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

6.61 The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of residential site options in relation to SA objective 16: Landscape. Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A1** in **Appendix A**.

6.62 Significant negative effects were identified for most residential site options, indicating that at least part of the site is within an area of high[107] landscape sensitivity. This reflects the fact that a large proportion of the Borough has been assessed as having high landscape sensitivity. Approximately one fifth of residential site options fell within areas of moderate or low landscape sensitivity and were scored as having minor or negligible effects respectively. Approximately half of these sites in less sensitive landscapes were in Maidstone Town Centre or wider Urban Area, with the remainder spread widely across the Borough.

Mitigation

6.63 Avoidance of development within the areas of highest landscape sensitivity to development would provide the best mitigation. However, outside of Maidstone Urban Area the generally high sensitivity of the landscape will make this difficult to achieve. In these sensitive areas, Local Plan policy requirements for development site layouts and development design that seek to reduce adverse effects on the landscape could be implemented to mitigate potential negative effects.

Appraisal findings for employment site options

6.64 The sites that were considered by the Council to be reasonable alternatives for class A (retail, financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways) or class B (business, general industrial, or storage or distribution) employment uses (including mixed use with a residential component) are listed in **Table 6.3** by unique site identification number, along with key site attributes.

6.65 **Table 6.4** summarises the likely effects of the residential site options in relation to each of the SA objectives that was scoped-in for the site appraisals.

6.66 These tables are followed by a description for each SA objective of the approach to site appraisal, the broad pattern of findings, and the potential for mitigation.

[107] Or 'very' high' sensitivity if the site was within one of the landscape character areas not assessed by the 2015 Landscape Capacity Study, necessitating reliance on the earlier 2013 study

Table 6.3: Reasonable alternative site options considered for employment (including mixed) use

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
8	Bassetts Bungalow, Marden	0.8	Mixed	19	0	0	Adjacent to	North of Staplehurst GS	Larger Villages	Greenfield
9	116 to 120 Week St	0.0	Mixed	2	38	19	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
53	12-14 Week St	0.1	Mixed	3	81	41	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
58	Green Lane Farm	2.3	Mixed	31	531	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
66	Land at Lodge Rd, Staplehurst	4.2	Mixed	34	3964	0	Within	Staplehurst	Rural Service Centres	Greenfield
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	20	334	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
144	34- 35 High Street, Maidstone	0.1	Mixed	2	56	28	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
145	Len House	1.1	Mixed	29	531	265	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
146	Maidstone East	1.6	Mixed	65	1573	787	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
147	Gala Bingo and Granada House	0.4	Mixed	71	201	100	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
148	Maidstone Riverside	6.9	Mixed	650	5149	2574	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
149	Maidstone West	2.1	Mixed	130	1035	517	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
150	Mill St Car Park	0.4	Mixed	15	358	179	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
151	Mote Rd	0.3	Mixed	84	2000	0	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
152	Royal British Legion Social Club	0.3	Mixed	4	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	114	2778	1389	Within	the Countryside	Countryside	Greenfield
167	North & West of Leeds	98.3	Mixed	1359	23097	1000	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
168	Land at Forge Lane	4.9	Mixed	68	1158	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	0	5363	0	Within	the Countryside	Countryside	Greenfield
176	Land North and South of Ashford Rd	23.2	Mixed	320	5444	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
177	Land between Lower St & George St	6.5	Mixed	90	1530	0	Within	Junction 8 Garden Settlement	New Settlements	Greenfield
179	Land at Westerhill	0.7	Mixed	33	2806	0	Adjacent to	Coxheath	Larger Villages	Greenfield
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	89	1508	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
193	Land East of Upper Street Langley	6.0	Mixed	83	1406	0	Adjacent to	South of Leeds	New Settlements	Greenfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
195	Waterside Park	16.2	Mixed	224	3814	0	Potentially Adjacent to	Junction 8 Garden Settlement	New Settlements	Greenfield
207	Ledian Farm	1.7	Mixed	24	409	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	6	101	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	142	0	0	Potentially Adjacent to	North of Staplehurst GS	Larger Villages	Mixed
226	Land north of Staplehurst - Garden village	109.3	Mixed	1658	0	1000	Within	North of Staplehurst GS	Larger Villages	Greenfield
239	Land to south Shangri-La, Langley	0.8	Mixed	12	198	0	Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
245	Land north of the M2 lidsing - urban extension	135.3	Mixed	1974	33564	1000	Within	Lidsing Urban Extension	Edge of Maidstone Urban Extension	Greenfield
252	Land rear of Butlers Farm Langley	3.6	Mixed	49	838	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
254	Land rear of Lavender Cottage, Langley	1.0	Mixed	14	235	0	Potentially Adjacent to	Langley Heath Garden Settlement	New Settlements	Greenfield
255	Land east of Yew Tree House Leeds	0.5	Mixed	7	112	0	Potentially Adjacent to	South of Leeds	New Settlements	Greenfield
260	Land at Ashford Road Lenham	0.8	Employment	0	3108	0	Adjacent to	Lenham	Rural Service Centres	Greenfield
263	Land west of Ledian Farm, Leeds	1.4	Mixed	19	322	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	0	41023	0	Within	the Countryside	Countryside	Mixed
274	South of Leeds	104.4	Mixed	1443	24528	1000	Adjacent to	South of Leeds	New Settlements	Unknown
279	Langley Heath - Strategic Settlement	98.4	Mixed	1360	23114	1000	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	9	188	0	Within	the Countryside	Countryside	Brownfield
286	Underlyn Lane	1.3	Mixed	0	4127	0	Within	the Countryside	Countryside	Greenfield
289	Heathlands Garden Community	373.3	Mixed	5161	87733	2500	Within	Heathlands	New Settlements	Greenfield
297	Bearstead Library	0.1	Mixed	1	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield
299	Maidstone AEC	0.1	Mixed	3	74	37	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
303	IS Oxford Rd	0.9	Mixed	14	FALSE	0	Within	Maidstone Urban Area (Outer)	Maidstone Urban Area	Brownfield

Site ID	Site name	Site area (ha)	Use	Residential units	B use (m^2)	A use (m^2)	Adjacent or within	Growth location	Location typology	Greenfield status
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	42	1020	510	Within	Maidstone Town Centre	Maidstone Town Centre	Brownfield
309	Strategic Expansion of Marden	134.1	Mixed	1854	31511	1000	Within	North of Marden	New Settlements	Greenfield
316	Binbury Park, Detling	191.0	Mixed	2113	0	1500	Within	Binbury Park	New Settlements	Mixed
317	Langley Heath	2.0	Mixed	27	458	0	Within	Langley Heath Garden Settlement	New Settlements	Greenfield
318	Pagehurst Farm	82.1	Mixed	1134	0	500	Within	Pagehurst Farm Garden Settlement	New Settlements	Greenfield
319	Beaux Aires Farm	43.0	Mixed	476	0	0	Adjacent to	Binbury Park	New Settlements	Greenfield
330	Land at Seeburg, Bredhurst	1.1	Mixed	16	269	0	Within	Lidsing Urban Extension	Edge of Maidstone Urban Extension	Brownfield

Table 6.4: SA results for employment site options

Site ID	Site name	Site area (ha)	Use	B use (m^2)	A use (m^2)	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA6 Town Centre	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
8	Bassetts Bungalow, Marden	0.8	Mixed	0	0	--	-	+	0	--	-	--	-	-	--	-	-?	--
9	116 to 120 Week St	0.0	Mixed	38	19	+	+	+	++	++	0	0	-	0	++	-	--?	0
53	12-14 Week St	0.1	Mixed	81	41	+	+	+	++	++	0	0	-	0	+	-	--?	0
58	Green Lane Farm	2.3	Mixed	531	0	-	+	+	0	-	-	--	-	0	-	--	--?	--
66	Land at Lodge Rd, Staplehurst	4.2	Mixed	3964	0	--	+	+	0	+	0	--	-	--	-	--	0?	--
143	Land south of Heath Rd, Langley Heath	1.4	Mixed	334	0	-	+	+	0	-	-	--	-	-	-	--	--?	--
144	34- 35 High Street, Maidstone	0.1	Mixed	56	28	+	+	+	++	++	0	0	-	-	+	-	--?	0
145	Len House	1.1	Mixed	531	265	+	-	+	++	++	0	0	-	--	+	-	--?	0
146	Maidstone East	1.6	Mixed	1573	787	+	+	+	++	++	0	0	-	--	++	-	--?	0
147	Gala Bingo and Granada House	0.4	Mixed	201	100	+	+	+	++	+	0	0	-	--	+	-	--?	0
148	Maidstone Riverside	6.9	Mixed	5149	2574	+	+	+	++	++	-	0	-	--	++	-	--?	--
149	Maidstone West	2.1	Mixed	1035	517	+	+	+	++	++	-	0	-	--	++	-	--?	0
150	Mill St Car Park	0.4	Mixed	358	179	+	-	+	++	++	0	0	-	--	+	-	--?	0
151	Mote Rd	0.3	Mixed	2000	0	+	+	+	0	+	0	0	-	-	+	-	--?	0
152	Royal British Legion Social Club	0.3	Mixed	FALSE	0	-	-	+	0	-	0	0	-	0	--	-	0?	--
158	Land adj Headcorn Rd & Heniker Ln	8.6	Mixed	2778	1389	-	+	+	0	-	-	--	-	--	-	-	--?	--
167	North & West of Leeds	98.3	Mixed	23097	1000	--	+	+	0	-	-	--	-	--	--	--	--?	--
168	Land at Forge Lane	4.9	Mixed	1158	0	--	+	+	0	-	-	--	-	0	--	-	--?	--
169	Land adj to Long Oast, Paddock Wood	1.7	Mixed	5363	0	--	0	+	0	-	0	--	-	-	--	-	--?	--
176	Land North and South of Ashford Rd	23.2	Mixed	5444	0	--	+	+	0	-	-	--	-	--	-	--	--?	--
177	Land between Lower St & George St	6.5	Mixed	1530	0	--	+	+	0	-	-	--	-	-	--	--	--?	--
179	Land at Westerhill	0.7	Mixed	2806	0	-	+	+	0	-	-	--	-	0	-	-	--?	--
187	Land at Penfold Hill and Ashford Road	6.4	Mixed	1508	0	--	+	+	0	+	-	--	-	--	-	--	--?	--
193	Land East of Upper Street Langley	6.0	Mixed	1406	0	-	+	+	0	-	-	--	-	--	-	-	--?	--
195	Waterside Park	16.2	Mixed	3814	0	--	+	+	0	-	-	--	-	--	--	--	--?	--
207	Ledian Farm	1.7	Mixed	409	0	--	+	+	0	-	-	--	-	0	-	--	--?	--

Site ID	Site name	Site area (ha)	Use	B use (m^2)	A use (m^2)	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA6 Town Centre	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
208	Land adjacent to the Kent House B&B Leeds	0.4	Mixed	101	0	--	+	+	0	-	-	--	-	0	-	-	--?	--
215	Woodford Yard Depot, Staplehurst	4.5	Mixed	0	0	--	0	+	0	-	0	-	-	-	--	--	--?	--
226	Land north of Staplehurst - Garden village	109.3	Mixed	0	1000	--	0	+	0	-	-	--	-	--	--	--	--?	--
239	Land to south Shangri-La, Langley	0.8	Mixed	198	0	-	+	+	0	-	-	--	-	-	-	--	--?	--
245	Land north of the M2 lidsing - urban extension	135.3	Mixed	33564	1000	--	+	+	0	-	0	--	-	--	--	--	--?	-
250	Land rear of Butlers Farm Langley	3.6	Mixed	838	0	-	+	+	0	-	-	--	-	0	-	-	--?	--
252	Land rear of Lavender Cottage, Langley	1.0	Mixed	235	0	-	+	+	0	-	-	--	-	0	-	--	--?	--
255	Land east of Yew Tree House Leeds	0.5	Mixed	112	0	--	+	+	0	-	-	--	-	-	--	-	--?	--
260	Land at Ashford Road Lenham	0.8	Employment	3108	0	-	+	+	0	-	-	--	0	-	-	0	--?	--
263	Land west of Ledian Farm, Leeds	1.4	Mixed	322	0	--	+	+	0	-	-	--	-	0	--	-	--?	--
273	Land between Maidstone Road (B2160) and Whetsted Road (A228) Paddock Wood	12.8	Mixed	41023	0	--	0	+	0	-	0	--	-	--	--	-	--?	--
274	South of Leeds	104.4	Mixed	24528	1000	-	+	+	0	-	-	--	-	--	-	--	--?	--
279	Langley Heath - Strategic Settlement	98.4	Mixed	23114	1000	-	0	+	0	-	-	--	-	--	--	--	--?	--
285	Land at Dickley Court, Dickley Lane Lenham	0.6	Mixed	188	0	--	+	+	0	+	0	--	-	0	-	-	-?	--
286	Underlyn Lane	1.3	Mixed	4127	0	--	0	+	0	-	0	--	-	--	--	-	--?	--
289	Heathlands Garden Community	373.3	Mixed	87733	2500	-	-	+	0	+	-	--	-	--	-	--	--?	--
297	Bearstead Library	0.1	Mixed	FALSE	0	--	+	+	0	+	0	-	-	-	-	-	--?	0
299	Maidstone AEC	0.1	Mixed	74	37	+	0	+	++	++	0	0	-	--	+	-	--?	0
303	IS Oxford Rd	0.9	Mixed	FALSE	0	-	+	+	0	-	0	0	-	--	-	-	0?	0
305	Maidstone East Station (within Maidstone East Site 146)	2.8	Mixed	1020	510	+	+	+	++	++	-	0	-	--	++	-	--?	0
309	Strategic Expansion of Marden	134.1	Mixed	31511	1000	+	0	+	0	+	-	--	-	--	0	--	--?	--
316	Binbury Park, Detling	191.0	Mixed	0	1500	--	-	+	0	-	-	-	-	--	--	--	--?	--
317	Langley Heath	2.0	Mixed	458	0	-	+	+	0	-	-	--	-	-	-	--	--?	--
318	Pagehurst Farm	82.1	Mixed	0	500	--	+	+	0	--	-	--	-	--	-	--	--?	--
319	Beaux Aires Farm	43.0	Mixed	0	0	--	+	+	0	-	0	--	-	--	--	--	--?	-

Site ID	Site name	Site area (ha)	Use	B use (m^2)	A use (m^2)	SA2 Services & Facilities	SA4 Health	SA5 Economy	SA6 Town Centre	SA7 Sustainable Travel	SA8 Minerals	SA9 Soils	SA10 Water	SA12 Flooding	SA13 Climate Change	SA14 Biodiversity	SA15 Historic Environment	SA16 Landscape
330	Land at Seeburg, Bredhurst	1.1	Mixed	269	0	--	+	+	0	-	0	-	-	--	--	-	--?	-

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

6.67 SA objective 1: Housing was scoped out of the appraisal of employment site options as it is not relevant to employment use.

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

6.68 The effects of site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities that may be accessed by employees during the working day. Access to open space was considered under SA objective 4: Health and not repeated here. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.69 Potential negative effects in relation to this SA objective were identified for the majority of employment site options, indicating that walking distances to existing, key services and facilities such as GP surgeries and service centres are relatively long. Many of the worst performing sites (significant negative effects) were in potential new settlements (including North of Staplehurst Garden Settlement), with smaller numbers of other sites having a significant negative score in The Countryside, Lidsing Urban Extension on the edge of Maidstone, in Maidstone Urban Area, or in Staplehurst.

6.70 Although significant positive effects were not identified for any site options, those appraised as likely to have minor positive effects were mainly within Maidstone Town Centre, plus one at North of Marden new settlement.

Mitigation

6.71 The potential negative effects identified by the SA of employment site options could be avoided by selecting sites within easy walking distance of existing key services and facilities where these have capacity or the potential exists to expand that capacity. Where this is not possible, it will be important to ensure that new development is well provided with relevant services and facilities and that these are delivered at the same time as development.

SA Objective 3: To strengthen community cohesion

SA objective 3: Community was scoped out of the appraisal of employment site options as it is not relevant to employment use.

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

6.72 The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of air pollution) or positive (e.g. access to open space) effects on health and well-being of employees during the working day. In terms of negative determinants, employment sites were assumed to be less susceptible to environmental noise pollution than residential sites, therefore exposure to road and rail noise was scoped out. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.73 Potential minor positive effects were identified in relation to this SA objective for most employment site options, indicating an absence of negative factors such as being in an air quality management area, combined with the presence of open space, sport and recreation facilities, or public rights of way within easy walking distance. Minor negative effects were, however, identified for a minority of sites. These were mainly located in the main road corridors in and around Maidstone town where AQMAs are designated, with the remaining ones close to waste management facilities. The remainder of sites had a negligible effect score.

Mitigation

6.74 The potential negative effects identified by the SA of employment site options could be avoided by selecting sites outside of air pollution hotspots or by further investigating the potential for negative effects on health and wellbeing from waste management facilities within or close to allocated employment sites. In relation to air pollution from roads, it should be noted that this generally reduces very quickly with increasing distance from the source, therefore on large site allocations it may be possible to avoid effects by appropriate site layouts. It may also be possible to use tree or shrub planting as a natural barrier to air pollution. Providing additional green space and active travel routes alongside development where this is currently lacking would help to improve positive effects of site allocations on health and wellbeing of employees more generally.

SA Objective 5: To facilitate a sustainable and growing economy

6.75 All site options with the potential to deliver employment opportunities have the potential for positive effects in relation to SA objective 5: Economy. All employment site options therefore scored a minor positive effect.

Mitigation

6.76 None required as no negative effects identified.

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

6.77 The allocation of use class A (shops, including some services such as professional services) or use class D (non-residential institutions, including many public services and entertainment/leisure) developments within or close to Maidstone town centre would help to create a strong service offering that increases footfall for new and existing town centres uses, with positive effects on vibrancy and viability of the town centre. Such site options were considered to have significant positive effects in relation to this SA objective with other site options assumed to have a negligible effect.

6.78 Significant positive effects were identified for approximately 20% of the employment site options – those being considered for A class or D class uses within Maidstone Town Centre. Negligible effects were identified for the remainder of the site options.

Mitigation

6.79 None required as no negative effects identified.

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

6.80 The effects of site allocations in relation to SA objective 7: Sustainable travel will partly depend on reducing the need to travel by ensuring that they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.81 Minor negative effects were identified for the majority of employment site options, indicating that the site is not within convenient walking distance of rail, bus and cycle facilities. Significant negative effects were identified for two sites that are remote from these transport facilities, these being adjacent to North of Staplehurst Garden Settlement and at Pagehurst Farm Garden Settlement. Significant positive effects were identified for approximately 20% of employment site options, all these being in Maidstone Town Centre. The remaining site options scored minor positive in relation to this SA objective.

Mitigation

6.82 The potential negative effects identified by the SA of residential site options could be avoided by not allocating sites in locations poorly served by sustainable transport. If such sites are allocated, negative effects would be mitigated by ensuring that public transport and active travel connections were created or enhanced as appropriate, in advance of or early in the delivery of housing development.

SA Objective 8: To conserve the Borough's mineral resources

6.83 Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either prevent future mineral extraction or delay delivery of housing until extraction is complete and land has been remediated (note that only one Mineral Consultation Area is defined in Kent and it is not in Maidstone Borough). Allocating development close to active mineral extraction sites could result in negative effects on amenity due to noise, vibration, dust, and road traffic associated with extraction. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of employment sites to relevant mineral resources. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.84 Minor negative effects were identified for approximately 60% of employment site options, indicating that the site is within a Mineral Safeguarding Area or close to a Safeguarded Mineral Site. This reflects the fact that limestone deposits extend in a broad band across the middle of the Borough while River Terrace Deposits are associated with the River Beult and other tributaries to the River Medway in the south of the Borough. The remainder of sites outside of these mineral resources scored negligible effects.

Mitigation

6.85 The potential negative effects identified by the SA of employment site options could be avoided by ensuring that where allocation of sites overlaying mineral resources cannot be avoided, those resources are recovered prior to construction, where economically viable.

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

6.86 Brownfield (as opposed to greenfield) site allocations were assumed to have a positive effect in relation to this SA objective. Potential loss of higher quality agricultural land to development was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.87 Significant negative effects were identified for approximately 65% of employment site options in relation to this SA objective, indicating that the site was categorised by the Council as greenfield and/or contained some Grade 1 (excellent quality) or Grade 2 (very good quality) agricultural land. The main areas of the Borough containing Grade 1 or Grade 2 agricultural land are a broad band across the centre of the Borough around the periphery of Maidstone urban area in the west to Boughton Malherbe in the east, as well as in the river valleys in the south of the Borough. Approximately 60% of the employment site options were classed as greenfield sites. Most of the remaining sites were assessed as having a negligible effect, indicating no loss of greenfield or agricultural land to development, these sites being in Maidstone Town Centre or wider Urban Area. The few remaining sites scored minor negative against this SA objective.

Mitigation

6.88 It would be difficult to avoid all of the potential negative effects identified by the SA of employment site options given the large proportion of site options affected but the effects could be mitigated by giving preference to brownfield sites and by considering whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of the best and most versatile agricultural land where this only occupies part of the site.

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

6.89 Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies. Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local WwTWs or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options.

6.90 Development could affect water quality in drinking water resources during construction or occupation. Source protection zones (SPZs) are areas designated to protect groundwater sources used for public drinking water supply. They relate to the risk of contamination of the water source from various activities, this increasing as the distance between the source of contamination and the groundwater abstraction point decreases. Drinking Water Safeguard Zones are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. Site options were appraised in relation to these zones. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.91 Almost all of the employment site options scored minor negative in relation to this SA objective because the site is within a drinking water safeguard zone (surface water) and/or within Source Protection Zone 2 or 3. Most of the Borough, except for the northern edge in the North Downs is within a drinking water safeguard zone (surface water) and almost all of the rest is within Source Protection Zone 2 or 3. One site at Lenham scored a negligible effect as it was outside of relevant water resource protection zones.

Mitigation

6.92 Given that almost all of the Borough is within relevant water resource protection zones it is not feasible to avoid these when allocating employment sites. Instead, the Council should work with the Environment Agency and water companies to understand the particular water resource protection objectives for which these zones have been designated and to ensure that Local Plan policies for sites allocated within the zones place appropriate requirements on development to avoid contributing to drinking water protection objectives.

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

6.93 The proximity of sites to Air Quality Management Areas (AQMAs) does not robustly test the potential for such sites to generate road traffic through AQMAs. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.

SA Objective 12: To avoid and mitigate flood risk

6.94 Development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. The Government's Planning Practice Guidance identifies most employment uses as a 'less vulnerable', which is suitable in areas of Flood Zone 1, 2 and 3a but would require an exception test in flood zone 3b. Surface water flooding occurs when intense rainfall overwhelms drainage systems. Groundwater flood risk can occur via permeable superficial deposits (PSD) (these generally occur in the flood plain, and can be mistaken for fluvial flooding), via high spring flows, and via high bedrock groundwater levels. Site options were appraised in relation to related flood risk zones. Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.95 Just over half of employment site options were appraised as having significant negative effects in relation to this SA objective, indicating that the part of the site was subject to one major or multiple minor forms of flood risk. These sites were mainly in Maidstone town or a potential new settlement. The main concentrations of sites subject to fluvial or surface water flood risk were along the valleys of the River Medway (e.g. in Maidstone town) and its tributaries (such as along the River Beult in the south of the Borough) while sites subject to higher levels of groundwater flood risk were concentrated in the M20 corridor in the north of the Borough and along the River Beult in the south. Half of the remaining sites were assessed as having minor negative effects and half as having negligible effects.

Mitigation

6.96 The potential negative effects identified by the SA of employment site options would be most effectively avoided by not allocating sites within the relevant areas of higher flood risk, where appropriate in accordance with the sequential and exception tests. It is notable, however, that many of the site options only partially overlay such areas and the council could therefore consider whether boundaries of site options could be redrawn or sites masterplanned so as to avoid development of areas with higher flood risk. The incorporation of green spaces and SuDS into the design of new developments to reduce the risk of flooding could also help to mitigate flood risk.

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

6.97 Site options were appraised against SA 13: Climate change in relation to travel-related carbon emissions by reference to a basket of appraisal criteria used for SA objectives 2, 4 and 7 on access to services, employment, open space, and public transport. Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the residential site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A.**

6.98 Approximately 75% of employment site options were appraised as having negative effects in relation to this SA objective, with about half of these significant negative. This broadly means that most site options are not within easy walking distance of key services, open space, or public. The more inaccessible sites having significant negative effects were widely distributed across the different location typologies (The Countryside; New Settlements etc.). Five sites scored a significant positive effect, all of these being in Maidstone Town Centre. Remaining sites scored minor positive or negligible.

Mitigation

6.99 Mitigation in relation to the potential negative effects identified by the SA of site options has already been discussed under SA objectives 2, 4 and 7 above.

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

6.100 Site options were appraised against SA 14: Biodiversity Development by consideration of their proximity to designated wildlife sites and habitats and related zones within which impacts on internationally and nationally designated sites may occur. Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity of those sites, for example through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be

determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.101 Approximately 40% of employment site options were appraised as having significant negative effects and all but one of the remaining sites having minor negative effects. One site adjacent to Lenham had negligible effects in relation to this SA objective. Sites were mainly identified as having significant negative effects because they were close to/ within the impact risk zone of more than one category of designated wildlife site (internationally/ nationally designated; locally designated) or close to one of these categories and also within an area of Priority Habitat. Approximately 25% of all employment site options, however, were scored significant negative because they actually overlap with a locally designated wildlife site or area of ancient woodland, although the extent of overlap was very small in a number of instances.

Mitigation

6.102 If any of the site options that overlap a locally designated wildlife site or area of ancient woodland are taken forward for allocation, the Council should carefully consider whether (in some cases minor) changes to site boundaries are required to ensure compliance with statutory and NPPF requirements for biodiversity conservation. In terms of the other negative effects identified by the appraisal of site options, avoidance of development in areas with the potential to negatively affect areas of high biodiversity value and identification and safeguarding of ecological networks would provide the best mitigation. Additionally, Local Plan policy should be put in place to ensure biodiversity net gain is achieved on each development site or losses are offset elsewhere within the Borough where this is not feasible.

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

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

6.104 The proximity tests used in the SA of the Local Plan site allocations are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of separate evidence in the form of a historic environment sensitivity study or similar they are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.105 Almost all employment site options were identified as having significant negative effects with uncertainty, indicating that they are close to at least one designated heritage asset. Small numbers of sites scored minor negative with uncertainty due to being more distant from the nearest heritage asset, or negligible with uncertainty due to being relatively remote from any such assets.

Mitigation

6.106 Avoidance of development that could result in harm to the significance of heritage assets, including their setting, would provide the best mitigation. Judgements on whether residential site allocations in different areas of the Borough are likely to be able to avoid such effects would best be informed by a historic environment sensitivity study or similar evidence. Where residual risks are likely, it may be possible to avoid significant negative effects via site-specific requirements in relation to site layout and development design.

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

6.107 The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of employment site options in relation to SA objective 16: Landscape. Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils. Further details on the approach to appraisal of site options against this SA objective are provided in **Table A2** in **Appendix A**.

6.108 Significant negative effects were identified for approximately 70% of employment site options, indicating that

at least part of the site is within an area of high[108] landscape sensitivity. This reflects the fact that a large proportion of the Borough has been assessed as having high landscape sensitivity. Most of the remaining employment site options fell within areas of low landscape sensitivity and were scored as having negligible effects; most of these sites were in Maidstone Town Centre. The few remaining sites scored minor negative against this SA objective.

Mitigation

6.109 Avoidance of development within the areas of highest landscape sensitivity to development would provide the best mitigation. However, outside of Maidstone Urban Area the generally high sensitivity of the landscape will make this difficult to achieve. In these sensitive areas, Local Plan policy requirements for development site layouts and development design that seek to reduce adverse effects on the landscape could be implemented to mitigate potential negative effects.

[108] Or 'very' high' sensitivity if the site was within one of the landscape character areas not assessed by the 2015 Landscape Capacity Study, necessitating reliance on the earlier 2013 study

Chapter 7
Cumulative effects

Introduction

7.1 4.1 It is a requirement of the SEA Regulations to identify cumulative effects. With respect to the Maidstone Local Plan, these can be divided into two categories:

- The total effects of the policies in the Local Plan as a whole.
- The cumulative effects of the Local Plan with development proposed in other plans or projects covering Maidstone Borough and the surrounding area.

Total effects of the policies in the Local Plan

7.2 The purpose of this part of a cumulative effects assessment is to consider how the Local Plan policies inter-relate with one another, either to result in effects that are greater than those identified for individual policies, or alternatively for the effects of one or more policies to offset the effects identified for other policies.

7.3 The sustainability effects of the Maidstone Local Plan as a whole will be considered at a later stage of the plan-making process, once a full draft of the Plan has been prepared and subject to SA.

Cumulative effects with development proposed by other relevant plans and projects

7.4 Development proposed in the Local Plan will not be delivered in isolation from development proposals in other plans and projects covering Maidstone Borough and the surrounding area. This section outlines the development proposed by nationally significant infrastructure projects, plans covering Kent county as a whole, and the Local Plans of the five neighbouring authorities which may combine with the Maidstone Local Plan to produce cumulative effects.

Nationally significant infrastructure projects

7.5 The following nationally significant infrastructure projects are identified within Maidstone Borough on the National Infrastructure Planning website[109]:

Extension to Allington Energy from Waste Facility

7.6 Extension of an existing energy generating station at Allington, close to the north-west boundary of Maidstone urban area. to process circa 910,000tpa of residual non-hazardous waste in total, with a total gross electrical generating capacity of circa 72.5MW. The application is not expected to be submitted to the Planning Inspectorate until October 2020 therefore no environmental impact assessment (EIA) is available yet. The EIA Scoping Report[110] proposed that the following topics be scoped into the EIA:

- cultural heritage;
- landscape and visual;
- geology, hydrogeology, contaminated land and ground stability;
- ecology;
- surface water, flood risk and drainage;
- air quality and odour;
- noise;
- transport;
- socio economics;
- health; and
- climate change.

7.7 The Inspectorate's Scoping Opinion[111] additionally recommended that Risk of Major Accident Events should be included in the EIA.

Potential for cumulative effects with Nationally significant infrastructure projects

7.8 The extension to Allington Energy from Waste Facility close to the north-west boundary of Maidstone urban area may result in cumulative effects with development proposed by the Maidstone Local Plan, particularly development in the centre, north and north-east of Maidstone town, such as at the Invicta Park Barracks site. Types of cumulative effect could include water quality in the River Medway; air quality, including from increased road traffic on the nearby M20 and A20; noise and vibration; biodiversity; and landscape and visual amenity. There is uncertainty in relation to this, given that the environmental impact assessment for this project has not yet been submitted.

County level plans

7.9 At the county level, the main planning responsibilities are with respect to minerals and waste, and transport.

Kent Minerals and Waste Local Plan

7.10 The Kent Minerals and Waste Local Plan 2013-30[112] describes (1) the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent; and (2) the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning. Around half of the Borough is covered by Mineral Safeguarding Areas designated in the Minerals & Waste Local Plan. Geological mapping is used to indicate the likely existence of a mineral resource but it is possible that the mineral has already been extracted and/or that some areas may not contain any of the mineral resource being safeguarded. Nevertheless, the onus will be on promoters of non-mineral development to demonstrate satisfactorily at the time that the development is promoted that the indicated mineral resource does not actually exist in the location being promoted, or extraction would not be viable or practicable under the particular circumstances.

Kent Local Transport Plan

7.11 Kent County Council's Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031[113] sets out Kent County Council's Strategy and Implementation Plans for local transport investment for the period 2011-31. Transport priorities for Maidstone include the following:

- M20 Junctions 3-5 'smart' (managed) motorway system.
- Maidstone Integrated Transport Package, including M20 Junction 5 and north-west Maidstone improvements.

[109] https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/
[110] FCC Environment (2019) Proposed Extension to the Existing Allington Energy from Waste Generating Station, Kent – EIA Scoping Report [online] Available from: https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/?ipcsection=docs
[111] The Planning Inspectorate (2019) SCOPING OPINION: Proposed Extension to the Existing Allington Energy from Waste Generating Station [online) https://infrastructure.planninginspectorate.gov.uk/projects/south-east/extension-to-allington-energy-from-waste-facility/?ipcsection=docs
[112] Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30 [online] Available at: https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1
[113] Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

- Thameslink extension to Maidstone East by 2018 giving direct services to the City of London.
- A229/A274 corridor capacity improvements.
- Public transport improvements on radial routes into town.
- Leeds and Langley Relief Road.
- M20 Junction 7 improvements.
- Bearsted Road corridor capacity improvements.
- Public transport improvements (redevelop Maidstone East, refurbish Maidstone bus station, and bus infrastructure improvements).
- Maidstone walking and cycling improvements.
- Junction improvements and traffic management schemes in the Rural Service Centres.

Potential for cumulative effects with County level plans

7.12 The Maidstone Local Plan has the potential to combine with proposals in the Kent Minerals and Waste Local Plans to generate cumulative negative effects within the Maidstone area, for example in relation to SA9: Soils, SA11: Air quality, SA14: Biodiversity, SA15: Historic environment, and SA16: Landscape.

7.13 The SEA of the Minerals and Waste Local Plan did not identify any significant negative effects, however there remains an ongoing debate related to the potential for impacts to the Kent Downs AONB from silica and sand extraction, in addition to some uncertainty around the landscape/biodiversity implications of making provision for both sand and sharp sand/gravel landbanks, which is relevant to SA14: Biodiversity and SA16: Landscape. All effects identified were positive.

7.14 Given that many of the development growth areas delivered through the Maidstone Local Plan would areas where mineral resources have been identified, there is potential for these to be sterilised, resulting in cumulative negative effects at the strategic scale. However, it may be possible to adopt a phased approach, where economically viable, to recover mineral resources prior to the delivery of economic and housing development.

7.15 The Kent Local Transport Plan is designed to deliver the transport solutions required to support development delivered through Local Plans in Kent, while also addressing existing transport challenges and issues, including improving the public transport network to deal with Kent's ageing population and greater reliance on public transport. Specific mention is made of the need to ease congestion and disruption along Kent's motorway network, in addition to the need to improve bus and rail services to support the ageing population and the growing commuter demand.

7.16 Many of these enhancements are already described in the Council's Local Plan Topic Papers and reflected in assumptions about what would be provided under different spatial strategy options that have been appraised by the SA. Other potential cumulative effects can be identified with greater certainty once the Council's preferred approach is worked in more detail in the form of a draft Local Plan.

Neighbouring authorities' Local Plans

7.17 Maidstone Borough is adjoined by the neighbouring local authorities of Medway, Swale, Ashford, Tunbridge Wells, and Tonbridge and Malling. The main development proposed by their respective strategic Local Plans is summarised below.

Medway Local Plan

7.18 The Medway Local Plan was adopted in 2003[114]. Since the new Local Plan has not yet been published for Regulation 19 consultation on a Proposed Submission version, only the adopted plan has been reviewed.

7.19 The LDP set out to deliver 13,000 dwellings between 1991 and 2006, with a focus on maximising the use of previously developed land within the urban area.

7.20 The Medway Local Plan identifies a target of creating 11,000 jobs in four main sectors: financial and business services, high technology manufacturing, transport and distribution and other key sectors including retail, education and construction.

7.21 The main development opportunities have been identified at the following locations:

- Chatham;
- Maritime;
- Rochester Riverside;
- Gillingham Business Park; and
- Frindsbury Peninsula

Swale Local Plan

7.22 Swale Borough Council adopted its Local Plan in 2017[115].

[114] Medway Council (2003) Medway Local Plan 2003 [online] Available at: https://www.medway.gov.uk/info/200149/planning_policy/146/current_planning_policies/3

[115] 6.15 Swale Borough Council (2017) Bearing Fruits 2031 – The Swale Borough Local Plan [online] Available from: https://www.swale.gov.uk/local-plan-for-swale/

7.23 The Local Plan sets out to deliver a minimum of 13,192 dwellings between 2014 and 2031 (776 per annum, 190 required as affordable dwellings).

7.24 Key locations proposed for development are:

- Sittingbourne;
- West Sheppey; and
- Faversham

7.25 Particular focus for growth in the Borough is within Sittingbourne since it is the largest settlement with strong opportunities for urban regeneration, employment and new services.

7.26 In rural areas, growth within the Borough will be focused in Rural Local Service Centres, with development providing local housing employment needs for their home and surrounding communities, while supporting existing and new services.

7.27 The Local Plan also sets out to deliver an estimated 10,900 jobs between 2014 and 2031, with most of the job growth anticipated to occur in retail, services, health and education, requiring 60 hectares on new employment land.

Ashford Local Plan

7.28 Ashford Borough Council adopted its Local Plan in 2019[116].

7.29 The Local Plan sets out to deliver 16,872 dwellings between 2011 and 2030. After taking into account the housing completions since 2011, this figure is reduced to 13,118 between 2018 and 2030.

7.30 The majority of the new housing development will occur within Ashford and its periphery, as the principal settlement of the borough and based on its access to a range of services and facilities. It is proposed that Ashford will 4,872 dwellings through new land allocations and existing commitments.

7.31 A proportion of new development will be directed to rural areas and will be of scale that is consistent with the relevant settlement's accessibility, infrastructure provision, site suitability and services available. It is proposed that these areas will contribute 1,017 dwellings.

7.32 The Local Plan also sets out to deliver 63 hectares of new employment land and a total of 11,100 jobs in the Borough between 2014 and 2030. This will be concentrated in and around Ashford town with the town centre on brownfield sites.

Tunbridge Wells Local Plan

7.33 Tunbridge Wells Borough Council adopted its Local Plan Core Strategy in 2010[117]. Since the new Local Plan has not yet been published for Regulation 19 consultation on a Proposed Submission version, only the adopted plan has been reviewed.

7.34 The Local Plan sets out to deliver 6,00 dwellings in the Borough between 2006 and 2026, with at least 65% of all housing development within this period to be delivered on previously developed land.

7.35 It is anticipated that 70% of new housing will be delivered in Royal Tunbridge Wells. Other key locations proposed for development are:

7.36 Southborough;

7.37 Paddock Wood;

7.38 Cranbrook; and

7.39 Hawkhurst.

7.40 A small proportion (6%) of new development will also be directed to villages and rural areas to support rural housing needs and local services and facilities.

7.41 Employment provision will be achieved by maintaining the overall net amount of employment floorspace across the Borough, the encouragement of new floorspace in Key Employment Areas and through the intensification or redevelopment of existing sites. The Key Employment Areas are defined as follows:

- Royal Tunbridge Wells Town Centre;
- Royal Tunbridge Wells, North Farm/Longfield Road Industrial Area;
- Paddock Wood;
- Gills Green, former Hawkhurst Railway Station and sidings; and
- Capel, Brook Farm.

Tonbridge and Malling Local Plan

7.42 Tonbridge and Malling Borough Council submitted its Local Plan for Examination in 2019[118].

[116] Ashford Borough Council (2019) Ashford Local Plan 2030 [online] Available from: https://www.ashford.gov.uk/planning-and-development/planning-policy/adopted-development-plan-documents/adopted-local-plan-to-2030/

[117] Tunbridge Wells Borough Council (2010) Tunbridge Wells Borough Core Strategy DPD [online] Available from: https://beta.tunbridgewells.gov.uk/planning/planning-policy/existing-local-plans/core-strategy

[118] Tonbridge and Malling Borough Council (2019) Tonbridge & Malling Borough Council Local Plan Regulation 22 Submission [online] Available from: https://www.tmbc.gov.uk/services/planning-and-development/planning/planning-local-plans/local-plan-reg-19-consultation

7.43 The Local Plan sets out to deliver 13,920 dwellings between 2011 and 2031 (696 per annum). The strategic housing market assessment also identified that the need for affordable housing was 277 dwellings per annum. Five strategic allocations have been identified for residential development. These are:

- Bushey Wood, Eccles;
- South Aylesford;
- Borough Green Gardens;
- Broadwater Farm, north of Kings Hill; and
- South-West Tonbridge.

7.44 Provisions is made for a net increase of around 38.5ha of employment land, as identified by the Council

Potential for cumulative effects with Neighbouring authorities' Local Plans

7.45 The five districts surrounding the Maidstone Borough are relatively rural, with Maidstone being the major town of the Borough, accounting for approximately 70% of its total population.

7.46 All Local Plans, whether adopted or in the process of preparation, provide for both increases in housing supply as well as job creation. Cumulative significant positive effects with the Maidstone Local Plan are likely in relation to SA1: Housing, SA5: Economy and SA6: Maidstone Town Centre, reflecting the significant amounts of residential and employment development to be provided across the wider area. Cumulative significant negative effects could occur on the environment, for example with respect to SA14: Biodiversity, SA15: Historic Environment, and SA16: Landscape.

7.47 The increased development in neighbouring authorities is also likely to combine with the development proposed in the Maidstone Local Plan to lead to increased traffic, which in turn could increase air pollution, and carbon emissions, with cumulative significant negative effects in relation to SA11: Air Quality and SA13: Climate Change. To a certain extent this would happen wherever development takes place and to mitigate this, the Local Plans aim to support sustainable transport modes and energy efficiency in built development. Whether this leads to a marked shift to the use of sustainable transport modes is difficult to predict, and therefore the cumulative effects on these SA objective and on SA7: Active and sustainable travel behaviour are uncertain. However, the development proposed in the Local Plans should, in combination, provide support for additional services and investment in infrastructure, resulting in a cumulative minor positive effect against SA2: Access to essential services and facilities, which could also help to address carbon emissions.

7.48 The cumulative effects on SA3: Community cohesion are difficult to predict but are likely to be mixed, with some existing and new communities and their services and facilities strengthened by additional development and others having their character and sense of identity adversely affected.

7.49 The cumulative effects on SA4: Health are also likely to be mixed. The provision of new homes, especially sustainably constructed and affordable homes, and new employment opportunities through the Maidstone Local Plan and neighbouring authorities' Local Plans, together are likely to result in cumulative significant positive effects, but there could be temporary adverse effects on health during construction disturbance, and potentially through increased noise, light and air pollution from new development.

7.50 There is the potential for cumulative negative effects on SA10: Water resources and quality and SA12: Flood risk arising from the in-combination demands of new development for water supply and treatment and increased urban run-off. However, these will have been planned for through Water Resource Management Plans, and through policies designed to avoid and reduce the risk of flooding

7.51 Many of the identified cumulative effects at a sub-regional scale are likely to be concentrated within and around the larger settlements and along the strategic transport corridors such as the M20. In addition, a number of the locations targeted for large-scale growth by neighbouring plans are close the Maidstone Borough border, increasing the potential for more localised cumulative effects. Examples include South Aylesford in Tonbridge and Malling, Chatham and Gillingham Business Park in Medway, Sittingbourne in Swale, and Paddock Wood in Tunbridge Wells.

Chapter 8
Conclusions and next steps

Conclusions

SA of initial spatial strategy options

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

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

8.3 However, there would also be development with the rural areas of the Borough and as a result could lead to greater car dependency, as well as dispersed but potentially both localised and cumulative effects on environmental assets. In addition, option RA2a would also provide garden settlements which would be concentrated settlements, and they would depend upon the specific locations chosen.

8.4 At the time of appraisal there were four potential locations, and they vary in terms of their relationship with the town of Maidstone as well as smaller communities, and some are in more sensitive environmental locations than others. This is particularly important when introducing new settlement scale urban development into a rural landscape. Garden settlements, though, offer the opportunity to design-in from the outset a development that encourages energy and water efficiency, cycling and walking, and a sense of community. Set against this is the experience from elsewhere, which suggests that garden settlements can often be car dependent, despite best intentions, and can also have long lead-in times, which means that they can take a long time to develop a critical mass capable of supporting the range of jobs, services and facilities characteristic of a sustainable community. They could also divert homes and investment from elsewhere in the Borough for existing communities in need. Garden Communities, in principle, offer an attractive and potentially relatively sustainable solution to meeting the Borough's needs, but it is important that a realistic assessment of their

deliverability in practice underpins any decision, so that vision can genuinely be turned into reality.

SA of refined spatial strategy options

8.5 SA was undertaken of the following refined spatial strategy scenarios:

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

8.6 The SA found that:

- The scenarios that performed most strongly were Scenarios 3a-c (One garden settlement approaches). This is primarily because they would concentrate development where there is the greatest number and range of jobs, services and facilities, and the best opportunities to use sustainable modes of transport, including walking, cycling and bus, thereby also helping to reduce air pollution and greenhouse gas emissions. These scenarios would also provide a garden settlement, which offers the opportunity to design-in from the outset a development that encourages energy and water efficiency, cycling and walking, and a sense of community. Set against this is the experience from elsewhere however, suggests that garden settlements can often be car dependent, despite best intentions, and can also have long lead-in times, which means that they can take a long time to develop a critical mass capable of supporting the range of jobs, services and facilities characteristic of a sustainable community. They could also divert homes and investment from elsewhere in the Borough for existing communities in need. Garden settlements, in principle, offer an attractive and potentially relatively sustainable solution to meeting the Borough's needs but it is important that a realistic assessment of their deliverability in practice underpins any decision, so that the vision can genuinely be turned into reality. The top-down appraisal of refined spatial strategy options found little difference between Scenarios 3a, 3b and 3c – the individual appraisals of the three garden settlements should be referred to in order to understand their relative sustainability merits.
- Scenario 1 (Local Plan 2017 Continued) also performs relatively well because development would be distributed based on the settlement hierarchy with the focus on Maidstone urban area then to the Rural Service Centres and then Countryside. Therefore, it would also concentrate development where there is the greatest number and range of jobs, services and facilities, where there are the best opportunities to use sustainable modes of transport, including walking, cycling and bus, thereby also helping to reduce air pollution and greenhouse gas emissions. However, the remaining development would be focused within the rural areas of the Borough which are more likely to lie within areas of higher landscape and biodiversity value.
- Scenarios 2a-c (Two garden settlement approaches) performed least well. They are expected to have similar effects to those described above for Scenarios 3a-c with regard to garden settlements. However, these options would provide two garden settlements instead of one, therefore the negative effects associated with the garden settlements are intensified for these options. In addition, the majority of development would be provided at the garden settlements and then targeted at the Rural Service Centres, the Countryside and lastly Maidstone urban area. As such, there is a risk that the additional development will be provided in areas of higher landscape and biodiversity value, similar to Scenario 1.

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

SA of garden settlement options

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

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

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

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

8.12 In relation to SA objective 5: Economy, all of the garden settlement options propose significant areas of land for economic uses and the information provided by MBC summarised in **Table 5.1** sets out an ambition of one on-site job for every house. However, only the Lidsing proposal currently includes sufficient employment provision to achieve this ambition in the form of a 20Ha business park.

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

8.14 Considering environmental SA objectives (sustainability objectives 9-16), there were fewer differences between the SA scores for the three garden settlement options. The only sustainability objective against which the options were given different scores was SA 12: Flooding. For this, Lidsing and North of Marden performed better than Heathlands because the extent of land with a relatively high flood risk was small for both of these sites.

8.15 Notwithstanding the differences between the sustainability performance of the garden settlement options highlighted above, many of the SA findings at this stage are subject to considerable uncertainty. Many aspects of the actual sustainability performance of any garden settlements that are taken forward in the Local Plan will depend on the extent to which garden community principles such as sustainable access to jobs, education, and services and delivery of environmental net gains can be delivered in practice. The uncertainties and the types of mitigation that could improve the sustainability of the garden settlement options have been described in **Chapter 5**.

8.16 Although Lidsing was appraised as being most sustainable across the range of SA objectives, potential significant negative effects (sometimes mixed with more positive effects) were nevertheless identified in relation to six SA objectives - SA objective 4: Health; SA objective 9: Soils; SA objective 13: Climate change; SA objective 14: Biodiversity; SA objective 15: Historic environment; and SA objective 16: Landscape. Whichever of the garden settlement options is taken forward, it will be important to further investigate the potential negative sustainability effects highlighted by the SA and to ensure that they are avoided or reduced as far as possible, including by reference to the potential mitigation outlined in **Chapter 5**.

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

SA of site allocation options

8.18 Over 200 potential residential site allocation options and over 50 employment site options were subject to SA. The SA scores for individual sites and summaries of the sustainability performance of the appraised sites in relation to each SA objective have already been provided. Some general patterns

are apparent in relation to the overall sustainability performance of the site options, as follows:

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

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

8.20 Although a number of sites are anticipated to result in positive effects, a large number of potentially negative effects have been identified for many of the sites. This is not surprising, as they will require land take, often of greenfield land, potentially placing pressure on biodiversity and potentially other environmental assets such as best and most versatile agricultural land. The large number of historic assets across the Borough, the high sensitivity of much of its landscape, and the wide extent of zones designed to protect drinking water quality also mean that many potential locations have the potential to have negative effects in relation to these environmental assets. Also, the rural nature of much of the Borough means that development in many locations is likely to result in increased car use, and associated carbon emissions and air pollution.

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

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

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

8.24 Having identified some broad patterns in the findings, it should be noted that there are also sites that do not follow the general pattern. For example, many sites in that part of Maidstone Urban Area outside of the Town Centre do not perform particularly well. Reasons for this may include that the larger service centres of both the Town Centre and Rural Service Centres are too far away to walk to, the site is within an area of poor air quality associated with major roads, or the site occupies a pocket of greenfield land within the urban area or close to environmental assets. Similarly, some of the sites in Rural Service Centres, Larger Villages, and the Countryside perform well, for example because they are close to a service centre and avoid many environmental assets.

8.25 The site option appraisals serve to highlight the different types of significant sustainability effect that could occur as a result of allocating sites in different locations for residential

development or for employment development and to indicate how these might be mitigated, thereby informing development of a more sustainable plan. When the Council comes to select its preferred sites for allocation, performance against the SA's site appraisal criteria should therefore be taken into account. However, SA is not a decision-making tool and can only aid this process. Local priorities will influence the weight that is attached to different sustainability issues considered by the SA as well as to sustainability or wider planning matters beyond the scope of the SA of site options.

Next steps

8.26 The Council will consider the options appraisals within this report alongside other technical evidence to inform its decision-making on the preferred approaches to be taken forward in the Maidstone Local Plan.

8.27 Once a complete Regulation 18b consultation draft of the Local Plan has been produced, it will be subject to further SA and the findings for the proposed approach presented alongside the appraisals of reasonable alternatives currently contained in this report so that they can be compared. The SA Report at that stage will also document how the Council took account of the SA findings, alongside other considerations, in deciding on its proposed approach, as well as meeting the other reporting requirements of the SEA Regulations.

8.28 Regulation 18b consultation will take place in December 2020, and this will bring together the work undertaken to date through a Draft Plan. The consultation period is expected to last for three weeks.

8.29 Following this consultation, comments will be reviewed before being fed into the plan, which will go out to Regulation 19 consultation in June 2021.

8.30 It is expected that submission of the plan will take place in December 2021.

LUC

November 2020

Appendix A

Site appraisal criteria

Table A.1: Appraisal criteria for sites considered for residential use

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
SA objective 1: Housing - To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home							
SA objective 1: Housing was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to this SA objective relates to factors such as its ability to deliver the right types and tenures of housing at prices that people can afford, as well as addressing the needs of specialist groups. These factors do not depend on the location of the site and are taken into account by the SA through appraisal of any Local Plan policies such as the total quantum of housing to be provided, the mix of housing types and tenures, affordable housing requirements, and design.							
SA objective 2: Services & facilities - To ensure ready access to essential services and facilities for all residents							
The effects of site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities, and to employment. Access to open space was considered under SA objective 4: Health and not repeated here. Accessibility scores for most services and facilities were based on walking distances. People often travel much longer distances to access employment than other services and facilities, however, and there is no guarantee that a major employment site close to where people live will offer jobs that are suited to those local residents. To appraise access to employment, reference was made to Census data indicating the main commuting destinations from each Middle-layer Super Output Area (MSOA) in the Borough. Residential development in areas with relatively low average commuting distances were rated as having better access to employment than residential development in areas with high average commuting distances.							
2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	Each criterion is scored: • Major positive +3 • Minor positive +1 • Negligible 0 • Minor negative -1 • Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	**GP surgeries** Excludes opticians, pharmacies, hospitals, any private healthcare facilities
2b Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,201m from primary or middle school	>1,200m from primary or middle school		**Primary and middle schools** Latter category may not be present; excludes private schools
2c Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school		**Secondary schools** Excludes private schools
2d Maidstone town centre	<=400m from town centre	401-800m from town centre	N/A	801-1,201m from town centre	>1,200m from town centre		**Town centres** Maidstone only **-** boundary provided by MBC
2e Rural Service Centres	<=200m from retail centre of Rural Service Centre	201-400m from retail centre of Rural Service Centre	N/A	401-800m from retail centre of Rural Service Centre	>800m from retail centre of Rural Service Centre		**Retail centres within Rural Service Centres** (Marden, Staplehurst, Headcorn, Lenham, Harrietsham - boundaries provided by MBC)
2f Employment	Sites in areas where average commuting distance is in lowest 20% of distances for the Borough	Sites in areas where average commuting distance is in 20-40% range for the Borough	Sites in areas where average commuting distance is in 40-60% range for the Borough	Sites in areas where average commuting distance is in 60-80% range for the Borough	Sites in areas where average commuting distance is in 80-100% range for the Borough		**2011 Census travel to work data** Relative performance to be confirmed once distribution of commuting distances from the Borough is known
SA objective 3: Community - To strengthen community cohesion							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
SA objective 3: Community was scoped out of the appraisal of residential site options. Performance of the Local Plan in relation to these SA objective relates to factors such as its ability to deliver development that integrates well with existing neighbourhoods, that meets the needs of specific groups, that will benefit both new residents and existing ones, that is designed to provide spaces for informal interaction, and that is designed to reduce crime and the fear of crime. These factors will be taken into account by the SA through appraisal of development management policies and site-specific requirements set out in allocation policies.							
SA objective 4: Health - To improve the population's health and wellbeing and reduce health inequalities The effects of site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of noise pollution) or positive (e.g. access to open space) effects on health and well-being. Footpath and cycle path networks are more likely to constitute a recreational resource if they are in or easily link to rural areas but those in urban areas may be important for commuting by active modes therefore both were considered. Many other factors within the scope of the Local Plan could affect achievement of this SA objective but these were tested by other site assessment criteria to which they more directly relate (e.g. access to healthcare facilities is tested under SA objective 2: Services & facilities and not repeated here) and by the SA of Local Plan policies (for instance in relation to provision of new or enhancement to existing healthcare facilities, open spaces, and sports and recreation facilities).							
4a AQMAs	N/A	N/A	All other sites	N/A	Site located within an AQMA	Each criterion is scored: • Major positive +3 • Minor positive +1 • Negligible 0 • Minor negative -1 • Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	**Air Quality Management Areas**
4b Road and rail noise	N/A	N/A	All other sites	Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB		**Strategic noise mapping**
4c Odour from waste facilities	N/A	N/A	All other sites	N/A	<=400m to wastewater treatment works or established safeguarding zone, or <=250m to waste management facility		**Waste water treatment works** **Waste management facilities**
4d Open space	<=300m from open space, sport, recreation facility, open country, or registered common land	301-800m from open space, sport, recreation facility, open country, or registered common land	N/A	801-1,200m from open space, sport, recreation facility, open country, or registered common land	>1,200m from open space, sport and recreation facility OR Loss of open space, sport, recreation facility, open country and registered common land		**Open spaces** (existing or allocated in Local Plan 2017) **Sport & recreation facilities** **Open country** **Registered common land**

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
4e Public Rights of Way (PRow) / Cycle Paths	<=200m from PRoW / Cycle Paths (assumed that paths running through development sites will be retained or diverted around the site boundary)	201-400m from PRoW / Cycle Paths	N/A	401-800m from PRoW / Cycle Paths	>800m from PRoW / Cycle Paths		**PRoW** **Cycle paths** (no data available for local cycle network so limited to national network)
SA objective 5: Economy - To facilitate a sustainable and growing economy Most factors relating to SA objective 5: Economy were scoped out of the appraisal of residential site options. Site options for employment use were the subject of a separate appraisal, guided by an amended version of the appraisal criteria for residential sites. The accessibility of residential sites to employment opportunities was addressed under SA objective 2. The provision of new homes across the plan area will create job opportunities, particularly during the construction phase but this will not vary between site locations and was scoped out of the site assessment. Performance of the Local Plan as a whole was appraised in relation to its ability to deliver sufficient employment land for different use classes that address evidenced need in different parts of the Borough, as well as how well it addresses more modern working practices such as remote/home working or the needs of smaller start-up businesses. These factors do not depend on the location of the site and were taken into account by the SA through appraisal of strategic and development management policies, as well as site-specific requirements set out in employment land allocation policies. The exception is that potential negative effects were identified where allocation of a residential site would lead to loss of an existing employment use.							
5a Employment land	N/A	N/A	All other sites	N/A	Site in existing employment use	If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative. All other sites have a negligible effect vs. the SA objective.	**Existing use** Source: MBC officer assessment
SA objective 6: Town centre - To support vibrant and viable Maidstone town centre The allocation of residential development in or close to Maidstone town centre could have positive effects by providing more demand for nearby town centre uses or negative effects by preventing or resulting in the loss of existing town centre uses. The information was not available to appraise individual site allocations on this basis. Instead, the SA of the Local Pan in relation to SA objective 6: Town centre considered whether policies encourage an appropriate mix of residential, office, retail, leisure, and community uses, as well as other factors set out in the SA framework that are unrelated to residential site allocations. SA objective 6 was therefore scoped out from the appraisal of residential site options.							
SA objective 7: Sustainable travel - To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion The effects of site allocations in relation to SA objective 7: Sustainable travel will partly depend on reducing the need to travel by ensuring that they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities.							
7a Railway stations	<= 500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion is scored: • Major positive +3 • Minor positive +1 • Minor negative -1	**Railway Stations**
7b Bus stops	<= 300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop		**Bus Stops**

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
7c Cycle paths	<= 200m of a cycle path	201-400m of a cycle path	N/A	401-800m of a cycle path	>800m of a cycle path	• Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	**Cycle paths** (no data available for local cycle network so limited to national network)
SA objective 8: Minerals - To conserve the Borough's mineral resources Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either prevent future mineral extraction or delay delivery of housing until extraction is complete and land has been remediated (note that only one Mineral Consultation Area is defined in Kent and it is not in Maidstone Borough). Allocating residential development close to active mineral extraction sites could result in negative effects on amenity due to noise, vibration, dust, and road traffic associated with extraction. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of residential sites to relevant mineral resources.							
8a Minerals safeguarding	N/A	N/A	All other sites	Site is within a Mineral Safeguarding Area OR within 250m of a Safeguarded Mineral Site	N/A	If the criterion scores minor negative then the significance of the effect of the site vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	**Mineral Safeguarding Areas** **Safeguarded Mineral Sites** Source: Kent Minerals & Waste Local Plan 2019
SA objective 9: Soils - To conserve the Borough's soils and make efficient and effective use of land Prioritisation of previously developed land over greenfield sites was assumed to have a positive effect in relation to this SA objective. Potential harm to soil quality through the development of greenfield land was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. The classification is based on the long-term physical limitations of land for agricultural use; factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Data to subdivide the agricultural land into grades 3a and 3b were not available for Maidstone Borough therefore these grades were considered together.							
9a Greenfield land	Existing status of site is brownfield	N/A	N/A	Site is currently a mix of greenfield and brownfield	Existing status of site is greenfield	If any of the criteria score major negative then the significance of the effect of the site vs. the SA objective is significant negative.	**Brownfield vs. greenfield site status** Source: MBC officer assessment
9b Agricultural Land	N/A	N/A	All other sites	Site on Grade 3 agricultural land but	Site on Grade 1 or 2 agricultural land		**Agricultural Land Classifications**

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				not on Grades 1 or 2		If only one criterion scores minor negative then the significance of the effect is minor negative. All other sites have a negligible effect vs. the SA objective.	
SA objective 10: Water - To maintain and improve the quality of the Borough's waters and achieve sustainable water resources management Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies. Effects of development on water quality will partly depend on adoption of good practice site layout and construction techniques as well as the inclusion of sustainable drainage systems (SuDS) within the design; these factors will be considered in the SA of development management policies. Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local wastewater treatment works (WwTWs) or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options. Development could affect water quality in drinking water resources during construction or occupation. Source protection zones (SPZs) are areas designated to protect groundwater sources used for public drinking water supply. They relate to the risk of contamination of the water source from various activities, this increasing as the distance between the source of contamination and the groundwater abstraction point decreases. Drinking Water Safeguard Zones are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. Site options were appraised in relation to these zones.							
10a Drinking water quality	N/A	N/A	All other sites	Site falls within a Source Protection Zone 2 or 3 OR Site falls within a drinking water safeguard zone (groundwater) OR Site falls within a drinking water safeguard zone (surface water)	Site falls within a Source Protection Zone 1	If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative. If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	**Source Protection Zones** **Drinking Water Safeguard Zones**
SA objective 11: Air Quality - To reduce air pollution ensuring lasting improvements in air quality							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
The proximity of sites to Air Quality Management Areas (AQMAs) does not robustly test the potential for such sites to generate road traffic through AQMAs. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.							
SA objective 12: Flooding - To avoid and mitigate flood risk							
Residential development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. The Government's Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of Flood Zone 1 and 2 but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b. Surface water flooding occurs when intense rainfall overwhelms drainage systems. Groundwater flood risk can occur via permeable superficial deposits (PSD) (these generally occur in the flood plain, and can be mistaken for fluvial flooding), via high spring flows, and via high bedrock groundwater levels. Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design.							
12a EA Flood Risk Zones	N/A	N/A	All other sites	Site within Flood Zone 2	Site within Flood Zone 3	If any criterion scores major negative or two or more criteria score minor negative, the overall significance of the effect of the site vs. the SA objective is significant negative. If only one criterion scores minor negative, then the overall significance of the effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	**EA Flood Risk Zones 2 and 3** (split between Zone 3a and Zone 3b not available)
12b Surface water flood risk	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding		**Surface water flooding areas** (Environment Agency data 'Risk of Flooding from Surface Water (Basic)' identifies areas with a 1 in 100 years or greater risk of surface water flooding)
12c Groundwater flood risk	N/A	N/A	Groundwater levels are at least 5m below the ground surface or area is categorised as "no risk"	Groundwater levels are between 0.025m and 5m of the ground surface	Groundwater levels are either at or very near (within 0.025m of) the ground surface		**Groundwater flooding areas** Source: Strategic Flood Risk Assessment
SA objective 13: Climate change - To minimise the Borough's contribution to climate change							
SA 13: Climate change was appraised in relation to travel-related carbon emissions by reference to other appraisal criteria on access to services, employment, open space, and public transport. Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the residential site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies.							
13a Access to services, employment,	See criteria: 2a to 2f	See criteria: 2a to 2f	See criteria: 2a to 2f	See criteria: 2a to 2f	See criteria: 2a to 2f	Each criterion is scored: • Major positive +3 • Minor positive +1 • Negligible 0	**See data requirements for the constituent criteria**

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
open space, and public transport	4d 7a to 7c	4d 7a to 7c	4d 7a to 7c	4d 7a to 7c	4d 7a to 7c	• Minor negative -1 • Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	

SA objective 14: Biodiversity - To conserve, connect and enhance the Borough's wildlife, habitats and species

Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.

Impact Risk Zones (IRZs) defined by Natural England were used to appraise the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. IRZs define zones around each biodiversity site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Note that all SACs, SPAs, Ramsar sites and National Nature Reserves (NNRs) in England are also designated as SSSIs (although the SSSI boundary may extend beyond that of these other designations) therefore SSSIs were used as a proxy for all these designations in the SA. European sites are underpinned by the SSSI designation and their interest features and sensitivities are covered by the SSSI IRZs. Where the notified features of the European site and SSSI are different, the SSSI IRZs have been set so that they reflect both. "Residential" IRZs define unique scales of proposed housing development above which there is a potential for adverse impacts and this will be taken into account in the appraisal. The effects of the Local Plan as a whole and of preferred policies and site allocations on European sites were assessed by the separate Habitats Regulations Assessment.

A zone of influence of 250 m was assumed for all sub-nationally designated wildlife sites and ancient woodland, based on professional judgement.

Loss of open space is addressed under SA objective 4: Health.

No digital data were available to confirm the location of any Regional Important/Local Geological Sites so these were excluded from the appraisal.

14a Internationally and nationally designated biodiversity assets	N/A	N/A	All other sites	Intersects with relevant (to allocated housing capacity and/or to rural vs urban location) 'residential', 'rural residential' or 'all	Intersects with designated site	If any one of the criteria score major negative or two or more criteria score minor negative then the overall effect of the site vs. the SA objective is significant negative. If only one criterion scores	I**nternational and national wildlife and geological designations** covered by the extent of the UK's Sites of Special Scientific Interest (SSSIs). See Appendix 3 of IRZ Guidance for further guidance:

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				planning applications' IRZ		minor negative, then the overall effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	/Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf
14b Locally designated wildlife sites and ancient woodland	N/A	N/A	All other sites	<=250m from designated site boundary	Intersects with designated site		**Local Nature Reserves** **Local Wildlife Sites** **Ancient Woodland**
14c Priority Habitat Inventory (PHI) habitat	N/A	N/A	All other sites	Intersects with habitat	N/A		**Priority Habitat Inventory**

SA objective 15: Historic environment - To conserve and/or enhance the Borough's historic environment

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

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

15a Proximity to historic assets: ***sites within existing settlements***	N/A	N/A	All other sites	101-250m	<=100m	One criterion for every site (either rural or urban) therefore criteria effects correspond directly to significance scores. However, all effects to acknowledge uncertainty (?) in the absence of a heritage impact assessment: • Major negative = --? • Minor negative = -? • All other = 0?	**Settlement boundaries** **Scheduled Monuments** **Listed Buildings** **Registered Parks and Gardens** **Conservation Areas** **Areas of Archaeological Potential** Not present in study area: Protected Wreck Sites; Registered Battlefields; World Heritage Sites
15b Proximity to historic assets: ***sites outside of existing settlements***	N/A	N/A	All other sites	501-1000m	<500m		

SA objective 16 Landscape - To conserve and enhance the character and distinctiveness of the Borough's settlements and landscape

The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of residential sites vs. SA objective 16: Landscape.

Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils.

16a Sensitive landscapes	N/A	N/A	Site contains landscape of "low" sensitivity or landscape was not included in sensitivity study as	Site contains landscape of "moderate" sensitivity but not landscape of "high" sensitivity	Site contains landscape of "high" sensitivity	If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative.	**Landscape sensitivity** Source: Landscape Capacity Study 2015 (a small number of LCAs containing site options were scoped out of the 2015 study - sensitivity

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
			it is in Maidstone urban area			If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	ratings per 2013 study were used for these)

Table A.2: Appraisal criteria for sites considered for employment use

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
SA objective 1: Housing - To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home							
SA objective 1: Housing was scoped out of the appraisal of employment site options as it is not relevant to employment use.							
SA objective 2: Services & facilities - To ensure ready access to essential services and facilities for all residents							
The effects of site options in relation to SA objective 2 were tested by analysis of their proximity to essential services and facilities that may be accessed by employees during the working day. Access to open space was considered under SA objective 4: Health and not repeated here.							
2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	Each criterion is scored: • Major positive +3 • Minor positive +1 • Minor negative -1 • Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	**GP surgeries** Excludes opticians, pharmacies, hospitals, any private healthcare facilities
2d Maidstone town centre	<=400m from town centre	401-800m from town centre	N/A	801-1,201m from town centre	>1,200m from town centre		**Town centres** Maidstone only **-** boundary provided by MBC
2e Rural Service Centres	<=200m from retail centre of Rural Service Centre	201-400m from retail centre of Rural Service Centre	N/A	401-800m from retail centre of Rural Service Centre	>800m from retail centre of Rural Service Centre		**Retail centres within Rural Service Centres** (Marden, Staplehurst, Headcorn, Lenham, Harrietsham - boundaries provided by MBC)
SA objective 3: Community - To strengthen community cohesion							
SA objective 3: Community was scoped out of the appraisal of employment site options as it is not relevant to employment use.							
SA objective 4: Health - To improve the population's health and wellbeing and reduce health inequalities							
The effects of employment site options in relation to SA objective 4: Health were tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of air pollution) or positive (e.g. access to open space) effects on health and well-being of employees during the working day. In terms of negative determinants, employment sites were assumed to be less susceptible to environmental noise pollution than residential sites, therefore exposure to road and rail noise was scoped out. Footpath and cycle path networks are more likely to constitute a recreational resource if they are in or easily link to rural areas but those in urban areas may be important for commuting by active modes therefore both were considered. Many other factors within the scope of the Local Plan could affect achievement of this SA objective but these were tested by other site assessment criteria to which they more directly relate (e.g. access to healthcare facilities is tested under SA objective 2: Services & facilities and not repeated here) and by the SA of Local Plan policies (for instance in relation to provision of new or enhancement to existing healthcare facilities, open spaces, and sports and recreation facilities).							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
4a AQMAs	N/A	N/A	All other sites	N/A	Site located within an AQMA	Each criterion is scored: • Major positive +3 • Minor positive +1 • Negligible 0 • Minor negative -1 • Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	**Air Quality Management Areas**
4c Odour from waste facilities	N/A	N/A	All other sites	N/A	<=400m to wastewater treatment works or established safeguarding zone, or <=250m to waste management facility		**Waste water treatment works** **Waste management facilities**
4d Open space	<=300m from open space, sport, recreation facility, open country, or registered common land	301-800m from open space, sport, recreation facility, open country, or registered common land	N/A	801-1,200m from open space, sport, recreation facility, open country, or registered common land	>1,200m from open space, sport and recreation facility OR Loss of open space, sport, recreation facility, open country and registered common land		**Open spaces** (existing or allocated in Local Plan 2017) **Sport & recreation facilities** **Open country** **Registered common land**
4e Public Rights of Way (PRow) / Cycle Paths	<=200m from PRoW / Cycle Paths (assumed that paths running through development sites will be retained or diverted around the site boundary)	201-400m from PRoW / Cycle Paths	N/A	401-800m from PRoW / Cycle Paths	>800m from PRoW / Cycle Paths		**PRoW** **Cycle paths** (no data available for local cycle network so limited to national network)
SA objective 5: Economy - To facilitate a sustainable and growing economy							
All site options with the potential to deliver employment opportunities have the potential for positive effects in relation to SA objective 5: Economy.							
5a Employment land	N/A	All sites	N/A	N/A	N/A	A minor positive effect is recorded for all site options	**N/A**
SA objective 6: Town centre - To support vibrant and viable Maidstone town centre							
The allocation of use class A (shops, including some services such as professional services) or use class D (non-residential institutions, including many public services and entertainment/leisure) developments to Maidstone town centre would help to create a strong service offering that increases footfall for new and existing town centres uses, with positive effects on vibrancy and viability of the town centre.							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
6a Allocations for town centre uses in Maidstone Town Centre	Sites in Maidstone Town Centre considered for use classes A or D	N/A	Sites considered for other use classes and sites not in Maidstone Town Centre	N/A	N/A	If the criterion scores major positive then the significance of the effect of the site vs. the SA objective is significant positive. All other sites have a negligible effect vs. the SA objective.	**Uses for which site considered** Source: MBC officer assessment **Maidstone Town Centre** boundary Source: MBC
SA objective 7: Sustainable travel - To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion The effects of site allocations in relation to SA objective 7: Sustainable travel will partly depend on reducing the need to travel by ensuring that they are conveniently located for access to essential services and facilities and employment but these factors were already tested under SA objective 2: Services and facilities. Access to open space was considered under SA objective 4: Health. These factors are not repeated here. Instead, the site appraisal criteria for SA objective 7 considered access to public transport facilities.							
7a Railway stations	<= 500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion is scored: • Major positive +3 • Minor positive +1 • Minor negative -1 • Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	**Railway Stations**
7b Bus stops	<= 300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop		**Bus Stops**
7c Cycle paths	<= 200m of a cycle path	201-400m of a cycle path	N/A	401-800m of a cycle path	>800m of a cycle path		**Cycle paths** (no data available for local cycle network so limited to national network)
SA objective 8: Minerals - To conserve the Borough's mineral resources Mineral resources are essential to the construction industry. Allocating other land uses within Mineral Safeguarding Areas could either prevent future mineral extraction or delay delivery of development until extraction is complete and land has been remediated (note that only one Mineral Consultation Area is defined in Kent and it is not in Maidstone Borough). Allocating development close to active mineral extraction sites could result in negative effects on amenity due to noise, vibration, dust, and road traffic associated with extraction. Potential negative effects in relation to SA 8: Minerals were identified based on the proximity of employment sites to relevant mineral resources.							
8a Minerals safeguarding	N/A	N/A	All other sites	Site is within a Mineral Safeguarding Area OR within 250m of a	N/A	If the criterion scores minor negative then the significance of the effect of the site vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	**Mineral Safeguarding Areas Safeguarded Mineral Sites** Source: Kent Minerals & Waste Local Plan 2019

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				Safeguarded Mineral Site			

SA objective 9: Soils - To conserve the Borough's soils and make efficient and effective use of land

Prioritisation of previously developed land over greenfield sites was assumed to have a positive effect in relation to this SA objective.

Potential harm to soil quality through the development of greenfield land was assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. The classification is based on the long-term physical limitations of land for agricultural use; factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Data to subdivide the agricultural land into grades 3a and 3b were not available for Maidstone Borough therefore these grades were considered together.

9a Greenfield land	Existing status of site is brownfield	N/A	N/A	Site is currently a mix of greenfield and brownfield	Existing status of site is greenfield	If any of the criteria score major negative then the significance of the effect of the site vs. the SA objective is significant negative. If only one criterion scores minor negative then the significance of the effect is minor negative. All other sites have a negligible effect vs. the SA objective.	**Brownfield vs. greenfield site status** Source: MBC officer assessment
9b Agricultural Land	N/A	N/A	All other sites	Site on Grade 3 agricultural land but not on Grades 1 or 2	Site on Grade 1 or 2 agricultural land		**Agricultural Land Classifications**

SA objective 10: Water - To maintain and improve the quality of the Borough's waters and achieve sustainable water resources management

Effects of development on water resources were not appraised on a site by site basis; instead, support of the Local Plan for water efficient design of new development will be considered in the SA of development management policies.

Effects of development on water quality will partly depend on adoption of good practice site layout and construction techniques as well as the inclusion of sustainable drainage systems (SuDS) within the design; these factors will be considered in the SA of development management policies.

Development could affect surface water quality due to additional discharges of wastewater, for example because there is insufficient treatment capacity at the local wastewater treatment works (WwTWs) or because of nutrient enrichment issues in the receiving waters. These issues are generally managed at the catchment scale and were considered by the SA of the spatial strategy and policies on the amount of development to be delivered rather than for individual site options.

Development could affect water quality in drinking water resources during construction or occupation. Source protection zones (SPZs) are areas designated to protect groundwater sources used for public drinking water supply. They relate to the risk of contamination of the water source from various activities, this increasing as the distance between the source of contamination and the groundwater abstraction point decreases. Drinking Water Safeguard Zones are catchment areas that influence the water quality for associated Drinking Water Protected Areas that are at risk of failing drinking water protection objectives. Site options were appraised in relation to these zones.

10a Drinking water quality	N/A	N/A	All other sites	Site falls within a Source Protection Zone 2 or 3	Site falls within a Source Protection Zone 1	If the criterion scores major negative then the significance of the effect of the site vs. the	**Source Protection Zones** **Drinking Water Safeguard Zones**

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
				OR Site falls within a drinking water safeguard zone (groundwater) OR Site falls within a drinking water safeguard zone (surface water)		SA objective is significant negative. If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	

SA objective 11: Air Quality - To reduce air pollution ensuring lasting improvements in air quality

The proximity of sites to Air Quality Management Areas (AQMAs) does not robustly test the potential for such sites to generate road traffic through AQMAs. Furthermore, individual sites options are unlikely to significantly affect air quality. Instead, the Local Plan's spatial strategy options were appraised via qualitative consideration of potential movement patterns. Once a preferred spatial approach has been selected, any available transport and air quality modelling will be used to inform appraisal of the total effects of the Council's preferred spatial strategy and site allocations.

SA objective 12: Flooding - To avoid and mitigate flood risk

Development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. The Government's Planning Practice Guidance identifies most employment uses as a 'less vulnerable', which is suitable in areas of Flood Zone 1, 2 and 3a but would require an exception test in flood zone 3b.

Surface water flooding occurs when intense rainfall overwhelms drainage systems.

Groundwater flood risk can occur via permeable superficial deposits (PSD) (these generally occur in the flood plain, and can be mistaken for fluvial flooding), via high spring flows, and via high bedrock groundwater levels.

Other aspects of the Local Plan affecting flood risk will be assessed via the SA of development management policies, for example requirements to incorporate SuDS, or site-specific policies, for example requirements for flood-resilient design.

12a EA Flood Risk Zones	N/A	N/A	All other sites	Site within Flood Zone 3	N/A	If any criterion scores major negative or two or more criteria score minor negative, the overall significance of the effect of the site vs. the SA objective is significant negative. If only one criterion scores minor negative, then the overall	**EA Flood Risk Zone 3** (split between Zone 3a and Zone 3b not available)
12b Surface water flood risk	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding		**Surface water flooding areas** (Environment Agency data 'Risk of Flooding from Surface Water (Basic)' identifies areas with a 1 in 100 years or greater risk of surface water flooding)

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
12c Groundwater flood risk	N/A	N/A	Groundwater levels are at least 5m below the ground surface or area is categorised as "no risk"	Groundwater levels are in the 0.5m-5m or 0.025m-0.5m below ground surface range	Groundwater levels are either at or very near (within 0.025m of) the ground surface	significance of the effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	**Groundwater flooding areas** Source: Strategic Flood Risk Assessment

SA objective 13: Climate change - To minimise the Borough's contribution to climate change

SA 13: Climate change was appraised in relation to travel-related carbon emissions by reference to other appraisal criteria on access to services, employment, open space, and public transport.

Other aspects of this SA objective depend on factors such as the promotion of energy efficient design, water efficient design, and renewable energy development. These factors were scoped out of the appraisal of site options as they do not depend on the location of the site allocations and will be taken into account by the SA of development management policies and site-specific requirements set out in allocation policies.

13a Access to services, employment, open space, and public transport	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	See criteria: 2a, 2d, 2e 4d 7a to 7c	Each criterion is scored: • Major positive +3 • Minor positive +1 • Minor negative -1 • Major negative -3 Scores are totalled and then averaged (i.e. total score divided by number of criteria). The significance of the overall effect of the site vs. the SA objective is scored as follows: • Significant positive >= +2 • Minor positive >0 to <2 • Negligible 0 • Minor negative <0 to <-2 • Significant negative >= -2	**See data requirements for the constituent criteria**

SA objective 14: Biodiversity - To conserve, connect and enhance the Borough's wildlife, habitats and species

Development sites that are close to an international, national or local designated conservation site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, proximity to designated sites provides an indication of the potential for an adverse effect. Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.

Impact Risk Zones (IRZs) defined by Natural England were used to appraise the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. IRZs define zones around each biodiversity site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Note that all SACs, SPAs, Ramsar sites and National Nature Reserves (NNRs) are also designated as SSSIs therefore SSSIs were used as a proxy for all these designations in the SA. European sites are underpinned by the SSSI designation and their interest features and sensitivities are covered by the SSSI IRZs. Where the notified features of the European site and SSSI are different, the SSSI IRZs have been set so that they reflect both. The effects of the Local Plan as a whole and of preferred policies and site allocations on European sites were

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
assessed by the separate Habitats Regulations Assessment. A zone of influence of 250 m was assumed for all sub-nationally designated wildlife sites and ancient woodland, based on professional judgement. Loss of open space is addressed under SA objective 4: Health. No digital data were available to confirm the location of any Regional Important/Local Geological Sites so these were excluded from the appraisal.							
14a Internationally and nationally designated biodiversity assets	N/A	N/A	All other sites	Intersects with 'rural non-residential', 'air pollution', 'water supply', or 'all planning applications' IRZ	Intersects with designated site	If any one of the criteria score major negative or two or more criteria score minor negative then the overall effect of the site vs. the SA objective is significant negative. If only one criterion scores minor negative, then the overall effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	**International and national wildlife and geological designations** covered by the extent of the UK's Sites of Special Scientific Interest (SSSIs). See Appendix 3 of IRZ Guidance for further guidance: /Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf
14b Locally designated wildlife sites and ancient woodland	N/A	N/A	All other sites	<=250m from designated site boundary	Intersects with designated site		**Local Nature Reserves** **Local Wildlife Sites** **Ancient Woodland**
14c Priority Habitat Inventory (PHI) habitat	N/A	N/A	All other sites	Intersects with habitat	N/A		**Priority Habitat Inventory**
SA objective 15: Historic environment - To conserve and/or enhance the Borough's historic environment The NPPF states that the *"significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting"*. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect. The proximity tests used in the SA of the Local Plan site allocations are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.							
15a Proximity to historic assets: ***sites within existing settlements***	N/A	N/A	All other sites	101-250m	<=100m	One criterion for every site (either rural or urban) therefore criteria effects correspond directly to significance scores. However, all effects to acknowledge uncertainty (?) in the absence of a heritage impact assessment:	**Settlement boundaries** **Scheduled Monuments** **Listed Buildings** **Registered Parks and Gardens** **Conservation Areas** **Areas of Archaeological Potential** Not present in study area: Protected
15b Proximity to historic assets: ***sites outside of***	N/A	N/A	All other sites	501-1000m	<500m		

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Significance Scoring	Datasets & related notes
existing settlements						• Major negative = --? • Minor negative = -? • All other = 0?	Wreck Sites; Registered Battlefields; World Heritage Sites
SA objective 16 Landscape - To conserve and enhance the character and distinctiveness of the Borough's settlements and landscape The Council's Landscape Capacity Study (2015) included an assessment of the overall landscape sensitivity of each character area, based on both landscape character sensitivity and visual sensitivity. This overall landscape sensitivity formed the basis of the SA of employment sites vs. SA objective 16: Landscape. Conservation of open spaces was covered under SA objective 4: Health. Loss of countryside was covered under SA objective 9: Soils.							
16a Sensitive landscapes	N/A	N/A	All other sites	Site within landscape of "moderate" sensitivity	Site within landscape of "high" sensitivity	If the criterion scores major negative then the significance of the effect of the site vs. the SA objective is significant negative. If the criterion scores minor negative then the significance of the effect vs. the SA objective is minor negative. All other sites have a negligible effect vs. the SA objective.	**Landscape sensitivity** Source: Landscape Capacity Study 2015 (a small number of LCAs containing site options were scoped out of the 2015 study - sensitivity ratings per 2013 study were used for these)