

Maidstone Borough Council

Core Strategy 2011

Appendices

Regulation 25 Public Participation Consultation

9. Sustainability Appraisal

CORE STRATEGY APPENDIX 9

Sustainability appraisal

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Glossary of Terms

AMR Annual Monitoring Report
AONB Area of Outstanding Natural Beauty
AQMA Air Quality Management Area
BREEAM Built Research Establishment Environmental Assessment Method
CO2 Carbon Dioxide
CS Core Strategy
CSH Code for Sustainable Homes
DPD Development Plan Document
GBIS Green Blue Infrastructure Strategy
GHG Greenhouse Gas
GOSE Government Office for the South East
GVA Gross Value Added
LCA Landscape Character Assessment
LDD Local Development Document
LDF Local Development Framework
LDS Local Development Scheme
LPA Local Planning Authority
LSP Local Strategic Partnership
PCC Per capita consumption
PPS Planning Policy Statement
RSC Rural Service Centre
RSDF Regional Sustainable Development Framework
SA Sustainability Appraisal
SEA Strategic Environmental Assessment
SFRA Strategic Flood Risk Assessment
SHLAA Strategic Housing Land Availability Assessment
SME Small and Medium-Sized Enterprise
SPD Supplementary Planning Document
SSSI Site of Special Scientific Interest
SUDS Sustainable Drainage Systems
TA Technical Appendix

1. Introduction

Maidstone Core Strategy: Public Participation Document

Maidstone Council has prepared its Core Strategy Public Participation document. The final version of the Core Strategy will be the central component in the Council's suite of LDF documents and follows DPDs addressing Open Space and Affordable Housing.

The Core Strategy through its vision, strategic objectives and policies sets out a planning framework which will guide development in the borough until 2026.

The first draft of the Core Strategy (the Preferred Options document) was produced in 2007 and was subject to a Sustainability Appraisal. Subsequently, in 2011 the Council has produced this document, the Maidstone Core Strategy Public Participation DPD which identifies the preferred option and associated objectives and policies for consideration in the emerging plan.

This report documents the results of a Sustainability Appraisal (SA), which was undertaken on the Maidstone Core Strategy Public Participation DPD. The purpose of the appraisal is to ensure the emerging plan is as sustainable as possible.

A Sustainability Appraisal promotes sustainable development by identifying the likely economic, social and environmental sustainability effects of the proposed objectives and policy options for the Core Strategy. It also makes recommendations for reducing, mitigating or compensating any significant adverse effects and maximising positive effects.

Sustainability Appraisal

Under the Planning and Compulsory Purchase Act (PCPA) (2004), all DPDs produced by local authorities as part of their LDF must undergo a process of SA. The Core Strategy is the key DPD, which sits at the centre of the LDF (the LDF can be thought of as a 'portfolio' of individual documents), and so is subject to SA.

SA involves the identification and evaluation of the DPD's impacts on economic, social and environmental objectives – i.e. its compatibility with the three dimensions of sustainable development. The SA process incorporates the requirements of a European law requiring certain plans and programmes to undergo a formal Strategic Environmental Assessment (SEA).

In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including DPDs.

SA and SEA are therefore both statutory requirements. The Government's approach to this dual requirement is to incorporate the requirements of the SEA Directive into the SA process. The SA, which considers all three pillars of sustainability, therefore incorporates the requirements of the SEA Directive, but does not have any bias towards giving consideration to environmental issues. To this end, the Government published guidance on undertaking SA of spatial plans ('the Guidance') in November 2005. The combined SA / SEA process is referred to in the Guidance and in this document as 'Sustainability Appraisal (SA)'.

This SA Report presents the findings of the sustainability appraisal carried out on Maidstone's Core Strategy Public Participation DPD. It follows the methodology and framework set out in Maidstone's 2009 Scoping Report used to inform further versions of the Core Strategy. The 2009 Scoping Report followed on from the 2006 Core Strategy Scoping Report and the 2007 Sustainability Appraisal accompanying the 2007 Core Strategy Preferred Options document.

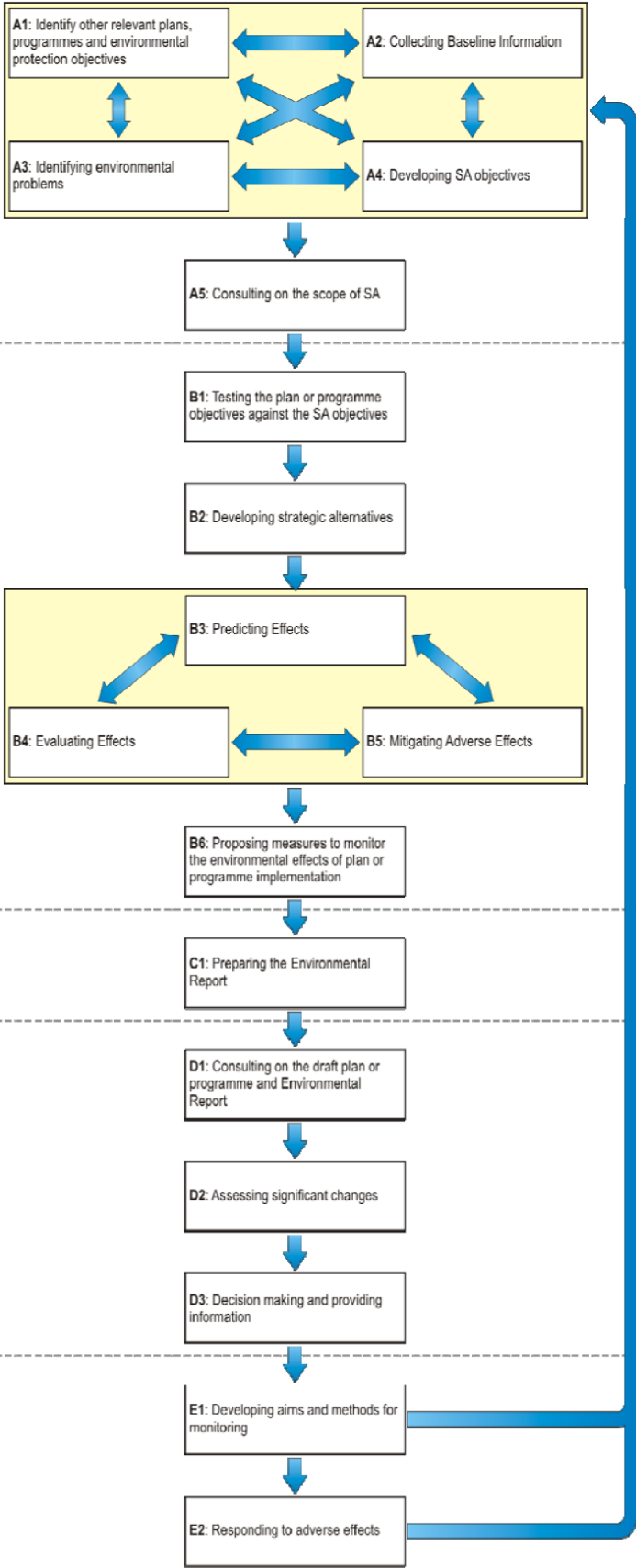
The SA Process

The Guidance advocates a five step approach (see also Diagram 1 below) :

- **Stage A** entails setting the context and objectives, establishing the baseline and deciding on the scope. The outcomes of this stage have been detailed in the 2006 and 2009 Scoping Reports. Section 2 of this report summarises the findings of the Scoping Reports
- **Stage B** is the assessment stage. It develops and refines the option.
- **Stage C** entails appraising the effects of the Core Strategy. Both Stage B and C are iterative. Between 2005-2006 through a number of workshops and a series of Café Consultation events the Council undertook consultation with a wide range of stakeholders. It then developed a series of policy options that were sent to all statutory consultees and anyone who wished to be kept informed about the progress of the Core Strategy.
- Following public response to the former issues and options stage of the Core Strategy in 2006, the Council appraised 11 draft spatial objectives before publishing its Core Strategy Preferred Option document (also known as Option 7C) for public consultation in 2007. It was published alongside an SA Report (Stage C)
- Following a representation seeking the Core Strategy to include a land allocation for a strategic freight interchange the Core Strategy was delayed until 2010. Since that time a number of other issues have come to light, including change to national and regional planning policy, which have made Option 7C unviable (see Section 2 for a more detailed summary of the Core Strategy's policy evolution) Subsequently, the new Preferred Option Public Participation document has undergone an SA (as documented in this Report, Stage C).

- The Council will alter the Core Strategy further, in order to reflect the consultation on the Core Strategy Public Participation DPD as well as the recommendations of the SA. If the changes made are likely to have significant sustainability implications then they will be subject to further SA (Stage B) and a further SA Report will be produced (Stage C). Stage C will be complete when an up-to-date SA Report (known as the Final SA Report) is submitted to Government alongside the Core Strategy.
- **Stage D** entails consulting on the plan and SA Report; and
- **Stage E** entails monitoring implementation of the Core Strategy

Diagram 1



Requirements of the SEA Directive

Table 1 sets out the legal requirements of the SEA Directive and signposts relevant sections of the report where these requirements are fulfilled.

Requirements	Where covered in SA Report
A)An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes.	Section 3 Scoping Report 2009, Sustainability Appraisal 2007, Scoping Report 2006
B)The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 3 Scoping Report 2009, Sustainability Appraisal 2007, Scoping Report 2006
C)The environmental characteristics of areas likely to be significantly affected	Section 3 Scoping Report 2009, Sustainability Appraisal 2007, Scoping Report 2006, Appendix III
D)Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 3 Scoping Report 2009 Appendix I
E)The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Scoping Report 2009
F)The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive	Sections 5 and 6 Technical Appendix

and negative.	
G)The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 6 Technical Appendix
H)An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2 SA Report 2007
I)A description of measures envisaged concerning monitoring in accordance with Article 10.	Section 6 Appendix II
J)A non-technical summary of the information provided under the above headings	Included

Report Structure

This SA report is structured as follows:

Section 2 – The story so far – SA and the Maidstone Core Strategy:

- Section 3 – summarises the relevant findings from Stage A in the SA process
- Section 4 – sets out the appraisal methodology
- Section 5 – summarises the relevant findings from Stage C in the SA process
- Section 6 – examines significant effects, mitigation and monitoring

2 Background: The Evolution of Maidstone's Core Strategy

PPS 12 Local Development Framework states that:

To be effective, sustainability appraisal should be fully integrated into the plan-making process. It should be started as soon as a new or revised local development document is first considered, and should provide input at each stage when decisions are taken.

The consultant's Scott Wilson were commissioned by the Council in 2005 to participate in the production of the Maidstone's Core Strategy. They were involved in the process until 2009.

These SA tasks were conducted in collaboration with the Council. As part of the production process the documents that have informed the Core Strategy so far are:

- An initial Scoping Report (2005) and its update (2009)
- SA of Preferred Options Core Strategy (2007)
- SA of Public Participation Core Strategy (2011 – this report)

This report has built on the information included in the previous documents.

The sections below provide more detailed information on each key task. This helps to demonstrate how the SA has informed the Core Strategy.

Scoping Report (2006 and 2009)

The consultants Scott Wilson worked closely with the Council to prepare and consult on two Scoping Report. As part of the Issues and Options stage of the DPD preparation process the 2006 Scoping Report was informed by evidence gathered through public consultation exercises called *Café Conversations* and a series of special events held for stakeholders including the Local Strategic Partnership, partnership organisations, local developers, local businesses and the Youth Forum.¹ A wide variety of stakeholders including community and business members representing economic, social and environmental interests attended these events. All the statutory SEA consultees were involved in the Scoping Report process - The Countryside Agency, English Heritage, English Nature and the Environment Agency.

The consultants proposed and assembled baseline data for an initial set of 81 indicators. The Scoping Report was sent to the four statutory SEA consultation bodies, the participants of a scoping workshop as well as other selected

¹ During the consultation events over 200 conversations took place, generating over 300 separate comments.

stakeholders for comment. It was made available for a consultation period of five weeks in line with SEA Regulations. To comply with the Council's Statement of Community Involvement (SCI) it was placed on the Maidstone Borough Council website.

The Scoping Report is a living document and was updated in 2009 to take into account new national and regional planning policy and guidance, recently published baseline information, and additional consultations since 2005/2006.

Through the addition of new evidence the 2009 Scoping Report the key issues that the Sustainability Appraisal should focus was refined. However, the original 18 SA Objectives remained the same. The four Consultation Bodies were informed of this update and it was made available on the Council's website.

Preferred Options 2007

The consultants Scott Wilson conducted the SA on the January 2007 Preferred Options Core Strategy. The SA appraised the:

- 12 Spatial Options
- 1 Strategic Policy
- 1 Locational Policy
- 17 General Policies

The SA measured the impact of these options and policies against four themes following on from the Café Conversations (**Getting Around, Your Home/Children's Home, Work & Jobs and Living Happily**) which corresponded with the three Core Strategy themes (**Making Quality Places, Increasing Social wealth and Creating Prosperity**). They were also assessed against the 18 Sustainability Objectives identified in the 2006 Scoping Report.

Following the appraisal of the policies and the seven alternatives listed above, Scott Wilson presented the Council with a draft SA Report prior to publication for public consultation alongside the Preferred Options DPD. This report indicated that adopting the edge of centre led strategy Spatial Option 7C was the preferred approach. The 2007 SA assessment of this option is in the box below:

Option 7C Housing 10,080: Employment 13,400 Maidstone Urban Area South East Extension

Appraisal Summary: The scenario should be effective for provision of affordable housing; scope for provision of services and facilities in RSCs as well as main urban area or edge. The option would bring about significant economic growth and job creation. The scenario would retain the physical and social character of the main urban area and retain the open space network (though there is potential for increased pressure on the open space network).

There is an opportunity for on-site renewable energy generation as part of sustainable mix-use community (if all greenfield development concentrated at edge of Maidstone with no major expansion of RSCs). However, it has a relatively large requirement for Greenfield land and relatively low rates (lower than government targets of 60%) of development on brownfield land (45%).

The option would be likely to result in an increase in car travel due to the net increase in dwellings. However, if development was concentrated at Maidstone's edge it has more opportunities than 5A and 6B to maximise sustainable transport modes/links); and the loss of some areas of local landscape importance.

Cumulative and synergistic effects: Expansion of Maidstone urban area and loss of greenfield land (natural resource). Opportunities for increase in proportion of energy generated from renewable sources.

Consultation

In addition to the statutory bodies (Countryside Agency, English Heritage, English Nature and the Environment Agency), Maidstone Borough Council consulted a full range of economic, environmental and social stakeholders on the scope of the SA and the Core Strategy Preferred Options stage.

The informal Core Strategy issues and options consultation was called Café Conversations and engaged with a large number of residents through the consultation events in public libraries, village halls and cafes and through the internet website. This consultation took place in February and March 2006.

What were the comments???

The 2007 Sustainability Appraisal documented the 2007 Core Strategy Preferred Options document, It identified the preferred options chosen by the Council and summarised and how social, economic and environmental effects were considered in choosing the preferred option.

The Sustainability Appraisal outlined why the Preferred Options was chosen and why the other options were considered unsuitable and the reasons for rejecting other options

The 2007 Sustainability Appraisal consultation was conducted alongside the 2007 Core Strategy. Below are a summary of the comments raised in relation to sustainability issues.

2007 Core Strategy Consultation Responses
Housing requirements. Why is there a need for more housing in the Borough when the population is not growing significantly? There is a need to justify why the Core Strategy is pursuing the Growth Point housing figure (10,080) in advance of knowing the outcome of the South East Plan. Justify the balance between Greenfield and brownfield development. There is a need to ensure a 5 year land supply is maintained.
Public transport. Need to state broad locations for new Park and Ride sites
Employment. Need to state where the broad locations for new employment will be (at present, this is described in criteria terms – near to new housing development, close to strategic road and rail routes
Landscape designations. Need to decide approach to Special Landscape Area / Area of Local Landscape Importance as government guidance does not encourage local designations unless justified. Need to review boundaries (particularly important for the northern Maidstone urban fringe). Concern over how green space network will be provided / implemented
Heritage and local character. Concern over effect of large new development on heritage sites and conservation area of Otham.
Utility provision. Concern over the provision of water supply / sewage capacity.
Highway issues. Concern over extra traffic generation from one concentrated new development. Detail / justify deliverability of urban extension and provision of SEMSL. Flexibility of strategy – what is fall-back position if road cannot be provided?
Approach to Rural Service Centres. Justification for level of development at RSC's
Infrastructure and community facilities. Ensure that urban extension is linked with adequate new provision for social and community facilities, which is provided at the same time as new housing

The 2009 Scoping Report was consulted on for five weeks in which time statutory consultees were invited to comment on the report. After the consultation period ended the comments were integrated into the final report.

Core Strategy Public Participation document 2011

The Core Strategy is the key document that will set out the vision for Maidstone Borough until 2026. All other DPDs and SPDs must be in conformity with the Core Strategy as it is the main document in the Local Development Framework.

The Core Strategy will set the broad pattern of development for the location of new housing, economic development, employment and community facilities while setting out strategies for preserving and enhancing the natural and built environment. The Core Strategy is the geographical translation of Maidstone's Sustainable Community Strategy.

Succeeding documents such as the Central Maidstone AAP will contain more detailed policies on specific issues. While the Core Strategy outlines the broad strategic locations of development, specific site allocations will be included within the Development Management and Site Allocations DPDs.

Maidstone's 2011 Core Strategy Public Participation document represents the current stage reached in the development of the Core Strategy. The document firstly sets out the Spatial Vision for the Borough which is reflected through 11 Spatial Objectives (see page 35). These objectives are designed to ensure that the Spatial Vision is realised. They in turn filter down into the Spatial policies which are part of the Spatial Strategy.

The Spatial Strategy is in Section 5 of the Core Strategy and provides a plan of how the Spatial Vision and Strategic Objectives will be achieved in practical terms. This section contains 1 overarching borough wide Spatial Policy. The policy broadly sets out **how much development there will be, where it will go, when it will take place and who will deliver it.**

Section 6 of the Core Strategy contains 4 Spatial Policies detailing the fundamental principles that should be adhered to in certain area types to deliver the quantity of development in accordance with the Spatial Strategy).

The Spatial Policies are followed by 9 Core Policies which cover general issues facing the Borough, focusing on delivering the strategy and set criteria against which applications for development are determined.

The Spatial Objectives, Spatial Policies and General Policies have all undergone a Sustainability Appraisal, with results presented within this Sustainability Appraisal Report (see Section 5,6 and the Technical Appendix).

The Core Strategy vision is:

- By 2026 Maidstone will be a vibrant, prosperous and sustainable community benefiting from its exceptional urban and rural environment
- The Core Strategy will deliver sustainable growth and regeneration whilst protecting and enhancing the Borough's natural and built assets
- Development will be guided by a sustainable and integrated transport strategy together with the timely provision of appropriate strategic and local infrastructure
- The character and identity of rural settlements will be maintained by directing suitable development and supporting infrastructure to the Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst.
- Employment skills will be expanded to meet and improved and varied range of local jobs
- There will be a better balanced housing market to meet the needs of the community

3. Evidence Base and SA Framework

Introduction

The ODPM guidance (November 2005) (Ref. 5) provides detail on the process of implementing SA.

Figure 2, overleaf, outlines the SA methodology and illustrates how SA fits into the DPD plan preparation process.

Stage A of the Sustainability Appraisal process involved gathering evidence concerning the current social, economic and environmental conditions in the Borough. This process identified key sustainability problems or likely future problems by looking at statistical trends and comparing the performance of the Borough with Kent as a whole, the South East and England and Wales.

The outcome of Stage A is a set of sustainability objectives (see Page 30) created to address the sustainability problems and which are used to assess the policy options in Stage B of the SA process.

Stage B of the process involves the development and refinement of broad strategic locations for development. Following initial work with partners and the planning forum during 2005, the Council consulted upon a range of policy approaches for the Core Strategy DPD in February and March 2006 and defined an initial set of options. The general public and stakeholders such as local service providers, businesses, interest groups and other interested parties were asked to comment on these initial options. The Council took the views of the stakeholders into account when formulating the Preferred Options.

Stage C : Concurrent to the public consultation exercise the policy approaches were subject to an initial Sustainability Appraisal to identify the broad sustainability issues to be considered in the formulation of the Preferred Options. The results of this initial appraisal can be found in Appendix II of this Appraisal.²

This stage was undertaken by Scott Wilson and the results were summarised in the Initial Sustainability Appraisal of the Maidstone Borough Core Strategy Preferred Options DPD which was issued for consultation in February 2007. The Sustainability Appraisal assessed the merits of 12 spatial options and the extent to which they would achieve or support each SA objectives (SA Objectives are explained further in Section 4.2). A further review of additional baseline

² Maidstone Sustainability Appraisal and Strategic Environmental Assessment of Maidstone Local Development Framework – Core Strategy Preferred Options DPD 2007, (page 4)

information was undertaken as part of the Initial Sustainability Appraisal as various reports, strategies and specific pieces of research had been undertaken by MBC (since the production of the Scoping Reports) in order to establish the evidence base for the Core Strategy.

The 2007 Sustainability Appraisal Report also provided an update on the review of relevant plans, policies and programmes as a result of significant changes in national sustainability policies as well as changes in planning policy at a national and regional level.

Following the 2007 Preferred Options report a further Scoping Report was undertaken in 2009.

The focus of this SA Report is Stages C and D, as shown on Figure 1 in relation to the Core Strategy Preferred Options Stage. This relates to the production of this SA Report to document the appraisal process (Stage C) and consultation of the SA Report alongside the Preferred Options Report (Stage D). A further review of additional baseline information has also been undertaken and is updated in this Report in Section 4 to reflect the emergence of new baseline information to further inform the evidence base for the Core Strategy.

Update to Stage A

Crucial to Stage A is the collection of up to date baseline data. This data identifies the sustainability issues against which the Core Strategy is assessed as and is a basis for predicting and evaluating effects and identifying appropriate monitoring indicators.

Below is a summary of the main recent evidence-base studies that have been published since the publication of the 2009 Scoping Report which highlight the following baseline conditions.

2010 Strategic Housing Market Assessment (SHMA)

Published in 2010 the Maidstone provides a comprehensive and robust assessment to inform policy and investment decisions across the housing market area. Key findings include:

- The study found a high level of need for affordable housing across the housing market area and a shortfall in comparison with existing provision. For example, there will be an overall annual shortfall in affordable housing in Maidstone of 292 homes. In view of this the study recommends a target of at least 40% affordable housing for all suitable sites.

- The need relative to present housing supply is the greatest for three to four bedroom accommodation
- The need relative to supply is much greater in the rural part of the borough.
- Around 90% of new social renting housing should have three or more bedrooms
- There is an oversupply of market flats in Central Maidstone

2011 Landscape Character Assessment (Draft)

The scope of the document was to undertake a landscape character assessment of the borough excluding the urban area of Maidstone and the built up areas of the Rural Service Centres .

However a more detailed assessment was undertaken of the rural setting immediately around Maidstone was conducted in view of the higher levels of development pressure in this locality

The Landscape Appraisal was composed of two elements namely:

- Landscape characterisation: identification and description of landscape character types and areas;
- Landscape analysis: judgements made regarding landscape condition and landscape sensitivity of each landscape character area.

Its purpose was to take into account:

- Changes to LCA guidance and methodology that have taken place since the original 2000 LCA study was undertaken;
- Ratification of the European Landscape Conference;
- Changes within Maidstone's landscapes in the intervening time;
- Increased awareness of climate change impacts.

Its objective was to provide logical, robust and defensible justifications for managing pressures for change in Maidstone borough without diminishing the value of the landscape and ultimately to inform the Core Strategy.

There are 58 landscape character areas identified at a Borough-scale (with a further 51 landscape character areas at the more detailed level which are nested within the borough wide areas).

The assessment found that the :

- Significant majority of the borough's landscape character areas are of good condition and high sensitivity and tend to relate to the more rural

areas away from Maidstone and the Medway Towns further north. It is also found that very little of the Borough's landscape is of poor condition and low sensitivity.

- Great majority of Maidstone's urban periphery is abutted by landscape of good condition and high sensitivity, with only a relatively small area to the north west being of low-moderate condition and low sensitivity. At the finer level of detail, there is wider range of conditions and sensitivities but there is no obvious consistent pattern,
- Area of the North Downs AONB lying between Maidstone and Medway Towns is assessed of being of moderate sensitivity and poor condition, largely reflecting the intense urban pressures this area is experiencing.

2011 Maidstone Transport Strategy (Draft)

This strategy aims to respond to existing transport challenges and those that may arise as a result of the scale and distribution of development proposed in emerging spatial planning policies. The Strategy recommends that future investment in transport infrastructure is predominantly structured around the distribution of development proposed by the Core Strategy.

The Strategy sets out to reduce congestion and pollution and tackle problems of accessibility and road safety. The findings of the Strategy highlight that there will be:

- Increased traffic congestion on the local highway network in particular routes accessing Maidstone urban area. If all the proposed development takes place there would be a "demand" for several thousand trips each day in each of the peak hours in and around Maidstone town, and many more at other times of the day
- Predicted hard transport measures and improvement (e.g Park and Rides spaces, possible new rail services, Thameslink and Maidstone West high speed routes)will not meet the predicted theoretical demand. Behavioural change through the adoption of softer transport measures such as walking and cycling will be needed to accommodate increased trip demand on the transport network
- Increased demand on parking in Maidstone urban area
- An expectation of 1500 Park and Ride spaces will be produced over the plan period.
- Increased pressures on the key Maidstone transport corridors such as the A274 Sutton Road, A20 Ashford Road, A249 Sittingbourne Road, A229

Royal Engineers Way, A20 London Road end, A26 Tonbridge Road and key junctions

Maidstone Outline Water Cycle Study 2010

The 2010 Water Cycle Study was carried out to assess the adequacy of the Water Cycle network if Maidstone Borough built 11,080 new homes and produced 10,000 new employment opportunities.

The Water Cycle Study was designed to facilitate an integrated approach to the question:

How can we best plan new development, taking into consideration water environment and infrastructure constraints, thus achieving more sustainable urban development?

The study concluded that the quantum of development proposed between the Core Strategy plan period can be accommodated by the water environment. However the outline Water Cycle Study identified the following issues:

- Available water resources in the Medway catchment area are limited. They are considered by the Environment Agency to be over-licensed i.e environmental damage would occur if all abstractors took the full amount of water allowed under their licenses
- Greater use of water demand techniques is required to reduce the impact of the developments on available water resources. New building regulations requires that new homes be designed to deliver water efficiency of 125 l/hd. Given the stress on water resources in the Maidstone area, it is recommended that Maidstone BC aim for the lower target of 115 l/hd from new developments where possible.
- South East Water's water resources management plan which sets out their proposals for supplying water to existing and new residents over the next 25 years is the subject of a public inquiry which started in May 2010. The findings of this inquiry may impact on their proposals, perhaps by requiring more ambitious targets for reducing future levels of water consumption in the area
- South East Water's 5 year Business Plan includes investments needed in the trunk main system to distribute water to new developments. However, the lead-in time needed to complete these investments may influence the allowable timing of developments

- Southern Water plan to upgrade the existing wastewater treatment works serving Maidstone in the period 2010 to 2015, following which it should have adequate capacity to accept additional wastewater from the proposed new developments
- The ecological status of the river Medway into which treated wastewater is discharged is poor. The Environment Agency may require Southern Water to increase the standard of treatment provided. Southern Water fully understand the necessary treatment processes to achieve this and existing land is available at the treatment works site for construction of associated infrastructure
- The capacity of the existing sewerage system to accept additional flows is limited. Significant new investment will be required to allow wastewater from new developments to be transferred to the treatment works. Such works will be costly and time consuming to implement
- The location of some sites in the functional floodplain will limit permissible development

Maidstone Local Biodiversity Action Plan (Draft).

The scope of the Plan was to review current activities and issues, identify aims and set specific objectives and targets for action in all aspects of Maidstone's biodiversity and conservation.

The purpose was to provide an up-to-date overarching long-term strategy and Action Plan for everyone involved in safeguarding and enhancing Maidstone's natural environment. Maidstone's Biodiversity Project Plan is a leading and novel approach at local authority level, in that it clearly defines a programme of projects that cover a range of work including research, monitoring, protocol development and capital one-off site projects

The main findings of the Plan were that:

- 13 habitats are considered a priority within the Borough: all but one (Urban Green Space) are UK priority habitats.
- The majority of the Borough is covered by arable and horticulture land practices. However, Maidstone holds a large amount of Lowland Mixed Deciduous Woodland, a UK priority habitat. A large amount of calcareous grassland, representing 9% of the county resource is found in the borough.
- Reports predating the draft Maidstone LBAP identified habitat fragmentation as an issue for Kent and saw this being exacerbated by estimated changes in the distributions of species as predicted by climate change. However through the Conservation Status Map developed in the LBAP it was indicated a large amount biodiversity action in the borough is

currently achieving connectivity of key UK priority habitats in a strategic and co-ordinated manner.

- Through environmental stewardship schemes run by Natural England (NE) and the Forestry Commission (FC) a significant area of Maidstone is currently managed to promote biodiversity (no figure provided, just a GIS-based figure).

Policy and Sustainability Context (A1)

Task A1 (of Stage A) of the SA process involved firstly establishing the context in which the Core Strategy is being prepared, i.e. the other policies, plans, programmes, strategies and initiatives (PPPSI) that influence its content (and vice-versa) and the opportunities and challenges they present.

The context review is detailed in full in the SA Scoping Report, and within this the key messages were identified. These messages, together with those identified during the initial SA Scoping Workshop in 2006 were discussed between officers and the consultants and a final list drawn up (see Appendix I). This list of messages is not necessarily exhaustive and no priority should be inferred from the ordering.

Baseline Information (A2)

The collection of baseline information is a key component of the SA process and a legal requirement under the SEA Directive. Baseline information helps to provide a basis for predicting and monitoring effects and assembling baseline data helps to identify sustainability problems.

Baseline data in the Scoping report is presented in the form of indicators. For the initial 2005 Scoping Report, the Consultants proposed and assembled baseline data (where it was available) for an initial set of 76 indicators. This set of indicators was subject to discussion at an SA Scoping Workshop in 2006. This list was revised and Appendix II lists the complete set of 70 baseline indicators investigated (these are organised around the proposed SA Objectives).

The SEA Directive requires plan or programme proponents to identify '*the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*'.

Predicting the nature of future trends is difficult as they will be influenced by a wide range of factors such as the global and national economic climate and decisions made at national and regional level. The Core Strategy policies will provide a local or spatial focus to national and regional policies giving detailed policy guidance which address particular issues in Maidstone Borough.

The baseline review included with the 2009 Scoping Report indicated that the following trends would be likely to continue if the Core Strategy was not implemented:

- Without the Core Strategy, the Central Maidstone AAP, urban regeneration and other initiatives, it is likely that the urban area would continue to perform reasonably well economically; however, it might not „punch its weight.
- Affordable housing will remain a concern within RSCs, particularly for the elderly and the young.
- Substantial levels of growth and associated impacts from traffic congestion, housing and employment (as provided by the South East Plan) could seriously affect the landscape character and biodiversity within the borough.
- Unmanaged growth and increasing traffic congestion will adversely impact on air quality and contribute to increase in greenhouse gas emissions.
- Development within the Borough may result in increased fragmentation and isolation of habitats.
- Without adequate mitigation measures in place, the Borough of Maidstone may experience shifting habitat ranges, an increased risk to native wildlife and an increase in foreign (e.g. continental) biodiversity, beyond that which is already anticipated.
- Inadequacies of provision of open space within the Borough will continue.
- Maidstone’s already disadvantaged areas may continue to suffer current or increasing levels of deprivation across all indicators.
- The condition for young people in deprived areas will significantly worsen - high numbers of teenage pregnancies, high number of 16 to 18 year olds who are not in education, employment or training and high number of young offenders.
- The affordability of residential and commercial properties is likely to remain a problem.
- Loss of local employment opportunities. A key weakness in Maidstone’s economy is the lack of specialisation and innovation that characterise Maidstone’s economy are likely to remain

- There is likely to be further „frequent flooding“ in areas of Maidstone, particularly in Maidstone Town.
- The demand for affordable housing is likely to increase, exacerbating the already existing difference between affordable housing demand and supply.
- The current under provision of Gypsy and Traveller pitches will remain a problem, leading to unauthorised occupation of sites potentially giving rise to tensions with local residents. Those living in unauthorised sites will also be more likely to experience lack of access to essential services such as health and education, thus increasing the disadvantage experienced by GTTS.
- Many of the opportunities for historical buildings and areas to contribute towards regeneration may be lost.
- In order to meet development targets it is possible that Greenfield sites released are not the most sustainable or are plainly inappropriate.
- Maidstone will continue to suffer from severe traffic congestion and the situation will worsen. This is likely to detrimentally affect future economic prosperity through reduced inward investment, effect quality life through poorer access to services and facilities and detrimentally effect air quality and heritage assets.
- Water quality and quantity would be likely to be adversely affected by new development. The capacity of the existing sewerage system to accept additional flows is limited. The ecological status of the river Medway into which treated wastewater is discharged will continue to deteriorate.

SA Framework (A4)

SA is fundamentally based on an objectives-led approach whereby the potential impacts of a plan are assessed in relation to a series of objectives for sustainable development.

In 2005 Scott Wilson as part of Stage A of the SA process, a series of 18 sustainable development objectives were developed for appraising the Maidstone LDF, including the Core Strategy. The Scoping Report provides further details of how these objectives were developed and consulted upon.³

It should be noted that SA Objectives are distinct from the LDF and Core Strategy objectives through they may in some cases overlap with them. SA Objectives should focus on outcomes (or ends), not on how the outcomes will be

³ The 2005 Scoping Report initially identified as set of 20 objectives.

achieved (inputs or means), as LDF and Core Strategy objectives often tend to do.

Although the Government intends to dissolve regional guidance each region has now adopted a Regional Sustainable Development Framework (RSDF).

Government guidance on the preparation of RSDFs states, “[r]egional sustainable development objectives set out in the framework will provide common and agreed starting points for revisions to, and sustainable development appraisals of, other regional strategies and policies”.

In addition to RSDF objectives, SA Objectives should also take into account the messages emerging from tasks A1, A2 and A3 in the SA process (see Diagram 2).

Diagram 2 Establishing the SA Objectives

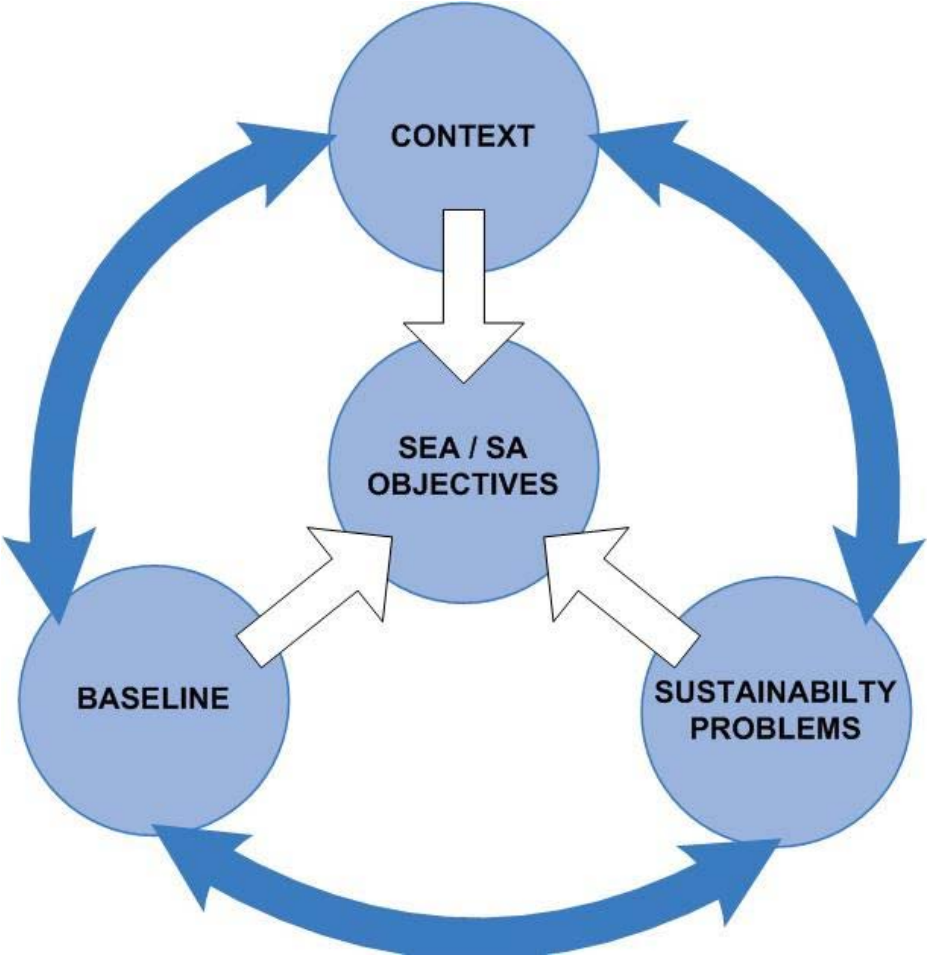


Table 3: The SA Objectives developed for Maidstone Borough.

Sustainability Objectives

1. To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment
3. To improve the health and well-being of the population and reduce inequalities in health
4. To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest
5. To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work
6. To reduce crime and the fear of crime
7. To create and sustain vibrant, attractive and clean communities
8. To improve accessibility to all services and facilities
9. To encourage increased engagement in cultural activity across all sections of the community in the Borough
10. To improve efficiency in land use
11. To reduce road congestion and pollution levels and ensure air quality continues to improve
12. To address the causes of climate change and ensure that the Borough is prepared for its impacts
13. To conserve and enhance the Borough's biodiversity and geodiversity
14. To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment
15. To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste
16. To achieve sustainable water resources management
17. To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough
18. To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough

What's the Situation without the Plan

Without the plan the Borough is likely to experience continued pressure on land availability to meet the high demand for housing. Housing that was brought forward would most likely fail to meet high design standards required by national legislation. The underprovision of family dwellings and affordable housing would also be experienced without the plan particularly in the rural areas.

In terms of socio-economic conditions a full range of measures go address Maidstone's areas of deprivation will not be developed. Proactive policies to help increase the levels of education and skills will not be implemented.

In terms of transport, high levels of private car use will continue (with associated greenhouse gas emissions and air pollution) and traffic congestion particularly within the Maidstone Urban Area will worsen. The separate Transport Strategy and Local Transport Plan will help encourage a modal shift towards more sustainable transport patterns. Proximity to London means that a large number of highly skilled residents will continue to commute to the capital for work.

In environmental and built heritage terms chances to enhance their value to the community may be lost. Without the inception of measures to increase accessibility measures such as a Green and Blue Grid, the potential to improve these assets through increased accessibility, legibility and interconnection will be lost. Similarly the opportunities for historical buildings and areas to contribute to regeneration may be lost.

The fragmentation of Maidstone's high quality biodiversity corridors will continue and the chance to enhance their value to people's quality of life, the economy through tourism will be lost. Without a plan there a degradation of biodiversity and landscape due to cumulative effects of development will result along with the underprovision of green space in Maidstone's Town Centre.

In terms of the economy without improved office provision it is possible that businesses of this type would locate to areas with better resources and transport links. As a consequence the trend for Maidstone's professionals to commute out of the area will continue. Maidstone will not fulfil its regional role offered by its status as the county town and the potential this has for encouraging inward investment, Without the Core Strategy as a framework for future development it will be more difficult steps for the CMAAP to take pro-active steps to regenerate the Town Centre. The unspecialised nature of Maidstone's economy and the associated lack of innovation will continue without proactive policies to stimulate investment in these areas.

4. Appraisal Methodology

Introduction

This chapter sets out the summary findings from the appraisal the Core Strategy Public Participation Document. This consists of separate appraisals of the:

- Spatial Objectives; and
- Policies.

The full appraisal can be found in the Technical Appendix to this report.

The appraisal was carried out using the SA Framework that was developed and documented in the Scoping Reports of 2006 and 2009. The SA Framework is provided in Table 3 (above) and consists of 18 objectives against which the Core Strategy Spatial Objectives, and policies were appraised.

4.2.3 Three contextual factors against which the Core Strategy was assessed were the prominent political and economic role Maidstone plays in Kent, the environmental constraints within the Borough which affect the quantum of appropriate development (27% is AONB while 80% of local landscape is rated as high quality)⁴ and the need to regenerate Maidstone Town Centre.

4.2.4 For the Core Strategy Spatial Objectives it was not considered necessary or useful to qualitatively score the impacts in as great a detail in comparison to the appraisal of the policies. This was due to the generalised nature of the options themselves and the dangers of 'false precision'. A text-based summary was performed to provide further information on areas where effects (positive and negative) were predicted.

4.2.5 The performance of the appraised features against each SA objective was given a score according to the criteria set out in Table 5. When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Cumulative nature of effects;
- Magnitude and spatial extent of the effects; and
- Value and vulnerability of area likely to be effected.

Mitigation and Monitoring Measures

⁴ 2011 Draft Landscape Character Assessment

The findings also include mitigation measures identified during the appraisal. Mitigation measures are identified in detail in this chapter and then summarised further, and presented alongside proposal for monitoring, in Section 6.

Many of the measures proposed are in the form of general recommendations or points for consideration, rather than measures designed to counter specific impacts. It will be important that the Council makes a justified response to these recommendations.

Symbol	Likely effect on the SA Objective
++	The option is likely to have a very positive impact
+	The option is likely to have a positive impact
0	No significant effect/clear link
?	Uncertain or insufficient information on which to determine impact
-	The option is likely to have a negative impact
—	The option is likely to have a very negative impact

Core Strategy Policies

There were no significant difficulties in undertaking the SA of the Core Strategy because a comprehensive and robust evidence base has been developed. Additions to the evidence base have been detailed in Section 3. At the time of this SA a number of these documents were in final draft form

5. Core Strategy Public Participation DPD

Introduction

This section sets out the summary findings from the appraisal the Core Strategy Public Participation stage DPD.

This consists of separate appraisals of the:

- Spatial Objectives; and
- Policies.

The full appraisal can be found in the Technical Appendix to this report.

The findings also include mitigation measures identified during the appraisal. Mitigation measures are identified in detail in this section and then summarised further, and presented alongside proposal for monitoring Section 6.

The measures proposed in this section try to strike the balance between general recommendations or points for consideration and measures designed to counter specific impacts. It will be important that the Council makes a justified response to these recommendations (see Section 6).

Objectives Summary

The Council has produced 11 Spatial Objectives (see Table 4 below). They have been assessed against the 18 Sustainability Objectives. The Spatial Objectives are the geographical expression of the Core Strategy Vision and Maidstone's Sustainable Community Strategy. The objectives guide the whole plan and the distribution of development . The aim of this appraisal is to ascertain whether there are any sustainability conflicts inconsistencies or beneficial synergies between the Spatial Objectives and the Sustainability Objectives.

Table 4

Spatial Objectives

1) To provide for 10,080 new homes and 10,000 new jobs with an emphasis on increasing skilled employment opportunities in the Borough alongside developing learning opportunities

2) To focus new development mainly within the Maidstone urban area with :

- o 80% of new housing built within and adjacent to the urban area of Maidstone with appropriate sustainable greenfield development being well located in relation to existing services in the urban area
- o The aim of providing 60% of new housing across the plan period on previously developed land and through the conversion of existing buildings
- o New employment land allocations to be exploited in Maidstone Town Centre first co-ordinated with opportunities on the most suitable greenfield sites to provide for a suitable mix of employment opportunities
- o The creation of opportunities to provide opportunities for local power generation

3) To transform the offer, vitality and viability of the Town Centre including office, retail, further and higher education, leisure, cultural and tourism functions together with significant enhancement to the natural and built environment particularly in respect of the riverside environment

4) To consolidate the roles of the Rural Service Centres at Harrietsham, Headcorn, Lenham, Marden and Staplehurst as the focus of the network of rural settlements with retained existing services and regenerated employment sites including expansion of existing employment sites where appropriate

5) To support new housing in the smaller villages that meet local needs and is of a design, scale, character and location appropriate to the settlement and which supports the retention of existing services and facilities

6) To safeguard and maintain the character of the district's landscapes including the Kent Downs AONB and other distinctive local landscapes whilst facilitating the economic and social well-being of these areas including the diversification of the rural economy

7) To retain and enhance the character of the existing green and blue

Spatial Objectives

infrastructure and to promote linkages between areas of environmental value

8)To ensure that new development takes account of the need to mitigate the impact of climate change and adapt to climate change and also to improve air quality by locating development to minimise the use of resources, to promote sustainable travel patterns, to develop a greater choice of transport measures, to support water and energy efficiency measures and to encourage renewable energy sources and sustainable drainage solutions

9)To ensure that new development is of high quality design, making a positive contribution to the area including protection of built and natural heritage and biodiversity

10)To provide for future housing that meets the changing needs of the Borough’s population including provision for an increasingly ageing population and family housing, an appropriate tenure mix, affordable housing and accommodation to meet the needs of the local gypsy and traveller community

11)To ensure that key infrastructure and service improvements needed to support delivery of the Core Strategy objectives and policies are brought forward in a co-ordinated and timely manner and that new development makes an appropriate contribution towards any infrastructure needs arising as a result of such new development

SA Objectives	Spatial Objectives Appraisal
1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home	+
2.To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	+
3. To improve the health and well-being of the population and reduce	+

SA Objectives	Spatial Objectives Appraisal
inequalities in health	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest	0
5. To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work	+
6. To reduce crime and the fear of crime	0
7. To create and sustain vibrant, attractive and clean communities	0
8. To improve accessibility to all services and facilities	+
9. To encourage increased engagement in cultural activity across all sections of the community in the Borough	+
10. To improve efficiency in land use	?
11. To reduce road congestion and pollution levels and ensure air quality continues to improve	-
12. To address the causes of climate change and ensure that the Borough is prepared for its impacts	0
13. To conserve and enhance the Borough's biodiversity and geodiversity	++

SA Objectives	Spatial Objectives Appraisal
14.To protect, enhance and make accessible for enjoyment, the Borough’s countryside,open space and historic environment	++
15.To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste	0
16.To achieve sustainable water resources management	++
17.To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough	+
18.To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough	+

Synopsis of Findings

The Spatial Objectives on the whole score well against the SA objectives particularly with regard to environmental objectives and protection and enhancement of the AONB and greenfield land. The construction of a Blue and Green Grid will enhance Maidstone’s natural environment and result in a number of cross cutting outcomes such as increased accessibility and permeability through the Borough which will link to enhancement and setting of its built heritage and the associated positive economic tourism effects.

The objectives try to strike the right balance between protection and enhancement of the Borough’s environment and the need to build future housing. In this instance the restrictions on the location of future housing is balanced by the strong commitment to support appropriate housing development in the Rural Service Centres. The dispersed pattern of development which the Objectives reflect will have positive benefits on housing affordability and through a commitment to respond to local need. The Core Strategy’s departure from the urban extension option advocated in the 2007 Preferred Options Core Strategy

has meant that a number of negative impacts on the SA Objectives (e.g 13, 14 and to a lesser extent 7) have been avoided. In addition if further detail is included in the Core Strategy it is possible that the objectives will score highly on improving efficiency in land use.

The commitment to support appropriate housing, economic and social development in the Rural Service Centres and smaller villages along with the concentration of development in Maidstone's existing urban area should help overall accessibility to services and help to augment existing infrastructure. In this instance, the objectives have the potential to significantly help transport related issues such as a reliance on the car in the Rural Service Centres and to a lesser extent the smaller villages. If the role of RSCs are consolidated it is possible that they could play a greater role in economic and social terms for their outlying smaller villages, thereby reducing the length of trip generation.

Notwithstanding the potential for a limited modal shift due to the rural nature of the Borough it is felt that there could be more emphasis should be placed on generating multi modal transport with specific reference to cycling and walking facilities. In this instance the structure of the objectives is unhelpful, as more than one issue is addressed in a single objective (see Ob 8)

The objectives score well against climate change issues but there are concerns with respect to air quality. The dispersal method of development in conjunction with the non locationally specific concentration of development in Maidstone Town Centre and Urban Area will not improve air quality. At best it is likely that the quality will remain the same as the whole of Maidstone Town Centre and Urban Area has been declared an AQMA.

While it is recognised that concentrating the majority of development in Maidstone Urban Area and Town Centre will aid biodiversity, AONB, greenfield land and discourage car based use, the levels of air pollution in this area is likely to increase. As a consequence the objectives should compensate for this impact by greater emphasis on promoting and facilitating sustainable travel patterns through stronger emphasis on public realm, road hierarchy, built fabric, open space improvements. It is suggested that two objectives relate specifically to Transport issues.

It is not anticipated that the overall Spatial Objectives will contribute to significant effects to health, poverty or skills related SA Objectives however, these have been addressed by general policies within the Core Strategy.

An overarching problem in assessing the Spatial Objectives has been the lack of specificity in location and number of development.

Core Strategy Policies

The section summarises the SA finding of the 14 policies within the Core Strategy. These policies are shown below and their appraisal in Table

Core Strategy Policies
Strategic Policies
CS1 Borough Wide Strategy
Locational Policies
CS2 Maidstone Town Centre
CS3 Maidstone Urban Area
CS4 Rural Service Centres
CS5 Countryside
General Policies
CS6 Sustainable Design and Development
CS7 Sustainable Transport
CS8 Economic Development
CS9 Housing Mix
CS10 Affordable Housing
CS11 Local Needs Housing
CS12 Gypsy and Traveller Accommodation
CS13 Natural Assets
CS14 Infrastructure Delivery

Sustainability Appraisal - Maidstone Core Strategy Public Participation DPD

SA Objectives	CS1	CS2	CS3	CS4	CS5	CS6	CS7	CS8	CS9	CS10	CS11	CS12	CS13	CS14
1. To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home	0/X	X	? ⁵	-	0	X	?	0	0/X	X	XX	X	0	X
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	x	X	0	x	0	X	?	0	0	0	0	X	X	X
3. To improve the health and well-being of the population and reduce inequalities in health	X ⁶	X	X	x	x	X	?	X	X	X	X	X	X	X
4. To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest	x	0 ⁷	x	0	x	0	?	X	X	X	X	XX	X	X
5. To raise educational achievement levels across the Borough and develop the	0	X	0	0	0	0	?	X	0	0	0	X	0	?

⁵ Footnotes to Table – Matt’s notes – not included in final version : Family housing sites etc

⁶ Expanded regenerated Town Centre near to areas of dep

⁷ Econ detail

SA Objectives	CS1	CS2	CS3	CS4	CS5	CS6	CS7	CS8	CS9	CS10	CS11	CS12	CS13	CS14
opportunities for everyone to acquire the skills needed to find and remain in work														
6. To reduce crime and the fear of crime	?	0	0	0	0	X	?	0	X		X	X	0	?
7. To create and sustain vibrant, attractive and clean communities	0	X	x	?	X	X	?	X	XX	XX	XX	X	X	X
8. To improve accessibility to all services and facilities	x	0 ⁸	x	x	0	0	?	X	0	0	0	X	X	X
9. To encourage increased engagement in cultural activity across all sections of the community in the Borough	?	X	?	x	0	0	?	0	0	0	X	0	X	0
10. To improve efficiency in land use	X	X	0	x	X	X	?	X	X	X	X	X	0	0
11. To reduce road congestion and pollution levels and ensure air quality continues to improve	?	?	-	?	0	-	-	-	-	-	0	-	-	-

⁸ Clear network of road hierarchy

SA Objectives	CS1	CS2	CS3	CS4	CS5	CS6	CS7	CS8	CS9	CS10	CS11	CS12	CS13	CS14
12. To address the causes of climate change and ensure that the Borough is prepared for its impacts	0		0	0	0	XX	?	X	X	X	0	0	X X	0
13. To conserve and enhance the Borough's biodiversity and geodiversity	xx		x	x	XX	0	?	0	0	0	X	X	X X	0
14. To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment			x	0	XX	X	?	X	0	0	X	0	X X	X
15. To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste	0	0	0	?	0	0	?	0	0	0	0	0	0	0
16. To achieve sustainable water resources management	0	0	0	?	0	0	?	0	0	0	0	0	X	0
17. To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough	0	0	0	0	0	0	?	0	0	0	0	0	X	0

Sustainability Appraisal - Maidstone Core Strategy Public Participation DPD

SA Objectives	CS1	CS2	CS3	CS4	CS5	CS6	CS7	CS8	CS9	CS10	CS11	CS12	CS13	CS14
18. To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough	?	?	?	?	0	X	?	X	0/X	X	X	0	0	X

A number of the Spatial Policies score relatively well against the Sustainability Objectives. Most of the policies have cross cutting implications but when addressed individually result in positive sustainability benefits.

Notwithstanding, it has been problematical to ascertain how some policies will impact against the objectives because of a lack of specificity with regards to the proposed quantum of development, the implementation of projects to support the Core Strategy and a lack of spatially distinct and proactive proposals. This is relevant to a number of policies including CS3, CS4, CS7 and CS8

Where degrees of uncertainty exist for example through the impact of Policy CS2 on SA Objective 11 this is due to the lack of detail through the absence of a forthcoming document. In this case it is the Central Maidstone AAP.

This report was produced by Maidstone Borough Council. It is important to note that the SA has been used to robustly question the quality of the Policies and how they impact upon the overall spatial strategy. The SA also realises that the CS is at Regulation 25 stage and will be subject to change and modification.

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
CS1 Borough Wide Strategy	This policy should signal and signpost all the relevant development issues which the following locational and general policies should unpack in detail.	Score: 0/+ In this instance the Policy is possibly too detailed and does not set the tenor of the development options and create strong enough hooks to the subsequent policies. One example of this is the lack of synergy between the strategic housing locations and Policy CS3. In effect what are the purpose of these locations: are they just repositories for Housing – how do they contribute to economic	Create stronger hooks between the Borough Wide Strategy and the subsequent more detailed policies. Set the theme for development that makes Maidstone distinctive As development is concentrated spatially indicators should not be too broad and as a result are unable to uncover where open space provision has deteriorated or accessibility

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
		<p>development, increased movement, new communities etc</p> <p>Sustainability benefits emerge from acknowledgement that the Borough’s needs to strike a balance between growth and conservation. Economic prosperity is balanced by the need for housing and the acknowledgement that the Borough’s places need to retain their distinctive natural and built quality.</p> <p>The Borough wide strategy attempts to distribute new housing equitably without being locationally exclusive. A balance is struck between the needs of new housing in Maidstone Town Centre, the adjacent Urban Area and RSCs. The strategic housing locations are located in areas of good accessibility encouraging social inclusion.</p> <p>Sustainability benefits emerge from locating</p>	<p>decreased.</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
--------	-----------------	-------------------------------------	---------------------

and focusing development in the areas of highest population. Locating development in these areas will restrict the harm done to Greenfield and AONB sites .

However in the case of Maidstone Town Centre and Urban Area this will put pressure on the environmental and physical infrastructure such as open space, air quality, water and sewage systems

Focusing development within the main settlements should also facilitate more sustainable forms of transport and lead to permeability, accessibility and legibility improvements particularly in Maidstone Town Centre and Urban Area.

The transport policy attempts to ensure that new development is accessible to the public transport and highway

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
--------	-----------------	-------------------------------------	---------------------

network.

Locational Policies

CS2	<p>A significant amount of development in the Borough is focused on the area of greatest accessibility which is Maidstone Town Centre.</p> <p>Development in Maidstone Town Centre is regeneration led and the policy has strong linkages to improvement in the urban fabric.</p>	<p>Score: ?</p> <p>In general it is difficult to assess the impact of this policy upon the Town Centre because much of the detail is left to the Central Maidstone AAP which is a lower tier document.</p> <p>Notwithstanding, Sustainability benefits come from the promotion of mixed use provision and the clustering of services in areas of good accessibility. The health of the Town Centre is proactively promoted by the need to increase its comparison retail floor space and office space.</p> <p>In general the need to promote Maidstone Town Centre economic prosperity is balanced by the need to enhance its natural and environmental assets. However a weakness is that Maidstone’s CS evidence base indicates that the urban area’s air quality in the short term can at best be mitigated not</p>	<p>More detail outlining the spatial strategy for the Town Centre needs to be included within this policy.</p> <p>As the Town Centre will be the future economic driver of the Borough the Policy should be a clear framework for attracting investment into the area.</p> <p>The urban fabric of Maidstone Town Centre should be analysed and detailed in order to create a strategy which allies economic and housing growth with the optimum use of space and proactive re use of vacant and older buildings such as commercial office buildings.</p> <p>The GBIS should</p>
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Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
		<p>improved.</p> <p>Through the regeneration of the Town Centre good design will be emphasised. The sustainability benefits will emerge through the support of Policy CS6 which includes requirements for sustainable design and construction. The concept of dividing the town into distinct quarters has the potential to make the best use of available space and resources which could increase the likelihood of affordable and well designed housing. The emphasis on place making through the concept of quarters may stimulate developers to invest in higher quality sustainable construction methods. The notion of identifying distinct places also impacts positively on residents' identification and connection with a place which has links to feelings of well being, crime etc.</p> <p>Intrinsic to this policy is the recognition that new and existing green space is contingent with the new housing and the need to reduce car use.</p>	<p>explore innovative ways of defining and producing open space and its perception</p> <p>The impact of increased development and density within Maidstone Town Centre could contribute to a decline in air quality. This should be well monitored and if possible development should be situated away from areas of poor air quality. If possible new residential development could be located in designated clear air zones</p> <p>Mitigation measures addressing the decline in biodiversity and water quality should be measured against increasing the density of development in the Town Centre</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
		<p>The success of this policy is reliant upon the forthcoming Central Maidstone Area Action Plan whose strategy will go into greater policy detail.</p> <p>The regeneration led policy could positively address the skills leakage from the borough, particularly if the quarters are allied with improvements in rail service provision. The link between the spatial implications of greater rail connections (e.g a change in desire lines ,patterns of movement to the rail stations) and the topography of the Town Centre should be articulated</p>	<p>Wording change: <i>` some 380 of new dwellings 'for ` some 380 of new dwellings aiding in the creation of a mixed and balanced community' or ` some 380 dwellings suitable for a mix of housing needs including families and elderly people.'</i></p>
<p>CS3 Maidstone Urban Area</p>	<p>This policy relates to Maidstone Urban which will be accommodate the highest quantum of new housing in Maidstone. It accommodates a varied mix of uses including and primarily housing, local</p>	<p><u>Score: ? / +</u></p> <p>Sustainability benefits emerge from the emphasis to increase connectivity with and to Maidstone's areas of deprivation.</p> <p>The policy promotes an integrated transport network that connects the residential areas with employment, education, shopping and leisure</p>	<p>The quantum of development in this area should not lead to a loss of focus on the Town Centre. Likewise infill development should not detract from the character of a particular neighbourhood.</p> <p>The form of the</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
	<p>town centres, business locations and environmental spaces.</p>	<p>facilities.</p> <p>The notion of place is enhanced by the promotion of Borough and local centres and the emphasis on improving the function of the Green Wedges.</p> <p>However a significant weakness in the Policy is the predicted impact and form of the strategic housing allocations. The form of these areas should be outlined in the Policy with an aim to creating distinctive places rather than repositories for housing</p> <p>The enhancement of these Green Wedges as important biodiversity corridors and open space help to offset the emphasis on development, redevelopment or infilling of appropriate urban sites</p> <p>The links between the transport network and the topography of the borough could be strengthened such as connecting the fragmented circle of the Green Wedges.</p>	<p>strategic housing allocation areas should be outlined in the Policy with an aim to creating distinctive places which will contribute to creating sustainable neighbourhoods</p> <p>The Green and Blue Infrastructure Strategy should identify would help to identify desire lines into the Town Centre whose attractiveness can be improved by public realm interventions.</p> <p>To mitigate the possible increase in car usage new developments should be located near park and ride sites where possible.</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
<p>CS4 Rural Service Centres</p>	<p>The Policy is designed to address and balance the RSCs necessity to accommodate a certain amount of growth with protection of their strong character.</p>	<p><u>Score: ?</u></p> <p>The Policy promotes more self contained and sustainable RSC’s which offer a range of services.</p> <p>However, the actual character of each RSC is only articulated in the supporting text. As a result the direction of development for each RSC is not tailored to their specific character or future role</p> <p>In addition a weakness of this policy is the lack of specificity surrounding each housing allocation. These numbers will set the parameters and context of growth in each of the RSCs. A degree of certainty is important as many of these areas will be in the forefront of developing Neighbourhood Plans.</p> <p>There is a danger that this approach could result in the RSC housing apportionment not being distributed equitably. Inclusion of an approximate number within the CS would still allow a flexible approach to housing delivery</p>	<p>The Policy should detail the role of each RSC and how this effects the direction and type of appropriate growth. Each RSC will have specific issues and this should be articulated.</p> <p>In addition the housing apportionment to each RSC should be more specific.</p> <p>Many of the negative impacts of this policy, such as Flooding and water drainage issues in Headcorn, Marden and Staplehurst, when measured against the SA objectives have been considered by the Council and are addressed in other policies.</p> <p>Increased development in these Centres may detrimentally effect air quality. This needs to be carefully monitored. Policy</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
		<p>In general there a number of sustainability benefits such as providing local needs housing (which helps to maintain a healthy and mixed community) encouraging economic growth and employment opportunities. These measures will help to reduce the need to travel by car</p> <p>The need for growth is offset by the recognition that the villages' natural assets and communities are intrinsic to their success.</p> <p>The policy is not spatially specific, for example recognising the need to improve the links to the poorly connected south of the borough</p> <p>The policy is connected to CS7 which is weighted to economic development and functionality and arguably less emphasis is put on improving the residents' quality of life</p>	<p>CS7 does attempt to mitigate these problems by controlling goods vehicle movement and promoting public transport.</p> <p>There could be a recognition within the Policy that transportation and accessibility in the south of the borough is poor when assessing which transportation measures should to be implemented.</p> <p>Softer transportation measures which impact on residents' quality of life could have more effect if a stronger relationship between Marden, Headcorn and Staplehurst is forged.</p>
<p>CS5 Countryside</p>	<p>Although primacy is given to the protection of Maidstone's</p>	<p>Score: 0</p> <p>This policy will lead to sustainability benefits</p>	<p>Stronger development hooks and more detail could be</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
	<p>high quality landscape within this policy it also addresses the need for moderate growth</p>	<p>against the SA Objectives by linking the integrity of the AONB and local landscape and to the needs of the community and the local economy. The countryside is not viewed in isolation but as something that can aid in rural economic diversification.</p>	<p>added to the Policy to allow the forthcoming Development Delivery DPD to implement a more proactive design led policy which is attuned to the character of the Countryside.</p> <p>Maidstone’s forthcoming Landscape Character Area Assessment SPD will help to ensure that the landscape is not degraded but rather its relationship with the community enhanced</p>

General Policies

<p>CS6 Sustainable Design and Development</p>	<p>This policy should set the design principles that new and existing development should adhere to. It should also address how development relate to the enhancement and creation of</p>	<p>Score: 0/+</p> <p>This policy has a number of sustainability benefits. Environmentally, the policy states that new building should reflect and enhance its setting whether it is the townscape, built heritage or landscape. Socially, the policy through BREEAM promotes a better living</p>	<p>A weakness of this policy is its lack of locally determined and specific design principles. More locationally relevant principles and hooks would allow the subsequent Development Delivery DPD to set more nuanced</p>
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Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
<p>place along with their relationship to the natural environment.</p>	<p>environment for residents along with improvements in health and well being.</p>	<p>and better standards of design.</p>	<p>A greater emphasis on the role that place plays in ensuring that new development is affordable in relation to strengthened design and build criteria is needed.</p>
		<p>Although not explicit it is recognised that developments should remain appropriate to their purpose thereby referencing the affordability and the required standard of design to be proportionate.</p>	<p>Building for Life criteria will help to shape distinct neighbourhoods. It will also aid in attracting and keeping young professionals in the Maidstone area by raising the standard of good design and improving the quality of the built environment.</p>
		<p>However, there is no clear linkage to existing buildings in this policy. If the policy is not modified there is a risk that social, environmental and design improvements in this area will be lost</p>	<p>The policy could be more proactive with regards to landscape protection and enhancement. The recognition that some development will have to occur on the borough's</p>
		<p>The positive sustainability impacts could be strengthened by incorporating Building for Life standards within the policy. These standards could be monitored by officers from the Council.</p>	
		<p>The high quality landscape in Maidstone might put onerous and restricting design constraints on developers thereby precluding the optimum use of available land.</p>	

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
			<p>greenfield land and within the local landscape offers the opportunity to produce well designed buildings that visibly enhance an area. Wording of this kind delimits the size of appropriate buildings possibly leading to increased housing or employment provision predicated on good design. Within a landscape setting the presumption is the smaller, less visible the better. A change of this kind could impact positively on SA Objectives 13,14 and 18</p> <p>Can the Policy be more closely linked to promotion of Maidstone’s regional role and economic prosperity? A higher standard of design could be attributed to Maidstone’s existing and future signature building</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
CS7 Sustainable Transport	<p>The aim of the Policy is to help implement a more integrated transport system which facilitates growth economic prosperity, improved movement and connectivity which references both the built and natural environment.</p>	<p>Score: ?</p> <p><u>SEE CAVEAT TO TECHNICAL APPENDIX</u></p> <p>There are key sustainability benefits through this policy whose central aim is to reduce the need to travel particularly by road and to promote an integrated transport network which interconnects the borough’s objectives such as economic prosperity, urban realm improvement and enhancement of the borough’s built and natural heritage</p> <p>A key element of the transport policy is to improve accessibility through public transport. This has been promoted by a number of interventions. These include both hard and soft transport measures such as park and ride service improvements and travel</p>	<p>and the locations appropriate for this kind of development.</p> <p>-</p> <p>The Policy does not commit to the delivery of critical projects needed to achieve the vision and spatial strategy of the Core Strategy.</p> <p>Identification of the projects that would have the most cross cutting positive impacts would give the CS the level of certainty that developers, businesses need if economic prosperity is a central aim of the document.</p> <p>The policy could be more specific with regards to the interventions needed to improve access to services and facilities such as GPS, post</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
		<p>plan promotion.</p> <p>The policy identifies the need to appraise development accessibility through a Transport Impact Assessment. The policy also will identify accessibility need through infrastructure delivery</p> <p>The policy is responsive to the profile of the different settlements, for example by acknowledging the adverse impact that HGV movement will have on rural roads. This has number of positive impacts on the sustainability objectives including improving the health and well being of the Borough's population</p> <p>Will the policy target areas in most need of transportation interventions? The policy is not spatially specific for example recognising the need to particularly improve the links to the poorly connected south of the borough⁹</p>	<p>offices and supermarkets. This is linked to the emphasis the Transport policy lays on economic development rather than improving the residents' quality of life which is strongly linked to soft transport interventions.</p>

⁹ These comments have been informed by DfT's recent Early Assessment and Sifting Tool (EAST) which can be used as an aid to help SAs' form an early view of how Transport options perform and compare

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
<p>CS8</p> <p>Economic Development</p>	<p>The Policy is committed to sustainable economic growth within the Borough which includes setting the framework for development which will generate 10000 new jobs.</p> <p>In this instance, a Core Strategy can be document for securing financial investment an area. As economic prosperity is a central aim of a CS a lack of a strong vision for economic development in this area can be detrimental.</p>	<p>Score: +</p> <p>Through the retention, intensification and regeneration of existing business sites, areas and buildings and the targeting of certain business industries the Policy has the potential to facilitate employment opportunities and retain businesses.</p> <p>Regenerating existing sites will reduce the impact on the countryside and biodiversity that would be detrimentally affected by developing new sites. The need to protect the environment should be traded off against the social and economical benefits that development brings.</p> <p>This policy is closely linked to Policy CS7 which states that areas of economic development should be supported by the transportation infrastructure improvements (e.g motorway junctions).</p> <p>The lack of specificity in the policy questions whether the available land specifically within the Town Centre will be optimally utilised. The</p>	<p>.</p> <p>The Policy should be closely linked to CS4 and CS6 to ensure that the extension of employment sites in areas of high landscape value create the right balance between economic development and environmental protection.</p> <p>As the CS is document for securing investment the Policy could articulate the intention to create distinctive places, quarters, clustering of uses and resources.</p> <p>The Policy could articulate a stronger linkage between the economic development in the Town Centre and regeneration of its urban fabric and specifically public realm improvements</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
		<p>effect of this policy and its sustainability benefits is closely linked to the Central Area Action Plan.</p> <p>While a planning framework exists to protect B class designated land there has been pressure to eat away at this allocation.</p> <p>The 2011 Employment Land Review (Draft) states that 15.2 hectares of B class warehousing land is required over the plan period but this amount has not been specified in the Core Strategy. Will the policy provide the required flexibility and certainty that businesses of this kind need?</p> <p>The presence of vacant poor quality office space in Maidstone Town Centre have kept rents low which is a disincentive to investment. Evidence suggests that businesses with office requirements now want to locate out of town at Junction 7 (Employment Land Review Draft 2011). Office developments in out of town locations would have significant detrimental sustainability impacts.</p>	<p><u>Word change:</u> Is bullet point 5 'will be granted for employment uses at or near to motorway junctions' too broad? It could be amended to 'some employment uses excluding office space etc'.</p> <p>In order to stimulate investment and economic development the Policy should reference Maidstone's strengths and weaknesses and the associated opportunity (e.g redundant commercial floorspace, its nighttime economy)</p> <p>Greater reference to Maidstone's role and future economic position within the region should be referenced</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
<p>CS9 Housing Mix</p>	<p>The Policy has been drafted under the auspices of the Borough’s housing growth targets and the need for different types of housing as evidenced by the SHMA.</p>	<p><u>Score: 0/+</u></p> <p>The Policy should encompass wider aspects of Housing.</p> <p>A greater level of detail is needed (see Mitigation comments) but in general the Policy will increase the amount of housing available and will have positive affects on Maidstone’s community including the elderly and young families.</p> <p>A more balanced housing distribution will lead to mixed communities and a stronger notion of place. This policy will have a number of associated effects such as reducing social exclusion and improving the public realm. The construction of affordable family housing particularly within the Maidstone Town Centre and urban area will lead to the retention of skills especially since it is allied with urban realm, economic and transport network improvements.</p>	<p>The housing size split and density should be specified in the policy and should include more detail on what where certain types of housing is suitable (e.g family). This level of certainty would aid delivery and help in place shaping</p> <p>Selection criteria should be developed to ensure that land supplied to meet housing needs are in an appropriate location with regards to the type of housing and do not contribute towards greater inequality.</p>
<p>CS10 Affordable Housing</p>	<p>The Policy is designed to improve the supply of affordable</p>	<p><u>Score: +</u></p> <p>The Policy should be read in conjunction with CS11. The Policy is robust and on the basis of the evidence</p>	<p>The Policy does not want to be too prescriptive but there should be a certain degree of specificity and</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
	<p>housing in the Borough.</p> <p>For developments of 15 dwellings or more or 0.5 hectares, 40% of these dwellings should be affordable. Only when the viability of a development is compromised may a lower percentage or financial contribution be accepted.</p> <p>The 40% threshold does not have a spatial aspect as it is not locationally variable but applies borough wide</p>	<p>base recognises that there is a need to provide affordable housing across the borough with specific reference to the acute need in rural communities.</p> <p>The Policy addresses the social need for those in rural areas where local residents are priced out of the housing market. The policy should impact positively upon retaining key workers and those with skills which benefit economic prosperity.</p> <p>Affordable housing provision is not restricted to deprived areas and should aid in producing mixed communities.</p> <p>The Policy does not want to be too prescriptive but there should be a certain degree of specificity and detail.</p> <p>The policy does not set the criteria for family housing locations nor does it set an overall target (percentage) for new housing to be suitable for families.</p> <p>It should be acknowledged that addressing the social need of communities within rural communities could have negative environmental impacts if built in or close to the local landscape and, or sites of historical and ecological significance.</p>	<p>detail.</p> <p>The policy does not set the criteria for family housing locations nor does it set an overall target (percentage) for new housing to be suitable for families.</p> <p>Selection criteria should be developed to ensure that land supplied to meet affordable housing are in an appropriate location and do not contribute towards greater inequality.</p>

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
<p>CS11 Local Needs Housing</p>	<p>The Policy aims to address the need for local needs housing and has strong links to community consultation, economic development and place shaping</p>	<p><u>Score: ++</u></p> <p>The policy has a number of positive Sustainability Objective impacts. It is designed to counter social exclusion through addressing the need of its residents and reducing the need to travel by connecting local housing need with places of employment. This policy subsequently impacts upon the retention of skills in predominantly rural areas.</p> <p>The Policy also addresses design issues through development being appropriate to the scale and setting of its environment. It is also a proactive policy in developing place identity which impacts upon well being and fear of crime</p>	
<p>CS12 Gypsy and Traveller Accommodation</p>	<p>The Policy aims to meet evidenced GTS accommodation need by allocating 71 pitches over the plan period</p>	<p><u>Score: +</u></p> <p>This policy should provide positive impacts in terms of providing sites and development to meet the needs of the Gypsies and Travellers and</p>	

Policy	Neutral Summary	Positive/Negative Impacts (Scoring)	Mitigation Measures
		<p>Travelling Show People communities, and thus provide for social equality and accommodation needs for the entire population of the Borough</p> <p>Implementation is very important in this policy, and a set of criteria which has special regard to transportation issues and protection of the Maidstone’s high quality countryside has been developed.</p>	
		<p>The level of provision has been based on the North and West Kent Travelling Showpeople Study 2007 and the 2005/2006 Gypsy and Traveller Accommodation Assessment that Maidstone Council conducted in conjunction with neighbouring boroughs.</p>	
		<p>To reduce the current very uneven distribution of provision across the region, need will be met by some boroughs over-providing and some under providing in relation to the GTAA assessments</p>	

<p>CS13 Natural Assets</p>	<p>The Policy acknowledges the need to protect and enhance the Borough's valuable Natural Assets</p>	<p><u>Score: +</u></p> <p>The Policy performs well against the SA Objectives but there is a lack of specificity with regards to Natural Asset measures and projects that could enhance the Borough's economy and biodiversity.</p> <p>The Borough's Natural Assets are viewed as a mechanism that will lead to positive secondary impacts on health and wellbeing. Through the inception of a wider network of green and blue spaces measures to address the Borough's deficiency in open space will be addressed.</p> <p>Accessibility and linkages between the Borough's Green Wedges will also be addressed by a network of green and blue spaces thereby helping movement through the Borough. The network will have positive impacts on the Borough's heritage assets and legibility. This could positively contribute to job creation in the leisure and recreation industry thereby having positive social and economic impacts.</p> <p>There is a recognition that the Borough's Natural Assets should not have negative effects against the encouragement of employment and economic competitiveness. The Policy allows for development in high quality</p>	<p>Suggest that the Policy is retitled Natural and Built Assets. The Policy would then have the scope to augment and utilise the potential of the built heritage (e.g to protect the beneficial reuse of old building that provide suitable locations for employment uses such as SMEs). This is a cross cutting issue which has links to economic prosperity, notion of place, business innovation (SA objectives 10, 14, 18)</p> <p>The Policy could be more specific and proactive with regards to the measures that could connect the Borough's network of fragmented biodiversity habitats</p> <p>Is there a tension between the lack of greenspace in the south east of the Maidstone Urban Area and the location of significant new housing development in this location. Where open space provision is poor and it is where new housing is located the policy could state something along the lines of <i>'the identity of this should be focused around provision of open space.'</i></p> <p><i>Achievement of the Policy aims are brought into question by the lack of monitoring indicators. It</i></p>
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natural environment where it is appropriate and suitable.

is suggested that the monitoring indicators are strengthened.

CS14 Infrastructure Delivery
 In order to ensure that the proposed level of growth is sustainable, equitable and achievable the Council has a duty to plan for the adequate and timely provision for infrastructure. This policy addresses the funding measures used to accomplish this aim by utilising CIL and S106. A degree of flexibility is included within the Policy.

Score: +
 This policy would have positive impacts on all aspects of sustainability. Through the Community Infrastructure Levy a proactive strategic approach to infrastructure provision has been adopted which through the Development Delivery DPD will tackle social, environmental and economic deficiencies borough and area wide. There will be benefits in all sustainability strands e,g socially, environmentally and economically.
 Developer contributions to the strategic transport infrastructure may lead to increased impact on Maidstone’s existing poor air quality and pollution but this is offset by Policy CS7 which emphasises sustainable travel modes and reduction in the need for private transport

6. Significant Effects, Mitigation and Monitoring

Introduction

This section aims to bring together the main findings of the SA. The most important part of this section is the identification of significant potential sustainability effects, and setting out measures to mitigate these effects.

Table 9 sets out the key significant effects that have been predicted through this appraisal. Not all potential mitigation recommendations that were highlighted in the previous Table (8) are included below in the Sustainability Appraisal's key recommendations. Rather, these have been distilled to form some key messages.

The Council should take onboard the recommendations set out to mitigate and monitor these significant effects. In the case of monitoring recommendations it is important to note that these are initial and in some cases aspirational ideas. It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

Significant Effects, Mitigation and Monitoring

There are a number of effects or areas of concern with respect to the performance of the Core Strategy against the SA Framework. The areas of concern are shown below.

Significant Effect	Mitigation	Monitoring	Council's Comments
<p>Air Quality</p> <p>There is an issue surrounding the distribution of development. Focusing the majority of development in and around the Maidstone conurbation could lead to decreased air quality. The whole of Maidstone Town Centre has already been</p>	<p>Core Strategy policies have taken this issue into account. The aim is to slow down the deterioration in Maidstone Town Centre through a number of measures including travel planning.</p> <p>The notion of monitoring hotspot sites</p>	<p>Air pollution levels in Town Centres.</p> <p>Average journey time per mile for key routes (Congestion): Indicator: KCC 001</p> <p>Air Quality Action Plan Update: Indicator ENH SP001</p>	

declared an AQMA . It is acknowledged that the council intends to reduce the need to travel and is initiating a number of soft transport measures which may have positive impacts.

Evidence states that on the basis of current trends, air quality in Maidstone Town Centre can at best be mitigated not improved.

within the Town Centre has been stated. To translate this monitoring into practice could the concept of Clear Air Zones be explored. This could then inform and co-ordinate with the development the Green and Blue Grid

Water Resource

The South East has been identified as an area of 'water stress.' The levels of additional housing and overall development, both within Maidstone Borough and across the region will place further strain on water resources.

Although the Water Cycle Strategy indicates that the quantum of proposed development can be accommodated by the water resources there are concerns surrounding wastewater

The impact of new development on the water supply will be minimised through BREEAM design standards. As identified by the Maidstone's Water Cycle Strategy, the water supply priority is to achieve certainty on the construction of the new reservoir in Canterbury.

As identified by the Water Cycle Strategy Maidstone has one of the highest levels of water consumption per head in the country.

The Council could develop indicators showing per capita water consumption and domestic per capita consumption as elements that will elicit a change in behaviour.

treatment and limited sewerage system capacity in Maidstone.

Open Space
 There is a concern that the focus of new development in the Maidstone Town Centre and Urban Area will exacerbate the poor provision of open space

It is likely that innovative uses of green space provision within the Town Centre will be required to meet the required level of provision.

Open space could be included within the wording of Policy CS2. Its definition has a wider scope e.g space in public and private ownership. Provision of open space is allied to perception and has a more expansive connection with street hierarchy, design of places. Provision of open space also relates to preservation of local views etc.

A strategy to counter the underprovision of Open Space in Maidstone Town Centre and Urban Area is hampered by the lack of local monitoring and indicators. The Council should consider developing indicators showing how much open space is being lost, e.g private gardens being converted into parking spaces or decking.

Economic Development
 Is the level of economic development deliverable?

To strengthen the effect of the Core Strategy against relevant SA objectives an amendment to CS8 could be made

supporting the development of start up units for small business location.

A wider issue relating to SA Objective 18 is the onus put on Maidstone’s Central Area Action Plan to deliver economic growth. Does the Core Strategy identify economic strengths and opportunities?

There is very little mention of its night time economy in CS1 and CS8 and the mechanisms involved in attracting highly skilled residents to work in the borough (e.g a strategy for office blocks, the criteria for employment hubs etc)

<p>Skills –</p> <p>There could be more detail in the CS that will lead to positive impacts on skills development</p>	<p>The Core Strategy could mention that it will work with partners to improve skills in the workforce, promote apprenticeships</p> <p>In addition it could state that it will work with job brokerage services to increase</p>
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<p>within the borough.</p>	<p>the number of young people obtaining access to employment opportunities.</p>
<p>The campus quarter designation as a possible focus for education uses is located on the side of Maidstone Town Centre away from the Borough's areas of deprivation</p>	<p>The Policy could state something along the lines of prioritising movement corridors from and to areas of deprivation and their access to resources such as education and skills.</p>

Transport

There are a number of implicit aspirations in the Policy and these can be assessed positively against the SA Objectives. However, the Policy does not substantially commit to any specific measures in itself such as enhancing the Borough's public transport services, pedestrian routes, or creating a cycle network. Rather the Policy leaves implementation of the aspirations to a Development Delivery document which will deal with these issues on a site by site

More concrete Transport measures are needed within the Policy to assess its impact on the Borough

basis.

Implementation of

proactive

Transport

measures also

refers to the ITS

but it only

mentions that this

has *an aim of*

developing and

implementing a

number of

schemes to deliver

better

accessibility." On

that basis for all

the Policy's implicit

aspiration it is

problematical to

assess the impact

of this policy

against the SA

Objectives. As a

result the

predicted effect is

predominantly

unknown.

General

Lack of specificity of broad areas of policy development

The Core Strategy acknowledges that not all infrastructure provision can be funded and a prioritisation of projects is needed. Without a level of spatial specificity within the Core Strategy it is not easy to see how relevant cross cutting themes interconnect and what projects should be prioritised.

Summary of Council's Comments - Impact on the Appraisal

Inserted at a later date

Appendix I

As part of Stage A1 of the SA a number of key issues were identified which the Core Strategy should address. They were drawn from the Scoping Reports of 2005 and 2009 and the incorporated Context Review. Key issues for the Borough are shown in Table 10. The list is divided into the various policy strand areas but do not exactly conform with the thematic chapter configuration in the Core Strategy.

Maidstone Town Centre
The need to reduce congestion in the Town Centre
The need to improve air quality in the Town Centre
The need to regenerate the Town Centre and combat deprivation
The need to provide quality office space in the Town Centre
The need to enhance the public realm, including green infrastructure
Maidstone Urban Area
The need to ensure that new development at the edge of the urban area facilitates access to the urban fringe and countryside, particularly through the provision and maintenance of green infrastructure
The need to ensure that any parts of the urban fringe which are currently or potentially subject to dereliction are considered
Coalescence between Maidstone and Medway towns (and Tonbridge and Malling) conurbations should be avoided
The need to preserve and protect the distinctive character and identify of Maidstone's villages
Opportunities to improve the function of the urban fringe should be exploited
The need to protect areas of biodiversity including ancient woodlands and local wildlife site
Maidstone Rural Areas
The need to manage the impacts of growth (particularly traffic) within the RSCs and in the surrounding area
The continued and improved provision of alternatives to private cars
The maintenance of open spaces
Access to key facilities and services

Maintenance and viability of local facilities and services
Maintenance and enhancement of the local distinctiveness and character of the individual villages.
Rural Settlements and the Countryside
The need to ensure that new development enhances the quality of rural villages
The need to support economic diversification
Housing affordability
Access to key facilities and services
The need to manage the impact of rising traffic levels
Protection of special landscape values.
Air Quality and Climate Change
The need to improve air quality in the AQMAs, including the Town Centre, key road junctions and the M20
The need to reduce greenhouse gas emissions to meet Government's targets
The need to increase the renewable energy capacity in the Borough
The need to adapt to climate change.
Biodiversity and Green Infrastructure
The need to conserve and enhance the biodiversity and protected areas in Maidstone (informed by the Maidstone Biodiversity Action Plan).
The need to enhance existing green spaces and where an under provision has been identified, contributions from development should be sought.
The need to conserve and enhance water courses and their benefits to biodiversity and public amenity.
Community Wellbeing
The challenge of meeting the needs of a growing population and particularly the elderly
The need to reduce inequalities in the Borough by addressing the issues of the most deprived areas and the most vulnerable groups and particularly the young and deprived
The low performance of some of the schools in the Borough
The impacts of air quality on health
Reducing the number of road accidents.

Economy
The need to maintain and enhance the characteristics of the Borough that contribute to attracting high quality and high value business and workers, e.g. quality public realm and green space, availability of suitable land, premises and facilities
The need to encourage new business creation particularly those which may lead to specialisation of the economy and innovation
The current inequalities in income and employment within the Borough.
Flood Risk
The need to take the findings of the SFRA into account in preparing policies and allocating sites for new development
The need to include SUDS as part of new developments
The need to ensure that the sewer infrastructure is appropriate to the levels of new development.
Housing and Affordable Housing
To ensure the provision of affordable housing in a sustainable manner
To ensure that the size of new homes, particularly affordable housing meet the needs of the existing and future population, including elderly people.
Gypsy and Travellers
The need to provide sufficient additional pitches in line with identified need.
The need to ensure that new sites are located with adequate access to services such as health and schools.
Land use, Landscape and the Historic Environment
The need to protect the Borough's landscape and historic assets from inappropriate development
The need to maximise the amenity and regeneration value of Maidstone's historic environment
The need to identify and avoid if appropriate remediate contaminated land in the Borough.
Transport and Accessibility
The need to reduce congestion in Maidstone Town
The need to improve access and public transport, particularly in rural areas
The additional pressure that new development will put on the transport network
The need to maintain or improve the links with London.

Waste
To maintain positive trends in terms of household waste recycling, composting and reduction
To minimise the amount of waste from all sources going to landfill
Water
Maidstone is located in a water scarce area, which will be exacerbated due to climate change and future growth and development
The need to improve the water quality of Maidstone's water courses in line with the Water Framework Directive requirements
The need to ensure distribution and location of new development takes the water supply and sewerage infrastructure into account

Appendix II – Baseline Indicators

Baseline data in the Scoping Reports and the 2007 Core Strategy Sustainability Appraisal Report is presented in the form of indicators. An initial set of 76 indicators was identified. The table below shows the complete list of baseline indicators investigated. The indicators have been based around the SA objectives and are the basis on which the DPD is appraised. National Government has moved away from using National Indicators to Local Indicators. Maidstone Council has been using Local rather than National Indicators for a number of years because it is considered that they provide a more accurate, nuanced rather statistical data.

Baseline Indicators	
<i>SA Objective</i>	<i>Indicator</i>
<p>To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p> <p>Will it improve the mix of dwelling sizes and tenures?</p> <p>Will it increase the number /</p>	<p>Tenant satisfaction / participation</p>

<p>proportion of decent homes?</p> <p>Will it improve the supply of affordable housing?</p> <p>Will it address changes in future housing need</p> <p>Will it increase the supply of Lifetime Homes?</p> <p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p> <p>Will it limit development in the flood plain?</p> <p>Will it reduce the number of properties affected by flood incidents?</p> <p>Will it employ the use of SuDS?</p> <p>To improve the health and well-being of the population and reduce inequalities in health</p> <p>Will it reduce rates of sickness and death</p> <p>Will it improve accessibility to local GP?</p> <p>Will it reduce noise pollution?</p> <p>Will it encourage healthy lifestyles, including travel choices?</p> <p>To reduce poverty and social exclusion and close the gap between the most</p>	<p>Decent Homes</p> <p>Provision of affordable housing</p> <p>Homelessness</p> <p>Number of houses built per annum</p> <p>Development in the floodplain</p> <p>Properties at risk from flooding Conditions of drainage channels</p> <p>Number of properties incorporating SUDS</p> <p>Death rates</p> <p>Access to GP</p> <p>Public concern over noise</p> <p>Access to green space</p>
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<p>deprived areas in the Borough and the rest</p> <p>Will it reduce poverty and social exclusion in those areas most affected?</p> <p>Will it reduce the number of households in fuel poverty?</p> <p>Will it reduce the number of households with no central heating?</p> <p>Will it reduce the number of children living in low income Households?</p>	<p>Index of deprivation</p> <p>Percentage of households in fuel poverty</p> <p>Number of households with no central Heating</p> <p>Children (under 16) living in low income Households</p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p> <p>Will it increase the numbers of school-leavers achieving GCSE passes?</p> <p>Will it increase numbers undertaking further and higher education?</p> <p>Will it enhance opportunities for adult education?</p> <p>Will it encourage training opportunities for higher quality employment?</p>	<p>People 16-74 with qualifications (highest)at Level 2 (%)</p> <p>Proportion of people qualified to degreelevel or higher</p> <p>Proportion of adults with poor literacy and numeracy skills</p> <p>Proportion of people qualified to degree level or higher</p>
<p>To reduce crime and the fear of crime</p> <p>Will it reduce actual levels of crime?</p> <p>Will it reduce the fear of crime,</p>	<p>Crime rates</p> <p>Fear of crime</p>

<p>esp. among vulnerable individuals / communities?</p> <p>Will it aid in adopting Safer by Design technologies?</p> <p>To create and sustain vibrant, attractive and clean communities</p> <p>Will it increase the ability of people to influence decisions?</p> <p>Will it encourage engagement with community activities?</p> <p>Will it increase opportunities for consultation?</p> <p>To improve accessibility to all services and facilities</p> <p>Will it improve access for the disabled?</p> <p>Will it improve accessibility to health, education, shopping and leisure?</p> <p>Will it enhance community and public transport?</p> <p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p> <p>Will it increase the numbers involved in cultural activities?</p> <p>Will it increase the number of cultural enterprises/ organisations in the Borough?</p>	<p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p>Access for disabled</p> <p>Access to Post office, Food shops Primary school</p> <p>Number and distribution of local bus Routes</p> <p></p> <p>Data Gap</p> <p>Amount of investment in cultural funds</p>
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<p>To improve efficiency in land use</p> <p>Will it use land that has been previously developed in preference to Greenfield?</p> <p>Will it re-use buildings and materials?</p> <p>Will it protect and enhance the best and most versatile agricultural land?</p> <p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p> <p>Will it improve air quality?</p> <p>Will it reduce other forms of pollution such as light pollution?</p> <p>Will it improve travel choice?</p> <p>Will it reduce the need for travel by car / lorry?</p> <p>Will it reduce the need to travel for long distances?</p> <p>Will it reduce the need to travel for commuting?</p> <p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p> <p>Will it reduce emissions of greenhouse gases?</p> <p>Will it reduce traffic volumes?</p> <p>Will it encourage travel by</p>	<p>New homes built on previously developed land (%)</p> <p>Buildings available for re-use</p> <p>Agricultural land quality</p> <p>Number of days of air pollution</p> <p>Heavy goods vehicles</p> <p>Average daily motor flows</p> <p>Travel to work (%) by mode</p> <p>CO2 emissions</p>
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<p>means other than the car?</p> <p>Will it assist in preparing the Borough for impacts of climate change?</p> <p>Will it assist in new homes meeting the BREEAM standards?</p> <p>To conserve and enhance the Borough’s biodiversity and geodiversity</p> <p>Will it protect sites designated for nature conservation interest?</p> <p>Will it help achieve Biodiversity Action Plan targets?</p> <p>14. To protect, enhance and make accessible for enjoyment, the Borough’s countryside, open space and historic environment</p> <p>Will it protect or enhance sites, features of areas of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled monuments)?</p> <p>Will it enhance, protect and make accessible for enjoyment the Borough’s water environment?</p> <p>Will it create vibrant, multifunctional countryside in and around towns?</p> <p>Will it protect and enhance the historic environment within built-up areas?</p> <p>Will it protect and enhance open</p>	<p>Percentage of homes meeting BREEAM Very Good standard</p> <p>% SSSIs in good condition</p> <p>Extent and condition of key habitats for which BAP have been established</p> <p>Grade I and II* listed buildings at risk of decay</p> <p>Access to and use of the countryside</p>
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<p>spaces of amenity and recreational value?</p> <p>Will it maintain and enhance the character of landscape and townscape?</p> <p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p> <p>Will it reduce household and other forms of waste?</p> <p>Will it increase waste recovery and recycling?</p> <p>Will it encourage waste treatment locally?</p> <p>Will it increase opportunities for domestic recycling?</p> <p>16. To achieve sustainable water resources management</p> <p>Will it reduce water consumption?</p> <p>Will it reduce the generation of wastewater?</p> <p>Will it encourage the re-use of water?</p> <p>Will it improve the quality of the Borough's rivers?</p> <p>Will it improve the quality of the Borough's groundwater?</p>	<p>Household waste arisings</p> <p>Percentage of waste arisings recycled, composted, used to recover heat etc</p> <p>Recycling of household waste (%)</p> <p>Rivers of Good or Fair chemical and biological water quality</p>
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<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p> <p>Will it increase the proportion of energy needs being met from renewable sources</p> <p>Will it reduce the demand for energy?</p>	<p>Energy generated from renewable Sources</p> <p>Percentage of homes meeting BREEAM Very Good standard</p>
<p>To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p> <p>Will it ensure high and stable levels of employment?</p> <p>Will it promote 'conditional growth' (balancing growth with housing provision and investment in social infrastructure?)</p> <p>Will it stimulate economic revival in priority regeneration areas?</p> <p>Will it increase provision of better quality jobs /skilled employment?</p> <p>Will it ensure the correct mix of skills to meet the current and future needs of local employers?</p> <p>Will it encourage the development of a buoyant, sustainable tourism sector?</p>	<p>Proportion of people of working age in Employment and Average gross weekly earnings</p> <p>New business formulation rate and House income to price ratio</p> <p>Unemployment rate</p> <p>Proportion of professional occupations among employed workforce</p> <p>Proportion of elementary occupations amongst employed workforce</p> <p>Percentage of jobs in the tourism sector</p>

Appendix III – Maidstone’s Key Issues

Stage A3 of the SA process involves the identification of the key sustainability issues. Below is a synopsis of the main sustainability issues identified by the Scoping Reports undertaken in 2009 and 2005. It has also taken into account a number of evidence based documents produced since 2009 such as Maidstone Borough Council Strategic Housing Market Assessment 2010, The Rural Service Hierarchy Report 2010, the Draft Landscape Character Assessment 2011 Maidstone Outline Water Cycle Study 2010 and Maidstone Draft Local Biodiversity Action Plan.

Sustainability Issue	Supporting Evidence
Social:	
Pockets of Deprivation	<p>In terms of employment there are 4 wards in Maidstone which are in the 20% most deprived in Great Britain (High Street, Park Wood, Shepway North and Shepway South). Likewise there are 6 wards which are among the 20% most deprived in terms of income (East, High Street, Park Wood, Shepway North, Shepway South and South wards)</p>
Shortage of Affordable Housing	<p>Annual need for affordable housing is double the target for all housing (1081 based on predicted need)</p> <p>In the urban area three and four bedroom houses are predicted to be the tenure most needed in the affordable and market sector in the urban area</p> <p>There is a significant need for 1 bed affordable housing - 2 and 3 bed housing is also needed.</p> <p>26% of single pensioners are unable to afford market housing (Maidstone Strategic Housing Market Assessment 2010)</p>

Access to Services	<p>Given the rural profile of the Borough limited public transport makes it difficult for those without private transport such as the elderly and young to gain access to services. Lack of appropriate access to and from the south of the Borough is particularly acute (Maidstone Integrated Transport Strategy 2005-2015).</p>
Crime	<p>Maidstone has the third highest number of entrants entering the criminal justice system of any Borough in Kent (Maidstone SA Scoping Report 2009)</p>
Education & Skills	<p>The proportion of people qualified to degree level or higher is relatively low (SA 2007 - Indicator)</p> <p>The proportion of 16-18 year olds who are not in employment or training is relatively high (p51 Scoping Report 2009)</p> <p>Some schools performed below the 30% threshold set by the national government (Maidstone Scoping Report 2009)</p>
Wage Disparity	<p>There is a marked disparity (22.89%) between those who work in Maidstone and those who commute to London or elsewhere. In 2009, the average Maidstone resident earned £23,313 and the average person who worked in Maidstone earned £18,971. The gap between residential and workplace earnings in Maidstone was greater than in Kent where the difference was 13.19% in 2009. The disparity between workplace and residential earnings has widened since 2008 in Maidstone and Kent (Maidstone AMR 2010).</p> <p>This issue is linked to retention of skills and the health of the Town Centre through expenditure leakage.</p>

Economy:

<p>Skills Leakage/Out Commuting</p>	<p>Graduate retention is falling and more higher level skills are being lost to London through out-commuting</p> <p>Local businesses are reporting recruitment problems and a lack of skills within the labour force exacerbated by high local house prices which are driving younger employees to jobs in other areas where home ownership is more affordable (West Kent Area Investment Strategy and Action Plan 2010-2015)</p> <p>Estimates suggest that 60.79% of Maidstone Borough residents work in Maidstone Borough, 9.86% work in Tonbridge and Malling, 1.62% work in Ashford, 5.54% work in Medway and 10.22% work in Greater London, the remaining residents working elsewhere (Maidstone AMR 2010).</p>
<p>Employment Land</p>	<p>Although there have been constraints on Greenfield development and previously strong housing markets this has not led to a significant loss in Maidstone’s Employment land.</p> <p>While a planning framework exists to protect B class designated land there has been pressure to eat away at this allocation.</p> <p>The 2011 Employment Land Review (Draft) states that 15.2 hectares of B class warehousing land is required over the plan period but this amount has not been specified in the Core Strategy. Will the policy provide the required flexibility and certainty that businesses of this kind need?</p> <p>The presence of vacant poor quality office space in Maidstone Town Centre have kept rents low which is a disincentive to investment. Evidence suggest that businesses with office requirements now want to locate out of town at Junction 7 (Employment Land Review Draft 2011). Office developments in out of town locations would have significant detrimental sustainability impacts in the areas such as transport, the quality of the built environment</p>

and reducing social exclusion.

<p>Transport</p>	<p>In comparison to the rest of the South East and England there are high levels of dependence on the private car for commuting to work.</p> <p>Accessibility to and from the south of the borough is poor</p> <p>There are a lack of viable alternatives to the car, including limited cycle and pedestrian networks, poor public transport in rural areas, inadequate rail links and slow journey times. With regard to the rail service provision a new HS1 service between Maidstone West and London St Pancras started in May 2011. The service will be reviewed at the end of 2011.</p> <p>Maidstone Town Centre suffers from severe traffic congestion (2011Maidstone Draft Transport Strategy)</p>
<p>General</p>	<p>The unspecialised nature of the economy and lack of innovation are identified as key weaknesses in Maidstone's economy</p> <p>Business stock is weak and Maidstone's business services do not capture key industries.</p> <p><u>Strengths include business density and high levels of entrepreneurship.</u></p>
<p>Environment</p>	
<p>Open Space</p>	<p>There is inadequate provision of open space within the Borough particularly within the Maidstone Town Centre</p>
<p>Air Quality</p>	<p>Around Maidstone Town Centre, the key road junctions to the Urban Area and the M20 generally poor air quality exists as primarily a result of traffic emissions and congestion.</p> <p>Three additional air pollution „hotspots“ have been recently identified at busy traffic junctions</p>

within the Maidstone Town urban area (Fountain Lane, Well Street and Wheatsheaf Junction)

Maidstone Town Centre and Urban Area has been declared an AQMA

Biodiversity

Maidstone is rich in biodiversity and has a wide range habitat areas which are sensitive to change

Maidstone has fragmented areas of high biodiversity and flooding. Enhancing and maintaining the health of these biodiversity areas and reducing the risk of flooding would be to create to create an interconnected series of habitat zones

Landscape

80% of Maidstone’s landscape is considered to be of high quality. Development in rural areas should be sensitive to the character of village areas and the surrounding countryside, much of which is subject to a number of environmental concerns such as AONB and Special Scientific Interest (Draft Landscape Character Assessment 2011).

The Maidstone SHLAA shows that large housing sites will have to be built on Greenfield land. This will have an impact on Maidstone’s landscape and careful consideration should be given to the Core Strategy design policy.

SUSTAINABILITY APPRAISAL

TECHNICAL APPENDIX

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Introduction

The Technical Appendix

This Technical Appendix is part of the Sustainability Appraisal for Maidstone's Public Participation Core Strategy DPD (September 2011). It is not a stand alone document but rather presents the detailed findings pertaining to the Core Strategy's Spatial Objectives and Policies.

The Spatial Objectives and Policies have been assessed against the 18 Sustainability Objectives adopted through a process of Stakeholder consultation by the Council (see Table 1). These 18 Sustainability Objectives form the SA framework for the Borough.

This Appendix appraises each Spatial Objective and Policy against each SA Objective. This means that the 14 Spatial Policies they have been appraised against the 18 components that constitute the SA framework.

Table 1: The SA Objectives

Sustainability Objectives

To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home

2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment

3. To improve the health and well-being of the population and reduce inequalities in health

4. To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest

5. To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work

6. To reduce crime and the fear of crime

7. To create and sustain vibrant, attractive and clean communities

8. To improve accessibility to all services and facilities

9. To encourage increased engagement in cultural activity across all sections of the community in the Borough

10. To improve efficiency in land use

11. To reduce road congestion and pollution levels and ensure air quality continues to improve

12. To address the causes of climate change and ensure that the Borough is prepared for its impacts

13. To conserve and enhance the Borough's biodiversity and geodiversity

14. To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment

15. To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste

16. To achieve sustainable water resources management

17. To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough

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

Table 2: Appraisal Scoring Criteria

Symbol	Likely effect on the SA Objective
++	The option is likely to have a very positive impact
+	The option is likely to have a positive impact
0	No significant effect/clear link
?	Uncertain or insufficient information on which to determine impact
-	The option is likely to have a negative impact
—	The option is likely to have a very negative impact

2. Spatial Objectives and Policies

The Core Strategy is comprised of 11 Spatial Objectives (see Table 3). They have been derived from the Sustainable Community Strategy to ensure that the Core Strategy Vision is achieved.

The Core Strategy Vision is:

- By 2026 Maidstone will be a vibrant, prosperous and sustainable community benefiting from its exceptional urban and rural environment
- The Core Strategy will deliver sustainable growth and regeneration whilst protecting and enhancing the Borough's natural and built assets
- Development will be guided by a sustainable and integrated transport strategy together with the timely provision of appropriate strategic and local infrastructure
- The character and identity of rural settlements will be maintained by directing suitable development and supporting infrastructure to the Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst.
- Employment skills will be expanded to meet and improved and varied range of local jobs
- There will be a better balanced housing market to meet the needs of the community
- Development will be of high quality sustainable design and construction to respond to climate change and to protect the environment.

The Spatial Objectives are the geographical expression of the Core Strategy Vision and Maidstone's Sustainable Community Strategy. The objectives guide the whole plan and the distribution of development and form the basis for the Spatial Policies.

The aim of this appraisal is to ascertain whether there are any sustainability conflicts inconsistencies or beneficial synergies between the Spatial Objectives and the Sustainability Objectives.

The 11 components are shown in Table 3 and their appraisal is shown in Table 4.

Table 3

Spatial Objectives

1) To provide for 10,080 new homes and 10,000 new jobs with an emphasis on increasing skilled employment opportunities in the Borough alongside developing learning opportunities

2) To focus new development mainly within the Maidstone urban area with :

- 80% of new housing built within and adjacent to the urban area of Maidstone with appropriate sustainable greenfield development being well located in relation to existing services in the urban area
- The aim of providing 60% of new housing across the plan period on previously developed land and through the conversion of existing buildings
- New employment land allocations to be exploited in Maidstone Town Centre first co-ordinated with opportunities on the most suitable greenfield sites to provide for a suitable mix of employment opportunities
- The creation of opportunities to provide opportunities for local power generation

3) To transform the offer, vitality and viability of the town centre including office, retail, further and higher education, leisure, cultural and tourism functions together with significant enhancement to the natural and built environment particularly in respect of the riverside environment

4) To consolidate the roles of the Rural Service Centres at Harrietsham, Headcorn, Lenham, Marden and Staplehurst as the focus of the network of rural settlements with retained existing services and regenerated employment sites including expansion of existing employment sites where appropriate

5) To support new housing in the smaller villages that meet local needs and is of a design, scale, character and location appropriate to the settlement and which

Spatial Objectives

supports the retention of existing services and facilities

6) To safeguard and maintain the character of the borough's landscapes including the Kent Downs AONB and other distinctive local landscapes whilst facilitating the economic and social well-being of these areas including the diversification of the rural economy

7) To retain and enhance the character of the existing green and blue infrastructure and to promote linkages between areas of environmental value

8) To ensure that new development takes account of the need to mitigate the impact of climate change and adapt to climate change and also to improve air quality by locating development to minimise the use of resources, to promote sustainable travel patterns, to develop a greater choice of transport measures, to support water and energy efficiency measures and to encourage renewable energy sources and sustainable drainage solutions

9) To ensure that new development is of high quality design, making a positive contribution to the area including protection of built and natural heritage and biodiversity

10) To provide for future housing that meets the changing needs of the Borough's population including provision for an increasingly ageing population and family housing, an appropriate tenure mix, affordable housing and accommodation to meet the needs of the local gypsy and traveller community

11) To ensure that key infrastructure and service improvements needed to support delivery of the Core Strategy objectives and policies are brought forward in a co-ordinated and timely manner and that new development makes an appropriate contribution towards any infrastructure needs arising as a result of such new development

Table 4

SA Objectives	Spatial Objectives Appraisal
To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home	+
To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	+
3. To improve the health and well-being of the population and reduce inequalities in health	+
To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest	0
To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work	+
To reduce crime and the fear of crime	0
To create and sustain vibrant, attractive and clean communities	0
To improve accessibility to all services and facilities	+
To encourage increased engagement in cultural activity across all sections of the community in the Borough	+
To improve efficiency in land use	?

SA Objectives	Spatial Objectives Appraisal
To reduce road congestion and pollution levels and ensure air quality continues to improve	-
To address the causes of climate change and ensure that the Borough is prepared for its impacts	0
To conserve and enhance the Borough's biodiversity and geodiversity	++
To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment	++
To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste	0
To achieve sustainable water resources management	+
To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough	+
To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough	+

Synopsis of Findings

The Spatial Objectives on the whole score well against the SA objectives particularly with regard to environmental objectives and protection and enhancement of the AONB and greenfield land. The construction of a Blue and Green Grid will enhance Maidstone's natural environment and result in a number of cross cutting outcomes such as increased accessibility and permeability through the Borough which will link to enhancement and setting of its built heritage and the associated positive economic tourism effects.

The objectives try to strike the right balance between protection and enhancement of the Borough's environment and the need to build future housing. In this instance the restrictions on the location of future housing is balanced by the strong commitment to support appropriate housing development in the Rural Service Centres. The dispersed pattern of development which the Objectives reflect will have positive benefits on housing affordability and through a commitment to respond to local need. The Core Strategy's departure from the urban extension option advocated in the 2007 Preferred Options Core Strategy has meant that a number of negative impacts on the SA Objectives (e.g 13, 14 and to a lesser extent 7) have been avoided. In addition if further detail is included in the Core Strategy it is possible that the objectives will score highly on improving efficiency in land use.

The commitment to support appropriate housing, economic and social development in the Rural Service Centres and smaller villages along with the concentration of development in Maidstone's existing urban area should help overall accessibility to services and help to augment existing infrastructure. In this instance, the objectives have the potential to significantly help transport related issues such as a reliance on the car in the Rural Service Centres and to a lesser extent the smaller villages. If the role of RSCs are consolidated it is possible that they could play a greater role in economic and social terms for their outlying smaller villages, thereby reducing the length of trip generation.

Notwithstanding the potential for a limited modal shift due to the rural nature of the Borough it is felt that there could be more emphasis should be placed on generating multi modal transport with specific reference to cycling and walking facilities. In this instance the structure of the objectives is unhelpful, as more than one issue is addressed in a single objective (see Ob 8)

The objectives score well against climate change issues but there are concerns with respect to air quality. The dispersal method of development in conjunction with the non locationally specific concentration of development in Maidstone Town Centre and Urban Area will not improve air quality. At best it is likely that

the quality will remain the same as the whole of Maidstone Town Centre and Urban Area has been declared an AQMA.

While it is recognised that concentrating the majority of development in Maidstone Urban Area and Town Centre will aid biodiversity, AONB, greenfield land and discourage car based use, the levels of air pollution in this area is likely to increase. As a consequence the objectives should compensate for this impact by greater emphasis on promoting and facilitating sustainable travel patterns through stronger emphasis on public realm, road hierarchy, built fabric, open space improvements. It is suggested that two objectives relate specifically to Transport issues.

It is not anticipated that the overall Spatial Objectives will contribute to significant effects to health, poverty or skills related SA Objectives however, these have been addressed by general policies within the Core Strategy.

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3. Locational Policies

Policy CS1: Borough Wide Strategy

Between 2006 and 2026 land for 10,080 new dwellings will be delivered within the Borough to support the achievement of 10,000 additional jobs and to respond to identified housing demand and need.

New development will be focused within and next to Maidstone's urban area. Regeneration will be prioritised and delivered within the urban area to make the best use of brownfield land with significant development within an expanded and regenerated Town Centre including to provide up to 22,600sqm of additional office accommodation and up to 29,950sqm additional comparison retailing. To ensure market choice and flexibility of provision limited additional office development of some 3,400sqm will be provided at appropriate, well connected locations beyond the town centre.

Strategic housing locations providing for more substantial housing development are identified on the Key Diagram at north west Maidstone to deliver some 975 dwellings and south east Maidstone to deliver some 1,000 dwellings.

The Key Diagram identifies a strategic location for warehousing at Junction 8 of the M20.

Appropriate greenfield sites will be located at the edges of Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst to deliver in the order of 1,130 dwellings, alongside suitably scaled employment opportunities.


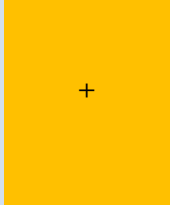
Priority will be given to the protection of the rural character of the borough avoiding coalescence between settlements including Maidstone and surrounding villages and Maidstone and the Medway Gap/Medway Towns Conurbation.

Infrastructure will be brought forward in a timely way to provide for the needs arising from development. Financial contributions will be sought from the Community Infrastructure Levy and Section 106 Agreements as appropriate and other appropriate funding streams as they emerge through the plan period.

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p> <p><i>Will it improve the mix of dwelling sizes and tenures?</i></p> <p><i>Will it increase the number / proportion of decent homes?</i></p> <p><i>Will it improve the supply of affordable housing?</i></p> <p><i>Will it address changes in future housing need</i></p> <p><i>Will it increase the supply of Lifetime Homes?</i></p>	+	<p>The Policy directs development primarily to the Maidstone Urban Area so that the greatest number of people can have their housing needs met. However this is balanced by distributing appropriate levels of development to the Rural Service Centres and Countryside. The development split is 80/20 in favour of the urban area</p>	

<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p> <p><i>Will it limit development in the flood plain?</i></p> <p><i>Will it reduce the number of properties affected by flood incidents?</i></p> <p><i>Will it employ the use of SuDS?</i></p>	0	<p>Risk of Flooding is at its highest in Maidstone Town and the RSCs of Headcorn and Marden so focusing development in this location could increase risks of detrimental harm</p>	<p><i>New development should incorporate flood risk mitigation measures such as SuDS.</i></p> <p><i>Greater open space provision should also be encouraged and incorporated within a Borough wide Green and Blue Grid which help to mitigate the risk of flooding.</i></p> <p><i>In accordance with the 2008 SFRA a Level 2 SFRA will be required if development is proposed in Flood Zone 2 and 3 within Maidstone Town Centre.</i></p>
<p>To improve the health and well-being of the population and reduce inequalities in health</p> <p><i>Will it reduce rates of sickness and death</i></p> <p><i>Will it improve accessibility to local GP?</i></p> <p><i>Will it reduce noise pollution?</i></p>	+	<p>Protection of the Borough’s rural character including AONB and Greenfield land will aid healthy lifestyles. Regeneration of the Town Centre and the associated urban fabric improvement will result in increased permeability and the promotion of cycling and walking.</p> <p>Avoiding coalescence between Maidstone’s settlement will aid in retaining and promoting localised</p>	

<p><i>Will it encourage healthy lifestyles, including travel choices?</i></p>		<p>community services</p>
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p> <p><i>Will it reduce poverty and social exclusion in those areas most affected?</i></p> <p><i>Will it reduce the number of households in fuel poverty?</i></p> <p><i>Will it reduce the number of households with no central heating?</i></p> <p><i>Will it reduce the number of children living in low income Households?</i></p>	<p>?</p>	<p>Regeneration of Maidstone's central area will result in better use of space and will have associated economic impacts. The resulting improvement to the urban fabric will increase accessibility to the Town Centre for the adjacent deprived areas. While this may reduce poverty and social exclusion it is unclear whether overall inequalities will be reduced</p> <p><i>Promoting a sense of place in these areas and targeting community services in the most accessible areas.</i></p>
<p>To raise educational achievement levels across</p>	<p>+</p>	<p>New development will be focused within and next to Maidstone's general</p>

<p>the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p> <p><i>Will it increase the numbers of school-leavers achieving GCSE passes?</i></p> <p><i>Will it increase numbers undertaking further and higher education?</i></p> <p><i>Will it enhance opportunities for adult education?</i></p> <p><i>Will it encourage training opportunities for higher quality employment?</i></p>		<p>urban area. Within the larger urban area opportunities for further and higher education uses will be clustered in the Town Centre which are relatively accessible to Maidstone's areas of deprivation (see CS2).</p>	
<p>To reduce crime and the fear of crime</p> <p><i>Will it reduce actual levels of crime?</i></p>		<p>Regeneration of the Urban Area and Town Centre should result in improvements to the urban fabric such as better lighting, safer walkways etc. This should be specified in the</p>	<p><i>Maidstone Borough Council needs to develop local indicators addressing crime. This will allow the Council to develop targeted interventions such as public realm measures that implement safe</i></p>

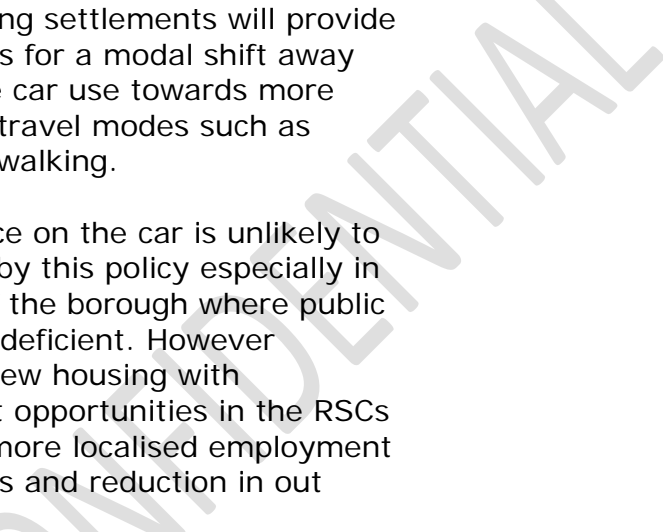
<p><i>Will it reduce the fear of crime, esp. among vulnerable individuals / communities?</i></p> <p><i>Will it aid in adopting Safer by Design technologies?</i></p>		<p>locational and general policies</p>	<p><i>spaces and corridors through better lighting, overlooking etc</i></p>
<p>To create and sustain vibrant, attractive and clean communities</p> <p><i>Will it increase the ability of people to influence decisions?</i></p> <p><i>Will it encourage engagement with community activities?</i></p> <p><i>Will it increase opportunities for consultation?</i></p>	<p>+</p>	<p>Avoiding coalescence between Maidstone's settlements will aid in maintaining their distinctive communities. The different profile of the different places in Maidstone will compliment the future Neighbourhood Plans which encourage the participation of people in making decisions.</p> <p>The Policy balances the need for economic, housing and social growth</p>	
<p>To improve accessibility to all services and facilities</p> <p><i>Will it improve access for</i></p>	<p>+</p>	<p>The strategic housing locations are located next to good transport links and the highway network.</p>	<p><i>The Core Strategy could explore the option of increasing service provision in some Rural Service Centres so that they,</i></p>

<p><i>the disabled?</i></p> <p><i>Will it improve accessibility to health, education, shopping and leisure?</i></p> <p><i>Will it enhance community and public transport?</i></p>		<p>Concentration of development in the Maidstone Urban Area and Town Centre will mean that services and facilities are located in the most accessible areas. This is balanced by maintaining service provision in the rural areas.</p>	<p><i>rather than Maidstone Town Centre, become the central focal point for provision of certain services for outlying smaller villages</i></p>
<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p> <p><i>Will it increase the numbers involved in cultural activities?</i></p> <p><i>Will it increase the number of cultural enterprises/organisations in the Borough?</i></p>	<p>?</p>	<p>Regeneration of Maidstone Town Centre and Urban Area could impact positively against this objective as increased accessibility to these facilities should ensue.</p> <p>The distribution of development which locates most development in Maidstone Town Centre and Urban Area is compatible with a mixed use profile which can incorporate community facilities.</p> <p>The effect of this policy will depend upon the implementation of other policies in the Core Strategy (e.g CS2).</p>	

<p>To improve efficiency in land use</p> <p><i>Will it use land that has been previously developed in preference to Greenfield?</i></p> <p><i>Will it re-use buildings and materials?</i></p> <p><i>Will it protect and enhance the best and most versatile agricultural land?</i></p>	+	<p>The prioritisation of regeneration in the Town Centre and Urban Area and the aim to make best use of brownfield land will lead changes in the urban fabric which could lead to a number of associated outcomes such as the possibility of more efficient high density housing located near to good infrastructure provision</p>	<p><i>The Policy does not specifically mention the re-use of existing buildings or the possibility of change of use where appropriate such as in long term vacancy. The re-use of existing buildings will have a number of cross cutting effects such as reducing waste generated by demolition, increased housing density if office buildings are converted into residential</i></p>
<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p> <p><i>Will it improve air quality?</i></p> <p><i>Will it reduce other forms of pollution such as light pollution?</i></p> <p><i>Will it improve travel choice?</i></p>	-	<p>The dispersal option and the concentration of development within the Town Centre and Urban Area will mean that it is unlikely that road congestion and air quality in Maidstone will improve.</p> <p>In principal encouraging employment opportunities and key facilities close to homes should help reduce the overall need to travel and provide a density of development more conducive to the provision of public transport.</p>	<p><i>A modal shift away from the car needs not only to be accompanied by an improved walking, cycling infrastructure and a number of secondary associations such as Park and Ride schemes, improvements to the public realm, heritage assets, and parking measures but an identification of desire lines and a Green and Blue Infrastructure which that indicates Green Corridors near to new housing developments and aid in overall</i></p>

<p><i>Will it reduce the need for travel by car / lorry?</i></p> <p><i>Will it reduce the need to travel for long distances?</i></p> <p><i>Will it reduce the need to travel for commuting?</i></p>		<p>The concentration of development within existing settlements will provide opportunities for a modal shift away from private car use towards more sustainable travel modes such as cycling and walking.</p> <p>Rural reliance on the car is unlikely to be affected by this policy especially in the south of the borough where public transport is deficient. However combining new housing with employment opportunities in the RSCs may aid in more localised employment opportunities and reduction in out commuting.</p>
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p> <p><i>Will it reduce emissions of greenhouse gases?</i></p> <p><i>Will it reduce traffic volumes?</i></p> <p><i>Will it encourage travel by means other than the car?</i></p> <p><i>Will it assist in preparing</i></p>	+	<p>Larger site are more likely to deliver on site renewables. Focusing development in Maidstone Town Centre and Urban Area offer the best opportunity for the delivery of renewable energy technologies. Topographical and morphological constraints in the Town Centre may restrict some development and the ability to maximise natural heat and light gained through orientation</p> <p>Maidstone's general urban area is the most accessible area in the Borough in terms of rail services and public</p>

legibility



<p><i>the Borough for impacts of climate change?</i></p> <p><i>Will it assist in new homes meeting the BREEAM standards</i></p>		<p>Transport. In conjunction with the regeneration of the Town Centre and the enhancement of the Urban Area's Green Wedges permeability will be improved aiding cycling and walking modes of transport. This will help to reduce greenhouse gas emissions through a reduced need to travel in particular by car</p>
<p>To conserve and enhance the Borough's biodiversity and geodiversity</p> <p>Will it protect sites designated for nature conservation interest?</p> <p>Will it help achieve Biodiversity Action Plantargets</p>	<p>+</p>	<p>By restricting development on greenfield and AONB (the Housing split is approximately 70% brownfield and 30% on Greenfield) will help conserve and enhance biodiversity and geodiversity through the application of other policies such as CS2, CS3.</p> <p>The concentration of development in existing settlements could have a negative effect against this objective by degrading urban biodiversity. However proactive policies such as those concerning the Borough's Green Wedges address this issue.</p> <p>Additionally, new development on the fringe of existing urban areas introduce a harsh edge to the adjacent</p> <p><i>Undue pressure should not be placed on fringe landscapes as sites for recreational opportunities.</i></p> <p><i>A possible tension emerges with regard to the commitment to protecting the characteristics of the Borough's landscapes and to facilitating the economic and social well-being by adopting a positive approach to small scale economic development proposals which re-use existing buildings. The forthcoming Landscape Character Assessment could explore and suggest positive ways of approaching re use or intensification of existing buildings in the countryside.</i></p>

		<p>landscape pressure for such development could contribute towards further landscape deterioration in Maidstone</p> <p>Intrinsic to this policy is CS13 Natural Assets which implements a Green and Blue Grid. This will aid in connecting together the fragmented parts of Greenfield and countryside land in the Borough which would have positive geodiversity and biodiversity impacts.</p> <p>The Maidstone Town Centre regeneration led policy could also lead to improved provision in open space.</p> <p>The policy does not advocate large urban extensions which has positive impacts on further landscape deterioration.</p>	
<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>+</p>	<p>Restricting development in the AONB and Greenfield land etc will help <i>protect</i> and make accessible for enjoyment the countryside and aspects of the historic environment located in these areas. Avoiding coalescence between Maidstone's</p>	<p><i>Directing most development to Maidstone Town Centre and Urban Area could decrease accessibility to the Countryside. Pedestrian and cycling desire lines should be identified and enhanced to encourage</i></p>

<p><i>Will it protect or enhance sites, features of areas of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled monuments?</i></p> <p><i>Will it enhance, protect and make accessible for enjoyment the Borough's water environment?</i></p> <p><i>Will it create vibrant, multifunctional countryside in and around towns?</i></p> <p><i>Will it protect and enhance the historic environment within built-up areas?</i></p> <p><i>Will it protect and enhance open spaces of amenity and recreational value?</i></p> <p><i>Will it maintain and</i></p>		<p>settlements will help to maintain green corridors</p> <p><i>movement to these assets</i></p>
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<p>enhance the character of landscape and townscape?</p>		
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p> <p><i>Will it reduce household and other forms of waste?</i></p> <p><i>Will it increase waste recovery and recycling?</i></p> <p><i>Will it encourage waste treatment locally?</i></p> <p><i>Will it increase opportunities for domestic recycling?</i></p>	<p>0</p>	<p>Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.</p>
<p>To achieve sustainable water resources management</p> <p><i>Will it reduce water consumption?</i></p>	<p>0</p>	<p>The dispersal method of development will mean that it is harder to get developers together to invest in new infrastructure</p> <p>Growth to a certain extent will be</p> <p><i>Maidstone Borough Council should liaise closely with South East Water to allow the water company to tailor their capital programme to meet the needs of proposed developments if required</i></p>

<p><i>Will it reduce the generation of wastewater?</i></p> <p><i>Will it encourage the re-use of water?</i></p> <p><i>Will it improve the quality of the Borough's rivers?</i></p> <p><i>Will it improve the quality of the Borough's groundwater?</i></p>		<p>mitigated by national legislation which prohibits new development to automatically connect up with the water drainage system.</p>	
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p> <p><i>Will it increase the proportion of energy needs being met from renewable sources</i></p> <p><i>Will it reduce the demand for energy?</i></p>	<p style="text-align: center;">+</p>	<p>The dispersal option focuses most development in Maidstone Town Centre and Urban Area. These areas are most likely to produce larger development sites which are compatible with on-site renewable technology. However heritage and amenity constraints in these areas may restrict development options.</p> <p>Although most development is focused to Maidstone Town Centre and Urban Area development will take place in RSCs and Rural Areas. Development in Maidstone's high quality natural environment does offer the chance to take advantage of renewable sources</p>	<p><i>The Council could consider promoting and designating a number of low carbon zones in the Borough especially where a number of large housing sites are likely to be located.</i></p> <p><i>The Council could explore the possibility of promoting decentralised heat and energy facilities which are proven to be reduce energy leakage. This issue is addressed in CS6 but more detail could be included</i></p>

		<p>such as wind power and natural materials.</p>	
<p>To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p> <p><i>Will it ensure high and stable levels of employment?</i></p> <p><i>Will it promote 'conditional growth' (balancing growth with housing provision and investment in social infrastructure?)</i></p> <p><i>Will it stimulate economic revival in priority regeneration areas?</i></p> <p><i>Will it increase provision of better quality jobs /skilled employment?</i></p>	<p>+</p>	<p>Focusing development in Maidstone Town Centre and Urban Area will help to strengthen Maidstone's regional role as the county town. The concentration of development in these areas is allied with increased public transport provision in the form of rail network services. This may offer the chance to attract businesses away from London if there is adequate infrastructure provision. Increased employment provision in these areas should benefit the adjacent deprived areas. Positive benefits on the retention of skills will ensue if it is followed by affordable housing provision and public realm improvement</p>	<p><i>The Council should explore innovative ways of land use to encourage SME development. This should build on the work undertaken in the Employment Land Review.</i></p> <p><i>A stronger link between economic prosperity and design could be fostered. Innovative design could be a mechanism for promoting Maidstone's regional role through signature buildings, place shaping etc which would aid in attracting and keeping skilled professionals and businesses in the area.</i></p>

Will it ensure the correct mix of skills to meet the current and future needs of local employers?

Will it encourage the development of a buoyant, sustainable tourism sector?

DRAFT: CONFIDENTIAL

Policy CS2: Maidstone Town Centre

Development and regeneration of Maidstone Town Centre is a priority and the town centre will be the preferred location for significant retail, office, leisure, cultural and tourism development with the opportunity for higher/further education uses.

Town Centre sites will be identified in the Central Maidstone Area Action Plan to provide for 29,950 sqm comparison retail floor space, up to 22,622 sqm office floor space and some 380 of new dwellings. Schemes will need to demonstrate a quality of design that makes a positive contribution to the distinctive character of the town centre ensuring the conservation and enhancement of the historic fabric.

Accessibility to and within the town centre supported by a choice of transport means should be increased including through implementation of travel plans.

Development on land adjoining the River Len and Medway should make a positive contribution to their setting, accessibility, biodiversity and amenity value.

Development in the town centre should maximise the opportunities to enhance green spaces, and access to them, and to further 'green' the town centre and its streets including the creation of new spaces to form a network and through adaptations for climate change.

The Town Centre boundary will be identified on the Interactive proposals map.

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	<p>+</p>	<p>Focusing development in the largest urban centre ensures that a greater number of people can have their housing needs met in their local area.</p> <p>While new developments will be required to meet progressively higher CSH BREEAM standards there are no policies in place to raise the quality levels of existing residential and commercial developments which comprise the majority of the stock.</p> <p>An area of concern regards the lack of detail surrounding housing type. There is no percentage attributed to each housing type (e.g 1,2,3,4 bedroom houses, flats etc). This raises a doubt that there are sufficient safeguards in place to produce a balanced community in the town centre.</p>	

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2.To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment

There is no specific mention of Flooding in this policy and mention of SuDs as a mitigation measure. It is noted that this issues is covered elsewhere (CS14 – Delivery and Monitoring).

0 However the Policy does mention enhancement of natural features (green spaces) which also provide an environmental gain by enhancing local habitats. It is noted that this issues is covered elsewhere (CS14 – Delivery and Monitoring).

Effects of this objective are dependent on the Development Delivery DPD and Central Maidstone AAP. It is noted that Maidstone Town is a flood risk area and that housing is not precluded in Flood Zone 2 and 3.

3.To improve the health and well-being of the population and reduce inequalities in health

+

As a focal point for mixed use development (including residential) and near two main line train stations, walking and cycling to key services could be encouraged. This will be augmented by regeneration of the urban fabric and by creating and

		enhancing green spaces and access to them.
<p>4.To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	+	<p>Promoting economic development near to areas of deprivation will have positive impacts on this objective</p>
<p>5.To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	+	<p>This policy explores the opportunity of locating higher and further education uses in the Town Centre. In principle this approach will impact positively against this objective because it locates these uses in the area of greatest transport accessibility.</p> <p>The clustering of these facilities is planned in the Campus quarter which is located to the North of the Town Centre. This is detached from most of the areas of deprivation which are situated in the South of the Urban Area. Notwithstanding it does offer the opportunity to cluster and therefore intensify the educational resources on offer. These uses will also be located near to a wide variety of employment</p>

		<p>uses and areas of deprivation.</p> <p>There is no clear commitment to build new education facilities (this is covered in CS8) but further detail and allocation will be outlined in the forthcoming Maidstone Central AAP</p>	
<p>6.To reduce crime and the fear of crime</p>	<p>0</p>	<p>Regeneration of the Town Centre will result in improvements to the urban fabric. Creating distinct areas and promoting high quality design will aid in promoting and mitigating the negative effects of certain types of economic types such as the night time economy</p>	<p><i>The policy could mention with relation to the housing element 'some 380 dwellings suitable for a mix of housing needs including families and elderly people.'</i></p>
<p>7.To create and sustain vibrant, attractive and clean communities</p>	<p>+</p>	<p>The aspiration to divide the Town Centre into quarters will aid in creating distinctive places. The essence of place shaping is collaboration with the community in order to shape neighbourhoods so that these areas are greater than the sum of their parts.</p> <p>All of the quarters proposed in the CS</p>	<p><i>In order to implement this policy, strong linkages to transport and landscape Issues and the creation of public space should be explored. Public squares, spaces encourage community activities as do local streets etc (for more comment see CS7 appraisal)</i></p> <p><i>The Policy should expand enhancement</i></p>

		<p>supporting text promote mixed use development.</p>	<p><i>of green spaces to include open space.</i></p> <p><i>The CMAAP should adopt a proactive consultation process which includes community workshops</i></p>
<p>8.To improve accessibility to all services and facilities</p>	<p>0</p>		
<p>9.To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>+</p>	<p>The division of the Town Centre into distinct quarters or areas should aid in developing a strong sense of place. The clustering of cultural activities could lead to increased capacity , accessibility and attraction.</p> <p>Combined with Policy CS6 distinctive design will aid legibility and improvements to the urban fabric will enhance the setting of its cultural heritage sites.</p> <p>Promotion of the natural environment through the enhancement of green spaces can encourage engagement in cultural activity and any open space provision in the Borough can at</p>	<p><i>Suggest that the Policy widens the scope of green spaces to open spaces.</i></p>

		<p>anytime become a temporary place for cultural engagement activities such as celebrations, fetes, and music events.</p>	
<p>10.To improve efficiency in land use</p>	<p>+</p>	<p>This policy will impact positively on the objective because development is based on regeneration of an existing built environment. Through the creation of distinct places or quarters more intelligent use of space will be promoted through complimentary buildings and land use.</p>	
<p>11.To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	<p>-</p>	<p>Focusing development in the Town Centre and Urban Area should allow for the greatest potential for people to live near their place of work and also access services and facilities by modes of transport other than the private car. However, the poor present state of cycling and walking infrastructure could hinder a modal shift away from the car.</p> <p>The Maidstone Air Quality Action Plan in conjunction with evidence in the forthcoming ITS shows that under development thresholds adopted in the Core Strategy air quality can at</p>	<p><i>Improved provision of cycle and pedestrian infrastructure will help facilitate a modal shift to more sustainable transport methods. These measures are covered in forthcoming Integrated Transport Strategy and GBIS. Additionally, green corridors should be considered in new developments where possible to reduce dependence on cars for short journeys.</i></p>

		<p>best be kept at present levels</p>
<p>12.To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	<p>+</p>	<p>The Town Centre offers the best chance of delivering on site renewables. Through regeneration of the Town Centre and the need to provide for 29,950 sqm of retail floor space in new development and existing buildings could incorporate renewables in their design.</p> <p>The council could promote the integration of on site renewables in existing buildings rather than just new build; this would apply predominantly to Policy CS6</p> <p><i>The Central Maidstone AAP could analyse the urban fabric of the town in order to find ways of reducing short trip car travel, permeability etc</i></p>
<p>13.To conserve and enhance the Borough’s biodiversity and geodiversity</p>	<p>+</p>	<p>The Local Biodiversity Action Plan recognises that the major tool for affecting biodiversity and geodiversity in Maidstone Town Centre is increased connectivity and linkages between improved provision of green spaces.</p> <p>The Policy addresses this issue by requiring development to maximise the opportunities to enhance green spaces and to create an interconnected network. It also stresses the importance of the River</p> <p><i>The policy also encourages building design to positively contribute to the historic fabric. This could have increased positive biodiversity effects if it was worded thus `quality of design to make a positive environmental contribution to conservation and enhancement of the natural and historic fabric.'</i></p>

		<p>Len and Medway, requiring development to positively contribute to its environment. This is reflected in the BAP Urban Green Space Action Plan Objective 4 which states that Maidstone's objective is to '<i>Incrementally green Maidstone Town Centre through the introduction of street trees and naturalisation of green spaces such as amenity grassland flanking the River Medway.</i></p>	
<p>14. To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>0</p>	<p>Development within Maidstone Town Centre could harm distinctive facets of its historic environment.</p> <p>Concentrating development in the Town Centre and the Urban Area will reduce the impact on the Borough's high quality landscape. Conversely high quality development design could help to create provision of innovative open space</p>	<p><i>Local and strategic views could be developed from the Town Centre to ensure that the intensification of land does not have a detrimental effect on the landscape. This could be explored in the Central Maidstone AAP and the Landscape Character Assessment SPD. I</i></p> <p><i>n the same vein Maidstone Town Centre has a deficiency in Green Space. The Policy could consider stating that money from the CIL will be used to target the creation of open space around the historic environment thereby increasing its impact on the built form and</i></p>

enhancing the setting of the Maidstone's built heritage

15.To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste

0

Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.

16.To achieve sustainable water resources management

The concentration of development in the Maidstone Town Centre and Urban Area will put pressure on the water resources in this area. This will exacerbate the problems with the limited sewerage system capacity in Maidstone town.¹

17.To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough

+

Maidstone Town Centre will be regenerated and will accommodate a significant quantum of development. New buildings will have to conform to higher standards of development and energy efficiency which is outlined in Policy CS6.

¹ Maidstone BC: Water Cycle Study - Outline Report Non technical summary June 2010

On-site renewable are more likely to be delivered on larger sites. Focusing the majority of housing development in Maidstone Town Centre and Urban Area in the first instance therefore offers good opportunities for the delivery of renewable technologies as they have the potential to trigger the threshold for the inclusion of renewable facilities.

Conversely some renewable options may be restricted by heritage and local amenity constraints within the Borough. Morphological constraints may also restrict some development options within urban sites, which may limit the ability to maximise natural heat and light gained through orientation.

<p>18.To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p>	<p>+/?</p>	<p>The Policy in Maidstone Town Centre advocates creation of a broad economic base which will offer a range of job opportunities. Economic development is consequently linked to areas of greatest accessibility and promotes Maidstone’s role as the</p>	<p><i>More detail outlining the spatial strategy for the Town Centre needs to be included within this policy.</i></p> <p><i>As the Town Centre will be the future economic driver of the Borough the Policy should be a clear framework for</i></p>
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		<p>County town. The Policy also strengthens the spatial linkage between areas of deprivation, economy and skills.</p> <p>Improvements to the urban fabric through regeneration will aid in the leakage of skills.</p>	<p><i>attracting investment into the area.</i></p> <p><i>The Central Maidstone AAP should investigate whether the clustering of business types (office blocks) would aid legibility, stimulate investment, result in a smarter use of resources and improve the urban realm.</i></p>
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DRAFT: COMMENT

Policy CS3: Maidstone Urban Area

Outside the town centre boundary identified in CS2 and within the defined urban boundary Maidstone will continue to be a good place to work and live. This will be achieved by:

- The development and redevelopment or infilling or appropriate urban sites in a way that contributes positively to the locality's distinctive character
- Retaining well located business areas in accordance with Policy CS8
- Maintain the network of district and local shopping centres, supporting enhancements to these centres in accordance with the overall hierarchy of centres
- Maintain and support the current network of transport infrastructure seeking enhancement in accordance with the Infrastructure Delivery Plan
- Ensuring that the functions of the green wedges are sustainable and enhanced
- Ensuring that development positively contributes to the setting, accessibility, biodiversity and amenity value of the River Medway and the River Len
- Supporting development that improves the social, environmental and employment well-being of those living in identified areas of deprivation
- The boundary of the Urban Area will be defined on the proposals map

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	<p>?</p>	<p>There is no specific mention of housing provision in this policy. Without an approximate number or location it is difficult to assess how housing need will be met and how this will contribute to the creation of sustainable communities</p>	<p><i>This policy needs to give greater certainty with regards to housing number, location, type and tenure</i></p> <p><i>A significant weakness in the Policy is the predicted impact and form of the strategic housing allocations. The form of these areas should be outlined in the Policy with an aim to creating distinctive places rather than repositories for housing</i></p>
<p>2.To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	<p>0</p>	<p>Part of Maidstone Urban Area is in a Flood Zone 2 and 3 area. Development in these locations could increase risks of detrimental harm. It is noted however that the strategic locations for Housing and a medical hub are not in areas liable to Flooding.</p> <p>Enhancement and protection of the area's Green Wedges will have a significant effect in mitigating the risk</p>	<p><i>New development should incorporate flood risk mitigation measures such as SuDs. Greater open space provision should also be encouraged and should be incorporated within a Borough wide Green and Blue Grid whose planting and design help to mitigate flooding.</i></p>

of Flooding in the affected zones

3.To improve the health and well-being of the population and reduce inequalities in health

+

Enhancing the function of the Green Wedges in the Urban Area will provide access to open green space and the wider countryside. This will encourage more walking and cycling and a modal shift away from the car particularly as the policy is augmented by CS13 and the inception of a Blue and Green Grid. As part of a strategy to counter deprivation in this areas the gap between the Urban Area and other parts of Maidstone will lead to closer access to services

To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest

++

This policy specifically addresses the needs of those living in identified areas of deprivation. Focusing most development in Maidstone Town Centre and Urban Area proactively supports development in these areas to increase employment, social and environmental provision.

		<p>Enhancement to the localised town centres and resultant improvements to communal space could increase employment and reduce social exclusion. Enhancement of the green wedges in these areas should help to improve the connection of these areas to other parts of Maidstone.</p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>+</p>	<p>This policy identifies the need to improve the social, environmental and employment well being of those living in areas of deprivation. This can include within its remit the development of education and skills facilities. The dispersal option locates and promotes housing areas near to well located business areas in the Urban Area thereby increasing employment in these areas</p>
<p>To reduce crime and the fear of crime</p>	<p>+</p>	<p>Supporting balanced development and improving accessibility to and from areas of deprivation will aid the social, environmental and employment well being of these communities. This will</p>

		<p>have a positive effect on reducing crime and fear of crime.</p>
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>?</p>	<p>The Policy supports development that improves the social well-being of those living in areas of deprivation</p> <p><i>Could the Policy be more specific in encouraging and promoting community uses in the southern areas of deprivation particularly since further and higher education uses are promoted towards the north of the Town Centre</i></p>
<p>To improve accessibility to all services and facilities</p>	<p>+</p>	<p>The Policy supports the enhancement of the local shopping centres in this area maintaining a balance between localised provision and centralised provision in Maidstone Town Centre. It supports development which targets improvements in the areas of deprivation. The concentration of employment and residential development within the Town Centre and Urban Area will increase density and be accompanied with infrastructure improvements through CIL etc. This will increase the level of accessibility to services for a greater number of people</p>

<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>0</p>	<p>Seeking enhancement of the Borough's Green Wedges will increase movement around Maidstone and accessibility to its rich natural environment</p>
<p>To improve efficiency in land use</p>	<p>+</p>	<p>The presumption in this policy is to redevelopment or infill appropriate urban sites in order to minimise development on Greenfield land. The infilling and intensification of housing in this area is offset by the enhancement of green wedges</p>
<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	<p>-</p>	<p>The dispersal method distributes most housing to the Urban Area and to two large housing sites while the rest are distributed on the periphery. This method does not allow for the level of funding required to improve the strategic road infrastructure.</p> <p>The success of this policy depends on a number of other factors such the implementation of a number of softer transport related measures, and the</p>

		<p>enhancement of local and neighbourhood town centres</p>
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	<p>+</p>	<p>Through the development, redevelopment or infilling of appropriate urban sites the Urban Area offers the opportunity to deliver on site renewables. This area has also fewer heritage constraints than the Town Centre.</p>
<p>To conserve and enhance the Borough's biodiversity and geodiversity</p>	<p>+</p>	<p>Although there will be new development on Greenfield sites in this area it will be complimented with redevelopment or infilling of appropriate sites. Any detrimental effect on biodiversity and geodiversity could be compensated by the enhancement of the Green Wedges which are biodiversity corridors.</p> <p>As evidenced by the Local Character Assessment and the LBAP, if these corridors are enhanced and connection to other habitat areas improved they will be significantly improve biodiversity and geodiversity in Maidstone. The positive impact that this policy would have on this objective is linked to CS13 and the</p>

		creation of a Green and Glue Grid.	
<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	+	<p>Through the promotion of Green Wedges development in this area will not reduce accessibility to the natural environment. The GBIS will also promote legibility and movement to the borough's built and natural heritage and increase there accessibility particularly for those without a car or access to public transport. The policy also protects the value of the River Len</p>	<p><i>Rather than the CMAAP helping to mitigate the negative effects to the town's historic environment it should consider proactively introducing measures to enhance their setting (developing local views, legibility etc)</i></p>
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	0	<p>Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.</p>	
<p>To achieve sustainable water resources management</p>	0	<p>Although Maidstone Urban Area will be a focus for development, evidence states that the quantum of development proposed by the Core</p>	<p><i>Given the stress on water resources in the Maidstone area, it is recommended that Maidstone BC aim for the lower target of 115 l/hd from new developments where possible.</i></p>

		<p>Strategy can be accommodated by the water environment.</p> <p>The policy states that new development positively contributes to the setting, accessibility, biodiversity and amenity value of the River Medway and the River Len. However, the ecological status of the river Medway into which treated wastewater is discharged is poor.</p>	<p><i>Maidstone Borough Council should help in facilitating Southern Water to build the infrastructure needed to increase the quality of wastewater treatment.</i></p>
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	<p>0</p>		
<p>To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p>	<p>+</p>	<p>Intrinsic to this policy is the intention to enhance the transport infrastructure thereby increasing the choice and accessibility of the area to places of employment and training. The Policy aims to retain well located business areas encourages stable levels of employment and</p>	



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CS4 Rural Service Centres

At the designated Rural Service Centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst defined on the interactive proposals map the Council will:

- Focus new housing and employment development within or adjacent to village boundaries, and ensure that a mix of house types and tenures are provided
- Support applications for local needs housing on appropriate sites in accordance with Policy CS11
- Retain and enhance existing employment sites and encourage new employment opportunities
- Resist the loss of local shops and facilities, whilst supporting new retail development to meet local need
- Ensure development assists with the creation of vibrant and sustainable communities
- Ensure that development does not cause harm to natural assets and that development is not located in areas liable to flooding

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SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	<p>?</p>	<p>The number of homes within this policy is not included. Although the policy refers to Policy CS11 Local Needs Housing there is a lack of certainty surrounding whether the required housing provision will be met. The Policy does react to the localism agenda in which local stakeholders play a role in determining housing need. Likewise its link to Policy CS11 creates a strong connection to providing housing for the local community who work in the vicinity.</p>	<p><i>Although the policy does specify the broad location for new housing, the number or the proportion of housing type is not specified. Although the policy through CS11 positively reacts to the localism agenda in consulting with local stakeholder, more detail around the quantum and type of housing needs to be detailed.</i></p> <p><i>Can more Maidstone specific sustainable design standards be included rather than reliance on generally applicable BreeamStandards</i></p>
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	<p>+</p>	<p>The Policy locates development away from areas liable to Flooding. It is noted there are currently inadequate surface water drainage systems for example in Marden and Staplehurst.</p>	<p><i>The development of further properties should be used as an opportunity to assess and improve the current surface water drainage system.</i></p>
<p>To improve the health and well-being of the</p>	<p>+</p>	<p>Safe guarding Maidstone's natural assets and AONB will ensure that</p>	

<p>population and reduce inequalities in health</p>		<p>there is adequate open space available for recreation. The impact on reducing health inequalities is uncertain.</p>
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	<p>+</p>	<p>The policy tries to strike the balance between maintaining the RSCs' existing character and the need to develop and enhance the existing community</p> <p><i>The Policy could be strengthened by greater specificity of the interventions needed to counter present and possible future social exclusion could be mentioned in the policy, e.g to produce greater old people facilities and children's play facilities in Harrietsham</i></p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>+</p>	<p>Economic development is balanced against maintaining the character of the Rural Service Centres. In conjunction with Policy CS11 this will increase the chance of people living in different parts of the Borough acquiring the skills to remain in work.</p>
<p>To reduce crime and the fear of crime</p>	<p>+</p>	<p>The intention to strengthen the role of RSCs in terms of enhancing employment and in social terms by supporting local shops and facilities</p>

		<p>will help to build a stronger community when seen against Policy CS11. This will have a positive effect on fostering a sense of place and thereby help to reduce crime and fear of crime</p>
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>+</p>	<p>This policy could help to strengthen the role of RSCs within Maidstone Borough. A mixture of development is promoted which could result in more self contained communities. In conjunction with the promotion of Neighbourhood Plans, community right to buy this could result in increased community activity, consultation with Maidstone BC and increased power in decision making. A strong sense of community will be aided by Policy CS11</p>
<p>To improve accessibility to all services and facilities</p>	<p>+</p>	<p>The Policy proactively supports appropriate development in RSCs and therefore has the potential to make them more self contained and reducing car based travel. The level</p> <p><i>The majority of housing and employment will be within or adjacent to village boundaries. Where possible any new development should not be detached from service provision. Possible future council</i></p>

		of services and facilities will be maintained or enhanced.	<i>spatial analysis should ascertain whether new neighbourhood centres need to be encouraged</i>
To encourage increased engagement in cultural activity across all sections of the community in the Borough	0		
To improve efficiency in land use	+	The dispersal option directs most housing to Maidstone urban area thereby protecting use of greenfield land. The policy encourages the retention and enhancement of existing employment sites.	
To reduce road congestion and pollution levels and ensure air quality continues to improve	?	The policy promotes enhanced localised employment opportunities. Seen in conjunction with CS11 and the support of retail development to support local need, this policy could result in less car based travel	
To address the causes of climate change and ensure that the Borough is	0	Smaller sites are less likely to trigger on site renewables. However, the Policy does specify	

<p>prepared for its impacts</p>		<p>that the Council will enhance existing employment sites. The enhancement of these sites could lead to the opportunity of incorporating renewable technology.</p> <p>The Policy attempts to strike a balance the RSC's residential, social and economic role. This approach recognises the need for a certain degree of self containment thereby reducing the need to travel and private car use which would effect the level of greenhouse gas emissions.</p>	
<p>To conserve and enhance the Borough's biodiversity and geodiversity</p>	<p>0</p>	<p>The Policy locates new housing within or adjacent to village boundaries. All RSCs apart from Headcorn have some surrounding agricultural land not covered by landscape designations.</p>	<p>A more proactive Housing design policy could be adopted that addresses the need of Maidstone's high quality biodiversity and geodiversity characters</p>
<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space</p>	<p>+</p>	<p>Through the protection of Maidstone's natural assets its valuable landscape will ensure that biodiversity and geodiversity is</p>	

<p>and historic environment</p>	<p></p>	<p>conserved</p>
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	<p>0</p>	<p>Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.</p>
<p>To achieve sustainable water resources management</p>	<p>0</p>	<p></p>
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	<p>0</p>	<p></p>
<p>To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p>	<p>?+</p>	<p>The Policy attempts to strike the balance between retaining the quality of life that the RSCs offer and promoting and retaining economic growth through the enhancement of existing employment sites and the encouragement of new employment</p> <p>The enhancement of existing employment sites should not detrimentally effect the high quality landscape that surrounds many of the RSCs</p>

opportunities. The Policy helps to distribute economic development across the Borough.

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CS5 Countryside

Policy CS5 Countryside Development proposals in the countryside for the purposes of rural economic development or to meet community needs will only be allowed where proposals maintain and enhance the local economy in such a way as to ensure that the character of the local landscape is protected and where possible enhanced. Development proposals will need to have regard to the Kent Downs AONB Management Plan. Development proposals will not be permitted where they lead to adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts cannot be achieved

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	<p>?</p>	<p>Although this policy is linked to CS11 it difficult to see how the provision of housing will contribute local housing need bearing in mind that the dispersal option attribute 80% of housing to the Maidstone urban area and 20% to the RSCs.</p> <p>If Housing is provided in this area it would be very much design led due to its responsiveness to the high quality landscape. Conversely, it is also related to economic development which is more proactive.</p> <p>On balance there is a concern that the</p>	<p><i>The Development Delivery DPD and development of Parish Plans should allow communities the flexibility to meet housing demands driven by an ageing population.</i></p>

		<p>policy does not address the potential for the changing population structure to place unmet demands on the type and tenure of housing within rural areas.</p>
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	<p>+</p>	<p>The diversification of the rural economy and the associated reduction in agricultural activity fuels the largest improvements in greenhouse gas emissions, recreation and greenspace activity resulting in substantial net benefits for society²</p> <p>The Policy also addresses the issue of Laddingford and Yalding by equating suitable development to appropriate mitigation measures.</p>
<p>To improve the health and well-being of the population and reduce inequalities in health</p>	<p>?</p>	<p>Safe guarding Maidstone's natural assets and AONB ensures that there is adequate open space available for recreation. The impact on reducing health inequalities is uncertain.</p>

² UK National Ecosystem Assessment 2011

<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	<p>+</p>	<p>The mechanism for countering social exclusion and deprivation in these areas is knitting rural economic development to community needs against protection of the local landscape. Although development and change in this area is less than in other areas, the policy does not preclude the necessity for change receptive to community needs.</p>	
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>0</p>	<p>Diversification of the rural economy could lead to greater employment diversification thereby offering the residents the opportunity of acquiring a wider skills base. The presumption is that economic development is linked to community needs and is only acceptable if the local landscape is protected and where possible enhanced</p>	<p><i>Some community needs are not linked to the local economy. The Policy could consider redefining the scope of what is acceptable in the local landscape</i></p>
<p>To reduce crime and the fear of crime</p>	<p>0</p>		
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>0</p>		

<p>To improve accessibility to all services and facilities</p>	<p>0</p>	<p>This policy will have not any significant impacts upon this objective. The scoping report does however acknowledge that access to services in the south of the Borough is a problem.</p>	<p><i>Delivery of this objective is very much dependant on factors outside of the CS such as the feasibility of transport services</i></p>
<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>+</p>	<p>This policy seeks to protect and where possible enhance the Borough's rich natural environment. It aims to support and combine the economic prosperity of rural settlements and sustain historic county houses, local heritage and culture. If tourism is promoted in the Countryside then better accessibility and facilities are likely to follow, thereby promoting cultural activity in the Borough</p>	
<p>To improve efficiency in land use</p>	<p>0</p>	<p>This Policy could result in development (albeit limited such as economic development to meet local needs) on greenfield land</p>	
<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	<p>0</p>	<p>This policy should be seen in conjunction with CS7, CS8 and CS13. Although rural diversification of the economy is encouraged (e.g tourism) measures are proposed to ameliorate</p>	

		the impact on the rural road network	
To address the causes of climate change and ensure that the Borough is prepared for its impacts	0	The development of smaller economic sites would be less likely to trigger the requirement for renewables. However the diversification of the rural economy can help to retain economic activity and preserve the viability of existing farms. This helps to retain localised employment and the need to use travel to work by car in other areas.	
To conserve and enhance the Borough's biodiversity and geodiversity	++	Predominantly restricting development to the Maidstone Urban Area and Town Centre along with RSCs will help protect the rich biodiversity and geodiversity in the Maidstone countryside	
To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment	+	By protecting against adverse impacts on the Kent Downs AONB and local landscape the scale and design of new development will ensure that the biodiversity and geodiversity is conserved.	<i>The Landscape Character Assessment SPD could help to define how building design could integrate into the landscape in a proactive way. Avoiding the application of the one size fit all model to different areas may mean that proactive design and development could be encouraged. This could have impacts on generating tourism etc.</i>
To reduce waste	0	Waste related measures are covered in	

generation, dumping and disposal, and achieve the sustainable management of waste

Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.

To achieve sustainable water resources management

0

To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough

0

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

0

Appropriate economic growth is promoted in this policy which will have effects on rural diversification including tourism. Fulfilling community needs are also included in the policy which could entail provision of an education/skills centre

The LCA SPD could explore ways of integrating new buildings into the landscape thereby allowing greater scope in building size, layout etc.

An appropriate level of live/work units could be promoted within the Policy: this would have cross implications such as encouraging economic development through entrepreneurship and reduction in the need to travel to work etc

CS6 Sustainable Design and Development

Development proposals in the borough will take into account the following design principles. Proposals will:

1. Respond to their local context in a positive, forward looking manner, and help to establish or maintain local distinctiveness, while remaining appropriate for their purpose.
2. Take into account any adopted or endorsed supplementary design guidance, with a view to optimising the potential of any site, both internally and in relation to surrounding uses.
3. Seek to enhance the townscape or landscape in which they are set, while affording protection to any identified heritage assets.
4. If residential; achieve a minimum of Code for Sustainable Homes level 4 from April 2013. A minimum of level 5 will be achieved from April 2016.
5. If non-residential of 1000m² (gross) and above; achieve BREEAM very good from April 2013. BREEAM excellent will be achieved from April 2019.
6. If residential of 10 units and above, or non-residential of 1000m² (gross) and above; provide 10% of their energy from decentralised, energy from waste, renewable and/or low-carbon energy sources. Where applicable this requirement will count towards (4) and (5) above.
7. [Relating to 4, 5, and 6] achieve a reduced standard, to be negotiated with the council, only if it can be demonstrated on the grounds of viability that the above standards are unattainable.
8. Appropriate crime prevention measures will be considered at the earliest stage of the design process.

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	<p>0/?</p>	<p>By requiring all new development to be of a high design quality and to incorporate principles of sustainable design, this policy should increase the opportunity for Maidstone residents to live in a decent and sustainably constructed home.</p> <p>However, this policy does not tackle build affordability (although it does state that new development should respond to their context) , and housing prices could be increased with increased design expectations.</p> <p>This policy also does not address existing development, which will continue to be of a lower housing standard.</p>	<p><i>The policy should address how existing development design can be improved e.g Maidstone should work with housing partners to facilitate existing homes to be brought up to at least the Decent Homes Standard.</i></p> <p><i>Due to the poor provision of open space in Maidstone Town Centre and Urban Area, the policy should also consider including communal amenity space for developments providing 10 units or more.</i></p> <p>A weakness of this policy is its lack of locally determined and specific design principles. More locationally relevant principles and hooks would allow the subsequent Development Delivery DPD to set more nuanced and better standards of design.</p>
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	<p>++</p>	<p>Adopting BREEAM standards includes incorporating a credible, environmental label for buildings. This would include incorporating SuDS within buildings when necessary</p>	

<p>To improve the health and well-being of the population and reduce inequalities in health</p>	<p>0</p>	<p>Improving the design standards of new developments will have positive effects in creating safe, inclusive and attractive environments and could impact positively on the health and well being of the population. The stipulation that new buildings should be forward looking and help to maintain local distinctiveness should aid in fostering greater permeability in the urban fabric should help to promote walking and cycling.</p>
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	<p>0</p>	<p>The Policy aims to improve areas lacking design quality or distinctiveness thereby enhancing its appeal to a range of incomes and encouraging mixed communities and attracting investment. The Policy will have an impact on the quality of public space and the profile and accessibility of communal space.</p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and</p>	<p>0</p>	

remain in work

<p>To reduce crime and the fear of crime</p>	<p>++</p>	<p>Designing out crime is incorporated at the earliest stage of the design process. The Policy also relates the development site to area's wider context and environment thereby aiding accessibility and movement.</p>
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>+</p>	<p>The Policy impacts positively against this objective by positively promoting place making through improved design.</p> <p>The Policy could be strengthened by stipulating that new homes should provide both housing amenity space and child playspaces in larger developments significant communal space</p> <p><i>Bearing in mind the shortfall in open space in Maidstone's Town Centre and Urban Area the Policy could be strengthened by stipulating that new homes should provide both housing amenity space and child playspaces in larger developments significant communal space.</i></p> <p><i>Building for Life is a national standard for well designed home and neighbourhoods. Adoption of these standards could aid in creating distinct and strong neighbourhoods.</i></p>
<p>To improve accessibility to</p>	<p>+</p>	<p>The Policy entails that development positively reacts to its environment and</p> <p><i>The Policy could consider stating that a priority for public realm improvements</i></p>

<p>all services and facilities</p>		<p>helps to create a sense of place. While protecting heritage assets, new development design could be used to enhance these assets. However, it does not mention how new development could be used to facilitate accessibility to facilities and services nor does it mention incorporating these features into their design where appropriate.</p>	<p><i>are public transport nodes as they could be realms of high pedestrian footfall if a movement away from the car is achieved.</i></p>
<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>+</p>	<p>This Policy will have a positive impact on the objective because it will improve the appearance and legibility of particularly the urban fabric. It will aid in protecting and improving the setting of Maidstone's historic monuments and heritage sites making the Borough's urban area a more legible place in which its cultural assets are more clearly defined.</p> <p>Design led policies aid in the perception of place which build up layers of understanding. Good design will aid in connecting Maidstone's residents with its cultural heritage.</p>	

<p>To improve efficiency in land use</p>	<p>+</p>	<p>This Policy seeks to achieve high quality design across the Borough which can lead to improved efficiency in land use</p>	
<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	<p>-</p>	<p>The Policy will aid pedestrian movement by improving the usability and functionality of buildings by improving the associated spaces and places through design; thereby increasing overall permeability, legibility and addressing barriers to movement.</p>	
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	<p>+</p>	<p>This policy will have positive effects on this objective by adopting Level 4 (by 2013) and Level 5 (by 2016) of the Code for Sustainable Homes and the BREEAM standard of excellent by 2019.</p>	
<p>To conserve and enhance the Borough's biodiversity and geodiversity</p>	<p>+</p>	<p>The policy adopts BREEAM standards which incorporate environmental benefits into building design. This can have positive biodiversity impacts</p>	<p><i>Could a more proactive policy to environmental standards in development and existing buildings, How can geodiversity be protected and enhanced through design of new development and can it be helped to offset or mitigate Maidstone Town Centres deficiency in green space.</i></p>

<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>0/+</p>	<p>The policy aims to enhance the built and natural environment and aim in creating a sense of place through local distinctiveness.</p> <p>However, the permeability of new buildings is not covered in the policy. New development can act as a gateways into heritage assets by increasing accessibility rather than acting as barriers to movement. Likewise new buildings can enhance heritage assets settings.</p>	<p>More specific design measures relating to Maidstone's issues (green space deficiency, lack of legibility, poor air quality etc) should be addressed in this policy</p>
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	<p>+</p>	<p>The policy refers to the Code for Sustainable Homes which encourages new developments to follow the waste hierarchy – increasing prevention, reuse, recovery and recycling of waste during design, demolition and/or construction and operation phases – and, where appropriate, include a range of appropriate waste management facilities such as public recycling collection points.</p> <p>The policy also requires residential homes of 10 units or above to provide</p>	<p><i>Although Maidstone Borough is not responsible for waste processing are there any smarter ways of using it as a potential energy source? Are there any facilities that can be converted or extended into producing heat from waste. This would aid the SA objective which refers to energy efficiency.</i></p> <p><i>Could the policy support development that use recycled materials?</i></p>

		<p>10% of their energy from decentralised, energy from waste, renewable and or low carbon energy sources</p>
<p>To achieve sustainable water resources management</p>	<p>+</p>	<p>This policy will have a positive effect on this objective by helping to reduce water consumption and improving surface water off through adoption the Code for Sustainable Homes (level 4 from 2013 to level 5 from 2016)</p>
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	<p>+</p>	<p>This policy promotes a suite of measures to promote energy efficiency including energy produced from waste.</p>
<p>To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p>	<p>?</p>	<p>A higher standard of build design will add to quality and attractiveness of an area to businesses that may want to relocate to places with lower rental rates.</p>

CS7 Sustainable Transport

The Borough Council, working in partnership with Kent County Council and the Highways Agency together with infrastructure providers and public transport operators to support Maidstone's role as a regionally important transport hub will ensure that improvements to the public transport infrastructure, network and services are secured.

An Integrated Transport Strategy (ITS) will be prepared in partnership with Kent County Council as the Highways Authority with an aim of developing and implementing a number of schemes to deliver better accessibility.

A key aspect of the ITS will be to facilitate growth, economic prosperity and good accessibility to the urban realm, built and natural heritage and Maidstone's urban area and to enhance connectivity in the Borough contributing to the overall health and well being of the Borough.

Development policies within the Core Strategy will guide the location of development in order to reduce the need for private transport. Development proposals must show how:

- They do not create an increased risk to road safety; and
- Will cope with impact of increased heavy goods movements particularly on rural roads unless they are well related to the main road network
- Show how all highways, public transport, walking and cycling needs arising from development will be satisfied and that all infrastructure required as a result of the development will be delivered in a timely manner

Major planning applications will require a Transport Impact Assessment and a Travel Plan in accordance with Kent County Council's guidance on Transport Assessments and Travel Plans.

Caveat:

There are a number of implicit aspirations in the Policy and these can be assessed positively against the SA Objectives. However, the Policy does not substantially commit to any specific measures in itself such as enhancing the Borough’s public transport services, pedestrian routes, or creating a cycle network. Rather the Policy leaves implementation of the aspirations to a Development Delivery document which will deal with these issues on a site by site basis. Implementation of proactive Transport measures also refers to the ITS but it only mentions that this has “an aim of developing and implementing a number of schemes to deliver better accessibility.” On that basis for all the Policy’s implicit aspiration it is problematical to assess the impact of this policy against the SA Objectives. As a result the predicted effect is predominantly unknown.

SA Objective	Score	Predicted Effect	Mitigation
1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home	?	This policy supports development in areas of good accessibility and which encourage a modal shift away from the car through an emphasis on other forms of travel such as walking and cycling. The Policy in general advocates better use of space by locating development near improved infrastructure and service provision which could have positive effects on density levels and the availability of housing. This could lead to higher quality, sustainable design.	
To reduce the risk of flooding and the resulting detriment to public well-	?	This policy is proactive in tackling the issue of Climate Change by reducing the need for private transport and	

<p>being, the economy and the environment</p>		<p>subsequently addresses the issue of Flooding.</p>
<p>To improve the health and well-being of the population and reduce inequalities in health</p>	<p>?</p>	<p>The aim to increase connectivity in the Borough resulting in increased access to services and a modal shift away from the car will contribute to the overall health and well being of the borough</p> <p><i>It is unlikely that the dispersal development option will impact positively on air quality in the Town Centre. The policy could be strengthened by promoting micro measures such as the creation of clean air zones in the Town Centre.</i></p>
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	<p>?</p>	<p>The Policy aims to improve connectivity to and from all parts of the Borough and therefore facilitate improved access to services and employment. It does not state anything about improving rural transport and consequently does not target public transport, soft infrastructure improvements in the south of the Borough where accessibility is at its worse</p> <p><i>The policy could be more spatial by identifying priority areas (the South) and interventions (e.g improving desire lines to Maidstone Town, removing barriers to movement) in deprived areas.</i></p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for</p>	<p>?</p>	<p>The aspiration to develop and provide an integrated cycle network improve connectivity in the urban realm and , reduce the need for private travel through the siting of new development</p>

<p>everyone to acquire the skills needed to find and remain in work</p>		<p>will have benefits for ensuring everyone has access to existing education/training infrastructure</p>
<p>To reduce crime and the fear of crime</p>	<p>?</p>	
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>?</p>	<p><i>Could the Policy encourage the implementation of a street hierarchy that puts pedestrians first?</i></p>
<p>To improve accessibility to all services and facilities</p>		<p>This policy aims to combine growth with greater accessibility. It promotes an integrated transport strategy which tries to link up soft and hard infrastructure measures. The premise is to locate development in areas of greatest accessibility. However, the dispersal option may mean that the level of development needed to create optimum hard transport links such as new bus links, routes may not be achieved.</p> <p><i>The Policy could be strengthened by mentioning the emphasis of improving rural transport links in the south</i></p>

<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>?</p>	<p>Through implementation of the Integrated Transport Strategy this policy will increase access to Maidstone’s cultural assets either through locating development near to communities or increasing the range of available transport modes. Promotion of cycle and walking lanes will improve access to the Borough’s natural cultural assets.</p>	<p><i>The policy could implement a street hierarchy which puts pedestrians first thereby promoting streets as links for movement and places in their own right.</i></p>
<p>To improve efficiency in land use</p>	<p>?</p>	<p>This policy could result in the clustering of services near to areas of good transport accessibility thereby intensifying land use in appropriate areas. Through encouraging the development of alternative modes of transport the policy acknowledges the multi use function of roads etc</p>	<p><i>The policy could improve its recognition of the multi use function of roads and streets etc. By designating local streets it enhances their place and social gathering function. This has links to creation of place and therefore increased cultural activity.</i></p>
<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	<p>-</p>	<p>Transport improvements through hard and soft measures are linked to growth and economic prosperity. However, background evidence states that it is unlikely that road congestion pollution levels will improve in Maidstone Town Centre where the problem is most</p>	<p>More specific interventions could be included such as those related to short trip car data which maybe a significant contributor to air pollution</p>

		<p>acute.</p> <p>The policy addresses movement outside the Town Centre by caveating movement on rural roads and promoting cycling and walking. However road congestion and pollution is primarily a problem in the Town Centre</p> <p>The policy does not explicitly commit to reducing car travel in the Town Centre. If this was mentioned it could create a hook to proactive parking standards which is a mechanism for reducing car travel.</p>
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	<p>?</p>	<p>This policy will have significant benefits for reducing transport-related greenhouse gas emissions in the Borough. The Policy aims to reduce the need for private transport by guiding development to accessible locations thereby helping to manage congestion which is a significant contributor to green house gases. Promotion of Maidstone as a regionally important transport hub will strengthen its rail</p> <p>More specific interventions could be included such as those related to short trip car data which maybe a significant contributor to air pollution</p>

<p>To conserve and enhance the Borough's biodiversity and geodiversity</p>	<p>?</p>	<p>links</p> <p>The Policy guides development to areas that will reduce the need for public transport and close to services and facilities.</p> <p>The policy states that the location of development should reduce the need for private transport. This positively effects the level of greenhouse emissions by emphasising more sustainable transport networks such as cycling and walking. The policy references the ITS which promotes a number of park and ride schemes, Transport Assessments, Green Travel Plans, the requirement for limited parking or car free developments and car club schemes. (See Caveat to Policy CS7)</p> <p>Careful consideration should be given that this aim does not compromise sites with rich natural environmental and ecological qualities.</p> <p>There is a level of protection given to rural roads with regards to heavy goods movements The road hedges can be biodiversity habitats</p>
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<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>?</p>	<p>The policy advocates increasing overall accessibility to all parts of the Borough. It promotes greater accessibility through improved public transport and softer measures such as walking and cycling.</p>
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	<p>?</p>	<p>Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.</p>
<p>To achieve sustainable water resources management</p>	<p>?</p>	
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	<p>?</p>	<p>Encouraging sustainable modes of travel such as walking and cycling will increase energy efficiency. This will also be positive benefits on this objective by promoting an integrated transport system, improvements in public transport and the Urban Traffic</p>

		<p>Management and Control System which will reduce travel time and static energy consumption</p>
<p>To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p>	<p>?</p>	<p>A key aspect of the ITS will be facilitate economic growth. The policy recognises Maidstone's regional economic role and within this the need for increased communication and co-operation between transport providers, KCC and the Council. This kind of co-operation will give a degree of certainty to investors and businesses and allow them to plan ahead.</p> <p>The policy also tries to balance the need for hard and soft transport measures to improve accessibility particularly within Maidstone's urban area.</p>

CS8 Economic Development

The Council is committed to improving the economy of the Borough and delivering the vision and objectives set out in the Economic Development Strategy including the provision of sustainable employment opportunities that will be sufficient to create 10,000 jobs over the plan period. This will be achieved by:

- The retention, intensification and regeneration of existing business areas, sites and buildings in the Maidstone urban area and the Rural Service Centres. Planning permission for change of use on existing employment sites will be resisted.
- Regeneration and modernisation of existing employment sites and buildings will be encouraged
- Enhancing Maidstone town centre and maintaining the hierarchy of retail centres
- Supporting proposals that encourage highly skilled residents to work in the borough to reduce out-commuting.
- Planning permission will be granted for employment uses at or near to motorway junctions where it is proven that the development cannot be located within the town centre first, followed by edge of centre locations
- Improving skills in the workforce in particular by promoting further and higher education provision within Maidstone's urban area with a preference for a town centre location
- Supporting improvements in information and communications technology to facilitate more flexible working practices.
- Supporting proposals that aim to provide tourist related development in appropriate and suitable locations that are of an appropriate and suitable scale according to the location. Applications for local needs employment use in the countryside including for the expansion needs of existing sites will be supported in appropriate locations.
- Allocations for employment use will be made in the Development Delivery DPD

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	+	<p>The regeneration of Maidstone Town Centre should have positive impacts on housing provision as this should improve efficiency in land use.</p>	
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	+	<p>Flood risk should be a known variable at current business sites, so by predominantly focusing the needs of business on these sites should manage and minimise flood risk.</p>	<p><i>Development proposals should undertake appropriate flood risk assessments.</i></p>
<p>To improve the health and well-being of the population and reduce inequalities in health</p>	++	<p>Retention, intensification and regeneration of existing business areas, sites and buildings is a sustainable use of space through reducing the need to occupy new space which could be used for recreation, community use, housing.</p> <p>The aim to increase employment in the Borough will improves people’s quality of life thereby improving well being. Promoting a more self contained work</p>	

		<p>force by encouraging highly skilled residents to work in the Borough will reduce journey time to work and increasing the possibility of adopting more healthy forms of travel such as cycling and walking.</p>
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	<p>+</p>	<p>The retention, intensification and regeneration of existing business areas and the regeneration of existing employment land along with the regeneration of Maidstone urban area will increase employment.</p> <p>The Policy encourages the development of a wide economic base, (from technology to tourism) that will cater for a wide range of skills and abilities.</p> <p>Employment areas will be located in accessible locations or with good transport links. One aim of the Policy is to develop a more self contained economy with a reduction in out commuting and the retention of skills.</p> <p><i>The achievability of this policy is largely dependant on regeneration of the Town Centre. This will be addressed in the Central Maidstone AAP. This document should consider exploring the amount of expenditure leakage from the Borough</i></p>

<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p style="text-align: center;">+</p>	<p>This policy has significant impacts on this objective. It explicitly promotes further and higher education provision within Maidstone’s Urban Area and specifically for a Town Centre location. It proactively addresses the issue of out-commuting which together with an ageing population could lead to future labour shortages.</p> <p>The Policy also encourages a varied economy which is not exclusively focused on Maidstone Town Centre and Urban Area. Regeneration of the Town Centre and the re use of existing sites and the allocation of new locations increase the availability of land for skills and education purposes</p>
<p>To reduce crime and the fear of crime</p>	<p style="text-align: center;">o/+</p>	<p>The Policy aims to improve skills and education and increase job opportunities for all in the Borough thereby raising the standard of living in these communities.</p>
<p>To create and sustain</p>	<p style="text-align: center;">0</p>	

vibrant, attractive and clean communities

<p>To improve accessibility to all services and facilities</p>	<p>+</p>	<p>Intensification and regeneration of existing employment and business sites will increase the probability of developing a greater number of associated services. Regeneration of the existing Town Centre should result in more intelligent use of space which will enhance its mixed use profile</p>
<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>+</p>	<p>The Policy links the Borough’s cultural assets with economic development through tourism. The proactive element of the Policy entails exploiting the full potential the Borough’s cultural assets, thereby linking them to increased legibility, setting and accessibility.</p> <p><i>Encourage the beneficial reuse of its built heritage to bring associated cultural, social and economic benefits to communities.</i></p>
<p>To improve efficiency in land use</p>	<p>+</p>	<p>The policy focuses most economic development in Maidstone Town Centre and Urban Area along with the RSCs. It also implements a town centre first approach which restricts out of town</p>

		<p>employment uses. This directs economic development to areas with the highest proportion of previously developed land</p>
<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	<p>?</p>	<p>The policy supports proposals that would reduce out-commuting, more flexible work practices and the presumption that employment uses should be located in the area of highest accessibility (Town Centre).</p> <p><i>Could the policy address the potential for live – work units thereby helping to reduce road based travel</i></p>
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	<p>+</p>	<p>More flexible working practices are encouraged thereby potentially reducing the need to travel. Likewise the Policy encourages improvements in IT which are environmentally cleaner than more established types of manufacture and industry.</p> <p><i>Following on from CS2 The regeneration of Maidstone Town Centre through the CMAAP should identify better use space, the clustering of certain types of uses and buildings where resources are pooled and the use renewables would be applicable????</i></p>
<p>To conserve and enhance the Borough’s biodiversity and geodiversity</p>	<p>+</p>	<p>The Policy encourages the retention, intensification and regeneration of existing business areas, sites and buildings in Maidstone urban and RSCs thereby helping to resist new development in Greenfield.</p> <p>Proposals regarding tourism will be supported. As the high quality</p>

		<p>countryside in Maidstone is a major asset will investment in tourism lead to enhancement of its associated features such as biodiversity, landscaping improvements etc.</p>	
<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>+</p>	<p>Through the reuse and enhancement of existing business and employment space the impact on the built heritage assets and the countryside is minimised. The Policy also promotes Maidstone's tourism sector which could result in the enhancement and increased accessibility of the Borough's environmental and historic assets (see CS5).</p>	<p><i>The Policy could consider including text about the reuse of existing, vacant or run down built heritage sites for the purposes of creating economic space. This would have positive effects against this objective through the regeneration of built heritage sites</i></p>
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	<p>0</p>	<p>Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.</p>	
<p>To achieve sustainable water resources</p>	<p>0</p>		

management		
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	+	<p>The Policy supports flexible working practices which could result in more home working and therefore a reduction in travel. In addition the retention, intensification and regeneration of existing business areas, sites and building will reduce the need for raw materials.</p>
<p>To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough</p>	?/+	<p>The Policy promotes the development of a wide economic base that is responsive to both urban and rural areas. This encourages the development of a wide skills and employment base which is promoted through enhanced further and higher education provision.</p> <p>Flexible working practices in the IT sector are encouraged which could have a beneficial effect on rural diversification. This could be further promoted by assessing the need for a live work policy.</p>

As the CS is document for securing investment the Policy could mention the need or possibility of creating distinctive places, quarters, clustering of uses and resources.

In order to stimulate investment and economic development the Policy should reference Maidstone's strengths and weaknesses and the associated opportunities (e.g redundant commercial floorspace, its nighttime economy)

Greater reference to Maidstone's role and future economic position within the region should be referenced The mechanisms of encouraging proposals

		<p><i>that attract high skilled residents to work in the Borough should be explored in the CMAAP.</i></p> <p><i>Local Business Agreements could be secured by the Council – small business capacity building – highlighting procurement opportunities</i></p>
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CS9 Housing Mix

Maidstone Borough Council will seek to ensure the delivery of sustainable mixed communities across new housing developments and within existing housing areas throughout the Borough. A mixture of house sizes will be sought that reflects the needs of those living in Maidstone now and in years to come as evidenced by the SHMA.

The Council requires that developers refer to the accommodation profiles detailed within the SHMA in order to assess the characteristics of house sizes likely to be required in both urban and rural areas, and across market and affordable housing. Developers should provide a clear explanation of how this information has been used to justify the proposed mix.

Tenure mix requirements applicable to affordable housing are detailed in Policy CS10

SA Objective	Score	Predicted Effect	Mitigation
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<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	<p>o/+</p>	<p>Through promoting mixed sustainable communities with a mixture of house sizes it will have a positive effect on the sustainability objective. Although there is reference to the SHMA with regard to appropriate housing type in rural and urban areas there is no borough wide housing size split detailed in the policy. Neither is mention of what housing type size will be suitable where. This lack of specificity and certainty weakens the aim of delivering mixed sustainable communities.</p>	<p><i>The housing size split should be specified in the policy and should include more detail on what housing type is suitable where. This level of certainty would aid delivery and help in place shaping.</i></p>
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	<p>0</p>		
<p>To improve the health and well-being of the population and reduce inequalities in health</p>	<p>+</p>	<p>The desire to create sustainable communities through the provision of a range of house types which meet the needs of the Borough’s residents impacts positively upon this objective. However the Policy could be strengthened by including detail on what housing should be prioritised and</p>	<p><i>More specificity in this policy is required to ensure that sustainable, mixed communities are created.</i></p>

		<p>where, e.g housing for older people, family 3 and 4 bed houses, affordable 1 bed flats in the urban area.</p>
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	<p>?</p>	<p>By addressing the provision of housing mix in relation to the borough's needs, this policy should have a positive effect on this sustainability objective.</p> <p>However there is a doubt that the Policy will be as effective as possible because it does not specify what type of housing should be promoted. For example encouraging the development of 3-4 bedroom houses should increase affordability and therefore allow more people to access the housing market</p> <p><i>The policy should consider including what housing it specifically wants to promote in the Borough.</i></p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>+</p>	<p>Improved housing choice will help to produce a mixed community and varied workforce. Therefore it is an important component in educational and economic development as it contributes to the development retention of skills in the medium and</p>

		long term
To reduce crime and the fear of crime	+	This policy is intrinsic to producing healthy and balanced communities which incorporate a mix of incomes and family types
To create and sustain vibrant, attractive and clean communities	0	The Policy does not directly impact upon this objective but it does aid in creating strong and balanced communities
To improve accessibility to all services and facilities	+	This policy should increase accessibility to services and facilities. By addressing the provision of housing size and type a balanced and mixed community will be produced. For example, providing a range of housing that accommodates elderly people and special needs increased independence will follow. In addition a wider range of services could follow from the

		promotion of a mixed community
<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	+	<p>This policy will have a positive effect on the objective in creating a mixed and balanced community. This will aid in the appropriation of space through the development of a wide range of cultural activities.</p>
<p>To improve efficiency in land use</p>	+	<p>This policy helps to create sustainable and mixed communities which will have a positive effect on the quality of the environment where a mixture of uses would be promoted</p>
<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	0	
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	0	
<p>To conserve and enhance the Borough's biodiversity and geodiversity</p>	0	

<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>0</p>	<p>This policy has no significant impact against this objective however it could state that larger family housing (4 beds) should be located near to open space.</p>
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	<p>0</p>	<p>Waste related measures are covered in Policy CS6, CS14 and Sustainable Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.</p>
<p>To achieve sustainable water resources management</p>	<p>0</p>	
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	<p>0</p>	
<p>To sustain economic growth, develop and</p>	<p>+</p>	<p>This policy helps to facilitate the establishment of mixed and balanced</p>

maintain a skilled workforce to support long-term competitiveness of the Borough

communities where all ages and family types are accommodated. This should help in the retention of skills.

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CS10 Affordable Housing

The Borough Council will seek the provision of affordable housing in residential development and mixed use developments that incorporate housing in the following manner:

- For developments of 15 dwellings or more , or 0.5ha or greater affordable housing will be required to address the Borough's housing need consisting of both:
- A target of 40% of the total number of dwellings provided on site
- A financial contribution (rate to be confirmed) towards the provision of affordable pitches for gypsies and travellers.
- Only in circumstances where the viability of a development is proven to be negatively affected will a lower percentage dwelling requirement or financial contribution be accepted
- Tenure split – Not less than 24% of the total number of dwellings provided will be affordable/social rented housing, the balance of up to 16% of the total number of dwellings will be intermediate housing.
- Initial and subsequent occupation of affordable homes is to be controlled through legal agreements to ensure that the accommodation remains available to meet the purposes for which it was permitted. If for any reason this restriction is lifted any subsidy will be recycled for alternative affordable housing provision.
- Affordable housing will be integrated on site with open market housing and applications for development will be expected to reflect this. With the exception of affordable pitches for gypsies and travellers, off site provision will only be acceptable in exceptional circumstances. The provision will take the form of
 - a) *Alternative serviced sites provided by the developer with the benefit of appropriate planning permission*
 - b) *The purchase of suitable existing accommodation and transferred by the developer to an registered provider of affordable housing*

- Where off site provision is agreed to the calculation for this will be made in relation to the full amount of Market housing now possible on the original site.
- Affordable housing will comply with the HCA minimum floor area standards. All affordable housing will be constructed to Lifetime Homes standards with a further percentage to be designed for wheelchair use.
- Sites will be expected to provide affordable housing at the appropriate rate on a whole site basis. Sub divisions of a site that would bring any particular application under the affordable housing threshold will be aggregated to ensure delivery of affordable housing is maximised across the entire site.
- Commuted sums are to be regarded as a measure of last resort.
- Developers will be expected to pay for all costs associated with the assessment of viability of proposals.
- An affordable housing SPD will be produced to expand on how these proposals will be implemented

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SA Objective	Score	Predicted Effect	Mitigation
1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home	+	This policy is targeted to ensure housing availability for those unable to buy in the open market, and also to ensure that the housing within new schemes supports an inclusive development in terms of location, layout and design.	
To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	0		
To improve the health and well-being of the population and reduce inequalities in health	+	The provision of affordable housing for those unable to enter the open housing market will impact positively against health and well being particularly since the policy integrates affordable housing with open market housing on development sites thereby helping to create mixed communities	
To reduce poverty and social exclusion and close	+	The SHMA states that affordable housing need will not be met in the	<i>Would greater flexibility in the affordable housing percentage in development</i>

<p>the gap between the most deprived areas in the Borough and the rest</p>		<p>Borough but that the threshold in this Policy is appropriate. In principle the Policy should help to ensure a wider housing mix and will help to close the gap between the most deprived areas and the rest.</p> <p>The Policy also aims to ensure that affordable housing within new schemes supports an inclusive development in terms of type of housing, location, layout and design</p>	<p><i>improve supply and therefore help counter social exclusion.</i></p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	+	<p>Affordable Housing as it helps to produce a mixed community and a varied workforce. Therefore it is an important component in educational and economic development as it contributes to the development retention of skills in the medium and long term</p>	
<p>To reduce crime and the fear of crime</p>	+	<p>This Policy is intrinsic to producing healthy and balanced communities</p>	

which incorporate a mix of incomes			
To create and sustain vibrant, attractive and clean communities	0		
To improve accessibility to all services and facilities	+	By the stipulation that affordable housing has to be incorporated within open market housing a more inclusive community will be built. This will avoid homogenised housing areas and the narrowing of service provision. Greater accessibility will follow if the location and design of the housing creates an inclusive development.	<i>Ensure developments, in addition to adequate housing mix, also have adequate access to services, facilities, recreational opportunities and enjoyment for the residents of affordable housing. This should be addressed through the Allocations DPD</i>
To encourage increased engagement in cultural activity across all sections of the community in the Borough	0		
To improve efficiency in land use	+	This policy helps to create mixed and balanced areas through the integration of affordable housing with	

		market housing and subsequently avoid the ghettoisation of communities which can result in a poor quality environments
To reduce road congestion and pollution levels and ensure air quality continues to improve	0	
To address the causes of climate change and ensure that the Borough is prepared for its impacts	0	
To conserve and enhance the Borough's biodiversity and geodiversity	0	
To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment	0	
To reduce waste generation, dumping and disposal, and achieve the sustainable management	0	Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse,

of waste

intensification or enhancement of existing sites will reduce the production of waste associated with demolition.

To achieve sustainable water resources management

0

To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough

0

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

0

CS11 Local Needs Housing

The council will work with parish councils and local stakeholders to bring forward local needs housing in its communities. This housing will:

- Have been proven necessary by a local needs survey undertaken by or on behalf of the parish councils concerned
- Be restricted in perpetuity to occupation by persons with a proven residence, family and or employment connection to the settlement concerned.
- Remain available in perpetuity to meet the purposes for which it was permitted. The initial and subsequent occupancy of the accommodation to be controlled via planning conditions and agreements to appropriate to ensure that this is the case.
- Be provided on a site that enables an appropriate scale and setting in the built context of the surrounding development
- Local needs housing eligibility criteria
- Family members living in the settlements for five years immediately prior to the completion of the development
- The settlement having been the place of employment for the five years immediately prior to the completion of the development
- Having resided in the settlement for the five years immediately prior to the completion of the development.
- Where any units are to be made available for shared ownership leasing the occupiers shall not be permitted to staircase above 80% of the value of such units at the date upon which the right to staircase is exercised unless the units fall under the rural repurchase scheme.

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	<p>++</p>	<p>This is a proactive policy which will help to produce affordable homes for local communities. The Policy will help to counter the increase in house prices by retaining in perpetuity housing for the local community</p>	
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	<p>0</p>		
<p>To improve the health and well-being of the population and reduce inequalities in health</p>	<p>++</p>	<p>This is a proactive policy which will impact positively against this objective. The Policy provides a level of security for people who have lived in a community for five years. This will enhance health and well being as people will promote a greater sense of place and emotional investment in a community</p>	
<p>To reduce poverty and social exclusion and close</p>	<p>++</p>	<p>This policy will have a very positive effect on this objective. It will aid</p>	

<p>the gap between the most deprived areas in the Borough and the rest</p>		<p>social inclusion by helping to provide housing for persons who have lived in an area for five years thereby fostering engagement in a community and a strong sense of place.</p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>+</p>	<p>This policy links economic need with local housing need along with the development of a sense of place and belonging. This has links to businesses investing in a localised well educated and skilled workforce.</p>
<p>To reduce crime and the fear of crime</p>	<p>++</p>	<p>This is a proactive policy which aims to foster a sense of place and identification with an area. It aids in building strong communities</p>
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>+</p>	<p>This is a proactive policy encourages the identification and investment in a place by its residents and workers by helping to create a sense of continuity.</p>

<p>To improve accessibility to all services and facilities</p>	<p>++</p>	<p>This policy gives a sense of continuity to service and facilities provision. It provides a sense of certainty for the service provider as the policy aids in building a sense of community. Housing is linked to employment provision and the wider range of associated services which accompany the combination of these elements</p>
<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>+</p>	<p>This policy will have a positive effect on the objective as it aids in giving the residents a sense of ownership and connection with a place. This sense of place aids in fostering an interest in cultural heritage and community events such as local history celebrations etc.</p>
<p>To improve efficiency in land use</p>	<p>?</p>	<p>This policy links the proximity of employment to place of residence. This could have an impact on the viability and extent of associated services and the need of transport related resources</p>

<p>To reduce road congestion and pollution levels and ensure air quality continues to improve</p>	<p>+</p>	<p>The Policy has the potential to help create more localised employment and thereby reduce the length of trip to work times.</p>
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	<p>0</p>	
<p>To conserve and enhance the Borough's biodiversity and geodiversity</p>	<p>0</p>	
<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>0</p>	
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	<p>0</p>	<p>Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.</p>

To achieve sustainable water resources management	0	
To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough	0	
To sustain economic growth, develop and maintain a skilled workforce to support long-term competitiveness of the Borough	+	This policy allies places of work and residence. It should aid in establishing and retaining a stable local workforce and the avoidance of skills shortage.

CS12 Gypsy and Traveller Accommodation

The borough need for gypsy and traveller pitches will be addressed through the granting of planning permissions and the Development Delivery DPD to deliver the pitch target of 71 pitches for the period 2006 to 2016

Financial contributions will be sought for the provision of affordable pitches for affordable rent as set out in Policy CS11 as part of the overall affordable housing requirement.

Planning permission for gypsy and traveller and travelling show people accommodation will be granted where the following criteria are met:

- a) There is a demonstrable need for the development that cannot be met on existing lawful pitches or allocated pitches in the borough
- b) The site is suitably connected preferably by sustainable modes of transport to a settlement with health and school facilities
- c) The impact of development including in combination with existing mobile homes would not harm the landscape and rural character of the area, in particular in the Kent Downs AONB and the Metropolitan Green Belt.
- d) The development would not cause significant harm to biodiversity.
- e) The site can be safely accessed to and from the highway
- f) The site is not located in an area liable to flood as shown on the latest information from the Environment Agency In addition to the above criteria the following applies to travelling show people accommodation only:
 - g) The site should be suitable for the storage and maintenance of show equipment and associated vehicles

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	+	<p>By providing sites for Gypsies and Travellers this policy along with the related housing policies should contribute towards providing homes for a community with specific housing needs.</p>	
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	+	<p>Site selection criteria includes avoiding areas not liable to Flooding</p>	
<p>To improve the health and well-being of the population and reduce inequalities in health</p>	+	<p>An element of the site selection criteria addresses the level and type of accessibility to health and school facilities. This should positively impact upon the potential for social inclusion</p>	
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	++	<p>This policy should aid in closing social exclusion and deprivation within the Borough by addressing the needs of a marginalised community</p>	

<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>+</p>	<p>This policy impacts positively against the objective as site selection criteria preferably requires that sites are connected by sustainable modes of transport to a settlement with school facilities</p>
<p>To reduce crime and the fear of crime</p>	<p>+</p>	<p>This policy aims to integrate a community with specific housing needs into the wider Maidstone community.</p>
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>0</p>	
<p>To improve accessibility to all services and facilities</p>	<p>+</p>	<p>The selection criteria stipulates that a site is preferably connected to sustainable modes of transport and health and school facilities.</p>
<p>To encourage increased engagement in cultural activity across all sections of the community in the</p>	<p>0</p>	

Borough		
To improve efficiency in land use	+	The selection criteria stipulates that a site is preferably connected to existing infrastructure provision
To reduce road congestion and pollution levels and ensure air quality continues to improve	0	
To address the causes of climate change and ensure that the Borough is prepared for its impacts	0	
To conserve and enhance the Borough's biodiversity and geodiversity	0	
To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment	0	
To reduce waste generation, dumping and disposal, and achieve the	0	Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use.

sustainable management of waste

With regards to the latter reuse, intensification or enhancement of existing sites will reduce the production of waste associated with demolition.

To achieve sustainable water resources management

0

To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough

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

0

CS13 Natural Assets

To enable Maidstone to retain a high quality of living and to be able to respond to the effects of climate change, developers will ensure that all new development protects and enhances natural assets by incorporating measures to:

- Protecting areas of Ancient Woodland from inappropriate development and ensuring that Veteran Trees do not suffer any adverse impacts as a result of development;
- Avoid inappropriate development within or adjacent to sites of designated nature conservation interest;
- Avoid damage to and inappropriate development within or adjacent to Local Biodiversity Action Plan priority habitats;
- Retain, protect and enhance features of biological or geological interest and create and restore other habitats wherever practicable;
- Provide for the long term maintenance of all natural assets associated with the development; and
- Mitigate for and adapt to the effects of climate change including flooding

Development proposals will be expected to:

- Be accompanied by an ecological evaluation of development proposals and associated sites to take full account of the biodiversity present;
- Positively contribute to the improvement of accessibility of natural green space within walking distance of housing, employment, health and education facilities and to the creation of a wider network of new links between green and blue spaces.

SA Objective	Score	Predicted Effect	Mitigation
<p>1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home</p>	0	<p>Protection of the high quality landscape within Maidstone could place overly onerous restrictions on housing development detrimentally affecting affordability and provision. A balance should be struck resulting in the best use of available space.</p> <p>Consequently, within Policy CS6 development could be viewed as something that can visibly enhance the countryside and landscape. Although CS6 does mention enhancing the landscape the presumption for development in these areas is guided by landscape t constraints which largely aims to mitigate development effects. More policy detail regarding development in Natural Asset areas is needed.</p> <p>A more proactive development policy could produce appropriate larger building in these areas, resulting in greater commercial, housing, social</p>	<p><i>The Landscape Character Assessment SPD could propose locations along with approximate type and size of buildings which enhance Maidstone’s Natural Assets.</i></p>

infrastructure provision.		
<p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	<p>++</p>	<p>The implementation of a GBIS will aid in mitigating the risk of flooding. It will help to mitigate against the surface water flooding which has mainly been caused by the blockage of gullies and ditches leading to insufficient drainage and ponding of water</p>
<p>To improve the health and well-being of the population and reduce inequalities in health</p>	<p>++</p>	<p>This policy impacts very positively against the objective. The desire to enhance and protect Maidstone's natural assets such as geological and biodiversity areas combined with greater accessibility through the GBIS will aid people's well being and health. The Policy attempts to relate the borough's landscape, biodiversity and geological facets with increased access to services thereby increasing its legibility and relevance to the population.</p>

<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest</p>	<p>0</p>	<p>There will not be any significant effects of this policy against the SA objective.</p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>0</p>	
<p>To reduce crime and the fear of crime</p>	<p>0</p>	
<p>To create and sustain vibrant, attractive and clean communities</p>	<p>0</p>	
<p>To improve accessibility to all services and facilities</p>	<p>++</p>	<p>Intrinsic to enhancement and protection of the Borough's natural assets is greater connectivity. As a borough wide issue increased linkages will lead into housing, employment ,</p>

		health and education facilities.
To encourage increased engagement in cultural activity across all sections of the community in the Borough	0	
To improve efficiency in land use	+	The Policy is designed to enhance the multi functional aspect of the Borough's natural assets. This includes creating a network of green and blue spaces which would help not only biodiversity but accessibility.
To reduce road congestion and pollution levels and ensure air quality continues to improve	+	The Policy commits to reducing car based travel by promoting the creation of a network of links between green and blue spaces
To address the causes of climate change and ensure that the Borough is prepared for its impacts	0	
To conserve and enhance the Borough's biodiversity	++	This policy will impact positively against this objective.

<p>and geodiversity</p>		<p>SuDS are mentioned in the Delivery and Monitoring section but not in the policy itself. SuDS can indirectly aid biodiversity through wetland management etc.</p> <p>This policy also promotes the creation of a green and blue grid which has the possibility to connect with Maidstone's green wedges, AONB, local landscape designations which will aid in creating biodiversity corridors</p>
<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>++</p>	<p>The policy affords a high level of protection of Maidstone's natural assets such as its Ancient Woodland. Through the GBIS it will enhance access to Maidstone's high quality landscape. In addition biodiversity and quiet recreation will be enhanced by the Borough's green wedges.</p>
<p>To reduce waste generation, dumping and disposal, and achieve the sustainable management of waste</p>	<p>0</p>	<p>Waste related measures are covered in Policy CS6, CS14 and Objective 10 which addresses efficiency in land use. With regards to the latter reuse, intensification or enhancement of</p>

		<p>existing sites will reduce the production of waste associated with demolition.</p>	
<p>To achieve sustainable water resources management</p>	<p>+</p>	<p>As part of its Delivery and Monitoring section this policy incorporates SuDS. As well as managing flood risk through improved surface water drainage, SUDS can offer additional benefits of water pollution reduction, and landscape and wildlife enhancement. Linked with the development of a GBIS this will have a positive impact upon the objective</p>	
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	<p>+</p>	<p>Protection and enhancement of the Borough's natural assets including its biological and geological features will allow the energy potential of these assets to be explored as future renewable technologies become more available and efficient.</p>	
<p>To sustain economic growth, develop and maintain a skilled workforce to support</p>	<p>?</p>	<p>Protecting, retaining and enhancing features of biological or geological interest and accepting the principle of development if sympathetic and</p>	<p><i>The Policy performs relatively well against the SA Objectives but there is a lack of specificity with regards to Natural Asset measures and projects that could enhance the Borough's economy and</i></p>

<p>long-term competitiveness of the Borough</p>		<p>reactive to environmental constraints offers the opportunity of proportionate economic development such as that associated with tourism. In addition the creation of a Green and Blue Grid will aid accessibility and legibility.</p>	<p><i>biodiversity.</i></p> <p><i>Suggest that the Policy is retitled Natural and Built Assets. The Policy would then have the scope to augment and utilise the potential of the built heritage (e.g to protect the beneficial reuse of old building that provide suitable locations for employment uses such as SMEs). This is a cross cutting issue which has links to economic prosperity, notion of place, business innovation (SA objectives 10, 14, 18)</i></p>
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DRAFT: COMMENT

CS14 Infrastructure Delivery

Development should in the first instance make most effective use of existing infrastructure.

Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement being provided to an agreed delivery programme.

Detailed specifications of the site specific contributions required will be included in the Development Delivery DPD. Development proposals should make provision for all the land required to accommodate any additional infrastructure that will be required arising from that development. Dedicated Planning Agreements will be used to provide the range of site specific facilities which will normally be provided on site but may in exceptional circumstances be provided in an offsite location or as a last resort via an in-lieu financial contribution.

The Community Infrastructure Levy will be used to secure contributions to help fund the strategic infrastructure needed to support the sustainable growth proposed in Maidstone.

With the exception of affordable housing, all residential development will pay the Community Infrastructure Levy. Business development will also be expected to contribute towards strategic infrastructure, particularly with regard to the transport infrastructure demand arising from their development proposals. The Community Infrastructure Levy rates will be set out in the Charging Schedule to accompany the Publication version of the Core Strategy.

Exceptionally where developers face genuine abnormal costs or consider that paying the Community Infrastructure Levy would seriously threaten the viability of a development the Council will be prepared to consider reductions in the amount of levy charged subject to there being complete and open transparency on behalf of the developers in revealing the basis for their calculations and subsequent claims.

SA Objective	Score	Predicted Effect	Mitigation
1.To ensure that the residents of Maidstone have the opportunity to live in a well designed, sustainably constructed, decent and affordable home	+	The inclusion of CIL within this policy will aid in providing the strategic infrastructure needed to support sustainable areas. This funding will aid in creating areas suitable for higher density of housing	
To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	+	The dispersal method of development means that it is harder to get developers together to invest in new infrastructure. CIL and S106 money could be used to improve drainage systems, natural barriers incorporated within the Green and Blue Grid	<i>Ensure that flood risk and flood management is accounted for where new infrastructure is planned.</i>
To improve the health and well-being of the population and reduce inequalities in health	+	Providing key infrastructure through such as health and community Facilities through CIL and S106, should improve the health and well-being of the population and reduce inequalities in health	
To reduce poverty and social exclusion and close	+	This policy will help in enhance service and infrastructure provision in	

<p>the gap between the most deprived areas in the Borough and the rest</p>		<p>deprived areas. Unless the policy details where certain CIL related money will go, such as providing areas of search for new further and higher education centres in deprived places, it is unclear how it will close the gap between deprived areas and the rest.</p>
<p>To raise educational achievement levels across the Borough and develop the opportunities for everyone to acquire the skills needed to find and remain in work</p>	<p>+</p>	<p>This policy will impact positively against the objective as CIL can be used to support additional education facilities if required.</p> <p><i>CIL is a finite resource. The Core Strategy should think about what areas need to be prioritised and if this needs to be articulated in the Core Strategy policy.</i></p>
<p>To reduce crime and the fear of crime</p>	<p>+</p>	<p>This Policy will aid in providing financing for measures such as public realm improvements which will help to build and safe and secure community through better legibility, lighting, walkways, open spaces etc.</p>
<p>To create and sustain vibrant, attractive and</p>	<p>0</p>	

clean communities

<p>To improve accessibility to all services and facilities</p>	<p>+</p>	<p>Through the adoption of CIL together with S106 payments which contribute positively to providing necessary infrastructure at new developments this policy will impact positively on the objective</p>
<p>To encourage increased engagement in cultural activity across all sections of the community in the Borough</p>	<p>+</p>	<p>CIL will be used to secure contributions to help fund the strategic infrastructure needed to support Maidstone's sustainable growth. Intrinsic to its growth will be promotion of tourism which entail investment in Maidstone's cultural assets</p>
<p>To improve efficiency in land use</p>	<p>+</p>	<p>Through CIL off site infrastructure provision is possible. This should allow a more strategic approach to infrastructure to be adopted by the council – e.g locating these facilities in places which will benefit the greatest amount of people.</p>
<p>To reduce road congestion and pollution levels and</p>	<p>+</p>	<p>Adoption of CIL could be used to fund strategic infrastructure. This could</p>

<p>ensure air quality continues to improve</p>		<p>include a number of sustainable transport measures.</p>
<p>To address the causes of climate change and ensure that the Borough is prepared for its impacts</p>	<p>++</p>	<p>A more integrated approach to Climate Change will be aided by the introduction of CIL. The levy can be used to fund strategic transport infrastructure which could help to mitigate congestion and car based travel</p>
<p>To conserve and enhance the Borough's biodiversity and geodiversity</p>	<p>?</p>	<p>Infrastructure provision could be directed to measures improving biodiversity and geodiversity. This could include funding to improve the GBIS and could be designated through the Infrastructure Delivery Plan.</p> <p><i>The IDP could seek to designate funding to the GBIS</i></p>
<p>To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment</p>	<p>+</p>	<p>Through the adoption of CIL along with S106 contributions the necessary infrastructure will be provided at new developments. This will help to improve accessibility and enjoyment of the Borough's built and natural assets</p>
<p>To reduce waste generation, dumping and</p>	<p>?</p>	<p>Although Maidstone Borough is not responsible for waste processing are</p>

<p>disposal, and achieve the sustainable management of waste</p>		<p>there any smarter ways of using it as a potential energy source? Are there any facilities that can be converted or extended into producing heat from waste. This would aid the SA objective which refers to energy efficiency. Could CIL money be used to fund these facilities?</p>
<p>To achieve sustainable water resources management</p>	<p>+</p>	<p>This policy promotes Planning contributions and effective communication with infrastructure providers. This should help to ensure that water resources are adequate for future need</p>
<p>To increase energy efficiency, and the proportion of energy generated from renewable sources in the Borough</p>	<p>?</p>	<p>Land is preserved to accommodate all additional infrastructure arising from a development and the inclusion of CIL can be used to support sustainable growth in Maidstone which could include the development renewable technologies where appropriate.</p>
<p>To sustain economic growth, develop and maintain a skilled workforce to support</p>	<p>+</p>	<p>Adopting CIL and the available money for strategic infrastructure development is a major element in attracting businesses and investment</p>

<p>long-term competitiveness of the Borough</p>		<p>into an area.</p> <p>Adoption of CIL means that the Council can plan for long term infrastructure development which in turn will give a level of certainty to developers who tend to positively react to Council investment and buy in</p>
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DRAFT: CONFIDENTIAL

Glossary of Terms

AMR Annual Monitoring Report
AONB Area of Outstanding Natural Beauty
AQMA Air Quality Management Area
BREEAM Built Research Establishment Environmental Assessment Method
CO2 Carbon Dioxide
CS Core Strategy
CSH Code for Sustainable Homes
DPD Development Plan Document
GBIS Green Blue Infrastructure Strategy
GHG Greenhouse Gas
GOSE Government Office for the South East
GVA Gross Value Added
LCA Landscape Character Assessment
LDD Local Development Document
LDF Local Development Framework
LDS Local Development Scheme
LPA Local Planning Authority
LSP Local Strategic Partnership
PCC Per capita consumption
PPS Planning Policy Statement
RSC Rural Service Centre
RSDF Regional Sustainable Development Framework
SA Sustainability Appraisal
SEA Strategic Environmental Assessment
SFRA Strategic Flood Risk Assessment
SHLAA Strategic Housing Land Availability Assessment
SME Small and Medium-Sized Enterprise
SPD Supplementary Planning Document
SSSI Site of Special Scientific Interest
SUDS Sustainable Drainage Systems
TA Technical Appendix

