

INTERIM SUSTAINABILITY FINDINGS: EMPLOYMENT SITE OPTIONS

1. SITE APPRAISAL METHODOLOGY

All site options have been subjected to SA utilising a strict ‘appraisal question’ based methodology. Site appraisal questions were developed to reflect the sustainability issues identified through SA scoping as far as possible – see Table 1; however, given data availability¹ the questions that it has been possible to pose are limited in scope.

This appraisal process is consistent with the site assessments that were undertaken at previous stages of SA.

Table 1: Scope of the site appraisal methodology

Sustainability topic	Appraisal criteria used	Comments / limitations
Housing	N/A	It is not appropriate to simply examine the size of sites as a proxy for the number of homes/affordable homes that could be delivered (taking into account the assumption that larger developments can deliver a higher proportion of affordable housing). This is on the basis that sites will often eventually be brought forward in combination.
Flooding	Is allocation of the site within a flood zone? Is the proposed use of the site appropriate in terms of guidance set out in the ‘Technical Guidance to the NPPF’ relating to flood risk? See table 3 (page 8) of the technical guidance.	Criteria do not establish the extent to which a site lays within flood zones or whether this portion could be avoided.
Health	Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site? How far is the site from the nearest children’s play space? How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	Criteria do not account for the quality of parks and play spaces. Nor do they account for the usage of facilities and potential over-capacity.
Poverty	Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	It is assumed that development can bring with it investment that will in turn help to facilitate an increase in prosperity locally / reduce spatial inequalities in terms of relative deprivation.
Education	How far is the site from the nearest secondary school? How far is the site from the nearest primary school?	It may have been possible to assess the potential for new development to impact on school capacity. However, in practice, developments will be required to provide enhanced school place provision to account for population growth in an area.
Crime	N/A	It is difficult to make a meaningful assessment of impacts on levels of crime at this scale.
Vibrant Community	N/A	It is not possible to determine how sites could affect involvement in community activities.

¹ Given the imperative of achieving consistency and transparency it is only possible to draw on data-sets for which data is available for each and every site option.

Sustainability topic	Appraisal criteria used	Comments / limitations
Accessibility	<p>How far is the site from the Maidstone Urban Area or a Rural Service Centre?</p> <p>How far is the site from the nearest medical hub or GP service?</p> <p>How far is the site from the nearest post office?</p> <p>How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)?</p> <p>How far is the site from the nearest children's play space?</p> <p>How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?</p>	<p>A major limitation relates to the fact that larger sites could have differing levels of accessibility.</p> <p>It is also important to note that all distances are „as the crow flies“ as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre).</p> <p>Criteria do not account for the quality of parks and leisure facilities. Nor do they account for the usage of facilities and potential over-capacity.</p>
Culture	N/A	It is not possible to determine how sites could affect cultural activities.
Land Use	<p>Will allocation of the site lead to loss of the best and most versatile agricultural land?</p> <p>Will allocation of the site make use of previously developed land?</p>	<p>Agricultural land classification uses historical data. The criteria does not differentiate between Grade 1, 2 and 3a/3b agricultural land. However, a description of each 'score' is provided in the individual site proformas to explain the site characteristics in further detail.</p>
Congestion	<p>How far is the site from the nearest bus stop?</p> <p>How far is the site from the nearest train station?</p> <p>Is the site within or near to an AQMA?</p>	<p>Different parts of a larger site may not be as accessible as others.</p> <p>Measuring 'as the crow flies' is not wholly representative of actual routes and distances.</p>
Climate Change	N/A	<p>The ability of development to adopt building integrated low carbon technologies is not affected by location.</p> <p>Suitability for district energy schemes has not been established for each site</p>
Biodiversity	<p>Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?</p> <p>Is the allocation of the site likely to impact upon a Site of Special Scientific Interest (SSSI)?</p> <p>Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?</p>	<p>Distance to wildlife sites is not the only indicator of a potential impact. For example, scale of development is not accounted for. A smaller allocation could be closer to a site and have fewer impacts than a much larger scale location that is further away.</p> <p>Distance is measures from site boundaries.</p>

Sustainability topic	Appraisal criteria used	Comments / limitations
Countryside and Heritage	<p>Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)? Listed Building? Conservation Area?</p> <p>Does the site lie within an area with significant archaeological features/finds or where potential exists for archaeological features to be discovered in the future?</p> <p>Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?</p> <p>Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?</p> <p>Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved?</p> <p>What is the Landscape Capacity to Accommodate Change?</p>	<p>Ideally, it would be desirable to establish the extent and sensitivity of different character areas and to make an assessment of how each site option could impact upon local character.</p> <p>This information is available for some sites (as taken from detailed Landscape Character Assessments 2014).</p> <p>However, for some sites, this information has been inferred using broader level landscape characterisations and officer views.</p> <p>Where a detailed site assessment has been undertaken as part of the 2014 landscape study, this replaces the assessment made at previous stages of appraisal using broad character areas in the 2012 landscape assessment.</p> <p>Proximity to heritage features is measured from site boundaries.</p>
Waste	N/A	
Water Management	N/A	Ideally, the potential impact of sites on water quality would be established. However, it is difficult to quantify impacts based purely on distance.
Energy	N/A	
Economy	<p>How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)</p> <p>Will allocation of the site result in loss of employment land/space?</p>	NB: Employment land is often somewhat substitutable, i.e. can be possible to develop other sites for the same or similar employment use.

Tables 2 and 3 present a concise list of the appraisal questions posed, along with the 'decision rules' used to categorise performance. A **red** categorisation equates to the prediction of a 'significant constraint', an **amber** categorisation equates to the prediction of a 'potentially significant constraint', and a **green** categorisation equates to the prediction of 'no constraint'.

The decision rules are quantitative. This allows for the analysis of the sites to be undertaken using Geographical Information System (GIS) software. No qualitative information / professional judgement has been drawn on when categorising sites as **red**, **green** or **amber**. Where subjective judgement has been used, this is highlighted.

Most of the rules are distance related. It is important to note that all distances are 'as the crow flies' as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre). Most distance rules have been developed internally by the plan-making / SA team, following a review of thresholds applied as part of Site Allocation / SA processes elsewhere in England. A number of thresholds reflect the assumption that 400m is a distance that is easily walked by those with young children and the elderly.

Table 2: Site appraisal questions and decision rules

Criteria	Scoring
Accessibility	
How far is the site from the Maidstone Urban Area or a Rural Service Centre?	<p>R = Not adjacent to the Maidstone Urban Area, or a rural service centre and would not be more accessible to services even if other sites were allocated</p> <p>A = Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well</p> <p>G = Within the Maidstone Urban Area or a rural service centre</p>
How far is the site from the nearest medical hub or GP service?	<p>R = >800m</p> <p>A = 400m – 800m</p> <p>G = <400m</p>
How far is the site from the nearest secondary school?	<p>R = >3900m</p> <p>A = 1600-3900m</p> <p>G = <1600m;</p>
How far is the site from the nearest primary school?	<p>R = >1200m</p> <p>A = 800-1200m</p> <p>G = <800m;</p>
How far is the site from the nearest post office?	<p>R = >800m</p> <p>A = 400m – 800m</p> <p>G = <400m</p>
How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)?	<p>A = >1.2km</p> <p>G = <1.2km</p>
How far is the site from the nearest children's play space?	<p>A = >300m from 'neighbourhood' children's play space</p> <p>G = <300m</p>
How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	<p>A = >300m (ANGST)</p> <p>G = <300m</p>
Economy	
How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)	<p>R= >2400m</p> <p>A = 1600-2400m</p> <p>G = <1600m</p>
Will allocation of the site result in loss of employment land/space?	<p>R = Allocation will lead to significant loss of employment land/space</p> <p>A = Allocation will lead to some loss of employment land/space</p> <p>G = Allocation will not lead to the loss of employment land/space</p>
Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	<p>A = Not within or close to the 40% most deprived Super Output Areas within the country, according to the Index of Multiple Deprivation, 2010.</p> <p>G = Within or close to the 40% most deprived Super Output Areas within the country.</p>

Criteria	Scoring
Transport and accessibility	
How far is the site from the nearest bus stop?	R = >800m A = 400 - 800m G = <400m
How far is the site from the nearest train station?	R = >800m A = 400 - 800m G = <400m
How far is the site from the nearest cycle route?	R = >800m A = 400 - 800m G = <400m
Landscape, townscape and the historic environment	
Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)?	A = On a SAM OR Allocation will lead to development adjacent to a SAM with the potential for negative impacts G = Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.
Is the allocation of the site likely to impact upon a listed building?	A = Contains or is adjacent to a listed building and there is the potential for negative impacts. G = Not on or adjacent to a listed building and is unlikely to have an impact on a nearby listed building.
Is the allocation of the site likely to impact upon a Conservation Area?	A = Within or adjacent to a Conservation Area and there is the potential for negative impacts. G = Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.
Does the site lie within an area with significant archaeological features/finds or where potential exists for archaeological features to be discovered in the future?	A = Within an area where significant archaeological features are present, or it is predicted that such features could be found in the future. G = Not within an area where significant archaeological features have been found, or are likely to be found in the future. N = No information available at this stage
Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?	A = In close proximity to the Kent Downs AONB and/or there is the potential for negative impacts. G = Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.
Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?	A = Within or adjacent to the Green Belt and development could potentially cause harm to the purposes of the Green Belt designation and/or its openness G = Not within or adjacent to the Green Belt
Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved? <i>*Determined through 2012 Landscape Character Assessment</i>	R = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is unlikely to be appropriately mitigated A = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is likely to be appropriately mitigated G = Opportunity to enhance landscape character or there is unlikely to be an adverse impact
Landscape Sensitivity <i>*Determined through Maidstone Landscape Capacity Study (2014)</i>	R = Low capacity to accommodate change A = Moderate capacity to accommodate change G = High capacity to accommodate change

Criteria	Scoring
Air quality and causes of climate change	
Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site?	A = Potential adverse impact G = Unlikely adverse impact N = No information available at this stage
Is the site within or near to an AQMA?	R = Within or adjacent to an AQMA A = <1km of an AQMA G = >1km of an AQMA
Land use	
Will allocation of the site lead to loss of the best and most versatile agricultural land?	A = Includes Grade 1, 2 or 3 agricultural land G = Does not include 1, 2 or 3 agricultural land
Will allocation of the site make use of previously developed land?	R = Does not include previously developed land A = Partially within previously developed land G = Entirely within previously developed land
Flood Risk	
Is allocation of the site within a flood zone?	R = Flood risk zone 3b A = Flood risk zone 2 or 3a G = Flood risk zone 1
Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk? See table 3 (page 8) of the technical guidance.	R = Development should not be permitted A = Exception test is required G = Development is appropriate
Biodiversity and Green Infrastructure	
Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?	R = Includes AW/ASNW A = <400m from an AW/ASNW G = >400m
Could allocation of the site have a potential adverse impact on a SSSI?	A = Potential impacts identified by County Ecologist G = No likely impacts identified at this stage.
Could allocation of the site have a potential adverse impact on a designated Local Wildlife Site or Local Nature Reserve?	A = Potential impacts identified by County Ecologist G = No likely impacts identified at this stage.

2. SITE APPRAISAL FINDINGS

Detailed site proformas have been produced for each site, which present the site scores against each of the site appraisal criteria included in table 2.

The following tables present a summary of these SA findings for the two site options at Junction 8 of the M20 as set out in the Report to Cabinet.

Site ID	Site Name	Location	Access to centres	Access to GP or medical hub	Access to Secondary School	Access to Primary School	Proximity to Post Office	Proximity to outdoor sports	Proximity to play space	Proximity to greenspace	Proximity to employment sites	Loss of employment land?	Proximity to bus stop	Proximity to train station	Cycle routes	Noise	Air quality	Agricultural land	Land use	Scheduled Ancient Monument	Listed Building	Conservation Area	Archaeology	Kent Downs AONB	Green Belt	Landscape character assessment	Landscape capacity to change (2014)	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
ED - 6	Waterside Park, Ashford Road	Junction 8, M20																														
ED - 12	Woodcut Farm, Ashford Road	Junction 8, M20																														

* Although 5.5% of the site is in flood zone 3b.

