

Maidstone Local Plan Sustainability Appraisal

Interim Sustainability findings: Gypsy and Traveller Site Options Appraisal

August 2015

1 Site Appraisal Methodology

1.1 Introduction

This report presents a summary of the Sustainability Appraisal findings for a range of Gypsy and Traveller Site Options.

SA is a process for determining the potential effects of the Local Plan (including sites) and identifying potential mitigation and enhancement measures. This ought to help inform the decisions about how the Plan should develop; including the selection of sites for allocation.

AECOM has been commissioned by the Council to undertake the SA of the Local Plan. The latest stage of appraisal has involved assessment of a range of site options that the Council considers to be reasonable to consider for potential inclusion in the Local Plan (as allocations for Gypsy and Traveller Sites).

1.2 Methodology

The sites appraised have been identified by the Council from a range of sources as follows:

- Sites previously considered as candidates for the potential public Gypsy and Traveller site;
- Sites submitted as potential Gypsy and Traveller Locations (Call for Sites 2014);
- Rejected housing, employment and mixed use sites from 2013 and 2014 SHLAA and SEDLAA; and
- Existing permanent Gypsy and Traveller Sites with possible potential to expand or intensify.

The appraisal findings are set out in separate tables, one for each of these different sources.

It should be noted that some sites were discounted at a first stage by the Council prior to being put forward for appraisal in the SA. These sites were ones not considered to be reasonable site options by the Council; with the main reason being the confirmed unavailability of the land, and/or the presence of a major or multiple planning constraints for example Flood Zone 2/3.

All site options included in the SA have been assessed using a strict 'appraisal question' based methodology. This means that there is consistency in how the scores have been established across every site.

The site appraisal questions were developed to reflect the sustainability issues identified through SA Scoping. Scoping is the process of identifying what the main issues should be that the SA focuses on. **Table 1** sets out how the SA framework established through scoping was used as a starting point for identifying suitable site appraisal criteria. However, given data availability the questions that it has been possible to pose are limited in scope; as discussed in **Table 1**.

The site appraisal process is consistent with all site assessments that have been undertaken at previous stages of SA (i.e. appraisal of housing and employment site options).

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.
Accessibility	How far is the site from the Maidstone Urban Area or a Rural Service Centre? How far is the site from the nearest medical hub or GP service? How far is the site from the nearest post office? How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)? 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)?	A major limitation relates to the fact that larger sites could have differing levels of accessibility. 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). 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.
Culture	N/A	It is not possible to determine how sites could affect cultural activities.
Land Use	Will allocation of the site lead to loss of the best and most versatile agricultural land? Will allocation of the site make use of previously developed land?	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.

Sustainability topic	Appraisal criteria used	Comments / limitations
Congestion	How far is the site from the nearest bus stop? How far is the site from the nearest train station? Is the site within or near to an AQMA?	Different parts of a larger site may not be as accessible as others. Measuring 'as the crow flies' is not wholly representative of actual routes and distances.
Climate Change	N/A	The ability of development to adopt building integrated low carbon technologies is not affected by location. Suitability for district energy schemes has not been established for each site
Biodiversity	Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)? Is the allocation of the site likely to impact upon a Site of Special Scientific Interest (SSSI)? Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?	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. Distance is measured from site boundaries.
Countryside and Heritage	Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)? Listed Building? Conservation Area? 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? Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB? 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? 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? What is the Landscape Capacity to Accommodate Change?	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. This information is available for some sites (as taken from detailed Landscape Character Assessments 2014). However, for some sites, this information has been inferred using broader level landscape characterisations and officer views. 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. Proximity to heritage features is measured from site boundaries.
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	How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?) Will allocation of the site result in loss of employment land/space?	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 presents 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 largely quantitative. This allows for the analysis of the sites to be undertaken using Geographical Information System (GIS) software.

The 'Landscape Character' and 'Noise' criteria have been determined using suitable evidence and professional evidence. Where qualitative information / professional judgement has been drawn on when categorising sites as **red**, **green** or **amber** this is highlighted in the site proformas.

Most of the decision 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

2.1 Introduction

Detailed site proformas have been produced for each site option, which present the site scores against each of the site appraisal criteria included in **Table 2**. These proformas will be included as a technical appendix to the Final SA Report.

The following tables present a summary of the SA findings, grouped by the source of site options as follows:

Table 3: *Sites previously considered as candidates for the potential public Gypsy and Traveller site*

Table 4: *Sites submitted as potential Gypsy and Traveller Locations (Call for Sites 2014)*

Table 5: *Rejected housing, employment and mixed use sites from 2013 and 2014 SHLAA/SEDLAA)*

Table 6: *Existing permanent Gypsy and Traveller Sites with possible potential for additional pitches*

Table 3: Sites previously considered as candidates for the potential public Gypsy and Traveller site

Site ID	Site Name	Location	Criteria																													
			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	Landscape capacity to change	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
Possible Site 33	Land north of Haste Hill Road	Boughton Monchelsea																														
Possible Site 34	Land south of the old Barn House	Boughton Monchelsea																														
Possible Site 35	Land north of Green Lane, Laburnam Cottage	Boughton Monchelsea																														
Possible Site 36	Land north of Green Lane, south of Lyewood	Boughton Monchelsea																														
Possible Site 43	Land north of Heath Road, Parsonage Farm	Boughton Monchelsea																														
Possible Site 46	Land north of Parsonage Farm	Stockbury																														
Possible Site 47	Land north of Church Lane, n. of South St	Stockbury																														
Possible Site 48	Land south of Church Lane, jct. South Street	Barming																														
Possible Site 65	Land at Dean Street	Coxheath																														
Possible Site 66	Land at Hurst Road	Bredhurst																														
Possible Site 67	Land off Dean Street	North of Coxheath																														
Possible Site 74	Monchelsea Farm	Boughton Monchelsea																														
Possible Site 78	Manor Farm	Sutton Valance																														
Possible Site 81	Land adjacent to The Nook	Yalding																														
Possible Site 84	Land adj Gallants Lane	near Coxheath																														
Possible Site 86	Land at Gallants Lane	Coxheath																														
Possible Site 87	Land at Lower Rd, Farleigh Green	East Farleigh																														
Possible Site 97	Land at Chart Sutton, Chart Sutton	Chart Sutton																														
Possible Site 98	Land at Tyland Lane	Sandling																														
Possible Site 101	The Stumps, Lenham Road	Kingswood																														
Possible Site 107	Land south Tumblers Hill	Sutton Valance																														
Possible Site 108	Land south Ploughwents Road	Chart Sutton																														
Possible Site 110	Garages off Grasslands	Langley																														

Table 4: Sites submitted as potential Gypsy and Traveller Locations (Call for Sites 2014).

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	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
GT3 50	Land Kingswood Farm	Ulcombe																														
GT3 51	Five Acres, Tilden Lane	Marden																														
GT3 J2	Blossom Lodge Stocket Lane	Coxheath																														
HO3 208	Land adjacent Charlesford Avenue	Kingswood																														
HO3 210	Butlers Farm, Horseshoes Lane	Langley																														
HO3 218	Eaglesham, Marley Road	Harrietsham																														
GT1	Congelow Farm	Yalding																														

Table 5: Rejected housing , employment and mixed use sites from 2013 and 2014 SHLAA/SEDLAA

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	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
HO3-198	Land adjoining `Yelton` at Heath Road, Coxheath	Coxheath																														
HO3-281	Land at rear of Peg Tile Cottage	Marden & Yalding																														
HO3-274	Duckhurst Farmyard, Clapper Lane, Staplehurst	Staplehurst																														
HO3-291	Rear of Barker Cottages, New Cut, East Farleigh	Coxheath																														
ED14	Sandway Quarry																															
ED2 - 16	Rough Shave Wood																															

Table 6: Existing permanent Gypsy and Traveller Sites with possible potential to expand or intensify

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	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
4	Fairview, Osborne Drive	Detling Hill																														
5	Little Acre, Chart Hill Road	Chart Sutton																														
7	Peacock Farm, Chart Hill Road	Chart Sutton																														
8	Chart View, Chart Hill Road	Chart Sutton																														
9	Chart Hill Paddock, Chart Hill Road	Chart Sutton																														
42	Mulberry Farm, East Street	Hunton																														
57	The Kays, Heath Road	Linton																														
59	Plum Tree Farm, Park Road	Marden																														
80	Blue Bell Farm, George Street	Staplehurst																														
81	The Paddocks, George Street	Staplehurst																														
84	Kilnwood Farm, Old Ham Lane	Lenham																														
109	Near Neverend Farm, Pye Corner	Ulcombe																														
115	Roydon Farm, Pye Corner	Ulcombe																														
125	Emmett Hill Nursery, Emmett Hill Lane	Yalding																														
167	Cobnut Tree Place (plot 1), Church Hill	Boughton																														
168	Greenacre (plot 5), Church Hill	Boughton Monchelsea																														
170	Four Oakes (plot 2), Church Hill	Boughton Monchelsea																														
173	Granada, Lenham Road	Headcorn																														
186	Orchard Farm Nursery Plot 1	Chartway Street																														

