

Maidstone Local Plan

Proposed Modifications

**Sustainability
Appraisal**

Addendum to SUB002

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1 Introduction

- 1.1.1 AECOM is commissioned to undertake a sustainability appraisal (SA) in support of the Maidstone Local Plan. SA is a process for considering and communicating the likely effects of a draft plan, with a view to avoiding and mitigating adverse effects and maximising the positives. This Addendum has been prepared to document the implications of proposed modifications to the Local Plan.
- 1.1.2 It is important to read this addendum alongside the main SA Report February 2016 (SUB 002) which contains further detail on the scope of the SA and provides the context in which these policies have developed¹.

2 Summary of changes to the Plan

- 2.1.1 During the Local Plan Examination, and in the lead up to it, a number of proposed changes to the submission version of the Local Plan have been put forward. These changes fall into two categories; Main Modifications are those which will be required to make the Local Plan sound and Minor Changes which otherwise improve or update the Plan (for example by providing clarification) but do not impact on the Plan's soundness. Changes to the policies map are categorised as Minor Changes.
- 2.1.2 AECOM has reviewed the schedule of proposed Minor Changes and concluded that these will not have any significant effect on the SA findings.
- 2.1.3 The wording of the proposed Main Modifications has also been reviewed in full. These changes are the focus of this SA Addendum. Some of these changes are unlikely to lead to any significant effects whereas for others there is the potential for some effects upon the environment, economy or communities.
- 2.1.4 Table 2.1 below lists the Main Modifications that have been 'screened in' to the SA process given their potential to have an effect on the SA findings. A number of the Main Modifications were 'screened out' as they were deemed unlikely to have any effect on the SA findings. Appendix A contains a summary of each of the proposed Main Modifications and the rationale for screening these in or out of the SA.

¹ This report is an Addendum to the Main SA Report, and should be read as such. It is not intended to represent an 'SA Report' in the context of the SEA Regulations, which requires the presentation of certain information in the SA Report. It is not appropriate, proportionate or in the interests of effective consultation to repeat all this information in the Addendum.

Table 2.1 Summary of proposed Main Modifications and corresponding policies

Modification / Policy	Summary of proposed modifications
MM1 Policy SS1	Policy SS1 sets a housing target of 17,660 that is approximately 900 dwellings fewer than in the submitted version of the Local Plan.
MM4 Policies SP1, SP2, SP3 and SP6, SP7, SP9, SP10, SP13, SP15	Criteria added to numerous site options to clarify infrastructure requirements for health and education.
MM8 Policy SP8	Reduction of 500 dwellings proposed for the Lenham broad location (from 1500 to 1000)
MM9/MM14 Policy SP12	Reduction in delivery of 193 dwellings on six sites to delivery of 118 dwellings on five sites as a consequence of Modifications to housing site allocations (MM14).
MM10 Policy SP16	Deletion of site RMX1(4) from this policy, leading to 200 dwellings fewer in Yalding. Acknowledgement of the need for potential infrastructure improvements for health centre.
MM12 New policy SP18	New Policy on the historic environment.
MM16 Policy H1	Consideration of minerals safeguarding areas added to specific site allocation policies.
MM22 Policy H1(29)	Deletion of H1(29) for 220 dwellings
MM29 Policy H2	Amendments to the amount of housing at the broad locations.
MM33 Policy RMX1(1)	Site specific changes to this allocation
MM36 Policy RMX1(4)	Site specific amendments relating to Newnham Park.
MM37 New Policy RMX1(5)	Allocation of the Baltic Wharf site.
MM39 Policy EMP1	Clarifications to site requirements relating to visual and landscape effects. Limit to the size of units to 5000sqm rather than 10,000sqm. Specified minimum amount of office floorspace (10,000sqm)
MM57 New Policy DM4	New Policy for the management of historic assets.
MM60 Policy LPR1	New Policy outlining the Council’s intention to undertake a plan review and the matters it relates to.

3 Consideration of alternatives

3.1 Introduction

3.1.1 The table below sets out the consideration of whether there are any reasonable alternatives to each proposed modification. Alternative approaches to a range of plan issues were considered at earlier stages of plan making (discussed in the main SA Report). At this stage, the focus is on whether there are alternatives to the proposed modifications, not to the whole policy approach (which remains broadly the same).

Table 3.1 Consideration of alternatives

Policy	Alternatives considered
MM1 Policy SS1	<p>A range of alternative site options has already been appraised through the SA process. The removal of sites does not necessitate the need for further appraisal on site options. However, the rationale for discarding these sites should be provided (see section 4.2).</p> <p>The broad spatial strategy remains the same, with no need to appraise further strategic alternatives.</p>
MM4 Policies SP1, SP2, SP3 and SP6, SP7, SP9, SP10, SP13, SP15	<p>Infrastructure requirements for health and education have been added in response to evidence. There are no reasonable alternatives.</p>
MM8 Policy SP8	<p>The strategic approach to the broad locations has been amended, with only 1000 dwellings being proposed for Lenham , Alternative locations for growth have previously been explored in the SA (albeit at a greater scale of growth). It is not considered necessary to undertake further appraisal of alternatives at this stage as the effects of the level of growth being proposed are already known (the alternative in Headcorn was considered at a scale of 1000 dwellings in the SA report).</p> <p>The H2(3) Lenham Broad Location is reduced from 1500 to 1000 dwellings to be delivered between 2021 and 2031. That would be a more realistic delivery rate. The reduced total development within the Plan period would also allow more flexibility for its location. The allocations would be determined by a Neighbourhood Plan or, by default, in a Local Plan review before April 2021. The plans would need to address any infrastructure constraints.</p>

Policy	Alternatives considered
MM9/MM14 Policy SP12 MM10 Policy SP16 MM22 Policy H1	A range of site options have already been appraised. Changes to the decision to allocate sites for housing development (or not) does not generate additional site options for appraisal. The justification for selected/deleted sites is outlined in section 3.2 below.
MM12 New policy SP18	There are no reasonable alternatives. The NPPF requires a positive approach to the protection and enhancement of the historic environment.
MM16 Policy H1	Additional criteria reflects consultation comments that minerals safeguarding areas ought to be taken into consideration for site allocations. There are no reasonable alternatives to these modifications.
MM29 Policy H2	The strategic approach to the broad locations has been amended, with only 1000 dwellings being proposed for Lenham, and 800 dwellings fewer at the Invicta Park Barracks (by 2031) and 240 additional dwellings in the Maidstone Town Centre Broad Location. Alternative locations for growth have previously been explored in the SA (albeit at a greater scale of growth). It is not considered necessary to undertake further appraisal of alternatives at this stage.
MM33 Policy RMX1(1)	The changes are site specific clauses to secure mitigation of potential effects. There are no reasonable alternatives.
MM36 Policy RMX1(4)	The changes are site specific clauses to secure mitigation of potential effects. There are no reasonable alternatives.
MM37 New Policy RMX1(5)	A range of reasonable alternative site options have been considered through the SA process. Also, this is a specific policy to reflect the specific circumstances of this site, notably securing the future of the Grade II listed building. No further alternatives have been identified.
MM39 Policy EMP1(5)	The changes relate to site specific mitigation and design measures. There are no reasonable alternatives.
MM57 New Policy DM4	Policy considers designated and non-designated heritage assets, as required by the NPPF. There are no reasonable alternatives.
MM60 Policy LPR1	New policy detailing the process of plan review. There are no reasonable alternatives.

3.2 Outline reasons for allocating or discarding site options

3.2.1 As a result of the modifications three sites have been removed as allocations in the Local Plan (New Line Learning, Boughton Lane, and the Former Syngenta Site) whilst one site has been added (Baltic Wharf). These sites were appraised along with a range of alternative sites as the plan was being developed. There are no further alternatives to appraise, however, the outline reasons for the decisions made relating to these four sites are provided below.

Added Site Allocation

Baltic wharf

3.2.2 The Baltic Wharf site is covered by planning consent. However, this has not progressed since permission was granted, and there is some concern that the viability of the site may affect the potential to develop the site and, crucially, secure an appropriate use for the listed building. A general allocation policy has been prepared to support development of the site, and secure the preservation of the listed building

Removed Site Allocations

New Line Learning, Boughton Lane

3.2.3 Kent County Council as Highway Authority now objects to the proposed allocation on the basis that the mitigation would not be sufficient to avoid a severe impact and it has particular safety concerns about the proposed Swan junction improvements.

3.2.4 Without adequate identified mitigation the Inspector does not consider the allocation of the H1(29) site to be sound.

Boughton Lane

3.2.5 The allocation of the site is considered to be unsound by the Inspector. There are traffic issues along Boughton Lane, and the site would generate significant movements along the northern part of Boughton Lane. Without adequate identified mitigation the allocation is not sound.

Former Syngenta site

3.2.6 The housing development needed to make the development viable would conflict with the flood risk and there is a lack of evidence that the risk could be adequately mitigated without worsening flood risk elsewhere in an area that has experienced severe local flooding.

4 Appraisal of proposed Main Modifications

- 4.1.1 The appraisal identifies and evaluates ‘likely significant effects’ on the baseline / likely future baseline associated with the proposed Main Modifications, drawing on the sustainability topics and issues identified through the SA Scoping as a methodological framework.
- 4.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy measures under consideration. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline.
- 4.1.3 In light of this, where likely significant effects are predicted this is done with an accompanying explanation of the assumptions made. In many instances it is not possible to predict likely significant effects, but it is possible to comment on the merits of the Plan as proposed to be modified in more general terms.
- 4.1.4 It is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for ‘cumulative’ effects is also considered. These effect ‘characteristics’ are described within the appraisal as appropriate under each sustainability topic.
- 4.1.5 The appraisal of the proposed Main Modifications is set out within separate tables for each of the sustainability topics listed below (which are derived from the SA Framework).
- | | |
|-------------------------------------|---|
| - Housing | - Efficient land use |
| - Flooding | - Congestion, pollution and air quality |
| - Health and wellbeing | - Climate change |
| - Social exclusion | - Biodiversity and geodiversity |
| - Education and skills | - Countryside and historic environment |
| - Crime and fear of crime | - Sustainable management of waste |
| - Vibrant, attractive communities | - Water resources management |
| - Accessibility | - Energy efficiency |
| - Engagement in cultural activities | - Economy and employment |
- 4.1.6 To reflect the different effects that the proposed Main Modifications could have, they may be scored as both positive and negative against the same SA Topic. This reflects the fact that policies could have different effects in different locations and circumstances.

- 4.1.7 It is important to note the difference between positive/negative effects and 'significant effects'. Where significant effects are predicted, this means that a change to the baseline position is predicted (positive or negative). Significant effects are highlighted in the accompanying text; with the text coloured as follows: there would be a significant positive effect or conversely a significant negative effect.
- 4.1.8 The appraisal text does not present a separate score or commentary for each individual policy, rather, the appraisal summarises the **cumulative effects** of each of the proposed Main Modifications which have been screened in as well as the plan 'as a whole'. This avoids duplication and provides a more realistic assessment of plan policies by taking into account other policies in the plan when identifying its overall effects.
- 4.1.9 Local Plans should be read 'as a whole' and thus appraisal needs to be undertaken on the same basis to take account of how policies complement or contradict one another. This is also where appropriate mitigation and enhancement can be identified.

4.2 Housing

Background

- 4.2.1 This section sets out a discussion of the appraisal findings for 'housing' associated with the proposed Main Modifications which have been screened in, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.2.2 Modification MM1 amends the housing target for the borough by reducing it from 18,560 to 17,660. . Despite changes in the housing land supply position resulting primarily from reductions at the broad locations in Lenham (MM8), Invicta Park Barracks (MM29) and other site allocations (MM9/10/14/26) the objectively assessed housing need will still be met. However, there would be slightly less flexibility and choice afforded, which makes delivery of the housing target very slightly less certain. Whilst this is negative for housing, it is not enough to negate the significant positive effect predicted for housing in the SA Report.
- 4.2.3 MM4 clarifies infrastructure requirements for a number of site allocations. Whilst these could add costs to the development, it is unlikely that it would affect the attractiveness or viability of the sites for development.
- 4.2.4 The removal of site allocations through MM9 / MM10 / MM14 / MM22 /MM26 is not likely to have a significant effect upon the delivery of housing needs across the Borough as a whole. However, there would be fewer dwellings delivered in Yalding and Boughton Monchelsea, which could mean that local demand for housing is less likely to be satisfied in these areas. However, it should be noted that needs at such a specific, local level have not been objectively identified at this stage.
- 4.2.5 MM37 identifies that the Baltic Wharf site could be suitable for housing should the extant planning permission lapse. Whilst this is positive, it is very uncertain at this stage whether housing would indeed be delivered.
- 4.2.6 MM12 and MM57 introduce two new policies which consider the historic environment. This amends the previous approach where heritage was considered alongside the natural environment. The modifications provide a more proactive approach to the management of the historic environment. Whilst the approach affords greater consideration to the protection and enhancement of heritage assets, this is unlikely to have significant implications for housing development.
- 4.2.7 MM16 requires developments to undertake a minerals assessment to determine if extraction is possible before development. This could delay the development

process if it is deemed that minerals could be extracted. This could have negative implications for housing delivery.

4.2.8 MM33 and MM39 relate to employment sites (Newham Park / Woodcut Park). As these do not include housing, the effects are predicted to be insignificant.

4.2.9 MM60 introduces a policy that sets a firm commitment to a plan review. This gives greater certainty that any failure to deliver the housing targets in the Local Plan could be rectified if necessary and would lead to a longer term strategy for the Borough. A positive effect is therefore predicted.

Table 4.1 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Residents are likely to have better access to the type of home they need. New houses are also likely to be of higher quality. Together, this constitutes a significant positive effect.</p>	<p>Though there are reductions in the amount of housing allocations in some locations (Yalding, Boughton, Lenham), this is unlikely to have a significant effect for the borough as a whole (as housing needs would still be met).</p> <p>In combination, the modifications are not predicted to lead to significantly different effects to those already identified in the SA Report.</p>

4.3 Flooding

Background

- 4.3.1 This section sets out a discussion of the appraisal findings for 'flooding' associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.3.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The effect of this on flooding is not predicted to be significant as the broad locations were not particularly sensitive to flooding.
- 4.3.3 MM10 removes the mixed use allocation in Yalding, which partly fell within areas at risk of flooding. This will maintain the current level of flood risk in the area, but ensure that new development does not take place in this location which is sensitive to flooding. However, MM36 still supports development at this location in principle, but only following a flood assessment and demonstrable mitigation measures.
- 4.3.4 MM9 would have no effects on flood risk as it removes a site that was allocated in flood zone one anyway. MM37 identifies the Baltic Wharf site as an allocation for mixed use development. Whilst part of the site lies in areas at risk of flooding, development would be required to adhere to a flood and surface water drainage strategy so effects are predicted to be neutral.
- 4.3.5 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effect on flood risk.
- 4.3.6 MM4, MM16, MM33, MM29, MM39 and MM60 would have no significant effect on flood risk.

Table 4.2 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>There is potential for increased flood risk due to the cumulative effect of new development on greenfield land. However, new developments could actually help to mitigate flood risk and manage surface water run-off through the use of SUDS.</p> <p>This would lead to a significant positive effect on the baseline position. The majority of allocated housing sites avoid areas at risk of flooding. Mitigation measures are also proposed at sites within close proximity to areas of flood risk.</p> <p>Nevertheless, development in some areas is within or adjacent to flood zone 2 or 3 and this presents the potential for negative impacts.</p>	<p>The modifications result in a lower overall amount of housing, which could have slight positive effects with regards to a reduction in surface water run-off.</p> <p>Where development is proposed through the modifications (<i>for example at the Baltic Wharf site</i>), there is a need to consider flood risk measures too.</p> <p>Overall, this ought to ensure that effects on flooding are not significantly different to those identified in the SA Report.</p>

4.4 Health and Wellbeing

Background

- 4.4.1 This section sets out a discussion of the appraisal findings for ‘health and wellbeing’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.4.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The effect of this on health and wellbeing is mixed. On one hand, less housing development is directed to the Maidstone urban area overall, which will reduce the number of people potentially at risk of exposure to air quality. There would also be less pressure on existing health infrastructure. On the other hand, there is less housing being planned for, and thus the delivery of affordable housing may be expected to be lower. In Lenham, the lower dwelling numbers for the broad location should still allow for significant infrastructure improvements to be secured, without putting undue pressure on current infrastructure.
- 4.4.3 MM4 introduces specific criterion for a number of site allocations to ensure that adequate infrastructure for health is secured. This improves the likelihood that development will have positive effects for health infrastructure. These additions

strengthen the existing positive effects upon health and wellbeing that were predicted in the SA Report.

- 4.4.4 MM10 introduces an acknowledgement in Policy SP16 that infrastructure requirements for health provision may be necessary in Yalding. This could lead to the generation of positive effects in this location if suitable contributions to infrastructure upgrades are secured.
- 4.4.5 MM9/MM26, MM12, MM16, MM33, MM37, MM39, MM57 and MM60 would have no significant effect on health and wellbeing.

Table 4.3 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Improved access to health facilities and open space should be achieved for most communities, having a significant positive effect on the baseline position.</p> <p>However, there is potential for negative effects on some communities if levels of congestion and reduced air quality increase due to urban concentration.</p>	<p>Additional site specific criteria introduced by MM4 contribute to the significant positive effects that were established in the SA Report.</p> <p>MM10 contributes to the positive effects on health that have already been identified for the Local Plan. Though the effects for the borough would remain similar, in Yalding there would be specific benefits.</p> <p>Overall, the modifications are predicted to have a positive, but not significant effect on health and wellbeing.</p>

4.5 Social exclusion

Background

- 4.5.1 This section sets out a discussion of the appraisal findings for ‘social exclusion’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.5.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The effect of this on social exclusion is not predicted to be significant as the broad distribution of growth remains the same, and communities ought to still have access to housing and employment opportunities.
- 4.5.3 MM4 should help to ensure access to adequate health facilities, which in some areas could benefit deprived communities. Though effects are positive, these are not predicted to be significantly different from those already identified in the SA Report.

- 4.5.4 MM9/MM26 and MM10 are unlikely to have an effect upon social inclusion. The de-allocated sites were not particularly well related to deprived areas in need of housing and employment and thus their removal generates no significant effects. Furthermore, MM36 still supports regeneration of the brownfield site in Yalding provided suitable flood management measures are secured.
- 4.5.5 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effect on social exclusion.
- 4.5.6 MM16, MM33, MM37, MM39 and MM60 would have no significant effects on social exclusion.

Table 4.4 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>There should be a reduction in social exclusion and poverty, particularly within the most deprived parts of Maidstone. This would constitute a significant positive effect.</p> <p>However, some strategic development is not in close proximity to deprived areas, which means certain communities may be less likely to benefit.</p> <p>There is also a risk of increased congestion in Maidstone town centre. This could worsen air quality and access to services for some deprived communities in the urban area. This would represent a significant negative effect.</p>	<p>The modifications result in a lower housing target for the borough. The effect of this on social exclusion is not predicted to be significant as the broad distribution of growth remains the same, and communities ought to still have access to housing and employment opportunities. Indeed, clarifications on the requirements for health infrastructure at new development sites ought to ensure that the planned growth is beneficial to existing and new communities.</p>

4.6 Education and skills

Background

- 4.6.1 This section sets out a discussion of the appraisal findings for ‘education and skills’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.6.2 Modifications MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The effect of this on education and skills is not predicted to be significant though.
- 4.6.3 MM4 introduces one criteria at SP3(3) to clarify that there needs to be additional expansion of a primary school in south east Maidstone. This ought to ensure adequate provision for education in this part of the borough, which is a positive effect.
- 4.6.4 MM9/MM26, MM10, MM12 MM16, MM33, MM36, MM37, MM39, MM57 and MM60 would have no significant effects on education and skills.

Table 4.5 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
New development should help to improve the provision and / or enhancement of education facilities. This is a significant positive effect .	The modifications are unlikely to have a significant effect upon education and skills. A significant positive effect remains.

4.7 Crime and fear of crime

Background

4.7.1 This section sets out a discussion of the appraisal findings for crime associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.7.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The effect of this on crime is not significant.

4.7.3 MM10 discards the allocated site in Yalding. This site is currently derelict, and is more likely to remain so now it has been discarded. This has negative implications for crime and antisocial behaviour, though not significant, especially given that the principle of regeneration at this site is still supported (MM36).

4.7.4 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effect on crime.

4.7.5 MM4, MM9/MM26, MM16, MM33, MM37, MM39 and MM60 leads to modifications that have no direct relationship with crime, and so no effects are predicted.

Table 4.6 Implications for the SA findings relating to the Plan 'as a whole'

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
No significant effects are anticipated. However, by providing a deliverable strategy for housing and employment, the Local Plan will support regeneration in areas of need, with knock on positive effects in terms of community safety.	In combination, the modifications are not likely to have a significant effect upon crime.

4.8 Vibrant, attractive communities

Background

4.8.1 This section sets out a discussion of the appraisal findings for vibrant, attractive communities associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.8.2 MM8 leads to a reduced amount of growth at the broad location in Lenham, which ought to better preserve the character and amenity value of greenfield land in this area.
- 4.8.3 MM10 discards the allocated site in Yalding. This site is currently derelict, and is more likely to remain so now it has been discarded which is negative with regards to the attractiveness of the settlement. However, MM36 clarifies that support for the regeneration of the site will still be supported, and so a neutral effect is predicted.
- 4.8.4 MM9 ought to be slightly more positive for Boughton Monchelsea as it means that development on a specific site would not be allocated. This ought to preserve the greenfield nature of this site, which has landscape value for the local community. In a borough-wide context, these effects are not significant.
- 4.8.5 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This ought to have positive implications for the attractiveness of communities by ensuring that the character of the built environment is respected and where possible enhanced.
- 4.8.6 MM4, MM16, MM33, MM37, MM39, MM60 would have no significant effect on the vibrancy of communities.

Table 4.7 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Improved access to community facilities should be achieved in new developments. The effects are not considered to be significant though.</p> <p>Development could have locally specific negative implications where it occurs on sites valued by local residents. Though the effects are not significant on a borough-wide basis, such negative effects ought to be acknowledged.</p>	<p>Though there could be some site specific implications in terms of the appearance and amenity of development sites, the overall effects on communities across the borough are negligible. The broad effects remain the same as those identified in the SA Report.</p>

4.9 Accessibility

Background

- 4.9.1 This section sets out a discussion of the appraisal findings for accessibility associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.9.2 Modifications MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The effect of this on accessibility is predicted to be insignificant, as the spatial strategy remains the same.
- 4.9.3 MM4 clarifies the need for infrastructure improvements locally, which ought to have a positive effect upon access to health facilities in particular.
- 4.9.4 MM10 discards a site option in Yalding that did not have the best accessibility to local services and facilities (Though RMX1/4 still outlines support for regeneration of the former Syngenta Site through MM36). This will have insignificant effects on the overall baseline position.
- 4.9.5 MM9 discards a site option that is relatively well related to services and facilities. Given the low numbers involved though, the overall effects on accessibility are insignificant.
- 4.9.6 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effects upon accessibility.
- 4.9.7 MM16, MM33, MM37 and MM39 would have no effect on accessibility.
- 4.9.8 MM60 commits to a plan review that would focus (amongst other things) on the need to secure a modal shift towards more sustainable travel. Should the plan be failing to deliver on improved accessibility by sustainable modes, the new policy LPR1 provides the opportunity to tackle negative trends. At this stage an uncertain effect is predicted.

Table 4.8 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Overall, there should be an increased proportion of trips by walking, public transport and possibly cycling. Access to local services and facilities in urban and rural areas should also improve. Together, this would lead to a significant positive effect on the baseline provided that people are willing to swap their private vehicle for other transport modes.</p> <p>Accessibility at some of the proposed site allocations for Gypsies and Travellers is very poor. This will affect a very small number of people, but it is a negative effect nonetheless.</p>	<p>In combination, the modifications are unlikely to have a significant effect upon accessibility. The spatial distribution remains the same, and there are minor changes to some policies that ought to improve access to local facilities.</p>

4.10 Engagement in cultural activity

Background

4.10.1 This section sets out a discussion of the appraisal findings for cultural activity associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.10.2 MM9/MM26 and MM10 are unlikely to have effects on engagement in cultural activity. The sites that are not being allocated do not have particular value for cultural engagement (despite their being heritage assets on site).

4.10.3 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This should help to identify how key assets can be used to increase cultural engagement in heritage.

4.10.4 MM1, MM4, MM8, MM16, MM29, MM33, MM36, MM37, MM39 and MM60 would have no significant effect on engagement in cultural activity.

Table 4.9 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Although the Local Plan should have a generally positive effect, no significant effects are anticipated in terms of engagement in cultural activity.</p>	<p>The modifications are not likely to have a significant effect in terms of engagement with cultural activities.</p>

4.11 Efficient land use

Background

4.11.1 This section sets out a discussion of the appraisal findings for efficient land use associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.11.2 Modifications MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. This will reduce the need to release as much greenfield land (particularly in Lenham), which is positive with regards to land use.

4.11.3 The removal of a derelict site (partly previously developed) at Yalding (MM10) reduces the likelihood that this site will be developed. This would make it less likely that positive effects are achieved regarding land use in this specific location. However, the effects would not be significant, especially as RMX1/4 (as amended by MM36) still supports the redevelopment of the site following a robust flood risk assessment and management plan. Conversely, agricultural land on this site would be 'better protected' from development, so a neutral effect is predicted overall.

4.11.4 MM9 leads to a lower amount of greenfield land being released in Boughton Monchelsea, which is an insignificant positive effect in terms of efficient land use.

4.11.5 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This ought to encourage the re-use and maintenance of historic buildings.

4.11.6 MM16 would have a positive effect upon land use, by ensuring that its value for minerals is considered before it is developed. This is a positive effect.

4.11.7 MM37 allocates the Baltic Wharf site for development. This should help to ensure that the long term use of this site is secured, which ought to help in the reuse of land and buildings.

4.11.8 MM4, M33, MM39 and MM60 would have no effects upon the efficiency of land use.

Table 4.10 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Development of housing and employment sites will lead to the permanent loss of greenfield land and in most locations this will include grade 2 or 3 agricultural land.</p> <p>This represents a significant negative effect. However, there should be a decreased amount of previously developed land left derelict, which is a significant positive effect.</p>	<p>In combination, the modifications are predicted to have a neutral effect on land use. A lower amount of housing growth overall will reduce the need for greenfield land release, whilst a more proactive approach to the historic environment should also help to ensure that land is used efficiently. However, these effects would be minor, and would not change the overall effects identified in the SA Report.</p>

4.12 Congestion, pollution and air quality

Background

4.12.1 This section sets out a discussion of the appraisal findings for ‘congestion, pollution and air quality’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

- 4.12.2 Modifications MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough, with approximately 560 dwellings less in the Maidstone urban area and 500 less at a broad location in Lenham. The broad location at Invicta Park Barracks is within a relatively accessible location, but a lower amount of growth here will reduce pressure on congestion from new trips that might otherwise have been generated in this area. With regards to the Lenham broad location, a lower level of growth would be likely to result in fewer car trips, which is positive, but not significant with regards to congestion and air quality.
- 4.12.3 Though MM9/MM26 removes a quantum of development (295 dwellings) from to the edge of the Maidstone Urban Area (which suffers most from air quality issues) the scale of growth is minimal, and thus effects on air quality and congestion are predicted to be insignificant.
- 4.12.4 MM10 is unlikely to have significant effects upon air quality and congestion, as these are not acute issues for Yalding and the scale of growth involved is low. Furthermore, MM36 supports the regeneration of the site, which could lead to growth at this location in the longer term anyway.

4.12.5 MM4, MM12, MM16, MM33, MM37, MM39 and MM57 would have no significant effect on congestion or air quality.

4.12.6 MM60 introduces a new policy that commits to a local plan review. Part of this process would involve consideration of a potential relief road. This will provide an opportunity to explore alternatives that could help to reduce congestion and air quality issues. Though uncertain at this stage, the effects could be positive.

Table 4.11 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Increased development could lead to higher levels of congestion in the Maidstone Town centre. This could lead to a significant negative effect.</p> <p>However, development would be required to implement strategic improvements to the network, which could mitigate the impacts or possibly help to improve traffic flows.</p> <p>The residual impact would therefore be less significant or potentially positive.</p> <p>The impacts are uncertain at this stage though.</p>	<p>In combination, the modifications are predicted to be positive in terms of congestion and air quality. The overall amount of development is lower, including a reduction in parts of the Maidstone Urban Area, which is most affected by congestion. However, the effects are minor, as the scale of effects would be very small.</p>

4.13 Climate change

Background

4.13.1 This section sets out a discussion of the appraisal findings for ‘climate change’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.13.2 Modifications MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. This should lead to a reduction in greenhouse gas emissions associated with new development.

4.13.3 Despite potentially leading to slightly lower levels of growth in Yalding and Boughton Monchelsea, MM9/MM26 and MM10 are unlikely to have a significant effect on climate change emissions or resilience. MM36 still outlines support for the re-development of the former Syngenta site in Yalding, so development here may still occur.

4.13.4 MM1, MM4, MM8, MM12, MM16, MM29, MM33, MM37, MM39, MM57 and MM60 would have no significant effect on climate change.

Table 4.12 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>There could be a reduction in carbon emissions (compared to growth without a Local Plan in place) from transport.</p> <p>Design policies should help to improve resilience to the effects of climate change.</p> <p>Together, these factors should lead to positive effects on the baseline. However, growth <i>per se</i>, is likely to generate an increased overall level of greenhouse gas emissions.</p>	<p>In combination, the modifications are likely to lead to a slight reduction in greenhouse gas emissions.</p> <p>Consequently, the positive effects predicted in the SA Report are likely to be more pronounced (though still not significant).</p>

4.14 Biodiversity and geodiversity

Background

4.14.1 This section sets out a discussion of the appraisal findings for ‘biodiversity and geodiversity’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.14.2 Modification MM8 and MM29 detail a reduction in the quantity of dwellings at the broad location in Lenham. Given that there are parcels of ancient woodland within the broad location, a lower level of growth ought to allow for less intrusion and disturbance from development, which is a positive effect in this location.

4.14.3 The removal of a development site through MM10 ought to avoid potential negative effects on locally important biodiversity. However, the site is not thought to be particularly sensitive, and it’s redevelopment in principle is still supported (MM36) so the effects would not be significant.

4.14.4 The site discarded by MM9 is not thought to be particularly important for biodiversity, and so the effects of its removal are negligible for biodiversity. There are no effects on geodiversity.

4.14.5 MM33 strengthens the approach to biodiversity by requiring an ecological management plan for the site and the development of a woodland park. This ought to ensure that effects are managed and where possible enhancements are secured.

4.14.6 MM4, MM12, MM16, MM37, MM39, MM57 and MM60 are predicted to have no significant effects.

Table 4.13 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Proposed Main Modifications
<p>Although the direct effect on designated habitats is likely to be insignificant, development could have localised negative effects on wildlife habitats and species.</p> <p>This would be determined at the project scale, and mitigation should be possible. In fact, Local Plan policies seek to ensure that impacts on wildlife habitats and species are mitigated, and where possible enhancements are secured as part of new development. This could lead to improvements in connectivity between habitats, having a significant positive effect on the baseline.</p> <p>In terms of recreational pressure, the Habitats Regulations Assessment determined that a concentration of development in the Maidstone Urban Area could lead to additional recreational activity within the North Downs Woodlands (Boxley Warren) SAC. However, provided that existing measures in place are suitably maintained, significant effects should be avoided.</p>	<p>The modifications have mostly neutral effects. However, a reduction in the scale of growth in the broad location at Lenham is likely to help better protect and manage effects on biodiversity in this area. This should help to minimise those negative effects identified in the SA Report.</p> <p>A more proactive approach is also established for the Newnham Park allocation, which ought to secure positive effects.</p> <p>Overall, the modifications are beneficial with regards to biodiversity, helping to reduce the significance of effects in Lenham and at Newnham Park.</p>

4.15 Countryside and historic environment

Background

4.15.1 This section sets out a discussion of the appraisal findings for ‘countryside and historic environment’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.15.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The effect of this on the historic environment and landscape is predicted to be positive. This relates mainly to a reduction in the amount of housing at the broad location in Lenham. A lower scale of growth ought to allow for development that better respects the character of the surrounding landscape by securing greater landscape buffer areas and / or lower density development. This should help to mitigate potential negative effects.

- 4.15.3 MM9 and MM10 would lead to positive effects for the historic environment, as development of these sites could have had negative effects upon heritage assets and their settings.
- 4.15.4 In terms of landscape character, the site in Yalding would present opportunities to enhance the landscape, and thus its removal would not be beneficial in this respect. However, support for redevelopment at this site is still made clear through MM36 (So effects are predicted to be neutral).
- 4.15.5 The site in Boughton Monchelsea on the other hand falls into an area that only has moderate potential to accommodate landscape changes. Therefore, MM9 ought to ensure that fewer adverse effects upon landscape character are generated in this location.
- 4.15.6 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. In particular, there is an acknowledgement of the need to tackle heritage at risk, encouraging the use of such assets in new developments, and looking to deliver enhancements to the historic environment through a number of routes such as master plans and neighbourhood plans. The changes strengthen the approach to heritage, by providing greater certainty that enhancements would be successfully secured. A positive effect is predicted.
- 4.15.7 MM33 is predicted to have beneficial effects upon landscape character by setting a more prescriptive approach to landscape management and mitigation of visual impacts. This ought to help offset the potential significant negative effects on landscape character predicted in the SA Report.
- 4.15.8 MM37 seeks to ensure that the historic buildings on the Baltic Wharf site are brought into appropriate and active use. This ought to have positive effects on the condition of this heritage asset and surrounding areas.
- 4.15.9 MM39 is likely to have a positive effect upon the landscape and historic environment as the modifications present a stronger approach to the protection of the countryside (larger landscape buffers, lower size threshold for larger buildings). This ought to better minimise potential negative effects as predicted in the SA Report.
- 4.15.10 MM4, MM16 and MM60 would have no significant effect on the historic environment.

Table 4.14 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Further Proposed Main Modifications
<p>Despite landscaping at development sites, the scale of growth and/or sensitivity of landscape is likely to lead to a change/loss of character in some parts of Maidstone. Cumulatively, this represents a significant negative effect.</p> <p>Substantial development in the South East of the Maidstone urban area could also have a cumulative negative effect on local character, although this would not be directly within any designated areas.</p> <p>Mitigation and enhancement measures should help to minimise these effects to ensure that they are not significant. Conversely, significant effects on the most sensitive locations such as Kent AONB are likely to be avoided; though allocated sites in Lenham (including the broad location) and Harrietsham in particular will need to be sensitively designed.</p> <p>Heritage features are likely to be maintained and in some places enhanced through regeneration; which would constitute significant positive effects. At this stage, whether these positive effects will occur is somewhat uncertain as it will depend upon project design.</p>	<p>Though a number of sites have been removed that could have had negative effects upon heritage assets, the overall effect on heritage across the Borough is likely to remain the same (i.e. both negative and positive effects depending upon location).</p> <p>The effects on landscape are predicted to be less significant as a number of the modifications ought to ensure that effects on landscape character are avoided or mitigated. The overall effect on landscape is therefore likely to be more positive than in the SA Report.</p>

4.16 Sustainable management of waste

Background

4.16.1 This section sets out a discussion of the appraisal findings for ‘sustainable waste management’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.16.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough, which would bring a commensurate reduction in total waste arising. However, the effects on a borough-wide basis would not be significant.

4.16.3 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effect on waste management.

4.16.4 MM4, MM33, MM36, MM37 and MM60 will have no significant effects.

Table 4.15 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Further Proposed Main Modifications
No significant effects have been identified. However, new development has the potential to put increased pressure on waste collection services, especially if not well designed for storage and access.	The removal of several site options and a lowering in the scale of growth at the Broad location in Lenham ought to mean that a lower amount of waste is generated in total. However, the scale of effects is minor, so the effects in the SA report remain broadly the same.

4.17 Water resources management

Background

4.17.1 This section sets out a discussion of the appraisal findings for ‘water resources management’ associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Further Proposed Main Modifications

4.17.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. Though this would reduce the requirement for infrastructure upgrades for water treatment, the effects are not significant.

4.17.3 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effect on water resources.

4.17.4 MM4, MM9/MM26, MM10, MM16, MM33, MM36, MM37 and MM60 are unlikely to have any significant effects upon water quality.

Table 4.16 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Further Proposed Main Modifications
<p>Increased growth could lead to pressure on already scarce water resources. Policy DM2 could help to mitigate this effect though.</p> <p>Development could present the opportunity to improve drainage and sewerage networks through infrastructure upgrades. This would lead to significant positive effects.</p>	<p>A lower scale of growth overall ought to be positive for water resources by decreasing the demand for water and the need for water treatment. However, the scale of effects is unlikely to be significant.</p>

4.18 Energy efficiency

Background

4.18.1 This section sets out a discussion of the appraisal findings for 'energy efficiency' associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Proposed Main Modifications

4.18.2 Modifications MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. This should result in a slightly lower demand for energy, but the effects are not predicted to be significantly different to those identified in the SA Report.

4.18.3 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effect on energy use.

4.18.4 MM4, MM9/MM26, MM10, MM16, MM33, MM36, MM37, MM39 and MM60 are unlikely to have any significant effects upon energy efficiency.

Table 4.17 Implications for the SA findings relating to the Plan 'as a whole'

Summary of effects identified in the SA Report	Implications of Further Proposed Main Modifications
Increased levels of growth could lead to higher overall levels of energy consumption. However, development would be likely to occur in the absence of the Plan to meet demand for housing and employment. Therefore, the effects are not significant. The delivery of low carbon infrastructure is not prioritised in the Local Plan, and therefore insignificant effects are predicted.	A lower scale of growth overall ought to be positive for energy by decreasing the demand for energy in new homes. However, the scale of effects is unlikely to be significant.

4.19 Economy and employment

Background

4.19.1 This section sets out a discussion of the appraisal findings for 'economy and employment' associated with the Proposed Main Modifications, and also how these affect the overall SA findings as set out in the SA Report (reproduced in the table below).

Appraisal of the Further Proposed Main Modifications

4.19.2 Modification MM1, MM8 and MM29 together result in a lower overall level of housing provision in the borough. The amount of employment development being planned for is the same, and despite a decrease in the housing target, the balance between homes and jobs remains appropriate.

4.19.3 The removal of an allocated mixed-use site in Yalding (through MM10) reduces the certainty of employment opportunities from coming forward in this settlement. This will prevent positive effects from being generated locally, but this would not be significant at a borough-wide level. Furthermore, MM36 still outlines support for the regeneration of this site.

4.19.4 The modifications MM12 and MM57 provide a more proactive approach to the management of the historic environment. This is unlikely to have any effect on economy and employment.

4.19.5 MM16 should have positive effects for the local economy by ensuring that mineral resources are safeguarded and extracted where this is viable before development occurs.

4.19.6 MM33 proposes a slightly lower floorspace for the retail element of development. This is not likely to have a significant effect upon the economic benefits that would be generated from development at this site.

4.19.7 MM60 sets out a commitment to a plan review, which will involve an assessment of employment needs. This should give greater certainty that the employment land targets in the plan will be appropriate and responsive to changes in the next five years.

4.19.8 MM39 relates to EMP1 and makes a number of changes that help to better protect the environment. One of these is to restrict the total size of units to 5000sqm rather than 10,000sqm. This could prevent the accommodation of certain businesses (i.e. strategic warehousing and distribution) that are looking for a larger scale plot. Nevertheless, the site is likely to remain attractive for employment and ought to achieve economic growth and jobs locally. The changes also state that a minimum of

10,000m of office floorspace will need to be given, which ought to ensure that high quality jobs are secured.

4.19.9 MM4 and MM9/MM26 will have no effects upon economy or employment.

Table 4.18 Implications for the SA findings relating to the Plan ‘as a whole’

Summary of effects identified in the SA Report	Implications of Further Proposed Main Modifications
<p>The Local Plan supports the development of land for employment in accessible locations. A range of jobs are likely to be created including in higher skilled sectors.</p> <p>This is predicted to have a significant positive effect on the economy.</p>	<p>The modifications are forecast to have mixed effects. On one hand, there are negative implications related to a lowering of the size threshold of buildings at Woodcut Farm. On the other, there is a commitment to a review of employment land need, and better consideration of minerals resources. None of the effects are predicted to be significant, and so the findings in the SA Report still remain valid.</p>

5 Mitigation and enhancement

- 5.1.1 No mitigation or enhancement measures were identified throughout the appraisal process at this stage. This is largely due to the fact that the proposed Main Modifications in themselves have been made to enhance positive effects and to mitigate any negative effects.
- 5.1.2 Rather than leading to 'new' significant effects, the modifications largely reduce the negative effects predicted in the SA Report.

6 Summary

6.1.1 The effects of the modifications against each of the 18 sustainability objectives are summarised below in tables 6.1 and 6.2. Table 6.1 illustrates the broad implications of the modifications, viewed in combination with one another. There are no significant effects predicted, and so the symbols provided do not reflect significant positive or negative effects. Rather, the symbols represent the broad implications of the modifications in relation to each objective. This is either positive (↑), negative (↓) or neutral (↔).

Table 6.1 Broad implications of the modifications

Housing	Flooding	Health	Social exclusion	Education	Crime	Communities	Accessibility	Cultural activity	Efficient land use	Air quality	Climate change	Biodiversity / Geodiversity	Countryside and historic environment	Waste management	Water resources	Energy efficiency	Economy and employment	
↓	↔	↑	↔	↔	↔	↔	↔	↔	↑	↔	↑	↑	↑	↑	↑	↑	↑	↑

Table 6.2 Summary of the effects of the modifications

Sustainability objective	Cumulative effects of modifications on SA findings
Housing	<p>Though there are reductions in the amount of housing allocations in some locations (Yalding, Boughton, Lenham), this is unlikely to have a significant effect for the borough as a whole (as housing needs would still be broadly met).</p> <p>In combination, the modifications are not predicted to lead to significantly different effects to those already identified in the SA Report. However, there are some negative implications reflecting lower housing in particular areas.</p>
Flooding	<p>The modifications result in a lower overall amount of housing, which could have slight positive effects with regards to a reduction in surface water run-off.</p> <p>Where development is proposed through the modifications (<i>for example at the Baltic Wharf site</i>), there is a need to consider flood risk measures too.</p> <p>Overall, this ought to ensure that effects on flooding are not significantly different to those identified in the SA Report.</p>

Sustainability objective	Cumulative effects of modifications on SA findings
Health and wellbeing	<p>Additional site specific criteria introduced by MM4 contribute to the significant positive effects that were established in the SA Report.</p> <p>MM10 contributes to the positive effects on health that have already been identified for the Local Plan. Though the effects for the borough would remain similar, in Yalding there would be specific benefits.</p> <p>Overall, the modifications are predicted to have a positive effect (but not significant) on health and wellbeing.</p>
Social Exclusion	<p>The modifications result in a lower housing target for the borough. The effect of this on social exclusion is not predicted to be significant as the broad distribution of growth remains the same, and communities ought to still have access to housing and employment opportunities. Indeed, clarifications on the requirements for health infrastructure at new development sites ought to ensure that the planned growth is beneficial to existing and new communities.</p>
Education and skills	<p>The modifications are unlikely to have a significant effect upon education and skills. A significant positive effect remains.</p>
Crime and fear of crime	<p>In combination, the modifications are not likely to have a significant effect upon crime.</p>
Vibrant and attractive communities	<p>Though there could be some site specific implications in terms of the appearance and amenity of development sites, the overall effects on communities across the borough are negligible. The broad effects remain the same as those identified in the SA Report.</p>
Accessibility	<p>In combination, the modifications are unlikely to have a significant effect upon accessibility. The spatial distribution remains the same, and there are minor changes to some policies that ought to improve access to local facilities.</p>
Cultural activity	<p>The modifications are not likely to have a significant effect in terms of engagement with cultural activities.</p>

Sustainability objective	Cumulative effects of modifications on SA findings
Efficient land use	<p>In combination, the modifications are predicted to have a neutral effect on land use. A lower amount of housing growth overall will reduce the need for greenfield land release, whilst a more proactive approach to the historic environment should also help to ensure that land is used efficiently. However, these effects would be minor, and would not change the overall effects identified in the SA Report.</p>
Congestion and air quality	<p>In combination, the modifications are predicted to be positive in terms of congestion and air quality. The overall amount of development is lower, including a reduction in parts of the Maidstone Urban Area, which is most affected by congestion. However, the effects are minor, as the scale of effects would be very small.</p>
Climate change	<p>In combination, the modifications are likely to lead to a slight reduction in greenhouse gas emissions. Consequently, the positive effects predicted in the SA Report are likely to be more pronounced (though still not significant).</p>
Biodiversity and geodiversity	<p>The modifications have mostly neutral effects. However, a reduction in the scale of growth in the broad location at Lenham is likely to help better protect and manage effects on biodiversity in this area. This should help to minimise those negative effects identified in the SA Report.</p> <p>A more proactive approach is also established for the Newnham Park allocation, which ought to secure positive effects.</p> <p>Overall, the modifications are positive with regards to biodiversity, helping to reduce the significance of effects in Lenham and at Newnham Park.</p>
Countryside and historic environment	<p>Though a number of sites have been removed that could have had negative effects upon heritage assets, the overall effect on heritage across the Borough is likely to remain the same.</p> <p>The effects on landscape are predicted to be less significant as a number of the modifications ought to ensure that effects on landscape character are avoided or mitigated. The overall effect on landscape is therefore likely to be more positive than in the SA Report.</p>
Sustainable management of waste	<p>The removal of several site options and a lowering in the scale of growth at the Broad location in Lenham ought to mean that a lower amount of waste is generated in total. However, the scale of effects is minor, so the effects in the SA report remain broadly the same.</p>

Sustainability objective	Cumulative effects of modifications on SA findings
Water resources management	A lower scale of growth overall ought to be positive for water resources by decreasing the demand for water and the need for water treatment. However, the scale of effects is unlikely to be significant.
Energy efficiency	A lower scale of growth overall ought to be positive for energy by decreasing the demand for energy in new homes. However, the scale of effects is unlikely to be significant.
Economy and employment	The modifications are forecast to have mixed effects. On one hand, there are negative implications related to a lowering of the size threshold of buildings at Woodcut Farm. On the other, there is a commitment to a review of employment land need, and better consideration of minerals resources. None of the effects are predicted to be significant, and so the findings in the SA Report still remain valid.

7 Monitoring and next steps

7.1 Monitoring

- 7.1.1 At the current stage (i.e. within the SA Report and Addendum), there is only a need to present measures envisaged concerning monitoring. As such, Table 19.1 in the main SA Report suggests measures that might be taken to monitor the effects (in particular the significant effects) highlighted by the appraisal of the plan.
- 7.1.2 The effects of proposed modifications are all predicted to be ‘insignificant’ and broadly in-line with those effects identified in the SA Report. Therefore, the monitoring measures outlined in the SA Report are considered to be sufficient.

7.2 Next steps

- 7.2.1 The Local Plan was submitted for Examination by an independent Planning Inspector in May 2016.
- 7.2.2 The Inspector will judge whether or not the Plan is ‘sound’. The SA report (SUB 002) was one of the background documents provided to the Inspector as part of the Examination.
- 7.2.3 During the Local Plan Examination, and in the lead up to it, a number of proposed changes to the submission version of the Local Plan have been put forward. The proposed Main Modifications have been appraised through the SA.
- 7.2.4 Public consultation on the proposed Main Modifications is being undertaken and the SA Addendum will be published at the same time. At the end of the consultation period, the consultation responses and the SA Addendum will be passed to the Inspector for his consideration.
- 7.2.5 At the time the Local Plan is adopted an SA ‘Statement’ must be published that sets out (amongst other things):
- How this SA findings and the views of consultees are reflected in the adopted Plan,
*i.e. bringing the story of ‘plan-making / SA up to this point’ up to date;
and*
 - Measures decided concerning **monitoring**.

Appendix A: Screening the Proposed Main Modifications

Schedule of Proposed Main Modifications to the submitted Local Plan.

Main Modifications are proposed to be made to the submitted Local Plan, and a summary is set out in the schedule below. The end column sets out whether the modifications are likely to have a significant effect in terms of the SA findings; and therefore whether they should be screened in or out of the SA process at this stage.

Main Modification Number	Summary of proposed change text	SA 'Screening'
MM1	Objectively assessed housing need is confirmed as 17,660 dwellings for the Local Plan period 2011 to 2031 (883 dwellings p.a.), a reduction of 900 dwellings from 18,560 dwellings. The Council's housing land supply position is updated to a snapshot date of 1 April 2016 (Table 4.1), and new text explains how land supply will be monitored and reviewed. The methodology used to establish gross and net floorspace requirements for offices, industry and warehousing is clarified, and Table 4.4 is adjusted to reflect net requirements. Amendments to policy to reflect consequential changes arising from the Modifications listed in this schedule.	Policy SS1 sets a housing target that is 900 dwellings fewer than in the submitted version of the Local Plan.
MM2	Amendments to the Key Diagram to show Lenham as a broad location in addition to its Rural Service Centre status, and to reflect the change in the legend of the Key Diagram.	Modifications are illustrative of changes to other policies. No implications for the SA findings.
MM3	Addition of new text introducing the restructuring of the Local Plan to distinguish between strategic and non-strategic policies (MM61).	Implications for the SA findings are considered as part of modifications to SS1.

MM4	Addition of new criteria for the strategic spatial policies, to reflect an updated assessment of infrastructure requirements for health and education.	Implications are positive for health and wellbeing and education.
MM5	Reduction in delivery of 1,859 dwellings on 24 sites to delivery of 1,846 dwellings on 23 sites as a consequence of Modifications to housing site allocations (MM14).	No implications for SA Findings.
MM6	Addition of reference to the installation of an extended bus lane in Sutton Road.	Clarification does not lead to implications for SA Findings.
MM7	Addition of new criterion to reflect the need for additional capacity in the sewer network and, if required, at the wastewater treatment works.	No implications for SA Findings.
MM8	Amendment to text to reduce the capacity of Lenham Rural Service Centre Broad Location from 1,500 dwellings to 1,000 dwellings. Addition of new criterion to reflect an updated assessment of infrastructure requirements for health. Clarification of the preparation of the master plan through the Neighbourhood Plan or the Local Plan review. Reduction in yield from allocated housing sites, from 165 dwellings to 155 dwellings as a consequence of Modifications to housing site allocations (MM14).	Number of dwellings proposed for the broad location could have effects on SA findings. Reduction in 10 dwellings has no significant effect on SA findings.
MM9	Reduction in delivery of 193 dwellings on six sites to delivery of 118 dwellings on five sites as a consequence of Modifications to housing site allocations (MM14). Reduction of the open space requirement from 1.79ha to 0.30ha (MM28).	Cumulative effects of site deletions and additions to be determined.
MM10	Reduction in delivery of 265 dwellings on two sites to delivery of 65 dwellings on one site as a consequence of Modifications to housing site allocations (MM14). Consequential deletion of 4.4ha of open space (MM28). Addition of new criterion to reflect an updated assessment of infrastructure requirements for health.	Potential Implications for SA findings related to Yalding.

MM11	Addition of new text relating to the Metropolitan Green Belt. Amendments to strengthen wording of policy, and the deletion of specific references to acceptable development in the countryside, replaced with a cross reference to other policies of the Local Plan. Clarification of the weight given to countryside designations, to accord with national policy.	General principles of the policy remain the same and are not likely to have a significant effect on SA findings.																		
MM12	Addition of new text and strategic policy for the Historic Environment, to protect the borough's heritage assets.	New policy – appraisal required.																		
MM13	Creation of a new strategic policy by merging criteria 1 and 2 from Policy DM24 and criterion 1 from Policy DM25 (MM52 and MM53).	Merged policies have already been appraised, and principles remain the same. No further implications for SA findings.																		
MM14	Amendments to housing site allocations, including: <table border="1" data-bbox="421 805 1608 1136"> <tr> <td>H1(11)</td> <td>Springfield, Royal Engineers Road and Mill Lane, Maidstone</td> <td><u>692</u> 500</td> </tr> <tr> <td>H1(29)</td> <td>New Line Learning, Boughton Lane, Loose</td> <td>220</td> </tr> <tr> <td>H1(30)</td> <td>West of Eclipse, Maidstone</td> <td><u>50</u> 35</td> </tr> <tr> <td>H1(42)</td> <td>Tanyard Farm, Old Ashford Road, Lenham</td> <td><u>145</u> 155</td> </tr> <tr> <td>H1(53)</td> <td>Boughton Lane, Boughton Monchelsea and Loose</td> <td>75</td> </tr> <tr> <td>RMX1(4)</td> <td>Former Syngenta Works, Hampstead lane, Yalding</td> <td>200</td> </tr> </table>	H1(11)	Springfield, Royal Engineers Road and Mill Lane, Maidstone	<u>692</u> 500	H1(29)	New Line Learning, Boughton Lane, Loose	220	H1(30)	West of Eclipse, Maidstone	<u>50</u> 35	H1(42)	Tanyard Farm, Old Ashford Road, Lenham	<u>145</u> 155	H1(53)	Boughton Lane, Boughton Monchelsea and Loose	75	RMX1(4)	Former Syngenta Works, Hampstead lane, Yalding	200	Implications for the SA findings are considered as part of MM1.
H1(11)	Springfield, Royal Engineers Road and Mill Lane, Maidstone	<u>692</u> 500																		
H1(29)	New Line Learning, Boughton Lane, Loose	220																		
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RMX1(4)	Former Syngenta Works, Hampstead lane, Yalding	200																		
MM15	Addition of a new criterion for a range of housing site policies, to reflect requirements for connection to the local sewerage system.	Procedural changes have no implications for the SA.																		
MM16	Addition of a new criterion for a range of housing site policies, to reflect the need for a minerals assessment in accordance with the adopted Kent Minerals and Waste Local Plan (2013-2030).	Potential implications for the SA findings																		

MM17	Deletion of criterion referring to open space beyond the boundary of the borough.	No implications for the SA findings.
MM18	Amendment to criterion to reflect the need for a separate bus access in addition to a separate cycle and pedestrian access.	Update ought to be positive with regards to sustainable transport. However, no significant implications for the SA findings.
MM19	Amendments to criteria to protect the historic setting of the church. Addition of new criterion to reflect an updated assessment of infrastructure requirements for education.	Additional policy clauses are positive for protection of the historic environment and education. The overall implications for the SA findings are not significant though.
MM20	Increase in yield from 500 dwellings to 692 dwellings as a consequence of Modifications to housing site allocations (MM14). Addition of new criteria to guide the location of the highest density development, and to exclude residential development from flood zone 3 unless appropriate mitigation can be provided.	Clarifications are site specific. Whilst amendments are positive for housing delivery and the management of flooding, the implications for the SA findings as a whole are not significant.
MM21	Deletion of open space criterion (MM28).	No implications for the SA findings.
MM22	Deletion of site allocation policy (MM14).	Lower delivery of housing in this area of the Borough. However, implications for the SA findings as a whole are not significant. Cumulative effects of all site deletions and additions to be determined.

MM23	Increase in yield from 35 dwellings to 50 dwellings as a consequence of Modifications to housing site allocations (MM14).	Slightly higher number of dwellings to be allocated. Effects on overall SA implications not significant.
MM24	Amendments to site access arrangements. Addition of new criterion to reflect an updated assessment of infrastructure requirements for education.	Site specific changes are positive for education and safety, but overall implications for SA findings are not significant.
MM25	Reduction in yield from 155 dwellings to 145 dwellings as a consequence of Modifications to housing site allocations (MM14). Addition of new criterion for 0.34ha open space to create a landscape vista (MM28). Addition of new criterion requiring a detailed flood risk assessment and a sustainable surface water drainage strategy.	Site specific changes are positive for landscape character and drainage. Implications for the overall SA findings are not significant.
MM26	Deletion of site allocation policy (MM14).	Lower level of allocated housing in Boughton Monchelsea may have locally specific effects in terms of lower housing provision (and associated effects). Implications for overall SA findings not significant. Cumulative effects of all site deletions and additions to be determined.
[MM27]	[this MM number has not been used].	.

MM28	Amendments to open space allocations, including:			No significant implications for the SA findings.	
	<u>OS1(18)</u>	<u>West of Church Road, Otham</u>	<u>1.40ha</u>		<u>Natural/semi-natural open space</u>
	<u>OS1(19)</u>	<u>Tanyard Farm, Lenham</u>	<u>0.34ha</u>		<u>Natural/semi-natural open space</u>
	OS1(14)	Former Syngenta Works, Hampstead Lane, Yalding	4.40ha		Natural/semi-natural open space
	OS1(15)	Boughton Lane, Loose and Boughton Monchelsea	1.49ha		Natural/semi-natural open space
	Amendment to policy to reflect a reduction in the delivery of homes at the broad locations within the Local Plan period, from 3,500 dwellings to 2,440 dwellings.				
MM29	Amendments to broad locations for housing growth, including:			Potential implications for the SA findings.	
	Policy Reference	Area	Approximate Dwellings yield		
	H2(1)	Maidstone town centre	<u>940</u> 700		
	H2(2)	Invicta Park Barracks	<u>500</u> 1,300		
	H2(3)	Lenham	<u>1,000</u> 1,500		
MM30	Increase in yield from 700 dwellings to 940 dwellings as a consequence of Modifications to broad locations for housing growth (MM29). Addition of new criterion to identify sources of dwelling yield: The Mall (400 dwellings), The Riverside (190 dwellings), and the conversion of poor quality office stock (350 dwellings).			Implications for the SA are covered under policy H2.	
MM31	Addition of new text to confirm that the broad location will be released by 2027, and that a minimum 500 dwellings of the 1,300 dwelling capacity will be delivered within the Local Plan period (MM29). Amendment to criterion to			Implications for SA are covered under MM29 (For H2).	

	reflect an updated assessment of infrastructure requirements for education.	
MM32	Reduction in yield from 1,500 dwellings to 1,000 dwellings as a consequence of Modifications to broad locations for housing growth (MM29). Clarification of the preparation of the master plan through the Neighbourhood Plan or the Local Plan review, and amendments to criteria to reflect the requirements of the master plan. Addition of new criteria to reflect the need for a flood risk management strategy, and to ensure adequate provision is made for sewerage infrastructure.	Implications for the SA are covered under policy H2.
MM33	Reduction in the threshold of the replacement retail centre from 15,000m ² to 14,300m ² , and amendments to text and criteria to confirm that additional retail floorspace above this threshold, and leisure uses, will require sequential and impact assessments. Addition of new criteria to reflect the need for an approved landscape and ecological management plan, and to reflect the need for a minerals assessment in accordance with the adopted Kent Minerals and Waste Local Plan (2013-2030). Deletion of criteria relating to phasing, and to contributions towards improvements at junction 5 of the M2 motorway.	Clarifications have site specific positive effects for visual landscape and minerals.
MM34	Addition of 4,000m ² of offices (B1a) to the site's capacity. Addition of new criterion requiring the submission of a retail impact assessment.	No significant implications for the SA findings.
MM35	Addition of new criterion requiring the submission of a retail impact assessment.	No significant implications for the SA findings.
MM36	Deletion of the allocated site for approximately 8,600m ² of employment floorspace, 200 dwellings and 4.4ha open space (MM14 and MM28). Addition of a new policy to support the redevelopment of the site for employment (B classes), leisure, commuter parking and open space, subject to suitable access arrangements and the findings of a flood risk assessment. Addition of new criterion to reflect the need for a minerals assessment in accordance with the adopted Kent Minerals and Waste Local Plan (2013-2030).	Clarifications have site specific positive effects for flood risk, minerals. Lower amount of housing to be delivered in Yalding though.
MM37	Addition of new text and policy for the Grade II listed Powerhub building and Baltic Wharf, to support a mix of uses comprising housing, offices (B1a and/or A2), leisure uses (D2), cafes and restaurants (A3) and retail (A1). Development is subject to criteria for design, layout and access. Assessments are required for retail impact, flood mitigation, noise attenuation and air quality	New policy with potential implications for the SA

	mitigation, land contamination and transport. Highway improvements are required, together with measures for improved pedestrian, cycle and public transport links to the primary shopping centre.	
MM38	Deletion of the allocated site for 8,000m ² of office floorspace (B1 use class). Addition of new text and policy to support a residential-led mixed use development to include a minimum of 2,000sqm of office floorspace (B1a). Leisure uses (D2) would also be appropriate as part of the mix of uses. Development is subject to criteria for design and layout; and assessments are required for noise attenuation and air quality mitigation, and land contamination.	Smaller scale of office development proposed. No significant implications for SA findings.
MM39	Amendments to criteria to reflect: <ul style="list-style-type: none"> • Addition of use class B1b to the range of mixed use employment floorspace, and a requirement for the site to provide at least 10,000m² of B1a/B1b floorspace as an absolute minimum; • Additional landscaping requirements, including increasing 15m landscape buffers to a range of depths dependant on location within the site: 35m/25m/15m; • Reduction in maximum unit size from 10,000m² to 5,000m²; • Clarification of scale of buildings in relation to their siting; and • The need for a minerals assessment in accordance with the adopted Kent Minerals and Waste Local Plan (2013-2030). 	Clarifications have site specific positive effects for visual landscape and minerals.
MM40	Deletion of references to the historic environment, which are incorporated into a new policy for the historic environment (MM12). Addition of new criteria to reflect the need to give weight to the protection of designated sites for biodiversity.	Details relating to compensation have been added, which ought to be more positive for biodiversity. Aspects of the policy relating to 'cultural heritage' are covered in a new plan policy, so the overall effects of the modifications are not significant.

MM41	Clarification of the exclusion of garden land in the countryside from the definition of brownfield land.	Clarification has no implications for SA findings.
MM42	Amendments to criteria to strengthen and clarify the requirements of the policy, and to confirm the Council will produce an Air Quality Development Plan Document.	Policy rewording / clarification but principles remain similar. No implications for SA findings.
MM43	Addition of a cross reference to retained economic development areas.	The principle of the policy is the same. No significant implications for SA findings.
MM44	Amendments to criteria to provide clarity.	The principle of the policy is the same, though strengthened. No significant implications for SA findings though.
MM45	Addition of cross reference to Neighbourhood Plans.	No significant implications for SA findings.
MM46	Addition of reference to making best use of land, and clarification of locational criteria for net densities.	No significant implications for SA findings.
MM47	Addition of new text to include reference to vacant building credit. Amendment to increase the threshold at which affordable housing will be sought: 11 units or more or which have a combined floorspace of greater than 1,000m ² (gross internal area).	Increased threshold will mean that slightly fewer affordable homes are delivered (approximately 80 fewer between 2016-31) . Implications are not significant for the overall SA findings though.
MM48	Amendments to the text and policy, to clarify that 'local needs housing' is affordable local needs housing on rural exception sites located outside of the Borough's settlement boundaries.	No significant implications for SA findings.

MM49	Amendment to criterion to provide clarity in respect of the impact of development proposals on the landscape.	No significant implications for SA findings.
MM50	Addition of new criteria to cross reference with other Local Plan policies and to provide clarification.	No significant implications for SA findings.
MM51	Addition of new criteria permitting the infilling of vacant sites within designated economic development areas, and requiring high quality design and landscaping for designated sites within the countryside.	No significant implications for SA findings.
MM52	Merge criteria 1 and 2 from Policy DM24 with criterion 1 from Policy DM25 to create a new strategic policy (MM13), and merge criterion 3 from DM24 and criterion 2 from DM25 to create a single amended DM policy.	No significant implications for SA findings. Policy SP23 to be appraised as a new policy.
[MM53]	[This MM number has not been used]	
MM54	Amendment to criterion to delete reference to AONB.	No significant implications for SA findings.
MM55	Addition of new criteria for design and landscaping. Deletion of references to the AONB.	Principle of policy remains the same. No significant implications for SA findings.
MM56	Deletion of criteria relating to scale of new and expanded premises. Addition of new criterion in respect of relocation of business to designated economic development areas.	Principle of policy remains the same, though strengthened. No significant implications for SA findings.
MM57	Addition of new text and policy, which includes criteria for the conservation and enhancement of designated and non-designated heritage assets.	Principle of policy remains the same, though strengthened. No significant implications for SA findings.
MM58	Addition of new criterion to encourage and support infrastructure schemes brought forward by service providers.	Principle of policy remains the same. No significant implications for SA

		findings.
MM59	Addition of new text and performance targets for monitoring the Local Plan.	No significant implications for the SA findings. However, monitoring measures and indicators will be considered when the SA monitoring framework is established (in an SEA statement).
MM60	Addition of new policy confirming the target for the adoption date for the Local Plan review is April 2021. The policy includes a list of the matters that will be the subject of the review.	New policy to be appraised
MM61	Amendments to the contents page of the Local Plan following restructuring to distinguish between strategic and non-strategic policies (MM3).	No significant implications for SA findings.