

Maidstone Local Plan

Proposed Modifications

Sustainability Appraisal

Addendum to SUB002

*Non-Technical
Summary*

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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. An SA Addendum has been prepared to document the implications of proposed modifications to the Local Plan. This non-technical document summarises the SA Report Addendum.
- 1.1.2 It is important to read this addendum (non-technical summary) alongside the main SA Report 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 non-technical summary. 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 modifications that have been ‘screened in’ to the SA process given their potential to have an effect on the SA findings. A number of modifications were ‘screened out’ as they were deemed unlikely to have any effect on the SA findings.

Table 2.1 Summary of proposed 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.

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.

Modification / Policy	Summary of proposed modifications
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 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), 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.
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
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 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 should be 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>
MM9/MM24 Policy SP12 MM10 Policy SP16 MM22 Policy H1	<p>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 sites is outlined below.</p>

Policy	Alternatives considered
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, 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. No further alternatives have been identified.
MM39 Policy EMP1	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 (Boughton Lane, New Line Learning 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 sites are provided below.

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 a valid 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

New Line Learning, Boughton Lane

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

Boughton Lane

- 3.2.4 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

- 3.2.5 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 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 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 modifications is set out within separate tables for each of the sustainability topics listed below (which are derived from the SA Framework).

- | | |
|-------------------------------------|---|
| - Housing | - Congestion, pollution and air quality |
| - Flooding | - Climate change |
| - Health and wellbeing | - Biodiversity and geodiversity |
| - Social exclusion | - Countryside and historic environment |
| - Education and skills | - Sustainable management of waste |
| - Crime and fear of crime | - Water resources management |
| - Vibrant, attractive communities | - Energy efficiency |
| - Accessibility | - Efficient land use |
| - Engagement in cultural activities | - Economy and employment |

- 4.1.6 To reflect the different effects that 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 Major Modifications 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.

5 Summary

5.1.1 The effects of the modifications against each of the 18 sustainability objectives are summarised below in tables 5.1 and 5.2. Table 5.1 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 5.1 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 5.2 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.

6 Mitigation and enhancement

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

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.