

Incorporating:



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planning consultants

MAIDSTONE J8

Environmental Statement: Non Technical Summary on behalf of Roxhill Developments Ltd

Date: April 2015



1.0 INTRODUCTION

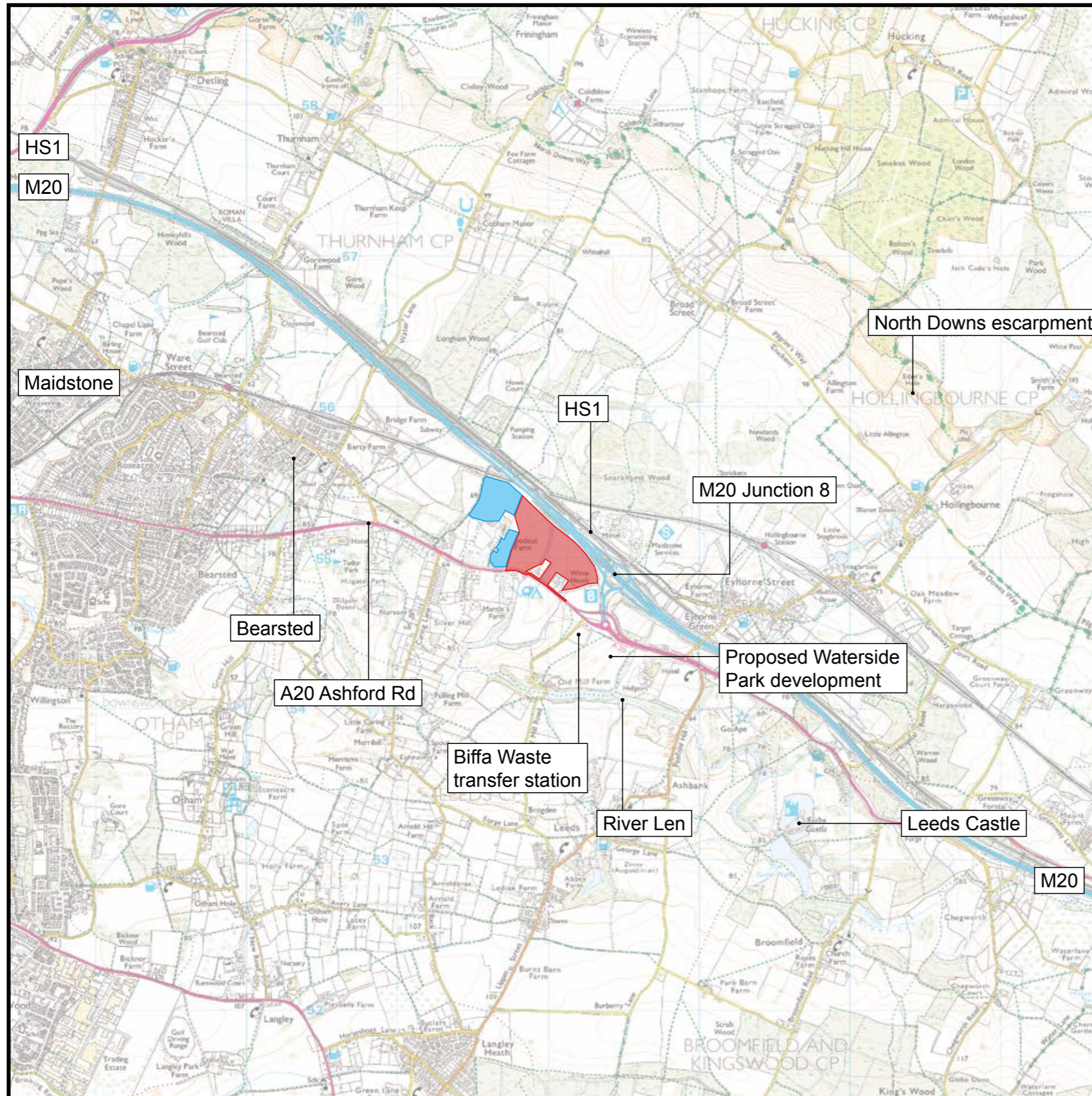
1.1. This Environmental Statement Non-Technical Summary (NTS) has been prepared on behalf of Roxhill Developments Ltd (the 'Applicant') to accompany an outline planning application to Maidstone Borough Council (MBC) for the following Proposed Development:

- Storage and distribution/warehouse accommodation (Use Class B8) – two units of area 14,632 sqm (Unit A1) and 9755 sqm (Unit A2);
- Six commercial units (Units B1-B6) for use either within Use Class B8 storage and distribution/warehousing or light industrial (Use Class B1c) with floor space totalling 11,231 sqm;
- Three units (Units C1, C2 and C3) for use in either Use Class B1b (research and development) or Use Class B1(c) light industry ranging from 1115 sqm to 1672 sqm;
- Three units (Units D1, D2 and D3) for uses in either Use Class B1a offices or Use Class B1(b) research and development, ranging in size from 439 sqm to 2,016 sqm;
- New Site Access on northside of A20, west of M20 Junction 8;
- New Emergency Access to the west of Units A1 and A2; and
- Internal drainage, new internal road network, and structural landscaping.



1.2. The area within which the Proposed Development will be located (the 'Application Site') is located approximately 6km to the east of Maidstone and adjacent to Junction 8 of the M20 as shown on Figure 1.1, while the Masterplan for the Proposed Development is provided in Figure 1.2. The National Grid Reference for the approximate centre of the Application Site is 582500, 155500.

1.3. This document provides the non-technical summary of the findings of the Environmental Statement (ES) that accompanies the planning application. The full findings of the ES are presented in a comprehensive set of documents that can be viewed at Maidstone House, King Street, Maidstone, Kent, ME15 6JQ. Hard copies of the NTS can be obtained free of charge from Hobbs Parker Property Consultants LLP, Romney House, Monument Way, Orbital Park, Ashford, Kent, TN24 0HB.

FIG 1.1. SITE LOCATION AND CONTEXT PLAN



LEGEND

-  Red line application boundary
-  Blue line buffer zone



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Figure 1.2
MASTER PLAN

Background to the Project

- 1.4. The Maidstone Borough Council Employment Land Review (2011)¹ identified a substantial requirement for new employment land within the Borough. As a result of the identification of this need, the 2011 Maidstone Borough Council Draft Core Strategy² proposed a Strategic Employment Location, at Junction 8, on the M20. Since then there has been ongoing consultation and deliberation by the Council as to whether to allocate a specific area of land for new employment uses.
- 1.5. At the date of publication of this ES (April 2015) the matter of whether to allocate a Strategic Employment Site at Junction 8 of the M20, and the proposals of the Maidstone Draft Economic Development Strategy³, are due to be considered further at forthcoming meetings of the Overview and Scrutiny Committee, and Cabinet. Further discussion on the background and need for the Proposed Development is provided in the Planning Statement accompanying the Planning Application.

2.0 THE ENVIRONMENTAL STATEMENT

- 2.1. Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011⁴ (herein referred to as the 'EIA Regulations'), an Environmental Impact Assessment (EIA) is required for a development of the scale and nature proposed. The findings of the EIA are presented in the ES.
- 2.2. The general approach to assessing environmental impacts and effects is to consider the current conditions on and around the Application Site for each environmental issue, and then to compare them with the predicted conditions during the construction and operational phases of the Proposed Development. Where there are international, national or local standards, policies or guidelines of relevance to these proposals, these are also taken into account.
- 2.3. In order to assess the potential impacts and effects of the Proposed Development on the environment, the sensitivity of existing resources and receptors are

¹ GVA (July 2011) Maidstone Borough Council Employment Land Review, Partial Update, Final Report

² Maidstone Borough Council (2011) Maidstone Borough Draft Core Strategy

³ Maidstone Borough Council (September 2014) Maidstone Draft Economic Development Strategy

⁴ Town and Country Planning (Environmental Impact Assessment) Regulations 2011

considered in conjunction with the scale (or magnitude) of the predicted impacts to establish the significance of the predicted effects.

- 2.4. Within EIA, the cumulative effects of a development in conjunction with other consented but not yet built development in the area are also considered. Cumulative effects are generally considered to arise from the combination of effects from the Proposed Development and from other proposed or permitted schemes in the vicinity which in this case was the Waterside Park, Maidstone.
- 2.5. The following sections set out the findings of the EIA process. The order in which sections appear matches the order in which they are considered within the ES.

3.0 THE APPLICATION SITE AND SURROUNDING AREA

- 3.1. The Application Site comprises approximately 19 ha of land currently in intensive agricultural rotation within two fields that form part of Woodcut Farm. Adjacent to the Application Site in the west is a further 9.14 ha of arable land that will be used for landscape and ecological mitigation. The Application Site is bounded to the northeast by the M20; northwest by Woodcut Farmhouse; southeast by an arable field and Musket Lane; and southwest by A20 Ashford Road and the privately owned properties of White Heath and Chestnuts as shown on Figure 1.1.
- 3.2. The Application Site slopes steeply down from 68m above Ordnance Datum (AOD⁵) at the main complex at Woodcut Farm in the west which is on a plateau of higher ground, eastwards towards a watercourse that flows through the Application Site approximately 200m from the western Application Site boundary at 50 to 53m AOD. The land then rises more gently east of the watercourse to 58m AOD in the north-eastern corner of the Application Site. There is also a gentle rise in the land from the A20 Ashford Road northwards towards the elevated M20. The boundaries of the fields to the northeast are delineated by wooden post and rail fencing while there is a mixture of post and wire stock-proof fencing and hedgerows along the southwest boundary and hedgerows along the northwest and southeast boundaries. A track known as Musket Lane is located along the southeast boundary separated from the Application Site by the low closely cut hedgerow.

⁵ Ordnance Datum is the vertical datum used by ordnance survey as the basis for deriving altitudes on maps. Topography may be described using the level in comparison or 'above' ordnance datum.

- 3.3. The Application Site is within a rural setting that is strongly influenced by the urbanising influence of the M20/A20. Urban uses in the vicinity of the Application Site include: the Great Danes Mercure Hotel, on the south side of the A20 Ashford Road; the BIFFA Waste Transfer Station, on land south of the A20 Ashford Road; and the Maidstone Motorway Service Area, on the north side of the M20 accessed from Junction 8. Other land uses in the vicinity of the Application Site are principally rural, including land mainly in agricultural use, interspersed with a mix of farmsteads, hamlets and villages with some large houses set in spacious grounds.

4.0 PROPOSED DEVELOPMENT

- 4.1. Development parameters have been established for the entire Application Site to guide the Proposed Development. These set out details of the limits, necessary to define and fix those aspects of the Proposed Development capable of having significant environmental effects, as defined in the EIA Regulations. The development parameters are shown on Figures 4.1 to 4.7 and described below.

Land Uses

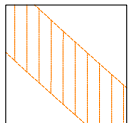
- 4.2. The Proposed Development will result in the introduction of 14 new buildings creating a total of 47,752 sqm Gross Internal Area (GIA) of floor space as shown on Figures 4.1 and 4.5. New areas of roads, parking and circulation will also be established to service the buildings. In addition, large areas of new planting and wetland will be established within the Proposed Development. Table 4.1 summarises the quantities of the main land uses.

Table 4.1: Land Use

Unit	Land Class	Use	Warehouse (sqm)	Office (sqm)	Office/R&D (sqm)	Unit total (sqm)
A1	B8		13935	696.8		14631.8
A2	B8		9290.3	464.5		9754.8
B1	B8-B1c		2647.7	264.8		2912.5
B2	B8-B1c		1997.4	199.7		2197.1
B3	B8-B1c		1765.2	176.5		1941.7
B4	B8-B1c		2601.3	260.1		2861.4
B5	B8-B1c		1486.4	148.6		1635
B6	B8-B1c		2322.6	232.3		2554.9
C1	B1b-B1c				1114.8	1114.8
C2	B1b-B1c				1114.8	1114.8
C3	B1b-B1c				1672.3	1672.3
D1	B1a-B1b				1904.5	1904.5

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 HP GAS MAIN WITH
 9M EASEMENT
 ON EACH SIDE

PLOT REF:	PLOT AREA		USAGE
	sq.m	sq.ft	
A1	25,819	277,916	B8
A2	21,160	227,766	B8
B1	5,520	59,417	B8 - B1c
B2	4,370	47,039	B8 - B1c
B3	3,450	37,136	B8 - B1c
B4	5,450	58,664	B8 - B1c
B5	3,330	35,844	B8 - B1c
B6	4,750	51,129	B8 - B1c
C1	2,820	30,354	B1b / B1c
C2	2,820	30,354	B1b / B1c
C3	2,460	26,479	B1b / B1c
D1	2,240	24,111	B1a / B1b
D2	2,380	25,618	B1a / B1b
D3	1,980	21,313	B1a / B1b

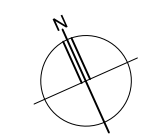
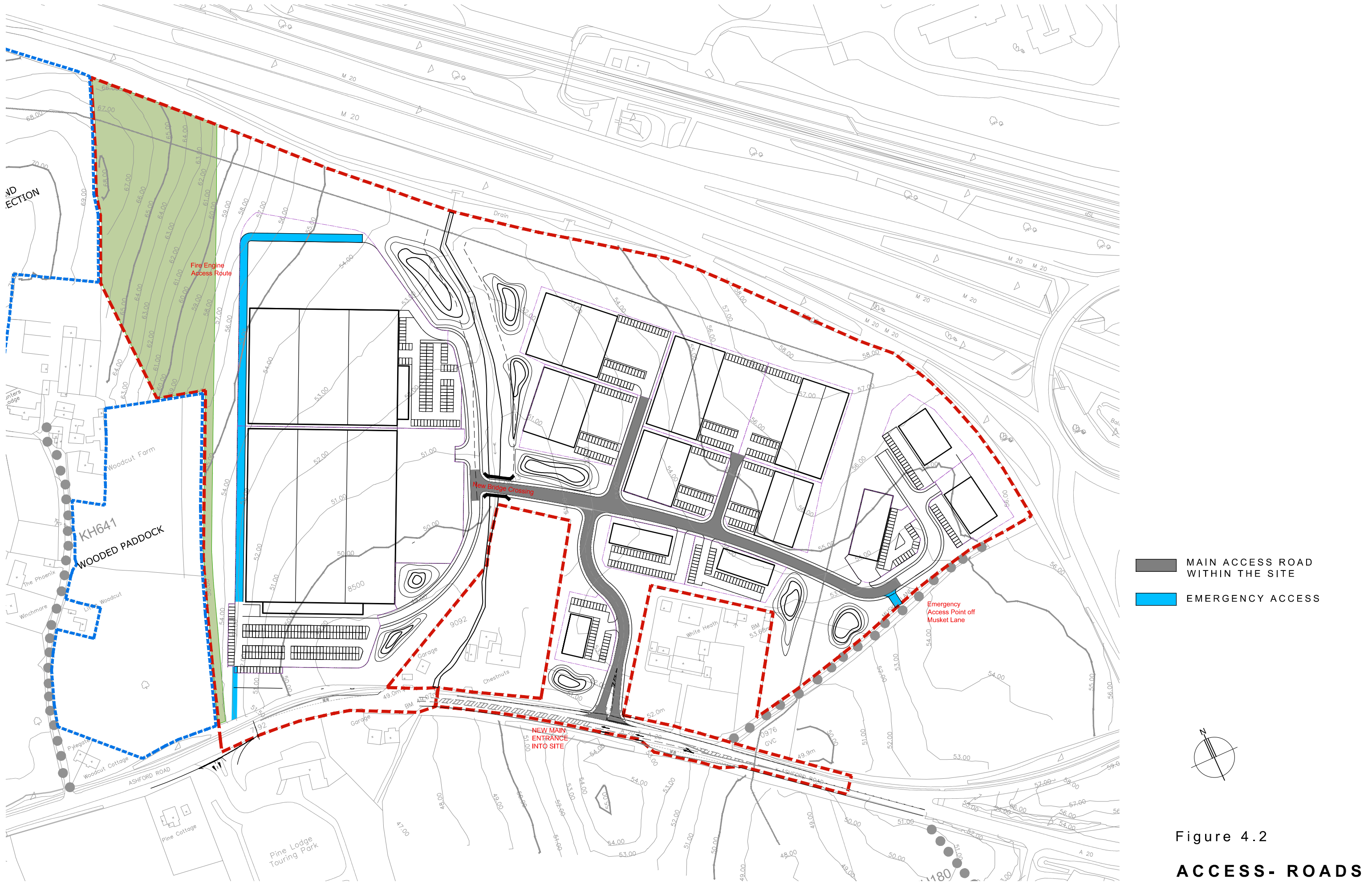




Figure 4.1
DEVELOPMENT PLOTS

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-  EXISTING WATER COURSE THROUGH THE SITE
-  PROPOSED POND AREAS

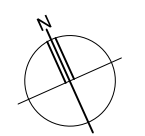





Figure 4.3
WATERCOURSES - PONDS

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-  LANDSCAPE FRAMEWORK
-  CONTROLLED LANDSCAPE AROUND THE GAS MAIN
-  PROPOSED POND AREAS

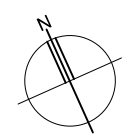


Figure 4.4
LANDSCAPE

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PLOT REF:	Heights		Ground Datum
	Eaves	Ridge	
A1	12M	13.8M	52.20
A2	12M	13.8M	52.20
B1	8M	12M	52.50
B2	8M	12M	52.00
B3	8M	10M	54.50
B4	8M	10M	55.25
B5	8M	10M	56.00
B6	8M	10M	56.75
C1	8M	10M	57.00
C2	8M	10M	55.50
C3	8M	10M	56.00
D1	10M	12M	54.50
D2	10M	12M	54.50
D3	10M	12M	52.50

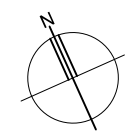
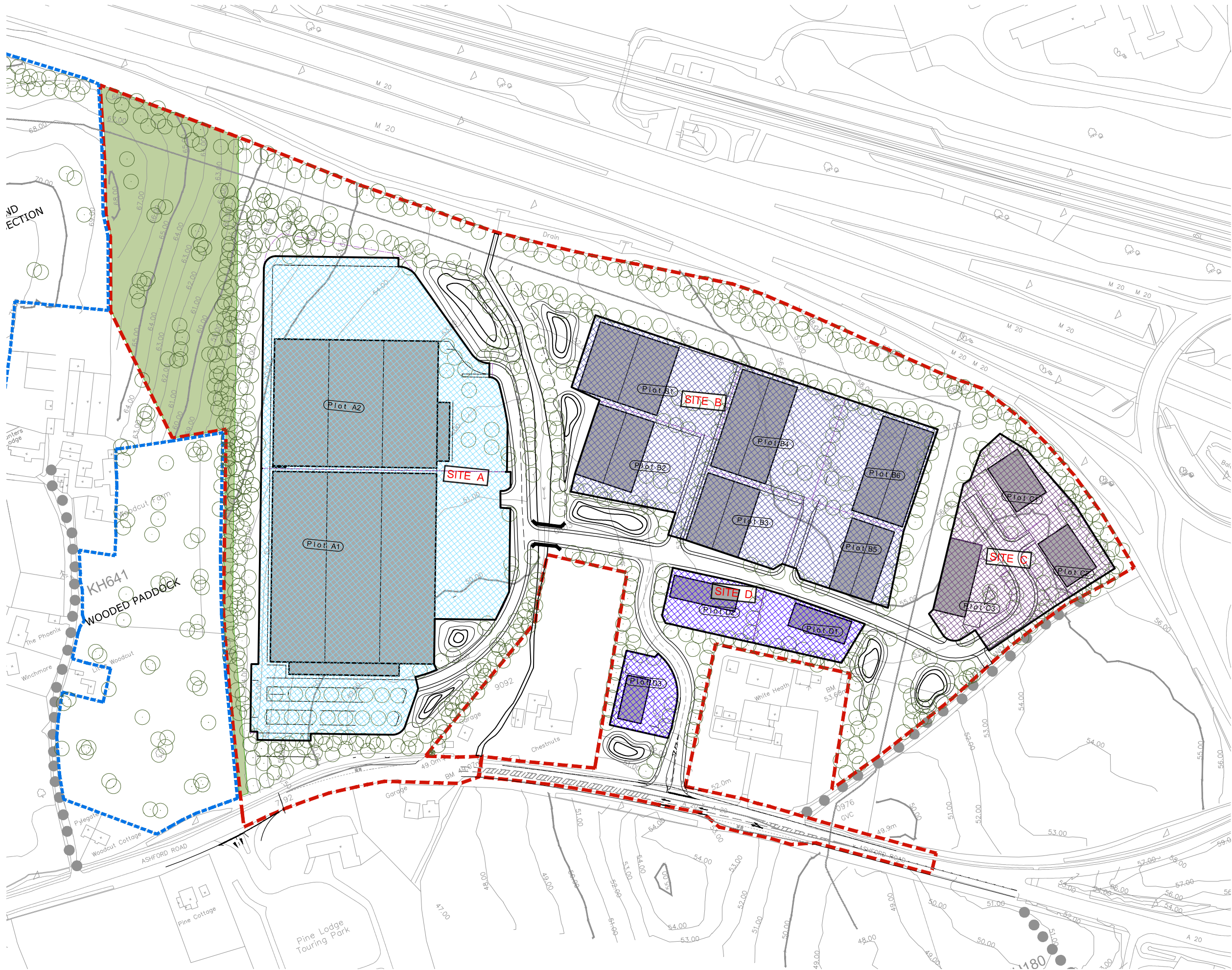


Figure 4.6

BUILDING HEIGHTS

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PLOT REF:	Max. Building Area		SITE	No. of buildings	USAGE
	sq.m	sq.ft			
A1	14,632	157,500	A	1 - 2	B8
A2	9,755	105,000			B8
B1	2,648	28,500	B	2 - 9	B8-B1c
B2	1,997	21,500			B8-B1c
B3	1,765	19,000			B8-B1c
B4	2,601	28,000			B8-B1c
B5	1,486	16,000			B8-B1c
B6	2,323	25,000			B8-B1c
C1	1,115	12,000	C	1 - 3	B1b - B1c
C2	1,115	12,000			B1b - B1c
C3	1,672	18,000			B1b - B1c
D1	1,904	20,500	D	1 - 9	B1a - B1b
D2	2,016	21,700			B1a - B1b
D3	1,440	15,500			B1a - B1b

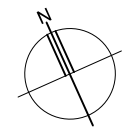
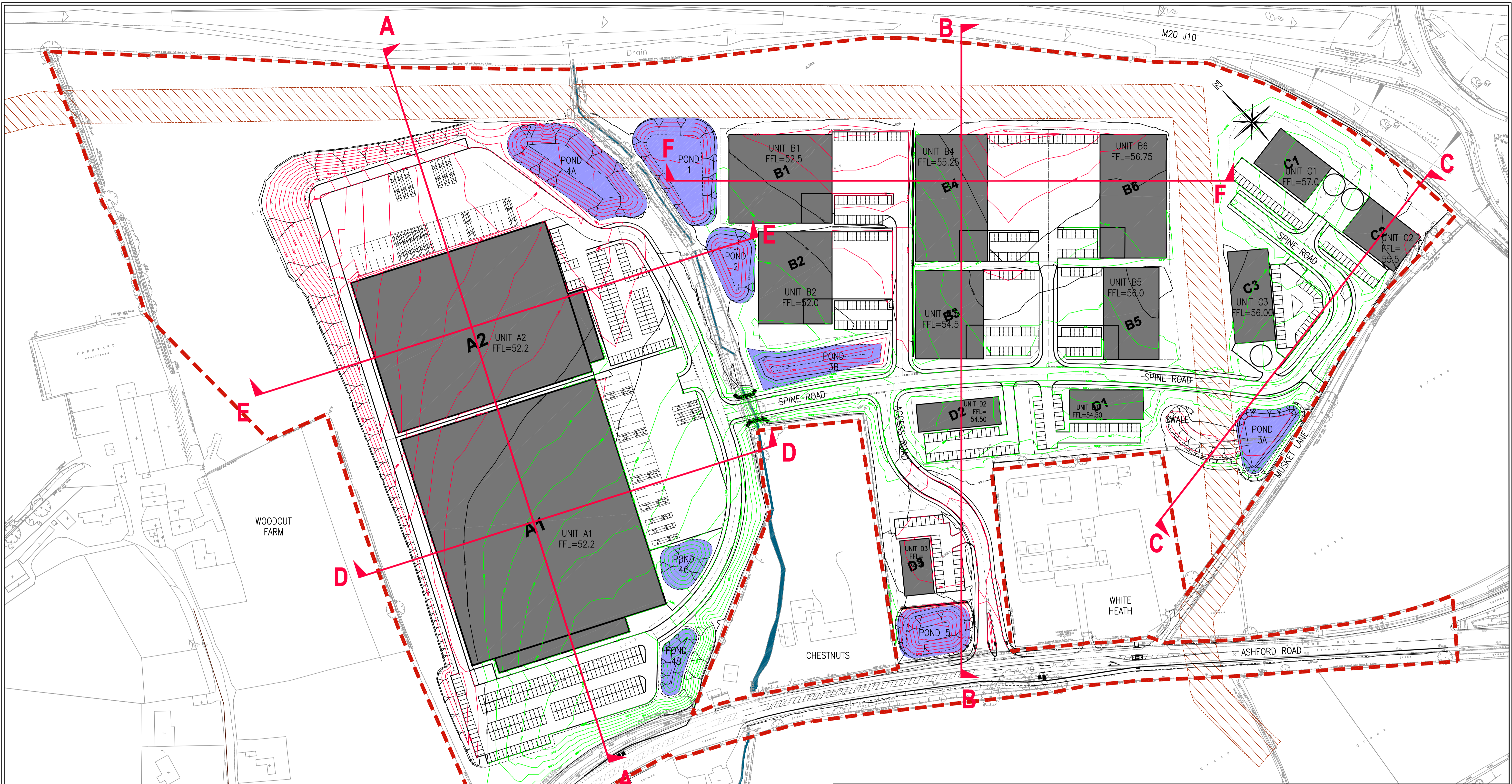


Figure 4.5
BUILDING AREAS



NOTES:

- THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH THE SECTIONS DRAWING No.13-0496/SK02.
- THE LAYOUT SHOWN IS BASED ON THE PROPOSED SITE PLAN No. 9325/FE-220, BY PRC ARCHITECTS.

EARTHWORKS VOLUMES:

THE VOLUMES CALCULATED BETWEEN PROPOSED FORMATION LEVELS AND UNDERSIDE OF TOPSOIL LEVELS ARE AS FOLLOWS: -

CUT	69,500m ³
FILL	74,100m ³

- THE ABOVE VOLUMES HAVE BEEN CALCULATED ASSUMING NO BULKING AND DO NOT INCLUDE ANY ALLOWANCE FOR ARISING FROM FOUNDATIONS AND DRAINAGE, WHICH WILL MAKE UP THE SHORTFALL.
- AN EXISTING TOPSOIL DEPTH OF 300mm HAS BEEN ASSUMED ACROSS THE SITE. (TO BE CONFIRMED), WHICH EQUATES TO APPROXIMATELY 53,800m³ IN ADDITION TO THE ABOVE VOLUMES, TOPSOIL TO BE USED IN LANDSCAPED AREAS (9,650m³ OVER VERGES/PONDS/GRASSED AREAS ASSUMING 150mm DEPTH), LANDSCAPED SCREENING BUNDS OR DISPOSED OFF SITE.
- FOR THE ASSUMED DEPTHS OF CONSTRUCTION USED TO CALCULATE THE FORMATION LEVEL SEE SECTIONS DRAWING No.13-0596-SK02.

KEY:

- 0.400 CUT ISOPACHYTE AND DEPTH
- 0.400 FILL ISOPACHYTE AND DEPTH
- 0.000 CUT/FILL BOUNDARY
- CLEARANCE TO ASSUMED POSITION OF 18" HP GAS PIPELINE
- APPLICATION SITE BOUNDARY

WOODCUT FARM, J8 M20 MAIDSTONE



PROPOSED LEVELS, VOLUMES AND SECTION LOCATION PLAN

Drawing Status:	PLANNING
CAD Reference:	See bottom left corner
Drawn:	RDT
Date:	26.03.15
Scale @A1:	1:1000

Project No:	13-0596	Drawing No:	Figure 4.7a	Rev:	-
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Unit	Land Class	Use	Warehouse (sqm)	Office (sqm)	Office/R&D (sqm)	Unit total (sqm)
D2	B1a-B1b				2016.0	2016.0
D3	B1a-B1b				1440.0	1440.0
Total			36045.9	2443.3	9262.4	47751.6

Building Heights

- 4.3. The building heights as shown on Figure 4.6, will vary between a maximum roof ridge height of 10m above floor level in the office and research and development (R&D) buildings in the northern area of the Application Site to 13.8m above floor level for the warehouses in the western area of the Application Site.

Ground Levels

- 4.4. The Application Site ground levels will be remodelled to facilitate the Proposed Development in the context of existing site levels, however this is limited to the extent necessary to achieve level finished floor levels for the proposed new buildings and the excavation for drainage attenuation across the Application Site, as shown on Figures 4.3 and 4.7a and b. The reprofiling will be undertaken as a cut and fill exercise on the Application Site, reusing spoil and material where necessary and practicable. There will be no net removal of spoil from the Application Site during construction.

Access

- 4.5. Access to the Proposed Development will be via a new junction off the A20 Ashford Road approximately 280m east of the western Application Site boundary as shown on Figure 4.2. Once within the Application Site the new access road will lead to a central spine that will serve all the buildings. There will also be an emergency access provided onto Musket Lane on the eastern boundary of the Application Site and another west of Units A1 and A2 leading to A20 Ashford Road.

Car and HGV Parking

- 4.6. The car parks for each building will be clearly identified and separated from any servicing function. There will also be provision for the mobility impaired. The car

parks will be well landscaped and provide direct access to the buildings that they serve. Car and HGV parking spaces will be provided and designed in accordance with Kent County Council's (KCC's) standards⁶.

- 4.7. There will be 110 loading bays and 20 dock-levellers for HGVs. The loading bays will be associated with Units A1, A2, B1, B2, B3, B4, B5 and B6. While the dock-levellers will be associated with Units A1 and A2.

Pedestrian and Cyclists

- 4.8. Pedestrian and cyclist access during operation will be encouraged for employees living locally and will be enabled through the provision of covered cycle storage at the access point to the buildings and safe pedestrian footpath access to all areas of the Application Site. The number of cycle spaces provided for each plot will accord with the requirements of KCC's standards outlined in SPG 4 Kent Vehicle Parking Standards which states that a minimum of one space per 200 sqm of B1 or B8 land use is required.

Public Transport

- 4.9. The Application Site will continue to be accessed via Bearsted and Hollingbourne Railway Stations and the No. 10X Stagecoach bus route.

Landscaping and Open Space

- 4.10. A landscape strategy has been designed in order to integrate the Proposed Development with the surrounding area and to ensure that it is sympathetic to the existing local landscape as shown on Figure 4.4.

Sustainable Drainage Network

- 4.11. Sustainable Drainage Systems (SuDS)⁷ will be used to reduce flood risk, improve water quality, assist groundwater recharge whilst also providing amenity and wildlife

⁶ Kent County Council (July 2006) Kent and Medway Structure Plan 2006 Mapping out the future. Supplementary Planning Guidance SPG 4 Kent Vehicle Parking Standards

⁷ Sustainable management practices designed to control the rate and quality of surface water runoff into receiving waters, for example the use of swales and wetlands as buffers, as opposed to conventional drainage practices.

benefits. The drainage system will incorporate a series of balancing ponds, rills, swales and arrow filter strips, where required.

Lighting

- 4.12. Lighting will operate in all external areas in order to provide a safe and secure environment for all users and visitors after dark. It will be designed to minimise light pollution and optimise energy use. 'Secured by Design' principles will be adopted throughout and emphasis will be placed on achieving good uniformity of light distribution. All lighting will comply with the recommended limitations for Environmental Zone E1 as set out in the Guidance Notes for the Reduction of Obtrusive Light (Guidance Note 01, Institution of Lighting Professionals, 2011)⁸.
- 4.13. Luminaires (light fittings) will be of the directional type that emit all their light below the horizontal. They will be mounted on buildings and standard height lighting columns and will be arranged to maximise the amount of light reaching trafficked hard surfacing while minimising spill light onto adjacent green areas. High mast lighting will not be used and mounting heights will never exceed the eaves height of adjacent buildings. Wherever possible lighting controls will be employed to dim or switch off any lighting that is not needed.
- 4.14. The lighting design will ensure that there will be no upwards emitted light, no glare and negligible light spill.

5.0 CONSTRUCTION PROGRAMME

- 5.1. Phase 1 of the Proposed Development (Plots A1 and A2) will be constructed simultaneously along with the supporting infrastructure, while the other smaller plots will be developed later. The construction programme for Phase 1 (Units A1 and A2) will span approximately 12-18 months and is expected to commence in 2016, subject to gaining planning permission. The construction of the rest of the Proposed Development will be occupier led and taking approximately a further two years to complete (2019)⁹.

⁸ Institution of Lighting Professionals (2011) Guidance Notes for the Reduction of Obtrusive Light (Guidance Note 01)

⁹ The Proposed Development apart from Phase 1 will be occupier led and will be built when there is the demand for it. However for the purposes of the assessment this is assumed to occur directly after the construction of Phase 1.

- 5.2. A Construction Environmental Management Plan (CEMP) will be prepared for the Proposed Development. It provides the methods of managing environmental issues for all involved with the construction activities.
- 5.3. MBC may wish to stipulate the hours of work prior to the commencement of the works. It is anticipated that these will be 07:00 – 18:00 Monday to Friday and 07:00 – 13:00 Saturday. All work outside of these hours will be subject to prior agreement, and/or reasonable notice by MBC, which may impose certain restrictions. Night time working will be restricted to exceptional circumstances.

6.0 ALTERNATIVES CONSIDERED

- 6.1. The form of the Proposed Development has been influenced by a range of factors, including location, surrounding uses, results of the EIA and input from MBC, statutory and non-statutory consultees and members of the public. A number of alternatives have been considered by the Applicant including:
- The 'do nothing' alternative where the Proposed Development is not progressed;
 - Alternative locations for the Proposed Development; and
 - Alternative design/layout of the Proposed Development in the context of the design evolution.

7.0 ECOLOGY

- 7.1. The Application Site is considered to be of local value for its broad-leaved semi-deciduous woodland, hedgerows, reptiles, breeding birds and foraging and commuting bats.
- 7.2. The Proposed Development avoids and mitigates for potential adverse effects on ecology. The effect of construction activities resulting in the loss and harm to trees and hedgerows will be minimised through implementation of the CEMP. This in turn will minimise impacts on breeding bird and foraging bat habitat resulting in minor beneficial and negligible effects respectively. Reptile capture and translocation works will also ensure animals are not killed or injured during construction activities resulting in a minor beneficial effect.

- 7.3. The landscaping scheme (Figure 4.4) and associated Biodiversity Enhancement Plan creates new habitats for wildlife and the CEMP will control construction activities and safeguard wildlife outside of the development footprint. Furthermore a light sensitive design during construction and operation will minimise light spillage onto bat foraging and commuting habitat resulting in a negligible effect.
- 7.4. It will not be possible to mitigate or compensate for the loss of arable land on skylark and yellowhammer which will result in a minor adverse effect. Both species are farmland specialists and are unlikely to use the newly created habitats on-site. In compensation, the landscaping scheme (Figure 4.4) will improve the extent and quality of the habitats for other notable birds such as song thrush, starling and house sparrow. Overall the Proposed Development is likely to have a minor beneficial effect on bird species.
- 7.5. A 10 year Ecological Mitigation and Enhancement Plan, which will be developed in consultation with stakeholders and responses to the planning application, will ensure habitats are managed sensitively for wildlife. It will also ensure the delivery of net gains for ecology, so that the extent and quality of habitats is greater after development than prior to it starting. Once mitigation, compensation and enhancement measures have been implemented, there is likely to be negligible to minor beneficial effects on habitats and species in the medium to long-term.
- 7.6. In terms of cumulative effect, it is concluded that the predicted effects of the cumulative development during both construction and operation will vary between minor adverse and minor beneficial and are therefore not significant.

8.0 LANDSCAPE AND VISUAL IMPACT

- 8.1. The Proposed Development will be located on land currently in agricultural use surrounded along some boundaries by hedgerows with trees, and divided by a watercourse flanked by scrub and trees. Typical urban fringe development occurs in the area surrounding the Application Site with land uses such as the nearby Bearsted Caravan Club, Biffa depot, car wash and used car sales forecourt. The Maidstone Motorway Service Area is located to the north of the M20 / A20 junction.

- 8.2. Despite these urban fringe developments, the area still retains some rural character, particularly to the east. To the north, these rural characteristics become heavily influenced by the impact of the M20 motorway and HS1, which is elevated above the Application Site on a substantial embankment along one section of the northern boundary. To the west, land uses become more typical of the urban edge, with private residential plots in close proximity to agricultural structures at Woodcut Farm. The Application Site is also located close to the North Downs Area of Outstanding Natural Beauty (AONB).
- 8.3. The Proposed Development will have an impact upon the surrounding landscape and on views from the local area, including the AONB during construction and operation. For people within dwellings adjacent to the Application Site, these effects are predicted to be significant while the majority of predicted effects for the remainder of the viewpoints are assessed to be between negligible and minor to moderate adverse and not to be significant.
- 8.4. The proposed planting scheme (Figure 4.4) along with careful selection of building materials will, in the long term, improve upon the existing landscape and visual baseline through the improvement of the existing landscape structure and the reduction in the visual impact of the M20/HS1 corridor, in line with the existing planning policy and published landscape character assessments. However the planting works will not entirely screen the Proposed Development to all views.
- 8.5. In terms of cumulative effect, it is concluded that the predicted significant effects of the cumulative development during both construction and operation will be substantial/moderate adverse significance and therefore significant locally but negligible and therefore not significant further away.

9.0 SOCIO – ECONOMICS

- 9.1. The Proposed Development will be well placed to build on the region's economic strengths as it will create significant employment opportunities in both office and distribution sectors and build upon existing trade by using existing transport networks.

- 9.2. During construction the Proposed Development will support construction related employment, along with providing associated expenditure on materials and support services. In addition measures such as the use of labour agreements, recruitment/training with a focus in Maidstone Borough, and local procurement of products and services will also be used to support the positive aspects and potential supply chain benefits to local businesses. Together these will provide between negligible and minor beneficial effects during construction.
- 9.3. The Proposed Development can be developed with a range of different unit sizes and respond to the requirements of a wide range of businesses. During operation this will assist in the delivery of between 1,039 and 1,364 new jobs sought by MBC to maintain a sustainable balance of homes and jobs whilst maintaining a diverse economic base. This will result in a minor to moderate beneficial effect to the local area.
- 9.4. There is potential for many of the new jobs to be taken up by people already resident within Maidstone Borough, and potentially those that might occupy the potential new residential dwellings planned around Maidstone. Overall, the additional value to the economy of the Proposed Development will amount to some £16 million each year in Maidstone Borough, with a further input of £4 million into the wider economy. Alongside this, the wider economic effect from the Proposed Development and the indirect beneficial effect on the health and well-being of those taking up the new jobs has the potential to help reduce deprivation creating a minor to moderate beneficial effect.
- 9.5. When completed and in operation, MBC and KCC will retain 50% of the business rates paid by the occupants. This is potentially between £0.4 million and £0.8 million annually (depending on the mix of different uses) to be used towards the support of services or facilities creating a minor beneficial effect.
- 9.6. In terms of cumulative effect, it is concluded that the predicted significant effects of the cumulative development during both construction and operation will be between minor and major beneficial and therefore significant.

10.0 HISTORIC ENVIRONMENT

- 10.1. The Application Site does not contain any designated heritage assets. The Application Site was subject to a geophysical survey in 2009, which did not reveal any significant archaeological features, other than evidence of buried medieval ridge and furrow cultivation remains. The Application Site possesses a high potential for such remains, of low significance, and a moderate potential for remains associated with the prehistoric and Roman periods (uncertain, potentially high significance) and post-medieval periods (low significance).
- 10.2. During construction there will potentially be adverse effects on archaeology through the removal any surviving remains resulting from: the preliminary site strip; reprofiling of the Application Site to create level areas on the slope; the excavation of nine proposed ponds; and creation of new foundations, service and drainage trenches and planting. However following the successful implementation of an agreed mitigation strategy which will involve an archaeological trenching evaluation followed by potentially a watching brief or strip map and sample, the residual construction effects on buried heritage assets will be negligible.
- 10.3. The impact of major infrastructure works associated with the M20 and HS1 in the past have eroded the setting of Woodcut Farmhouse to the extent that the significance of the asset is considered to be reduced from high to medium. The Proposed Development will not impact further on the setting to any great degree the significance will remain medium.
- 10.4. The former Mortuary building associated with the Hollingbourne Union Workhouse is divorced from any original setting and is something of a 'curiosity'. Its significance is assessed as medium largely by virtue of this quality. During construction and operation the Proposed Development will not affect unduly the asset, and therefore its significance will remain medium.
- 10.5. There will be little if any effect on the significance of heritage assets attendant upon the Proposed Development, as the 'heritage' landscape at this point has been compromised by the construction of the M20 and HS1, the road network and attendant forms. It is considered that, given the relative disposition and very limited

visual access between the Application Site and Leeds Castle, there will be no impact in historic landscape terms and therefore on the significance of the asset.

11.0 TRAFFIC AND TRANSPORTATION

- 11.1. The Application Site is located approximately 6km to the east of Maidstone and adjacent to Junction 8 of the M20. The existing Application Site is currently open fields with two existing un-gated access points off the A20 Ashford Road.
- 11.2. Vehicle access to/ from the Application Site is to be from the A20 Ashford Road. In addition there is an existing footway along the north of the A20 Ashford Road providing connection for pedestrians towards Maidstone; however, this is currently poorly maintained with vegetation obscuring the footway in places. There are also a number of Public Rights of Way in the area although none of which go through the Application Site.
- 11.3. The closest bus stops to the Application Site are located on the A20 Ashford Road less than 400m from the proposed site access and are served by the hourly 10X bus service operated by Stagecoach between Folkestone and Maidstone via Ashford. The closest railway stations to the Proposed Development are Bearsted and Hollingbourne Railway Stations.
- 11.4. During construction, it was concluded that the effects of the Proposed Development will be negligible. Similar conclusions were drawn for the operational assessments, where the overall impact will also be negligible. The exception during operation is that there will be a minor adverse significance of effect on driver delay. Therefore the effects during operation are not significant.
- 11.5. In terms of cumulative effect, it is concluded that the predicted significant effects of the cumulative development during both construction and operation will be negligible.

12.0 AIR QUALITY

- 12.1. MBC has declared an Air Quality Management Area (AQMA)¹⁰ for the entire built-up area of Maidstone. The Application Site is 1.7 km to the east of the AQMA and sits in a rural location where the background pollution concentrations at the Application Site are expected to be well below the key threshold levels for NO₂ and PM₁₀.
- 12.2. The construction of the Proposed Development will give rise to emissions that could cause some dust soiling effects on adjacent uses. However the effective implementation of the CEMP and Considerate Constructors Scheme will reduce emissions and their potential effects down to negligible which are not significant.
- 12.3. A model has been used to predict pollutant concentrations at receptors adjacent to roads during operation where the greatest changes in traffic flows from the Proposed Development are expected. It has been shown that no significant increases in Nitrogen Dioxide (NO₂) or Particulate Matter (PM₁₀) concentrations are anticipated at any of the assessed receptor locations, which include those within the Maidstone AQMA where development-generated trips have been predicted to cause low to imperceptible changes in pollution concentrations. Therefore the significance of effect on all receptors, either within or outside the Maidstone AQMA, is expected to be negligible and not significant.
- 12.4. In terms of cumulative effect, it is concluded that the predicted significant effects of the cumulative development during both construction and operation will be negligible and therefore not significant.

13.0 NOISE AND VIBRATION

- 13.1. The baseline noise environment is dominated by traffic travelling on the M20 motorway and punctuated by the passing of high speed trains using the HS1 rail link. To a lesser extent, there is noise from passing vehicles using the A20 Ashford Road and various farming activities.

¹⁰ An Air Quality Management Area (AQMA) is a defined area by virtue of Section 82(3) of the Environment Act 1995, where it appears that the air quality objectives prescribed under the UK Air Quality Strategy will not be achieved. In these areas, a Local Authority must designate Air Quality Management Areas, within which an Action Plan can be proposed to secure improvements in air quality so that prescribed air quality objectives can be achieved.

- 13.2. During construction, through the implementation of 2.4m high solid timber hoardings and provision of a solid timber access gate at the site access, construction noise effects at most receptors will be reduced to minor adverse or negligible with the exception of R3 (Chestnuts) during the site preparation and superstructure phases when the effects are predicted to be moderate adverse. Moderate adverse effects are also predicted at R4 (Bearsted Caravan Club) during site preparation. It should be noted that these impacts are temporary and only when machinery is operating closest to the Application Site boundary.
- 13.3. During operation no specific measures are required to mitigate for noise relating to the relatively small changes in traffic volumes predicted for the road network in the vicinity of the Application Site as the effects will be negligible. However as a result of the operational noise arising from the development units, the following measures are required resulting in between negligible and moderate to major beneficial effects:
- A 3m high acoustic barrier around the yard of Unit A1. This can take the form of an acoustic fence or wall structure;
 - A 2.4m acoustic fence or acoustic green wall around the east and north boundary of the site with Chestnuts; and
 - A 2.4m high acoustic fence or acoustic green wall around the west and north boundary of the site with White Heath.
- 13.4. The cumulative effects of the nearby Waterside Park development have been considered. Taking the distance between the two sites into consideration there will be no significant cumulative construction or operational noise effects are anticipated.

14.0 FLOOD RISK, HYDROLOGY, HYDROGEOLOGY AND DRAINAGE

- 14.1. The Application Site is currently used as arable land which slopes down from its border with the M20 and HS1 in the north to the A20 Ashford Road in the south. The land currently falls towards an unnamed watercourse which crosses the Application Site approximately a third of the way across the western boundary of the Application Site. The Application Site lies over a principal aquifer.

- 14.2. The Application Site is to be re-profiled, and partially covered with impermeable surfacing, thereby increasing the speed at which rainfall will reach, and the rate at which it will flow into the watercourse and onwards to the River Len. If left unchecked this will increase the risk of flooding and pollution of catchments, adjacent properties and the underlying aquifer.
- 14.3. A drainage system will be provided to control the rate at which water enters the watercourse, the resultant build-up of water being temporarily stored in balancing ponds, swales, permeable pavements systems and other storage media until it flows at a controlled rate into the watercourse minimising any potential risk of flooding. The resultant flow off the Application Site will be marginally lower but essentially equivalent to that which currently flows from the undeveloped Application Site resulting in a negligible effect during construction and a minor beneficial residual effect during operation.
- 14.4. The quality of the water that flows into the watercourse from the Application Site will be improved by the drainage system described above, which will remove any sediment and many of the pollutants that may contaminate the water as it drains from the car parks, service yards and access roads. This will result in a negligible residual effect during construction and operation.
- 14.5. The principal aquifer underlying the Application Site will be protected from any potential contamination from water draining from the Proposed Development, as all balancing ponds, swales and permeable pavements will be lined with an impermeable barrier, and no soakaways or any other infiltration drainage techniques will be allowed to be used to drain the Proposed Development into the ground. This will result in a negligible residual effect during construction and operation.
- 14.6. Local foul water sewerage will be upgraded to accommodate the extra foul water flows generated by the Proposed Development. This will result in a negligible residual effect during construction and operation.

- 14.7. The cumulative effects of the nearby Waterside Park development have been considered. Taking the distance between the two sites into consideration there will be no significant cumulative construction or operational noise effects are anticipated.

15.0 LIGHTING AND NIGHT TIME

- 15.1. The Application Site is situated within an essentially rural environment with some significant lighting both adjacent and nearby. Highly visible parts of the road network especially around the M20 and A20 Ashford Road are lit, and there is lighting associated with nearby properties, some of it very intrusive. These sources also give rise to significant areas of light spill onto the Application Site itself. Sky glow can be seen in many directions from various viewpoints, most notably above Maidstone in westerly views.
- 15.2. The lighting effects of the Proposed Development during construction without mitigation in place will be minor adverse or negligible for the majority of receptors, although a few nearby residential properties with partial or full views of the Application Site will experience major or moderate adverse lighting effects. However all construction effects will be mitigated through the implementation of the CEMP and will be reduced mostly to negligible significance.
- 15.3. During detailed design a fully detailed Lighting Strategy will be provided, giving specific details of the position and type of lighting units to be used for the built (operational) lighting. As a result of implementing the Lighting Strategy the significance of the permanent effects of the Proposed Development during operation will be moderate adverse (significant) for the majority of residential properties within 100m of the Application Site and negligible (not significant) elsewhere, with two exceptions. Chestnuts will have a major adverse significance of effect which is considered significant, while White Heath will only have a minor adverse significance of effect which is considered not significant.

16.0 SUMMARY AND CONCLUSIONS

- 16.1. In summary the Proposed Development will result in the following beneficial effects:

- The recording of previously unknown cultural heritage remains found during construction of the Proposed Development;
- The creation of construction jobs for people with skills that are readily available in the local labour market;
- Introduction of indirect economic vitality to the local area through local procurement of supplies and services during construction;
- The creation of approximately 1,039 and 1,364 jobs for people with skills that are readily available in the local market during operation;
- The planting of trees, shrubs and other new habitats providing benefits to wildlife; and
- The enhancement of the footways along the A20 Ashford Road;
- Local reduction in noise generated by traffic using the M20 to the south of the Proposed Development; and
- Improved drainage of the Application Site and reduction in the risk of flooding of properties downstream.

16.2. The ES has also identified a number of adverse effects which will mainly occur during construction which include the following:

- Loss of breeding bird habitat;
- Changes to a limited number of local views associated with construction activities from residential properties, roads and public rights of way;
- Local changes to landscape features, character and the Kent Downs AONB as a result of the construction activities;
- Temporary disruption to users of the surrounding road network;
- Potential for mobilisation of contaminants resulting in the deterioration of surface and groundwater quality;
- Potential for dust emissions resulting from the construction activities; and
- Potential for noise and vibration disturbance to nearby residents.

16.3. However, the implementation of the mitigation measures outlined within the CEMP during construction such as the use of site hoarding, dust and noise suppression measures and temporary drainage will result in many adverse effects being minimised or avoided.

16.4. There will also be adverse residual effects during operation resulting from the following.

- Changes to a limited number of views from residential properties, roads and public rights of way including those within Kent Downs AONB; and
- Increased lighting and noise to Chestnuts and White Heath which are adjacent to the Proposed Development.