

**Maidstone Borough Council**

# **Maidstone Local Plan Review**

## **Sustainability Appraisal - Topic Paper Options**

**Final report**

Prepared by LUC

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**Maidstone Borough Council**

**Maidstone Local Plan Review**  
**Sustainability Appraisal - Topic Paper Options**

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# Chapter 1

## Introduction

**1.1** Maidstone Borough Council (the Council) commissioned LUC in November 2018 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of their Local Plan Review. SA is an assessment process designed to consider and communicate the significant sustainability issues and effects of emerging plans and policies, including their alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.

### Identifying the options to be subject to SA

**1.2** The SA began with the appraisal of a number of draft Approaches described in a series of 'topic papers' prepared by the Council to inform emerging policy options for the Local Plan Review. The 'topic papers' are as follows:

- Housing Strategy Topic Paper
- Economic Strategy Topic Paper
- Transport Infrastructure Topic Paper
- Social Infrastructure Topic Paper
- Retail and Leisure Strategy Topic Paper
- Environment Topic Paper

**1.3** Four Spatial Approaches were identified within the Council's topic papers. These are high-level, alternative distributions of the housing and economic development needed during the Plan period. The four Spatial Approaches and the results of the appraisal of these are set out in **Chapter 2**.

**1.4** The Council's topic papers also outline a number of additional options that are not reflected in the four Spatial Approaches. These relate to potential policy direction in relation to the environment, types of housing, and social infrastructure. These options and their appraisals are set out in **Chapter 3**.

### Approach to the SA of options

**1.5** The options were appraised against a set of sustainability objectives that constitute the 'SA Framework'. These were finalised following consultation on the SA Scoping Report and are shown in **Table 1.1**.

Table 1.1: SA framework

SA Objective
SA 1 Housing: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home.
SA 2 Services & Facilities: To ensure ready access to essential services and facilities for all residents.
SA 3 Community: To strengthen community cohesion.
SA 4 Health: To improve the population's health and wellbeing and reduce health inequalities.
SA 5 Economy: To facilitate a sustainable and growing economy.
SA 6 Town Centre: To support vibrant and viable Maidstone town centre.
SA 7 Sustainable Travel: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion
SA 8 Minerals: To conserve the Borough's mineral resources.
SA 9 Soils: To conserve the Borough's soils and make efficient and effective use of land.
SA 10 Water: To maintain and improve the quality of the Borough's waters and achieve sustainable water resources management.
SA 11 Air Quality: To reduce air pollution ensuring lasting improvements in air quality.
SA 12 Flooding: To avoid and mitigate flood risk.
SA 13 Climate Change: To minimise the Borough's contribution to climate change.
SA 14 Biodiversity: To conserve, connect and enhance the Borough's wildlife, habitats and species.
SA 15 Historic Environment: To conserve and/or enhance the Borough's historic environment.
SA 16 Landscape: To conserve and enhance the character and distinctiveness of the Borough's settlements and landscape.

**Approach to the SA of Spatial Approaches**

1.6 The Spatial Approaches comprise four alternative, high-level approaches to distributing the housing and economic development needed to meet future growth. Specific development site options will be considered at a later stage in the plan-making and SA processes. Reflecting this level of detail and the stage of plan-making, this stage of the SA has been prepared in the form of a comparative commentary that explores the sustainability pros and cons of the Spatial

Approaches in relation to the achievement of each SA objective. This appraisal is set out in **Chapter 2**.

1.7 The findings of the SA have been summarised using the colour coded symbols in **Table 1.2**, representing the likely direction (positive or negative) and significance (significant, minor, or negligible) of the effects of each option against each of the SA objectives.

Table 1.2: Key to SA scores

++	Significant positive effect likely
++/-	Significant positive and minor negative effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--/+	Significant negative and minor positive effect likely
--	Significant negative effect likely
?	Likely effect uncertain
+/-	Mixed effect likely

1.8 The dividing line between sustainability scores is often quite small. Where significant effects are distinguished from more minor effects this is because, using the appraisal questions and criteria and applying professional judgement, the effect of the option on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.

1.9 At this stage, the SA appraises each Spatial Approach on its own merits, considering its likely effect compared to the likely future baseline in the absence of the Local Plan Review. Once a full draft of the Local Plan Review is produced, an appraisal will also be made of the total effect of all plan proposals against each SA objective, as well as how these may combine with other significant plans, policies and strategies. This will allow cumulative and synergistic effects to be identified, including mitigation of the potentially significant effects of proposed development by other policies in the Local Plan Review, by national planning policy, or by other regulatory regimes.

**Approach to the SA of additional options**

1.10 The additional options outlined in the topic papers comprise broad approaches to Local Plan Review policies relating to protection of the environment; provision of

affordable housing; housing type and mix; and provision of social infrastructure.

**1.11** These additional options are described at a very high level in the topic papers. Consistent with this, the SA at this stage has been prepared in the form of a commentary that explores the sustainability pros and cons of each option. This appraisal is set out in **Chapter 3**. Once policies are worked up in more detail at a later stage in the plan-making process, the likely significance of their effects will be appraised and significance scores of the type indicated by **Table 1.2** will be assigned.

## Chapter 2

# SA of Spatial Approaches

**2.1** The SA began with the appraisal of a number of theoretical, high-level Spatial Approaches identified in the Council's Local Plan 'topic papers' as follows:

- RA1: Continue with the spatial approach in the adopted Local Plan 2017
- RA2: Develop one or more Garden Settlements
- RA3: Maidstone town centre focus
- RA4: Eastern orbital road corridor focus

**2.2 Table 2.1** describes the approaches more fully, drawing on information contained within the Council's Local Plan Review topic papers.

Table 2.1: Attributes of Spatial Approaches

RA1: Continue with Local Plan 2017	RA2: Develop 1 or more Garden Settlements	RA3: Maidstone town centre focus	RA4: Eastern orbital road corridor focus
Housing Strategy Topic Paper			
<p>This means sites will be allocated in and around Maidstone urban area, and in and around Rural Service Centres and Larger Villages.</p>	<p>Develop Garden Settlements at one or more of the new growth locations brought forward in the Call for Sites. At the current time there are 4 potentially suitable Garden Settlement locations.</p>	<p>In line with the more ambitious employment and town centre reasonable alternatives, the town centre could become an expanded residential location. The value driven from the town centre residential could help to drive office and town centre uses locally.</p>	<p>Not described in this topic paper but Council considers it likely that development similar to RA2 would be required to part-fund this approach.</p>
Economic Strategy Topic Paper			
<p>Extensions to existing successful rural business sites.</p> <p>New business sites at the strategic motorway junctions.</p> <p>Maidstone town centre new (B1a) office development as part of mixed use residential, retail, and office developments.</p> <p>Further allocations at the Kent Medical Campus, a specialist hub for medical related development at Junction 7 of the M20, on the edge of Maidstone.</p>	<p>A percentage of any Garden Settlement would be dedicated to employment development, providing employment opportunities in conjunction with housing development.</p> <p>In purely quantitative terms, any single Garden Settlement, in addition to current LP17 allocations will provide surplus employment floorspace vs. objectively assessed need, bringing additional qualitative choice to the market.</p> <p>The location of any chosen Garden Settlement will have implications for the type of B-use considered most appropriate. For example, a settlement close to the strategic road network would be preferable for B2/ B8 uses requiring larger vehicular access. Garden Settlements with rail access may aim to deliver B1/B2 uses.</p> <p>Depending upon the amount of additional floorspace proposed to be allocated over and above the objectively assessed requirement, there would be scope to alter or deallocate some current LP17 allocations.</p> <p>A combination of any 2 or more Garden Settlements would theoretically mean no other employment allocations other than town centre mixed-use sites would be required. However, Garden Settlements would not be expected to come forwards for development immediately after Local Plan Review adoption. Therefore, a range of other allocations are likely to be needed outside of the Garden Settlement, to ensure choice is available in the</p>	<p>A targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace in Maidstone Town Centre as a prime location.</p> <p>As well as providing additional floorspace in the traditional sense, also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses.</p> <p>Locating such office space close to rail links to/from London (Maidstone East/Maidstone West) further encourages businesses to locate in the town centre.</p> <p>This approach would require the Council to revisit assumptions on mixed-use development in the town centre - increasing the percentage of office provision on each site. This may come at the expense of other uses, such as residential or retail provision. It may also require more intensive/higher density town centre office developments than previously permitted.</p> <p>The Local Plan Review should also acknowledge and be flexible enough to accommodate the employment opportunities provided for by the leisure and cultural sectors, particularly in the town centre.</p> <p>Any new B2/B8 allocations would likely accord with the current Local Plan 2017 strategy and be located at the strategic motorway junctions or adjoining existing employment sites in</p>	<p>Focus employment floorspace allocations (mixed B-uses) at Junction 8 of the M20.</p> <p>This would complement the existing Local Plan 2017 allocation at Woodcut Farm EMP1(4) to create a strategic employment location, enabling co-location and clustering of employment sectors/uses.</p> <p>This could be in addition the existing Local Plan 2017 allocations in more peripheral locations/existing industrial estate expansions, or it could be in replacement of some of the smaller allocations.</p> <p>While town centre sites would continue to provide office floorspace too, the amount would be reduced in favour of business park office development at M20 J8.</p>



RA1: Continue with Local Plan 2017	RA2: Develop 1 or more Garden Settlements	RA3: Maidstone town centre focus	RA4: Eastern orbital road corridor focus
	short to medium term for employment development.	more peripheral locations across the Borough.	
Transport Infrastructure Topic Paper			
<p>This approach would involve maintaining the existing approach to the Local Plan Transport Strategy, as set out for the 2017 Local Plan, as outlined below.</p> <p>Delivery of modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements – bus priority measures along radial routes including prioritisation at junctions; prioritisation of sustainable transport modes along radial routes; enhanced waiting and access facilities and information systems for passengers, including people with disabilities.</p> <p>Improve capacity at key locations and junctions.</p> <p>Manage parking in town centre and wider Borough.</p> <p>Protect and enhance PROW.</p> <p>Increased bus service frequency along radial routes into town centre and railway stations.</p> <p>New bus station.</p> <p>Improve bus links to Rural Service Centres and Larger Villages.</p> <p>Improve strategic links to Maidstone across county and to London.</p> <p>Inclusive for all.</p> <p>Address air quality impact of transport.</p> <p>Infrastructure Delivery Plan.</p>	<p>Minimising transport impact on the existing network by creating high quality large developments with high levels of sustainability and trip internalisation.</p> <p>Requires minimal mitigation on the existing network, due to minimised impacts.</p> <p>Facilitates Garden Settlement locations and provides improved sustainable transport options for surrounding areas.</p>	<p>All the same measures as in RA1.</p> <p>In addition, including major new public transport infrastructure investment as part of town centre renaissance.</p> <p>Make significantly more efficient use of the existing network. This would include new Park &amp; Ride and public transport interchange(s) with appropriate prioritisation measures.</p>	<p>All the same measures as in RA1.</p> <p>In addition, adding in a significant new section of highway infrastructure, such as a Leeds &amp; Langley Relief Road.</p> <p>Taking this approach a step further, a higher intervention might be the provision of a complete southern link road.</p>
Social Infrastructure Topic Paper			
<p>This approach would continue the allocation of services to existing settlements, in line with the current settlement hierarchy.</p>	<p>Garden Settlements present opportunities for new patterns of infrastructure provision. They should capture an exceptional level of value uplift with which to provide a greater infrastructure contribution than a comparable site in or at the edge of an existing settlement.</p>	<p>Not described in this topic paper.</p>	<p>Not described in this topic paper.</p>

RA1: Continue with Local Plan 2017	RA2: Develop 1 or more Garden Settlements	RA3: Maidstone town centre focus	RA4: Eastern orbital road corridor focus
Retail and Leisure Strategy			
<p>This approach maintains the current hierarchy of centres and continues to roll forward the existing Local Plan 2017 allocations. These, plus the extant permissions and increased occupation of currently vacant stock would provide in excess of the floorspace required to 2037. It assumes the allocations are viable to come forwards over the plan period. Any new allocations, if needed for choice in the market, would use the 'town centre first' approach – in Maidstone town centre, then edge, then out of centre subject to sequential impact assessment.</p> <p>Broadly retain existing Primary Shopping Area and frontage designations of Maidstone Town Centre.</p>	<p>This approach would see the allocation of new retail floorspace appropriate to the size (expected population) of any Garden Settlement. This would likely also require alterations to centre hierarchy to include GS centre(s); but would retain Maidstone Town Centre as the top of the Borough's centre hierarchy.</p> <p>Depending on the scale of the new Garden Settlement(s), some town centre need from Maidstone will be absorbed in the new settlement(s). This will vary based on the scale of the new settlements. At present the largest proposal is for a 5,000 unit settlement at Heathlands. This is unlikely to change the retail hierarchy beyond adding a new RSC-level centre.</p> <p>Depending on how much new retail floorspace would be allocated to any new Garden Settlement, there would be potential scope to roll forward, amend or de-allocate some of the current LP17 allocations. Re-occupation of vacant town centre retail floorspace would go some way to meeting the floorspace requirements.</p> <p>Broadly retain existing Primary Shopping Area and frontage designations of Maidstone Town Centre.</p>	<p>This approach sees the transformation of Maidstone Town Centre, significantly bolstering its retail and leisure offer by allocating over and above the A-uses floorspace required; accompanied by an ambitious strategy to diversify the town centre uses, enhancing the leisure and cultural offer. This could represent a genuine opportunity to reinvigorate and reinstate the role of Maidstone Town Centre as the County Town.</p> <p>Town centre sites located west of the riverside could be allocated for mixed use residential and town centre uses, primarily focused on food and beverage uses, promoting a vibrant riverside café culture.</p> <p>Maximising the retail/A-use floorspace across all town centre sites would likely come at the expense of other uses, such as residential or office space. This in turn may have implications on site viability.</p> <p>This approach would seek to maintain the Borough's sub-regional retail hierarchy, with an aspiration to raise the market offering to "upper middle" and would significantly diversify the town's cultural offering. The town centre would be a leisure destination beyond traditional retailing.</p>	<p>This approach would see the allocation of A-use floorspace to a new out-of-town centre location, creating a new leisure destination. Given that approximately 56% of the floorspace requirement to 2037 is for A3/A4/A5 food and beverage uses, there is scope to accommodate this as part of a leisure complex which could also offer flexible opportunities for entertainment/leisure D-class uses.</p> <p>Potential locations might include further development/ diversification at J7 of the M20, or at M20 J8, or using land as part of the potential M20 J8 Garden Settlement to provide a leisure complex anchor.</p> <p>Review current Local Plan 2017 allocations and either roll forwards, amend, or de-allocate as necessary.</p> <p>Broadly retain existing Primary Shopping Area and frontage designations of Maidstone Town Centre.</p>

Table 2.2: Summary of SA Scores

	SA Objectives															
	SA 1 Housing	SA 2 Services & Facilities	SA 3 Community	SA 4 Health	SA 5 Economy	SA 6 Town Centre	SA 7 Sustainable Travel	SA 8 Minerals	SA 9 Soils	SA 10 Water	SA 11 Air Quality	SA 12 Flooding	SA 13 Climate Change	SA 14 Biodiversity	SA 15 Historic Environment	SA 16 Landscape
RA1: Continue with the spatial approach in the adopted Local Plan 2017	++/-	++/-	++/-	+	++	++/-	++/--	--?	--?	--?	--/+	--?	--?	--?	?	--?
RA2: Develop one of more Garden Settlements	++/--	++/--	++/--	++/-?	+/-	+/-	++/--	--?	--?	--/+	++/--	--/+?	++/--?	--/+?	?	--?
RA3: Maidstone town centre focus	++/-	++/-	+/-	++	++/-	++	++/-	-?	++/-	--?	++/-	--?	--/+?	+/-?	?	-?
RA4: Eastern orbital road corridor focus	--/+	--/+	--/+	+/-	++/--	+/-	--/+	--?	--	--?	--/+	-	--?	--?	?	--

## Results of SA of Spatial Approaches

**2.3** The results of the SA of the Spatial Approaches are described below by SA objective and summarised in **Table 2.2**.

### SA Objective 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home

**2.4** Between 2017 and 2018, house prices in Maidstone have continued to increase. There has been an increase of 5.1%, which is greater than the Kent average. There has also been a decrease in the number of house sales in the Borough of 14%, which is also reflected in the Kent average. The house price to earnings ratio has increased from 10.30 in 2017 to 11.20 in 2018<sup>1</sup>. The SHMA (December 2019) calculated that the standard method would result in a need for 1,214 dwellings per annum from 2022. Over the Plan period, the population of the Borough is expected to grow by 28% with the strongest growth expected in those aged over 65. Overall, the total affordable housing need for the Borough equates to 38% of the total housing need and there is a need for different types of homes in both the market and affordable sectors. According to the SHMA, 52% of residents living in the rural areas of the Borough and 47.8% of residents within the urban areas of Maidstone are unable to afford market housing (without subsidy).

**2.5** New development would be more widely distributed under Spatial Approach RA1 (Local Plan 2017 continued) than under the other Spatial Approaches as it is expected to be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, significant positive effects are expected as there is the potential for more people across the Borough to have the opportunity to live in a decent and affordable home compared to the other Spatial Approaches. However, if these developments are of a smaller scale, they may not be as well placed to deliver affordable housing as part of the development mix, resulting in a minor negative effect.

**2.6** Spatial Approach RA2 (One or more Garden Settlements) is expected to provide sufficient housing through the development of one or more Garden Settlements and it is likely that these settlements will be within the rural areas of the Borough. Therefore, one or more Garden Settlements could provide affordable housing within these rural areas. However, this would be through the creation of relatively large settlements compared to smaller rural villages, and this Spatial Approach would deliver less housing at Maidstone and

in other settlements in the Borough. In addition, the creation of a Garden Settlement will require significant investment in new infrastructure, which may reduce the funds available to cross-subsidise the delivery of affordable homes from the sale of market housing and may divert investment from other parts of the Borough. Garden settlements can also take a long time to deliver, which means that homes, including affordable homes, would not be provided for in the early years of the plan period. As a result, mixed significant positive and significant negative effects are considered likely for this Spatial Approach.

**2.7** Since Spatial Approach RA3 (Maidstone town centre focus) is focused primarily on the town centre of Maidstone, the rest of the Borough would not benefit from significant amounts of additional housing thereby creating minor negative effects for these communities, and continuing to exacerbate the current higher rural housing price pattern. Given that Maidstone is the primary focus in the Borough of existing infrastructure, services and facilities, there may be less need to cross-subsidise further investment, allowing for greater funding for affordable housing provision resulting in significant positive effects. However, the standard of infrastructure and service provision in Maidstone town centre is currently relatively poor, therefore a decision may need to be made about the extent to which market housing delivery is used to support improvement of this offer rather than delivering affordable housing. Conversely, brownfield sites can be relatively costly to develop compared to greenfield sites, if demolition of existing structure and hard standing is required, and even more so if remediation of contaminated land is needed.

**2.8** Spatial Approach RA4 (Eastern orbital road focus) would provide new housing primarily along the eastern orbital road corridor thereby only positively affecting one part of the Borough's housing market. It would still be capable of providing homes to contribute to the housing need, but it would also require significant investment in road infrastructure and other supporting infrastructure, since much of the development would be some distance from the main concentrations of services and facilities, meaning there may be less funding available to provide affordable housing. This option would also do little to meet the needs of more rural communities, nor the town centre. If housing were to be delivered as part of comprehensive, masterplanned urban extensions, this would result in more positive effects than piecemeal peripheral delivery of homes along the road corridor. Taking all these factors into account, a minor positive, mixed with a significant negative effect is expected.

**2.9** There is no reason why all Spatial Approaches could not deliver decent, well-designed, sustainably constructed homes,

<sup>1</sup> Maidstone Borough Council (2018-2019) Authority Monitoring Report [online] available at:

[http://www.maidstone.gov.uk/data/assets/pdf\\_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf](http://www.maidstone.gov.uk/data/assets/pdf_file/0003/321798/Authority-Monitoring-Report-2018-19.pdf)

if other policies in the Local Plan require such homes to be delivered, backed up by the Building Regulations. Comprehensive, masterplanned developments, such as Spatial Approach RA2 (One or more Garden Settlements) offers the additional opportunity to introduce a design code for developers to follow.

### Mitigation

**2.10** The quality of homes provided under any of the Spatial Approaches could be ensured through suitable policies in the Local Plan Review relating to, for example, room sizes, sustainable design and construction, lifetime homes standards, energy efficiency, etc. In addition, for larger developments, it may be possible to introduce design codes for developers to adhere to, ensuring not only the resource efficiency of homes, but also space and access requirements, lighting, and their style and character to complement the local vernacular.

**2.11** The provision of affordable housing can be achieved through various mechanisms, such as S106 agreements. Larger developments are generally more likely to be able to deliver affordable homes on site.

### Conclusion

**2.12** Spatial Approach RA1 (Local Plan 2017 continued) and Spatial Approach RA3 (Maidstone town centre focus) perform most strongly against this SA objective, primarily because they would be delivering development where services and facilities already exist, thereby ensuring that there is the greatest potential for delivering affordable homes alongside market housing. RA1 (Local Plan 2017 continued) would be expected to perform slightly better than RA3 (Maidstone town centre focus) because it would allow the additional affordable housing to be delivered where the greatest need for it exists – the rural area. However, Spatial Approach RA2 (One or more Garden Settlements) offers considerable potential in the longer term assuming that investment in new infrastructure, services and facilities would allow enough headroom to also cross-subsidise the provision of affordable homes. Spatial Approach RA4 performs least well of the four Spatial Approaches, as it is not clearly linked to existing settlements where homes are required, although this too would perform better if it resulted in comprehensive masterplanned urban extensions to Maidstone town itself in a similar vein to Garden Settlements.

### SA Objective 2: To ensure ready access to essential services and facilities for all residents

**2.13** The Borough of Maidstone covers 40,000 hectares and approximately 70% of its population lives in the urban area<sup>2</sup>. As the County town and the dominant settlement in the Borough, Maidstone itself has a much wider range and number of services and facilities than elsewhere in the Borough. For example, outside of Maidstone, only Lenham has a secondary school.

**2.14** The five rural service centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst all provide a good range of services which serve both the village and the surrounding hinterland. All provide a nursery and primary school; a range of shops (including a post office); a doctor's surgery; at least one place of worship, public house, restaurant and community hall as well as open space provision<sup>3</sup>.

**2.15** The five larger villages of Boughton Monchelsea, Coxheath, Eyhorne Street (Hollingbourne), Sutton Valence and Yalding have fewer services than rural service centres but can still provide for the day-to-day needs of local communities and the wider hinterland. All villages provide a nursery and primary school; a shop (including a post office); at least one place of worship, public house and community hall as well as open space<sup>4</sup>.

**2.16** In 2017, Maidstone Borough saw the biggest net inward migration of pre-school age children of all the districts in Kent, with the equivalent of a new primary school required to serve these children. Currently, there is capacity for non-selective and selective sixth form capacity in the short and medium term, however there will be a deficit throughout the Plan period in the Borough and across the County. In addition, forecasts indicate that Reception and total primary school rolls will continue to rise across the Plan period and will result in an overall deficit of places from 2022-23. Future pressure is also anticipated within the town centre of Maidstone<sup>5</sup>.

**2.17** New development would be more widely distributed under Spatial Approach RA1 (Local Plan 2017 continued) as it would be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, a significant proportion of new development would be focused on Maidstone town, where there is good access to existing higher order services. Development at the Rural Service Centres and Larger Villages would also help to support the viability of services in these settlements, although residents living in these settlements would not have the range of

<sup>2</sup> Maidstone Borough Council, Contaminated Land Strategy 2016-2021 [online] Available at: [https://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0009/164673/MBC-Contaminated-Land-Strategy-2016-Final.pdf)

<sup>3</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

<sup>4</sup> Maidstone Borough Local Plan. Adopted 25 October 2017

<sup>5</sup> Kent County Council (2019) Commissioning Plan for Education Provision in Kent 2019-2023 [online] available at: [https://democracy.kent.gov.uk/documents/s88604/KCP%202019%20-%202023%20\\_Cabinet%20Committee%20-%20FINAL%20PW.pdf](https://democracy.kent.gov.uk/documents/s88604/KCP%202019%20-%202023%20_Cabinet%20Committee%20-%20FINAL%20PW.pdf)

services and facilities provided by the town of Maidstone. This scenario is therefore expected to have mixed significant positive effects and minor negative effects on this SA objective. This scenario aims to deliver a modal shift through enhanced public transport and continued park and rise services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW), all of which will improve the accessibility of more residents to key services and facilities through the expansion of different modes of transport.

**2.18** Spatial Approach RA2 (One or more Garden Settlements) is expected to provide additional social infrastructure alongside housing within the Garden Settlement/s as it presents opportunities for new patterns of infrastructure provision. This scenario would likely provide a greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. In addition, it aims to minimise the transport impact on the existing network by creating high quality large developments with high levels of sustainable travel and trip internalisation. Garden Settlements provide the opportunity to create more self-sustaining communities thereby ensuring access to essential services and facilities to all residents of the Garden Settlement, although evidence elsewhere suggests that this can be difficult to achieve<sup>6</sup>. If successful, this would have positive implications for residents of the Garden Settlements, and any communities in surrounding areas that are in need of these services and facilities. However, the additional social infrastructure that will be provided by Garden Settlements may not provide easy access for existing residents of the Borough as the four potentially suitable locations for Garden Settlements and these locations may not be in areas that are in need of additional social infrastructure. In addition, Garden Settlements can take a long time to deliver, which means that additional social infrastructure may not be provided in the early years of the plan period but only once the Garden Settlement reaches a size large enough to support them. Furthermore, concentrating investment in services and facilities at one or more Garden Settlements may mean that existing services and facilities, particularly in the rural service centres and larger villages, may attract less investment and support from new development. Therefore, mixed significant positive and significant negative effects with uncertainty are expected for this Spatial Approach.

**2.19** Spatial Approach RA3 (Maidstone town centre focus) would have a similar effect to Spatial Approach RA1 (Local Plan 2017) as it would have the same measures put in place regarding transport infrastructure, although there is no mention of social infrastructure. Development under this scenario would also include major new public transport

infrastructure investment as part of the plan to revitalise the town centre. This would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. However, as this is a Maidstone town centre focused scenario the rest of the Borough, particularly the rural communities, would not benefit from additional social and transport infrastructure to improve access to, and support for, key services and facilities therefore minor negative effects are also expected.

**2.20** Spatial Approach RA4 (Eastern orbital road focus) would provide the same measures as Spatial Approach RA1 (Local Plan 2017) with regard to transport infrastructure, however it would also provide a significant new section of highway infrastructure, such as a Leeds Langley Relief Road. There is no specific mention of social infrastructure for this scenario. Therefore, access to services and facilities could be improved along the road corridor, however this is a small portion of the Borough and would not improve access to services and facilities for the majority of residents, except potentially for those living in the eastern outskirts of Maidstone and nearby settlements. In addition, by allocating development along a road corridor it is likely in the short term that only residents with cars will be able to access these facilities. This option would also do little to meet the needs of more rural communities or the town centre. If development of social infrastructure were to be delivered as part of comprehensive, masterplanned urban extensions, this would result in more positive effects than piecemeal peripheral delivery of necessary infrastructure along the road corridor. Therefore, significant negative effects and minor positive effects are expected.

### Mitigation

**2.21** Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that new development can develop a sense of community and that existing services and facilities elsewhere do not feel additional pressure in the short term.

**2.22** In selecting a preferred Spatial Approach, it will be important not only to ensure that new development is well provided with services and facilities, but that existing services and facilities, particularly in the rural service centres and larger villages, receive investment and support to maintain their viability.

<sup>6</sup> Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, and ATLAS

(April 2016) North Hertfordshire New Settlement Study Final Report



## Conclusion

**2.23** Spatial Approach RA1 (Local Plan 2017 continued) and Spatial Approach RA3 (Maidstone town centre focus) perform most strongly against this SA objective, primarily because they would be delivering development where services and facilities already exist, thereby ensuring that there is the greatest potential for easy access to, and support for, key services and facilities. However, Spatial Approach RA2 (One or more Garden Settlements) offers considerable potential in the longer-term assuming investment in new infrastructure, services and facilities would be provided. Spatial Approach RA4 (Eastern orbital road focus) performs least well of the four Spatial Approaches, as it is not clearly linked to existing settlements where access to services and facilities exist or are needed, although this too would perform better if it formed comprehensive masterplanned urban extensions to Maidstone town itself in a similar vein to Garden Settlements.

### SA Objective 3: To strengthen community cohesion

**2.24** Community cohesion is influenced by the range of jobs, services and facilities available to residents, the integration of different sectors of the community, and between new and existing communities. It has many links with other SA objectives.

**2.25** Spatial Approach RA1 (Local Plan 2017 continued) is expected to strengthen community cohesion across communities in the Borough through support for and potentially increased provision of social infrastructure, green space and increased social interaction. However, as this scenario aims to provide development within the rural areas of the Borough as well as the urban areas there may be opposition to additional development within the smaller villages if this changes the character of the villages and places pressure on services and facilities and traffic. Therefore, mixed significant positive and minor negative effects are expected for this scenario.

**2.26** Spatial Approach RA2 (One or more Garden Settlements) is expected to develop new community cohesion through increased provision of social infrastructure and green space within the Garden Settlements themselves. Garden Settlements can be designed from the outset to achieve community cohesion although in practice a true sense of community cohesion can take a long time to achieve, especially when such developments are only partly completed. As this scenario has the potential to provide up to three large developments within rural areas of the Borough there may be opposition to additional development within the smaller villages, particularly those in closest proximity. It may also lead to a diversion of investment in communities elsewhere in the Borough, particularly in rural villages, although some residents may welcome less in the way of development and

change. Therefore, mixed significant positive and significant negative effects are expected for this scenario.

**2.27** Spatial Approach RA3 (Maidstone town centre focus) is expected to strengthen community cohesion through increased provision of social infrastructure, green space and increased social interaction. However, there is no mention of social infrastructure being provided by this scenario within the topic papers. Also, this scenario would provide development within the urban area of Maidstone, which is the densest area of the Borough, therefore opposition may be voiced against the intensified densification of the urban area. It may also lead to less investment in, and support for, more rural communities. On the other hand, it may result in less development in rural communities that do not wish to see the character of their villages change too dramatically. Therefore, mixed effects are expected.

**2.28** Spatial Approach RA4 (Eastern orbital road focus) has the potential to develop a form of community cohesion through increased provision of social infrastructure, green space and increased social interaction. However, depending on how this development is planned, piecemeal or masterplanned, it could have negative effects on existing residents and potential residents by making it hard to access social infrastructure. Development of a community premised on the construction of a relief road may be hard to achieve and could affect the community cohesion of those existing communities in close proximity. On the other hand, the relief of traffic from existing roads could improve community cohesion for those communities currently affected by traffic congestion. There is no mention of social infrastructure being provided by this scenario within the topic papers. Therefore, mixed significant negative minor positive effects are expected.

### Mitigation

**2.29** Ensuring social, health, green and transport infrastructure is delivered at the same time as housing would ensure that existing services and facilities do not feel additional pressure in the short term.

**2.30** Also, large new communities should be planned and design-in community cohesion principles from the outset. In addition, ensuring that existing communities also receive sufficient development, investment and support for their services and facilities is vital, rather than focus all the attention on the new communities.

### Conclusion

**2.31** Each of the Spatial Approaches are expected to strengthen community cohesion through increased provision of social infrastructure and green space. However, each of the scenarios are expected to have mixed effects on this SA objective as it is likely there will be opposition to additional

development within rural settlements and the further densification of the urban area.

**2.32** The effect on community cohesion will differ, depending upon whether the focus is on the new or the existing community. Overall, Spatial Approach RA1 (Local Plan 2017 continued), performs best because it is most likely to meet the needs of the greatest number of communities.

#### SA Objective 4: To improve the population's health and wellbeing and reduce health inequalities

**2.33** Maidstone Borough (69.2%) has a higher percentage of adults who consider themselves physically active nationally (66.3%) but is just below the Kent average (69.8%)<sup>7</sup>. However, with regard to health inequalities, the Maidstone urban wards of Park Wood, Shepway South and High Street contain the highest levels of deprivation in the Borough and rank in the top 10% in Kent. The most deprived Lower Super Output Areas (LSOA) in Maidstone are clustered within the inner urban area, and the least deprived LSOAs are located on the edge of the urban area and in the rural hinterland<sup>8</sup>.

**2.34** Maidstone contains 425 hectares of greenspace, 30 large parks, 80 Neighbourhood greenspaces, 68 play areas, 700 allotment plots across 12 sites and 4 Green Flag parks. Overall, there is more publicly accessible, managed open space within the urban wards compared to the rural wards of the Borough<sup>9</sup>.

**2.35** Spatial Approach RA1 (Local Plan 2017 continued) would continue to allocate services to existing settlements, in line with the settlement hierarchy. This would likely provide additional social infrastructure and green space to areas throughout the Borough. However, as previously stated the urban area includes the most deprived neighbourhoods in the Borough and would be most in need of investment. In addition, this scenario aims to deliver a modal shift through enhanced public transport and continued park and rise services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW), thereby improving health and wellbeing of residents by improving active travel options. Therefore, minor positive effects are expected.

**2.36** Spatial Approach RA2 (One or more Garden Settlements) is expected to have significant positive implications for this SA objective as Garden Settlements present opportunities for new patterns of infrastructure provision. This scenario would likely provide a greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. In addition, as a principle of Garden Settlements, it is expected that additional green space

will be provided with biodiversity net gain. Providing net gain would have indirect positive effects on health and wellbeing. Currently, there are four potential locations for Garden Settlements, one of which would lie on the edge of the urban area. As such, if this Garden Settlement is taken forward it is likely to provide much needed infrastructure to the most deprived areas within the Borough. The other locations for Garden Settlements would lie in the rural areas and as such would not provide additional infrastructure for the urban area. Therefore, this scenario also, has an uncertain minor negative effect as the specific location of these settlements are unknown.

**2.37** Spatial Approach RA3 (Maidstone town centre focus) is expected to have significant positive effects on this SA objective as it aims to revitalise the town centre, which is within the urban area where the highest levels of deprivation are within the Borough. Development within the urban area would provide additional homes, economic opportunities, social infrastructure and green space. In addition, this scenario aims to deliver a modal shift through enhanced public transport and continued park and rise services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW), thereby improving health and wellbeing of residents by improving active travel options.

**2.38** Spatial Approach RA4 (Eastern orbital road focus) is expected to have negative implications for this SA objective as it would facilitate the increase of vehicles through the creation of additional road infrastructure, although it may relieve pressure on existing urban roads. This scenario also aims to deliver a modal shift through enhanced public transport and continued park and rise services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW), thereby improving health and wellbeing of residents by improving active travel options.

#### Mitigation

**2.39** It is recommended that the areas of deprivation, and specifically health deprivation, are mapped out within the Borough. In addition, understanding why those areas are deprived and aiming to provide specifically what is lacking in those areas is crucial. Providing additional green space and active travel routes at a simultaneous rate as the rest of the development would also improve health and wellbeing.

#### Conclusion

**2.40** Spatial Approaches RA2 (One or more Garden Settlements) and RA3 (Maidstone town centre focus) are

<sup>7</sup> Public Health England (2020) Maidstone Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000110.html?area-name=maidstone>

<sup>8</sup> Ibid

<sup>9</sup> Maidstone Borough Council (2017) Maidstone's Parks & Open Spaces – 10 Year Strategic Plan 2017-2027 [online] Available at: [https://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0011/228980/Parks-and-Open-Spaces-Strategic-Plan-2017-2027-June-2017.pdf)



expected to have the most positive effects on this SA objective as Garden Settlements create opportunities for new patterns of infrastructure provision and more development within the urban area could reduce the amount of deprivation. Spatial Approach (Local Plan 2017 continued) is also expected to have positive effects, however they are not as magnified as the potential development from this scenario is more widely dispersed. Spatial Approach RA4 (Eastern orbital road focus) is expected to have mixed minor effects as the development is based around a road corridor.

### SA Objective 5: To facilitate a sustainable and growing economy

**2.41** From the seven local authorities surrounding Maidstone, 49% of the total commuting flows are workers coming into Maidstone Borough. There is a higher proportion of workers commuting out to Tonbridge and Malling (58%) and all London metropolitan boroughs (83%) compared to the proportion of workers commuting in from these locations. Medway has the highest proportion of workers commuting into Maidstone (65%). Overall, Maidstone has a negative net commuting flow<sup>10</sup>. Maidstone has shown steady growth in the number of business from 2011 to 2017 and there has been an increase of 7,000 additional jobs created between 2011 and 2016<sup>11</sup>.

**2.42** Spatial Approach RA1 (Local Plan 2017 continued) would aim to provide extensions to existing successful rural business sites, new business sites at strategic motorway junctions, new office development as part of mixed use residential, retail and office developments within Maidstone town centre and further allocation at the Kent Medical Campus. As such, significant positive effects are expected against this scenario as it would provide economic opportunities throughout the Borough, aiding many different communities.

**2.43** Spatial Approach RA2 (One or more Garden Settlements) would provide employment development as a percentage of any development within the Garden Settlement. The location of any chosen Garden Settlement will have implications for the type of B-use considered most appropriate. For example, a settlement close to the strategic road network would be preferable for B8 uses requiring larger vehicular access. Garden Settlements in less accessible locations would be more broadly suited towards B2 uses. However, Garden Settlements would not be expected to come forwards for development immediately after Local Plan Review adoption and experience elsewhere suggests that attracting investment in employment uses can take some time<sup>12</sup>,

although it can be achieved<sup>13</sup>. As such, mixed positive and negative effects would be expected as this scenario would increase the diversity of economic opportunities, but these will not be provided in the short term.

**2.44** Spatial Approach RA3 (Maidstone town centre focus) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space nearby rail links to and from London is also encouraged which would attract business to the town centre. This approach would however require the Council to revisit assumptions on mixed-use development in the town centre - increasing the percentage of office provision on each site. This may come at the expense of other uses, such as residential or retail provision. It may also require more intensive/higher density town centre office developments than previously permitted. It would also provide less in the way of support for rural businesses. Therefore, mixed significant positive and minor negative effects are expected for this scenario.

**2.45** Spatial Approach RA4 (Eastern orbital road focus) would focus employment floorspace allocations (mixed B-uses) at Junction 8 of the M20. While town centre sites would continue to provide office floorspace too, the amount would be reduced in favour of business park office development at M20 J8. This scenario would have mixed significant positive and significant negative effects on this SA objective as centring economic opportunities around Junction 8 of the M20 would not benefit the entire Borough.

### Mitigation

**2.46** The diversity of economic development provided under any Spatial Approach could be ensured through suitable policies in the Local Plan. This could ensure that all parts of the Borough are catered for, both within the main focus of economic activity in the urban area and the rural economy.

**2.47** If Garden Settlements are preferred, it will be particularly important to provide an attractive planning and financial regime to attract early investment. Therefore, a range of other allocations are likely to be needed outside of the Garden Settlement, to ensure choice is available in the short to medium term for employment development

<sup>10</sup> Maidstone Borough Council (2018) Authority Monitoring Report [online] available at: <https://www.maidstone.gov.uk/home/primary-services/planning-and-building/primary-areas/local-plan-information/tier-3-additional-areas/monitoring-reports>

<sup>11</sup> Ibid

<sup>12</sup> Lichfields (December 2019) How does your garden grow? A stock take on planning for the Government's Garden Communities programme, also ATLAS

(April 2016) North Hertfordshire New Settlement Study Final Report, and Nathaniel Lichfield & Partners (October 2013) Cambourne Retail and Employment Study

<sup>13</sup> See, for example, Cranbrook in Devon (<https://www.local.gov.uk/local-growth-local-people>)

## Conclusion

**2.48** Spatial Approach RA1 (Local Plan 2017 continued) would provide the most widespread economic opportunities for the Borough. Spatial Approach RA3 (Maidstone town centre focus) would offer much needed economic development near public transport links. Relative to Approach RA1 it suffers from the disadvantage that it would not provide Borough-wide benefits but conversely, concentration of B1 business uses in the town centre could create a critical mass of investment with greater benefits than spreading this type of development more widely across the Borough.

**2.49** However, Spatial Approach RA2 (One or more Garden Settlements) could have minor positive economic effects, however it is not likely that economic development will occur in the short term. Spatial Approach RA4 (Eastern orbital road focus) could have the most pronounced mixed effects of the four scenarios as it would centre economic development within one area of the Borough, some distance from existing communities.

### SA Objective 6: To support vibrant and viable Maidstone town centre

**2.50** Maidstone town centre is home to the predominant concentration of shops, jobs, services and facilities in the Borough. No other settlements in the Borough have such an offer. Town centres are experiencing increased strain from out-of-centre and out-of-town competition, as well as on-line alternatives. Therefore, retaining the vitality and viability of Maidstone town centre is an important sustainability objective for the Borough.

**2.51** Spatial Approach RA1 (Local Plan 2017 continued) would aim to provide new office development as part of mixed use residential, retail and office developments within Maidstone town centre. Any new allocations, if needed for choice in the market, would use the 'town centre first' approach – in Maidstone town centre, then urban edge, then out of centre subject to sequential impact assessment. In addition, increased bus service frequency along radial routes into town centre and railway stations would be supported. This would provide positive effects on this SA objective. However, this scenario could provide development within the rural centres thereby steering footfall away from the town centre.

**2.52** Spatial Approach RA2 (One or more Garden Settlements) would be creating new local centres through their development as they aim to create self-sustaining communities thereby steering footfall away from the Maidstone town centre. However, Maidstone town centre would still provide a range of jobs, services and facilities not provided for by a Garden Settlement, so some additional demand for town centre shops and services may be created.

Therefore, mixed minor negative and minor positive effects are expected for this SA objective.

**2.53** Spatial Approach RA3 (Maidstone town centre focus) would provide a targeted economic strategy for inward investment into the Borough focusing on the provision of high quality B1a office floorspace within the town centre. As well as providing additional floorspace in the traditional sense, also focus on models such as serviced offices and co-working space that accommodate more modern working practices or are suited to smaller start-up businesses. Locating office space near to rail links to and from London is also encouraged which would help to attract business to the town centre. Therefore, this scenario would provide significant positive effects against this SA objective.

**2.54** Spatial Approach RA4 (Eastern orbital road focus) would focus employment floorspace allocations (mixed B-uses) at Junction 8 of the M20. While town centre sites would continue to provide office floorspace too, the amount would be reduced in favour of business park office development at M20 J8. This scenario would have mixed minor positive and negative effects on this SA objective as the town centre would not be a focus for this scenario, but some additional demand for town centre shops and services might result.

## Mitigation

**2.55** Ensure that transport connections to the town centre are made available and attractive so that all residents can readily access the town centre, thereby sustaining the vibrancy and vitality of the area.

## Conclusion

**2.56** Spatial Approach RA3 (Maidstone town centre focus) is expected to be the best option as it aims to deliver development specifically to revitalise the town centre. Spatial Approach RA1 (Local Plan 2017 continued) would have similar effects, however it would also develop within the rural areas thereby diverting some activity away from the town centre. Spatial Approach RA4 (Eastern orbital road focus) and Spatial Approach RA2 (One or more Garden Settlements) would perform least well as these settlements would create new competing local centres.

### SA Objective 7: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce road traffic congestion

**2.57** Maidstone town centre is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20, as well as to/from the M2 & M25. The constrained nature of the town centre has contributed to peak period congestion and the designation of the wider urban area as an AQMA. Rail

links across the Borough are comparatively poor, with Maidstone currently having no direct service to the City of London (although there is a proposed Thameslink extension) and a slow journey into Victoria. Bus services within the urban area are largely focused around serving the town centre and hospital. Many outlying suburban and rural communities are afforded a more limited level of service that does not provide a convenient travel option for many potential users<sup>14</sup>. In addition to issues with road capacity, rail capacity on the North Kent line is also stretched and is likely to be over-capacity in the near future. The Network Rail Kent Area Route Study also highlights capacity issues with the railways in Kent and states that the number of passengers using the railway across the route has increased substantially in recent years and further growth is forecast – up to 15% growth in passenger numbers between 2011 and 2024 and 47% up to 2044. Routes into London are particularly busy, with little capacity to operate additional services<sup>15</sup>.

**2.58** New development would be more widely distributed under Spatial Approach RA1 (Local Plan 2017 continued) as it is expected to be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, it is expected to have significant positive effects on this SA objective as there is a higher probability for existing transport services to be supported more widely throughout the Borough. This scenario aims to deliver a modal shift through enhanced public transport and continued park and rise services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW), all of which will improve the existing sustainable modes of transport. However, it is less likely that this option will provide new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity, resulting in significant negative effects. Furthermore, currently a high proportion of the Borough's residents drive to work, and the uptake of more sustainable travel options is limited<sup>16</sup>.

**2.59** Spatial Approach RA2 (One or more Garden Settlements) is expected to minimise transport impact on the existing network through the creation of high-quality large development with high levels of sustainability and trip internalisation. This scenario presents opportunities for new patterns of infrastructure provision and for the creation of an integrated community. This scenario would likely provide a greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. It is also expected to

provide improved sustainable transport options for surrounding areas. However, in the short term, Garden Settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would not be provided for in the early years of the plan period. Furthermore, research of practical experience elsewhere<sup>17</sup> has concluded that Garden Settlements can become car dependent and create more traffic for the local roads as many residents drive to and from cities to work. The study found that it is likely that the Garden Settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. Therefore, mixed significant positive and significant negative effects with uncertainty are expected against this Spatial Approach.

**2.60** Spatial Approach RA3 (Maidstone town centre focus) would have a similar effect to Spatial Approach RA1 (Local Plan 2017) as it would have the same measures put in place regarding transport infrastructure. Development under this scenario would also include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures. The infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone. As such, it would have significant positive effects on this SA objective. However, as this is a Maidstone town centre focused scenario the rest of the Borough would not benefit from additional transport infrastructure to improve sustainable transport options, and potentially less support for existing services, therefore minor negative effects are also expected.

**2.61** Spatial Approach RA4 (Eastern orbital road focus) would provide the same measures as Spatial Approach RA1 (Local Plan 2017) with regard to transport infrastructure, however it would also provide a significant new section of highway infrastructure, such as a Leeds & Langley Relief Road. Therefore, sustainable transport links could be improved along the road corridor. However, this is a small portion of the Borough, and its primary focus would be to relieve traffic congestion and would not improve transport options for the majority of residents. This option would also do little to meet the needs of more rural communities, nor the town centre.

<sup>14</sup> Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>15</sup> Network Rail (2018) South East Route: Kent Area Route Study [online] Available at: <https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-print-version.pdf>

<sup>16</sup> NOMIS method of travel to work (2011) Maidstone Borough [online] available at: [https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=c ell&cols=rural\\_urban](https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=c ell&cols=rural_urban)

<sup>17</sup> Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality

Therefore, significant negative effects and minor positive effects are expected.

### Mitigation

**2.62** Ensure that public transport and active travel connections are created and enhanced at the same time housing and economic development is being undertaken. This could be done through various mechanisms, such as S106 agreements.

### Conclusion

**2.63** Spatial Approach RA3 (Maidstone town centre focus) performs strongest against this SA objective as this scenario aims to improve existing public transport and infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone and currently experience high levels of air pollution. Spatial Approach RA1 (Local Plan 2017 continued) and RA2 (One or more Garden Settlements) are also expected to improve public transport and active travel but not to the same extent. Spatial Approach RA4 (Eastern orbital road focus) would perform least well as development would be centred around a road corridor, in essence this would not reduce the need to travel.

### SA Objective 8: To conserve the Borough's mineral resources

**2.64** Around half of the Borough is covered by Mineral Safeguarding Areas (MSAs) designated in the Kent Minerals & Waste Local Plan. The minerals include limestone, sandstone, river terrace deposits, silica sand and sub-alluvial river terrace deposits<sup>18</sup>.

**2.65** Spatial Approach RA1 (Local Plan 2017 continued) would have the most dispersed growth for the Borough, therefore it could have the highest probability of developing within an MSA. Overall, it is likely that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

**2.66** Spatial Approach RA2 (One or more Garden Settlements) is expected to have negative effects on this SA objective as two of the four potential locations for Garden Settlements are located within an MSA. Overall, it is possible

that this scenario would provide housing and economic development within MSAs. As such, there is potential for housing and economic growth to sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

**2.67** Spatial Approach RA3 (Maidstone town centre focus) would focus development within the town centre and urban area of the Borough. There are no MSAs within the town centre of Maidstone, however within the urban area there are small portions in the south western sections that are designated as MSAs. As such, minor negative effects with uncertainty are expected as the exact location of development is unknown at this stage.

**2.68** Spatial Approach RA4 (Eastern orbital road focus) aims to provide housing and economic development along a road corridor, such as a Leeds & Langley Relief Road. This road corridor would be developed along an MSA, therefore development within the area could sterilise the mineral deposits. However, uncertainty is attached depending on the exact location of the development sites and whether the mineral could be extracted prior to development taking place. As such, significant negative effects with uncertainty are expected.

### Mitigation

**2.69** It is recommended that delivery of housing and economic development in MSAs is phased, such that mineral resources can be recovered prior to construction where economically viable. All other matters being equal, sites that would not result in the sterilisation of mineral resources should be preferred (e.g. when choosing a location for a new Garden Settlement).

### Conclusion

**2.70** Spatial Approach RA3 (Maidstone town centre focus) performs strongest against this SA objective as the majority of the urban area of Maidstone does not contain MSAs and there are none in the town centre. However, there is still the potential for minor negative effects depending on where exactly development will be located within the urban area. Each of the other scenarios is likely to have significant negative effects as there is a higher possibility for MSAs to be adversely affected via those scenarios.

<sup>18</sup> Kent County Council (2015) Kent Minerals and Waste Local Plan 2013-2030: Maidstone Borough Council – Mineral Safeguarding Areas [online] Available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment->

[waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1](#)



### SA Objective 9: To conserve the Borough's soils and make efficient and effective use of land

**2.71** Maidstone Borough contains a mix of different soils. To the north of Maidstone bands of Upper, Middle and Lower Chalk run in a south east to north west direction forming the North Downs. Shallow soils are found over the dry valleys of the dip slope, with other areas supporting well drained calcareous fine silty soils over chalk. The second distinct geological region is Gault Clay. Soils range in the Gault Clay Vale from the calcareous chalk soils to the north through to heavier clays and a mix of clay and sandy soils where they meet the Greensand to the south. The underlying soils give rise to a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 1, Grade 2 and Grade 4<sup>19</sup>.

**2.72** Spatial Approach RA1 (Local Plan 2017 continued) would have the most dispersed growth for the Borough, therefore it would also have the highest probability of developing within Grades 1, 2, or 3 agricultural land. As such, significant negative effects with uncertainty are expected.

**2.73** Spatial Approach RA2 (One or more Garden Settlements) would provide large settlements within four possible locations. Each of the locations lies within Grade 3 agricultural land, with two of the potential growth locations also partially within Grade 2. It is uncertain whether the Grade 3 agricultural land is 3a or 3b, as such, there is the potential for new development to harm the Borough's best and most versatile soils. Therefore, under the precautionary principle, uncertain significant negative effects are expected.

**2.74** Spatial Approach RA3 (Maidstone town centre focus) would provide development within the town centre of Maidstone which is almost entirely classified as urban. Depending on where the development would take place it could be located within Grade 1 or 2 agricultural land. As such, a mixed significant positive and minor negative effect is expected.

**2.75** Spatial Approach RA4 (Eastern orbital road focus) would provide development along a new road corridor. This scenario would be developed within Grades 2 and 3 agricultural land, with the majority within Grade 2. As such, significant negative effects are expected.

### Mitigation

**2.76** All other matters being equal, give preference to sites that would avoid development within Grades 1 to 3a agricultural land.

### Conclusion

**2.77** Spatial Approach RA3 (Maidstone town centre focus) performs the best against this SA objective as it would provide development within the town centre of Maidstone which is almost entirely classified as urban land. The other three scenarios would have negative implications for this SA objective as they could all be developed within the best and most versatile agricultural land.

### SA Objective 10: To maintain and improve the quality of the Borough's waters and achieve sustainable water resources management

**2.78** Kent is one of the driest regions in England and Wales<sup>20</sup>. Water use in the Borough is high by both national and international standards, and some water bodies in Maidstone are failing to meet the Water Framework Directive objective of 'good status'<sup>21</sup>. These issues could be exacerbated by additional housing and economic growth, coupled with climate change. Pressures, including the projected increase in population, related to the provision of water supply and wastewater treatment are key contributors to the current status and future status of water bodies in Kent. There may also be an increased risk of urban run-off that could affect water quality; this is already evident in parts of the catchment. There is also an increased risk of over abstraction.

**2.79** Spatial Approach RA1 (Local Plan 2017 continued) would provide additional housing, economic development and infrastructure which could put the region under additional water stress. It is likely that water resources will become overstretched under this scenario. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works (also known as water recycling centres) to accommodate the additional demand.

**2.80** Spatial Approach RA2 (One or more Garden Settlements) would provide one or more large settlements that would be in need of large amounts of water and as the Borough is currently having issues with high water uses this scenario would worsen the situation. Therefore, significant negative effects are expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand. Garden Settlements offer the potential to design-in water efficiency and wastewater management from the outset in a comprehensive and integrated way that may not be possible with some of the

<sup>19</sup> Maidstone Borough Council with Jacobs Consulting (2013) Maidstone Landscape Character Assessment [online] Available at: [http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20\(July%202013\).pdf](http://services.maidstone.gov.uk/docs/Maidstone%20Landscape%20Character%20Assessment%202012%20(July%202013).pdf)

<sup>20</sup> Kent County Council (2016) Kent Environment Strategy [online] Available at: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

<sup>21</sup> AECOM (2017) Kent Water for Sustainable Growth Study

other options, which means that the scenario also receives a minor positive effect.

**2.81** Spatial Approach RA3 (Maidstone town centre focus) would concentrate development within the town centre which is already developed and contains impermeable surfaces. Additional development in this area could increase the amount of urban runoff, which is already an issue for the catchment the Borough is within. In addition, additional development would intensify the water stress within the region. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand.

**2.82** Spatial Approach RA4 (Eastern orbital road focus) would provide development along a road corridor either in a piecemeal fashion or through an urban extension. As such, the amount of impermeable surface will be increased resulting in a higher likelihood of urban runoff. In addition, as water use in Kent and the Borough are already high this scenario will increase the amount of water being used thereby creating adverse effects. Therefore, significant negative effects as expected. Uncertainty is attached as it is unknown whether water efficiency standards will be put into place, nor the capacity of wastewater treatment works to accommodate the additional demand.

### Mitigation

**2.83** The incorporation of policies and design codes that include water efficiency measures will be necessary. Also, the introduction of a water use awareness campaign could educate the public on how best to reduce their water use. Investment in wastewater treatment works may be required to accommodate additional demand from development, although in some instances there may be limits to whether this is achievable depending upon existing loads and through flow of water.

### Conclusion

**2.84** Each of the scenarios are expected to have negative effects on this SA objective as the area is already suffering from high levels of water use, therefore any development without water efficiency measures will worsen the situation. Of all the scenarios, Spatial Approach RA2 (One or More Garden Settlements) probably offers the best opportunity to design-in water efficiency and wastewater management from the outset in an integrated and comprehensive way.

### SA Objective 11: To reduce air pollution ensuring lasting improvements in air quality

**2.85** Maidstone town centre is at the point where several main roads (A20, A26, A249, A274 and A299) converge and provide onward connectivity to four nearby junctions with the M20. The Council designated the wider urban area as an AQMA in 2008 due to elevated concentrations of Nitrogen Dioxide (NO<sub>2</sub>) at residential receptors in six areas of the Borough. However, in May of 2018 the AQMA within Maidstone was reconfigured to only follow the carriageways of the main roads passing through the Borough, including the M20, A229, A20, A26, A249, and A274. NO<sub>2</sub> levels at some key locations near major roads and junctions remain above the EU Limit Value with no discernible downward trend<sup>22</sup>.

**2.86** New development would be more widely distributed under Spatial Approach RA1 (Local Plan 2017 continued) as it is expected to be located according to the existing settlement hierarchy (Maidstone, Rural Service Centres, Larger Villages and some suitable sites within the Countryside). As such, it is expected to have significant negative effects on this SA objective as it would continue travel patterns that have developed over time, including significant car use, particularly in the more rural areas. Currently a high proportion of the Borough's residents drive to work, and the uptake of more sustainable travel options is limited<sup>23</sup>. It is less likely that this scenario will provide new transport infrastructure, therefore additional housing and economic development will continue to stretch roads and rail that are over capacity. However, this scenario aims to deliver a modal shift through enhanced public transport and continued park and ride services, walking and cycling improvements and by protecting and enhancing Public Rights of Way (PROW), all of which will improve the existing sustainable modes of transport, and potentially air quality, resulting in a minor positive effect.

**2.87** Spatial Approach RA2 (One or more Garden Settlements) is expected to minimise transport impact on the existing network through the creation of high-quality large development with high levels of sustainability and trip internalisation. This scenario presents opportunities for new patterns of infrastructure provision and for the creation of a self-sustaining community. A principle of Garden Settlements is to provide green space which will provide biodiversity net gain. Providing net gain, often in the form of tree planting, will help to absorb air pollutants. This scenario would likely provide a greater infrastructure contribution than a comparable site in or at the edge of an existing settlement. It is also expected to provide improved sustainable transport options for surrounding areas. As it is likely that Garden Settlements will

<sup>22</sup> Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

<sup>23</sup> NOMIS method of travel to work (2011) Maidstone Borough [online] available at: [https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=c ell&cols=rural\\_urban](https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157316?rows=c ell&cols=rural_urban)

be masterplanned the incorporation of sensitive planning and reduction of the need to travel by car through good site layout and promotion of walking, cycling and public transport is likely. However, in the short term, Garden Settlements can take a long time to deliver, which means that additional sustainable transport infrastructure would not be provided for in the early years of the plan period. Furthermore, research of practical experience elsewhere has shown that, despite original intentions, Garden Settlements can become car dependent and create more traffic for the local roads as many residents drive to and from cities to work<sup>24</sup>. The study found that it is likely that the Garden Settlements will provide massive investment into road capacity compared to funding cycleways and public transport thereby increasing the likelihood of travel by car and traffic congestion. In the case of the Garden Settlements, car journeys into Maidstone could go through the AQMA. Therefore, mixed significant positive and significant negative effects with uncertainty are expected against this Spatial Approach.

**2.88** Spatial Approach RA3 (Maidstone town centre focus) would have the same measures put in place regarding transport infrastructure as Spatial Approach RA1 (Local Plan 2017). Development under this scenario would also include major new public transport infrastructure investment as part of the plan to revitalise the town centre and would make significantly more efficient use of the existing network. This would include new Park & Ride and public transport interchange(s) with appropriate prioritisation measures. The infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone, and there would be greater opportunities to use more sustainable modes of transport including walking and cycling for everyday journeys, reducing the effects on air quality. As such, it would have significant positive effects on this SA objective. However, as this is a Maidstone town centre focused scenario the rest of the Borough would not benefit from additional transport infrastructure to improve sustainable transport options, and so car use would continue in these locations. Therefore, minor negative effects are also expected.

**2.89** Spatial Approach RA4 (Eastern orbital road focus) would provide the same measures as Spatial Approach RA1 (Local Plan 2017) with regard to transport infrastructure. However, it would also provide a significant new section of highway infrastructure, such as a Leeds & Langley Relief Road. Therefore, sustainable transport links could be improved along the road corridor, however this is a small portion of the Borough and would not improve transport options for the

majority of residents. This option would also do little to meet the needs of more rural communities, nor the town centre, although it could divert some traffic going through the AQMA on to the relief road. Therefore, significant negative effects and minor positive effects are expected.

### Mitigation

**2.90** Ensure that through design codes each development will have to incorporate green infrastructure which improves air quality. In addition, incentivise the creation of active travel options such as bike lanes and pedestrian walkways through design of development, integrated with existing networks, supported by contributions from developers through S106 agreements.

### Conclusion

**2.91** Spatial Approach RA3 (Maidstone town centre focus) performs strongest against this SA objective as this scenario aims to improve existing public transport and infrastructure provisions through this scenario would benefit a large amount of the population of the Borough since 70% of the Borough live within the urban area of Maidstone and currently experience high levels of air pollution. Spatial Approach RA1 (Local Plan 2017 continued) and RA2 (One or more Garden Settlements) are also expected to improve public transport and active travel but not to the same extent. Spatial Approach RA2 (One or more Garden Settlements) offers the opportunity to design-in sustainable modes from the start but experience elsewhere suggests that car use will still dominate. Spatial Approach RA4 (Eastern orbital road focus) would perform least well as development would be centred around a road corridor, in essence this would encourage private vehicle use although it could relieve the AQMA of some traffic.

### SA Objective 12: To avoid and mitigate flood risk

**2.92** Flood risk within Maidstone is concentrated in the southern and south western part of the Borough. The primary source of fluvial flood risk in the catchment is associated with the River Medway<sup>25</sup>. The main source of surface water flooding is attributed to heavy rainfall overloading highway carriageways and paved areas, drains and gullies, but other sources of flooding were associated with blockages and high-water levels impeding free discharge from surface water drains and gullies<sup>26</sup>. The risk of flooding could be intensified due to climate change.

**2.93** Spatial Approach RA1 (Local Plan 2017 continued) would provide additional housing, economic development and

<sup>24</sup> Transport for Homes (2020) Garden Villages and Garden Towns: Visions and Reality

<sup>25</sup> Maidstone Borough Council and JBA Consulting (2016) Level 1 Strategic Flood Risk Assessment – Addendum Report [online] Available at:

[http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0015/132810/CC-005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0015/132810/CC-005-Level-One-Strategic-Flood-Risk-Assessment-Addendum-October-2016.pdf)

<sup>26</sup> Ibid

additional infrastructure associated with both through the most dispersed approach, as such it is possible development will be located within Flood Zones 2 and 3. However, this is unlikely as proposals for development within Flood Zones 2 and 3 would not satisfy the sequential and exception tests. In addition, the creation of more impermeable surfaces creates additional flood risk as it is likely that greenfield land will be developed within the more rural areas of the Borough. Additional development under this scenario could increase the amount of urban runoff, which is already an issue for the catchment. However, if sensitive planning including SuDS is put into place then development could provide positive effects on this objective, however this is uncertain at this stage.

**2.94** Spatial Approach RA2 (One or more Garden Settlements) would provide one or more large settlements, three of the four potential locations are within or within close proximity to Flood Zones 2 and 3. In addition, the creation of more impermeable surfaces create additional flood risk as it is likely that greenfield land will be developed on for each of the large settlements thereby reducing the value of infiltration provided by greenfield land. However, as a principle of Garden Settlements, it is expected that additional green space will be provided with biodiversity net gain. Providing net gain, often in the form of tree planting, will help to slow down infiltration. In addition, as Garden Settlements aim to be self-sustaining, it is more likely for that a masterplanned approach will be employed through the support for green infrastructure, sensitive planning and strategic scale sustainable drainage systems (SuDS). Overall, this scenario would have a mixed significant negative and minor positive effect on this SA objective.

**2.95** Spatial Approach RA3 (Maidstone town centre focus) would concentrate development within the town centre which is already developed and contains impermeable surfaces. However, this town centre is located within close proximity to the River Medway which has a history of flooding, which could increase due to climate change and the projected increase in population and development. Additional development in this area could increase the amount of urban runoff, which is already an issue for the catchment. If sensitive planning including SuDS is put into place then development could provide positive effects on this objective, however this is uncertain at this stage, particularly given the potential lack of space to incorporate them. Overall, this scenario could have significant negative effect on this SA objective, although this is uncertain.

**2.96** Spatial Approach RA4 (Eastern orbital road focus) would provide development along a road corridor whether in a

piecemeal fashion or through an urban extension. It is possible the road corridor would be developed on greenfield land. As such, the amount of impermeable surface will be increased resulting in a higher likelihood of urban runoff. However, additional green space is likely to be provided through this scenario which could create natural barrier to flooding. Furthermore, if sensitive planning including SuDS is put into place then development could provide positive effects on this objective, however this is uncertain at this stage.

### Mitigation

**2.97** Avoid development within Flood Zones 2 and 3, where appropriate and in accordance with the sequential test. The incorporation of additional green space, SuDS and green infrastructure into the design of new developments to reduce the risk of flooding could be achieved through various mechanisms, such as S106 agreements.

### Conclusion

**2.98** Spatial Approach RA2 (One or more Garden Settlements) would perform the best against this SA objective as the Garden Settlement/s would be masterplanned to employ SuDS and sensitive planning through the incorporation of design codes. However, Garden Settlements would result in the development of greenfield land and three of the four potential locations include Flood Zone 2 and 3 land. Spatial Approaches RA3 (Maidstone town centre focus) and RA4 (Eastern orbital road focus) are expected to have negative effects on this option as it is likely they will increase the rate of urban runoff. Spatial Approach RA1 (Local Plan 2017 continued) performs the least well against this SA objective as it is possible development could be within Flood Zones 2 and 3 with less opportunity for a comprehensive approach to flood management.

### SA Objective 13: To minimise the Borough's contribution to climate change

**2.99** Changes to the climate will bring new challenges to the Borough's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP18) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present<sup>27</sup>. In order to make its contribution towards addressing these issues, the Borough will need to reduce its carbon emissions significantly over the plan period.

<sup>27</sup> UK Climate Projections (2018) Land Projections Maps: Probabilistic Projections [online] Available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>



**2.100** Spatial Approach RA1 (Local Plan 2017 continued) would provide additional housing, economic development and additional infrastructure associated with both across the Borough in accordance with the settlement hierarchy. As such this development could increase greenhouse gas emissions through the higher number of private vehicles on the road and amount of energy generated from new housing and economic development. Therefore, significant negative effects with uncertainty are expected.

**2.101** Spatial Approach RA2 (One or more Garden Settlements) would provide one or more large settlements that offer the opportunity to create energy efficient development and operations, through the promotion of an integrated network of sustainable modes of transport for internal journeys, and the incorporation of energy efficiency and renewable energy into settlement design. However, as has already been described, experience to date indicates that Garden Settlements tend to generate significant car journeys, despite best intentions at the planning and design stage. As such, mixed significant positive and significant negative effects with uncertainty are expected.

**2.102** Spatial Approach RA3 (Maidstone town centre focus) would concentrate development within the town centre. There is greater opportunity in the town centre to use sustainable modes of transport for a variety of journeys, given the range of jobs, services and facilities, although car use is still high, and could increase with additional development, thereby increasing greenhouse gas emissions. There may be less opportunity to incorporate larger scale energy efficiency and renewable energy networks within an already highly developed urban area than large masterplanned greenfield sites. Therefore, significant mixed negative and minor positive effects with uncertainty are expected.

**2.103** Spatial Approach RA4 (Eastern orbital road focus) would provide development along a road corridor either in a piecemeal fashion or through an urban extension. Additional development in this area would increase the likelihood of private vehicle use and energy consumption thereby increasing greenhouse gas emissions unless public transport and active travel infrastructure is put into place simultaneously. Therefore, significant negative effects with uncertainty are expected.

### Mitigation

**2.104** Incorporate good design codes that are adaptive to climate change and sustainable construction that include energy efficiency measures that require all strategic development to be zero carbon. Decentralised heating networks and micro renewables should also be considered. In addition, improvements to public transport and introduction of

car sharing programs could reduce the Borough's greenhouse gas emissions.

### Conclusion

**2.105** Each of the scenarios are expected to have negative effects on this SA objective as the area is already experiencing the effects of climate change and without resilience measures in place it is likely that climate change will continue to adversely affect the region. However, Spatial Approach RA2 (One or more Garden Settlements) offers the greatest opportunities to incorporate, from the outset, integrated sustainable transport networks, and energy efficiency and renewable energy networks. Although Spatial Approach RA3 (Maidstone town centre focus) offers considerable opportunity to promote sustainable modes of transport, given that walking, cycling and bus services are available for everyday journeys, it allows less opportunity to incorporate major renewable energy projects. However, micro renewables could be incorporated, and decentralised heating networks are more likely to be doable within the town centre. Spatial Approach RA1 (Local Plan 2017 continued) and Spatial Approach RA4 (Eastern orbital road focus) perform least well against this SA objective.

### SA Objective 14: To conserve, connect and enhance the Borough's wildlife, habitats and species

**2.106** The Borough contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity including a Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSIs), Local Wildlife Sites (LWSs), Local Nature Reserves (LNRs), priority habitats and ancient woodland. In addition, many Biodiversity Opportunity Areas have been identified within the Borough, indicating where enhancement could be most beneficial. Apart from designated sites, it is important that functional ecological habitats and networks are safeguarded and improved in order to support biodiversity in the Borough generally, and its connections outside the Borough but also to help support the designated sites and features.

**2.107** Each Spatial Approach has the potential to adversely affect biodiversity. Spatial Approach RA1 (Local Plan 2017 continued) is expected to have a more dispersed approach to development compared to the other scenarios. It is likely that this scenario will have a negative effect on this SA objective as development is more likely to be on greenfield land and could be on or within close proximity to biodiversity assets or disrupt the Borough's ecological networks.

**2.108** Spatial Approach RA2 (One or more garden settlements) would provide a large development within four potential locations, three of which are within the rural area of

the Borough. The majority of the Borough's biodiversity designations lie within the rural areas and it is likely that development will occur on greenfield land therefore this Spatial Approach could have negative effects. However, Garden Settlements are expected to provide additional green space thereby offering the opportunity to create additional wildlife habitat and biodiversity net gain. Therefore, minor positive effects are also expected against Spatial Approach RA2 (One or more garden settlements).

**2.109** Spatial Approach RA3 (Maidstone town centre focus) is expected to have mixed effects on this SA objective as a Maidstone town centre focused approach is likely to provide development on brownfield land rather than greenfield land compared to the other options. Although, there are less biodiversity designations within the urban area, negative effects are also expected because sections of the urban area lie within a Biodiversity Opportunity Area, Ancient Woodland and Local Wildlife Sites. Uncertainty is attached to this Spatial Approach as the exact location of development is unknown at this point in time.

**2.110** Spatial Approach RA4 (Eastern orbital road focus) is also expected to have negative effects on biodiversity since the location of the eastern orbital road corridor would lie within a Biodiversity Opportunity Area and patches of Ancient Woodland and Local Wildlife Sites. In addition, it is likely that development will be located on greenfield land.

### Mitigation

**2.111** Avoidance of development within the area of biodiversity assets, and identification and safeguarding of ecological networks, would provide the best mitigation. However, various mechanisms should also be put in place to ensure biodiversity net gain is achieved on site or employ biodiversity offsetting within the Borough if the development is unable to provide net gain on site.

### Conclusion

**2.112** Spatial Approach RA3 (Maidstone town centre focus) is expected to be the best performing option as it concentrates development within the town centre of Maidstone which has the least amount of biodiversity designations compared to the potential locations of the other scenarios. Each of the other scenarios are expected to perform negatively as they each could adversely affect biodiversity designations. However, Spatial Approach RA2 (One or more Garden Settlements) offers opportunities to incorporate green infrastructure and biodiversity net gain on a community-wide scale.

### SA Objective 15: To conserve and/or enhance the Borough's historic environment

**2.113** There are 41 Conservation Areas within the Borough. There is a cluster of 5 Conservation Areas in Maidstone Town Centre, 16 in the rest of the urban fringe and an additional 4 that straddle the urban/rural boundary. The remaining 16 are focused in the villages of the rural area. Each of these Conservation Areas contain a mixture of Listed Buildings. The Borough also contains 5 sites included on the Register of Historic Parks and Gardens<sup>28</sup>.

**2.114** Spatial Approach RA1 (Local Plan 2017 continued) is the most dispersed option of the scenarios and therefore is likely to adversely affect heritage assets as each existing settlement has an array of historic designations. However, this is uncertain as the exact locations of development are unknown at this stage.

**2.115** Spatial Approach RA2 (One or more Garden Settlements) proposes four locations for potential Garden Settlements, each of which are within close proximity to heritage assets. However, Garden Settlements could incorporate sensitive planning into the masterplan approach which could protect heritage assets from harm. Therefore, uncertainty is expected.

**2.116** Spatial Approach RA3 (Maidstone town centre focus) is likely to have adverse effects on the Borough's heritage assets as the majority of Listed Buildings and Conservation Areas are within the town centre and within the urban area of Maidstone.

**2.117** Spatial Approach RA4 (Eastern orbital road focus) would be located in an area with numerous Listed Buildings that could be adversely affected by development of a new road corridor with housing and economic development accompanying it. However, this is uncertain as the exact locations of development are unknown at this stage.

### Mitigation

**2.118** Avoidance of development that results in harm to heritage assets including their setting would provide the best mitigation. However, design codes with heritage assets and local character at the forefront should also be implemented.

### Conclusion

**2.119** It is likely that each of the scenarios will have a negative impact on local heritage assets, however as no heritage impact assessment has been conducted yet the effects of each scenario are uncertain at this stage.

<sup>28</sup> Maidstone Borough Council (2016) Maidstone Borough Local Plan Heritage Topic Paper [online] Available at:

[https://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf](https://www.maidstone.gov.uk/_data/assets/pdf_file/0019/131725/ENV-018-Heritage-Topic-Paper-September-2016.pdf)

### SA Objective 16: To conserve and enhance the character and distinctiveness of the Borough's settlements and landscape

**2.120** Just over a quarter of the Borough lies within the Kent Downs Area of Outstanding Natural Beauty (AONB). In addition, many parts of the rest of the Borough are designated as Landscapes of Local Value.

**2.121** Spatial Approach RA1 (Local Plan 2017 continued) is the most dispersed option of the scenarios and therefore is likely to adversely affect the local landscape. The effects are likely to be more dispersed rather than concentrated in a small number of locations, with a significant amount of development taking place with Maidstone town centre. The significant negative effect is uncertain as the exact locations of development are unknown.

**2.122** Spatial Approach RA2 (One or more Garden Settlements) could result in the introduction of large urban developments within four potential locations, two of which are located within areas of valued landscape, one on the edge of the AONB and the other within a Landscape of Local Value. As such, significant negative effects are expected. Uncertainty is attached as it is unknown at this time which locations will be taken forward for development. However, as Garden Settlements are likely to be masterplanned, support for green infrastructure, sensitive planning and strategic scale landscaping is likely.

**2.123** Spatial Approach RA3 (Maidstone town centre focus) is likely to avoid adverse effects on the landscape where development is concentrated within the built-up urban area. However, some adverse effects on this SA objective could occur as there are three areas of Landscape of Local Value that run across the southern section of the urban area. Again, uncertainty is attached to this SA objective as the exact location of development is currently unknown.

**2.124** Spatial Approach RA4 (Eastern orbital road focus) is likely to have significant negative effects as the road corridor would be located within the Leeds-Langley Corridor Landscape of Local Value.

#### Mitigation

**2.125** Avoidance of development within the area of landscape of national and local value would provide the best mitigation. However, strategic scale landscaping and sensitive planning should be implemented.

#### Conclusion

**2.126** Each of the scenarios are expected to adversely affect the local landscape unless sensitive planning and strategic scale landscaping is put into place before development begins. Spatial Approach RA3 (Maidstone town centre focus)

is the best performing as it concentrates development within the existing built-up urban area.

**2.127** The effects of Spatial Approach RA1 (Local Plan 2017 continued) and RA2 (One or more Garden Settlements) depends very much on which locations are selected for development, as there are options available to avoid the most sensitive landscapes in the Borough. The effects of Spatial Approach RA1 are likely to be more dispersed and cumulative with a number of locations affected, whereas with Spatial Approach RA2, the effects would be more concentrated and substantive in a small number of locations. Spatial Approach RA4 (Eastern orbital road focus) would be likely to affect a Landscape of Local Value.

### Overall summary and conclusions

**2.128** The SA of the four Spatial Approaches is necessarily high level, and as a result there are a lot of uncertainties attached to the judgements of potential effects.

**2.129** Nonetheless, some clear findings emerge from the SA. First, the Spatial Approach that performs most strongly across the SA objectives as a whole is Spatial Approach RA3 (Maidstone town centre focus). This is because this scenario would concentrate development where there is the greatest number and range of jobs, services and facilities, where there are the best opportunities to use sustainable modes of transport, including walking, cycling and bus, thereby also helping to reduce air pollution and greenhouse gas emissions. This scenario would also result in the least development of greenfield land, thereby potentially having the least harm on biodiversity, soils and the landscape. However, this Spatial Approach compares less well than some of the others when the needs and viability of rural communities are taken into account. In addition, Maidstone town centre has a history of flooding, which could be exacerbated by both intensification of development and climate change.

**2.130** Second, Spatial Approach RA4 (Eastern orbital road focus), performs least well of all the options. Although relatively close to Maidstone itself, apart from the new road corridor itself and employment development at Junction 8 of the M20, it is not clear in what form other development would take place, such as housing, for example whether it would be in the form of an urban extension, piecemeal development or restricted in terms of scale. Being a road focused scenario, primarily aiming to relieve traffic congestion elsewhere, it is unlikely to provide the comprehensive and integrated approach that will encourage a significant switch to more sustainable modes of transport. It also has the potential to adversely affect a range of environmental assets, such as best and most versatile agricultural land, biodiversity, and landscapes designated of being of local value. This scenario

could, though, help to address air pollution issues in the AQMA.

**2.131** Third, Spatial Approaches RA1 (Local Plan 2017 continued) and RA2 (One or more Garden Settlements) performed quite similarly, although individual scores against SA objectives were often quite different. Spatial Approach RA1 had some of the benefits of Spatial Approach RA3 (Maidstone town centre focus) given that it follows the settlement hierarchy, and it also provides for development in the more rural communities, including housing providing support for local shops, services and facilities. However, unlike Spatial Approach RA3, this could lead to greater car dependency, as well as dispersed but potentially both localised and cumulative effects on environmental assets.

**2.132** Spatial Approach RA2 (One or more Garden Settlements), on the other hand, would result in the concentration of development in specific locations. As a result, the effects would also be concentrated, and they would depend upon the specific locations chosen. There are currently four potential locations, and they vary in terms of their relationship with the town of Maidstone as well as smaller communities, and some are in more sensitive environmental locations than others. This is particularly important when introducing new settlement scale urban development into a rural landscape. Garden Settlements, though, offer the opportunity to design-in from the outset a development that encourages energy and water efficiency, cycling and walking, and a sense of community. Set against this is the experience from elsewhere, which suggests that Garden Settlements can often be car dependent, despite best intentions, and can also have long lead-in times, which means that they can take a long time to develop a critical mass capable of supporting the range of jobs, services and facilities characteristic of a sustainable community. They could also divert homes and investment from elsewhere in the Borough for existing communities in need. Garden Communities, in principle, offer an attractive and potentially relatively sustainable solution to meeting the Borough's needs, but it is important that a realistic assessment of their deliverability in practice underpins any decision, so that vision can genuinely be turned into reality.

## Chapter 3

### SA of additional options

**3.1** The Council's Local Plan topic papers contain a number of additional reasonable alternatives that are not reflected in the four Spatial Approaches appraised in **Chapter 2**. These are outlined in **Table 3.1**, which also indicates the topic paper in which the option appears and how that option has been appraised by the SA.

Table 3.1: Additional options in topic papers and where they are appraised

Option	Where appraised
<b>Environment Topic Paper</b>	-
Divided into three themes: climate change and biodiversity; landscape and heritage conservation; and flood risk. Each has the following reasonable alternative approaches:	-
■ Approach A: LP17 continued	Reflected in Spatial Approach 1 (LP 2017 continued) and appraised as part of SA of Spatial Approaches in <b>Chapter 2</b> .
■ Approach B: Introduce Garden Settlement(s)	Reflected in Spatial Approach 2 (Garden Settlements) and appraised as part of SA of Spatial Approaches in <b>Chapter 2</b> .
■ Approach C: Go above and beyond LP17 measures	Appraised in this chapter of the SA.
■ Approach D: Relax the current LP17 measures	Appraised in this chapter of the SA.
<b>Housing Topic Paper</b>	-
<i>Affordable Housing</i>	-
■ RA1: Keep the Local Plan 2017 affordable housing policy	Appraised in this chapter of the SA.
■ RA2: Seek to maximise affordable housing	Appraised in this chapter of the SA.
■ RA3: Apply a more localised approach to affordable housing.	Appraised in this chapter of the SA.
<i>Housing Typologies</i>	
■ RA1: Keep the Local Plan 2017 housing mix policy and add detail about typologies as set out in the NPPF	Appraised in this chapter of the SA.
■ RA2: Apply a neighbourhood-level housing type and mix policy	Appraised in this chapter of the SA.
<b>Infrastructure Topic Paper</b>	-
Divided into three themes: utilities infrastructure; social/community services; and social/community spaces. Each has the following reasonable alternative approaches:	-
■ RA1: Continue to allocate infrastructure assets according to the hierarchy set out in the current Local Plan 2017	Reflected in Spatial Approach 1 (LP 2017 continued) and appraised as part of SA of Spatial Approaches in <b>Chapter 2</b> .
■ RA2: Allocate development and associated infrastructure to one or more Garden Settlement location(s)	Reflected in Spatial Approach 2 (Garden Settlements) and appraised as part of SA of Spatial Approaches in <b>Chapter 2</b> .
■ RA3: Apply a more localised approach to infrastructure provision	Appraised in this chapter of the SA.

## Environment options

**3.2** In addition to the options reflected in the separately appraised Spatial Approaches, two further alternative policy approaches to the natural environment are outlined in the Environment topic paper:

- **Approach C: Go above and beyond LP17 measures** - this policy approach would continue the spatial pattern of growth as per LP17 but set more stringent environmental standards than those required by the current Local Plan 2017 requirements in relation to climate change, biodiversity, landscape, the historic environment, flood risk, and so on.
- **Approach D: Relax the current LP17 measures** - this approach would continue the spatial pattern of growth as



per LP17 but would relax the current LP17 measures in relation to environmental matters.

**3.3** The sustainability implications of these alternative approaches to the environment are expected to be as follows.

### Climate change

**3.4** The SA of the Local Plan 2017 summarised its likely effects in relation to climate change sustainability objectives as follows:

“There could be a reduction in carbon emissions (compared to growth without a Local Plan in place) from transport. Design policies should help to improve resilience to the effects of climate change. Together, these factors should lead to positive effect on the baseline. However, growth per se, is likely to generate an increased overall level of greenhouse gas emissions.<sup>29</sup>”

**3.5** In relation to transport-related carbon emissions associated with proposals in the Local Plan, these are likely to be most heavily influenced by the choices made in the Local Plan about the locations for new residential development in relation to existing or planned key employment opportunities, education facilities, and centres for the provision of other services, as well as by policies that support the provision of low carbon transport routes and services. As detailed in the SA for the adopted Local Plan 2017, these factors are already taken into account in the current Local Plan 2017 approach, including by a spatial strategy focussed on Maidstone and Rural Service Centres and by development management policies that seek to promote sustainable travel choices.

**3.6** The nature of the additional localised evidence and more stringent climate change measures envisaged by the Environment Topic Paper (Approach C) are not known. Examples of opportunities to enhance the sustainability of the Local Plan in relation to climate change objectives include:

- Identifying particular locations where barriers to sustainable travel choices exist that are unlikely to be apparent from high level spatial analysis (for example low uptake of public transport due to perceptions of poor frequency, high cost, or fear of crime) and seeking to target these via location-specific policies.
- Analysing the potential of different parts of the Borough to accommodate renewable energy development to inform locally-specific policy on support for renewable energy generation infrastructure or development

management policy, such as requirements to be capable of connecting to a renewable heat network.

**3.7** While such policies could have positive effects in relation to SA objective 13 (Climate change) they might also require trade-offs in order to preserve economic viability, as discussed at the end of this section.

**3.8** Conversely, relaxation of the Local Plan 2017 policy approach in relation to climate change (Approach D) would have negative effects in relation to SA objective 13 (Climate change), for example due to increased transport-related emissions from development located in places with poor access to employment, services and sustainable transport networks or reduced resilience to overheating, drought, extreme weather events, and other conditions expected under climate change. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**3.9** However, the Local Plan will need to comply with national policy, and there is a clear requirement in the NPPF to take a proactive approach to mitigating and adapting to climate change. Paragraph 150 of the NPPF states that new development should be planned for in ways that:

- “a) avoid increased vulnerability to the range of impacts arising from climate change.”; and
- “b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design.”

**3.10** Paragraph 151 of the NPPF requires plans to help increase the use and supply of renewable and low carbon energy and heat, stating that they should:

- “a) provide a positive strategy for energy from these sources”;
- b) consider identifying suitable area for renewable and low carbon energy source”; an
- c) identify opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply systems”

**3.11** Therefore, it is questionable whether a policy approach that seeks to relax climate change measures, such that it does not comply with national policy, is a reasonable alternative.

<sup>29</sup> AECOM (2106) SA of Maidstone Local Plan Non-Technical Summary

## Biodiversity

**3.12** The SA of the Local Plan 2017 summarised its likely effects in relation to biodiversity as follows:

“Although the direct effect on designated habitats is likely to be insignificant, development could have localised negative effects on wildlife habitats and species. 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.

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.<sup>30</sup>”

**3.13** By seeking to avoid development in locations that would lead to loss of valued biodiversity assets and placing requirements on development to mitigate and where possible enhance biodiversity, the current Local Plan policy approach already has positive effects on SA objective 14 (Biodiversity) relative to unplanned development.

**3.14** The nature of the additional localised evidence and more stringent biodiversity measures envisaged by the Environment Topic Paper are not known. Indeed, the SA of the adopted Local Plan<sup>31</sup> states that it already seeks to mitigate potential negative effects through site specific policies. Nevertheless, localised evidence gathering may provide opportunities to enhance the sustainability of the Local Plan in relation to biodiversity objectives. This might be achieved by analysing in more detail the existing habitats and species at development site options, in terms of existing pressures on these, their sensitivities to different typologies of development, and the opportunities to enhance pre-existing habitats or create linkages between adjoining ones as part of a wider biodiversity network.

**3.15** While more stringent biodiversity conservation and enhancement policies based on such location-specific evidence (Approach C) could have positive effects in relation to SA objective 14 (Biodiversity) they might also require trade-

offs in order to preserve economic viability, as discussed at the end of this section.

**3.16** Conversely, relaxation of the Local Plan 2017 policy approach in relation to biodiversity (Approach D) would have negative effects in relation to SA objective 14 (Biodiversity), for example due to loss of or harm to habitats within or adjacent to development sites or failure to identify opportunities for development to enhance on-site habitats or connectivity between surrounding habitat networks. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**3.17** However, the Local Plan will need to comply with national policy, and there is a clear requirement in the NPPF to provide greater emphasis on enhancing biodiversity. Paragraph 174b of the NPPF states that Local Plans should:

“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.

**3.18** Therefore, it is questionable whether a policy approach that seeks to relax protection of biodiversity, such that it does not comply with national policy, is a reasonable alternative.

## Landscape and heritage conservation

**3.19** The SA of the Local Plan 2017 summarised its likely effects in relation to landscape and heritage conservation sustainability objectives as follows:

“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.

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. Mitigation and enhancement measures should help to minimise these impacts though.

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.

Heritage features are likely to be maintained and in some places enhanced through regeneration; which

<sup>30</sup> AECOM (2106) SA of Maidstone Local Plan Non-Technical Summary

<sup>31</sup> AECOM (2106) SA of Maidstone Local Plan Non-Technical Summary



would constitute significant positive effects. At this stage, whether these positive effects will occur is somewhat uncertain as it will depend upon project design.<sup>32</sup>

**3.20** The nature of the additional localised evidence and more stringent landscape and heritage conservation measures envisaged by Approach C in the Environment Topic Paper are not known. Indeed, the SA of the adopted Local Plan<sup>33</sup> states that it already seeks to mitigate potential negative effects through site specific policies. Nevertheless, localised evidence gathering may provide opportunities to enhance the sustainability of the Local Plan in relation to landscape (SA objective 16) and the historic environment (SA objective 15). This might be achieved by analysing in more detail the landscape context and heritage assets (including the setting of off-site assets) at development site options and then specifying in more detail for each location the development typologies that would be acceptable and the design requirements that must be met to conserve and where possible enhance the landscape and historic environment.

**3.21** Rather than a more locally-specific approach, an alternative approach to increasing the positive effects of the Local Plan on landscape would be to plan for enhancement at a landscape scale, across local authority boundaries.

**3.22** While more stringent landscape and heritage conservation and enhancement policies (Approach C) could have positive effects in relation to corresponding sustainability objectives they might also require trade-offs in order to preserve economic viability, as discussed at the end of this section.

**3.23** Conversely, relaxation of the Local Plan 2017 policy approach in relation to landscape and heritage conservation (Approach D) would have more negative effects in relation landscape (SA objective 16) and the historic environment (SA objective 15), for example due to failure to require appropriate landscaping of development sites or to identify opportunities for development to enhance heritage assets. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**3.24** However, the Local Plan will need to comply with national policy. In relation to landscape, paragraph 170 of the NPPF states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:  
a) protecting and enhancing valued landscapes...b)

recognising the intrinsic character and beauty of the countryside”.

**3.25** In relation to the historic environment, paragraph 185 of the NPPF states that:

“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”.

**3.26** Therefore, it is questionable whether a policy approach that seeks to relax protection of landscape or heritage, such that it does not comply with national policy, is a reasonable alternative.

### Flood risk

**3.27** The SA of the Local Plan 2017 summarised its likely effects in relation to flood risk sustainability objectives as follows:

“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. 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. Nevertheless, development in some areas is within or adjacent to flood zone 2 or 3 and this presents the potential for negative impacts.<sup>34</sup>”

**3.28** Relative to a baseline of unplanned development, the effects of the existing Local Plan policy approach on SA objective 12 (Flooding) are positive due to requirements for measures to mitigate flood risk but negative due to the location of some allocated development.

**3.29** The Environment Topic Paper outlines that Strategic Flood Risk Assessment (SFRA) Levels 1 and 2 would be updated under all policy approaches, including continuation of the Local Plan 2017 approach. However, under Approach C it suggests that a more stringent policy approach could involve refusing any development that may cause even limited flooding and/or drainage issues. Such an approach would certainly deliver more positive effects in relation to SA objective 12 (Flooding). However, depending on the findings of the updated SFRA, it might also mean that insufficient land

<sup>32</sup> AECOM (2106) SA of Maidstone Local Plan Non-Technical Summary  
<sup>33</sup> AECOM (2106) SA of Maidstone Local Plan Non-Technical Summary

<sup>34</sup> AECOM (2106) SA of Maidstone Local Plan Non-Technical Summary

could be identified for development allocations (with negative effects on social and economic sustainability objectives due to unmet need) or that a reduced choice of site options limited the potential for development to be allocated in sustainable locations in terms of potential harm to environmental assets or sustainable travel patterns, with negative effects on associated environmental or social sustainability objectives.

**3.30** Conversely, relaxation of the Local Plan 2017 policy approach in relation to flood risk (Approach D) would have more negative effects in relation SA objective 12 (Flooding), for example due to failure to require flood resilient design or flood mitigation by SUDS in appropriate development sites. Such a relaxation of environmental policy requirements may also have some benefits, as discussed at the end of this section.

**3.31** However, the Local Plan will need to comply with national policy, and there is a clear requirement in the NPPF for plans to manage flood risk from all sources. Paragraphs 155 to 157 of the NPPF state that:

“inappropriate development in areas at risk of flooding should be avoided” and that  
“all plans, should apply a sequential, risk-based approach to the location of development...so as to avoid, where possible, flood risk to people and property”.

**3.32** Therefore, it is questionable whether a policy approach that seeks to relax flood risk management, such that it does not comply with national policy, is a reasonable alternative.

#### Trade-offs in relation to all environment policy options

**3.33** While the existing Local Plan 2017 approach has generally positive effects relative to unplanned development in relation to the environmental sustainability objectives, there may be scope to improve this performance via localised evidence gathering to justify more locally-specific<sup>35</sup> and/or more stringent policy requirements – Approach C in the Environment topic paper. This would result in positive effects in relation to corresponding SA objectives such as SA12 Flooding, SA13 Climate change, SA14 Biodiversity, and SA16 Landscape.

**3.34** In locations with relatively low property sales values or relatively high land preparation costs, it is possible that overall economic viability and hence deliverability of development could be threatened by more stringent environmental policy requirements (Approach C). However, by identifying at the

plan-making rather than proposal stage where greater developer contributions towards environmental mitigation or enhancement are likely to be required to achieve sustainable development, the Council should be able to check that the cumulative cost of all relevant policies does not undermine viability. In line with government guidance<sup>36</sup>, land value in such calculations should be based on existing use value a reasonable incentive to the landowner to sell land for development. If viability calculated on this basis is confirmed, then more stringent environmental policies should not threaten deliverability of development. If viability is threatened then a trade-off would be necessary, i.e. more stringent environmental policies could only be applied if other policy requirements, such as developer contributions towards affordable housing or social infrastructure, were relaxed.

**3.35** In addition to viability considerations, it is also possible that more stringent environmental policy under Approach C could limit the number of site options that are deemed acceptable, such that overall development needs across the Borough cannot be met. This would result in negative effects on social and economic sustainability objectives associated with development benefits. It is therefore important to consider the sustainability advantages and disadvantages of all reasonable alternative development site options in the round so that potential trade-offs are explicit and informed choices can be made. The SA of site options will provide such an analysis.

**3.36** If environmental policy requirements were to be relaxed relative to the Local Plan 2017 approach (Approach D), this would be likely to increase the risk of negative effects in relation to environmental sustainability objectives such as such as SA12 Flooding, SA13 Climate change, SA14 Biodiversity, and SA16 Landscape. Adherence to environmental policy requirements, for example provision of more energy efficient homes, often carries a direct, short term cost to developers. Reduction of this cost may allow other policy requirements that rely on developer contributions, for example provision of affordable housing, to be tightened with positive effects in relation to associated sustainability objectives such as SA1 (Housing).

**3.37** In addition to these short-term consequences, it should be remembered that relaxation of environmental requirements for development will often carry with it a longer term cost that will be borne by the occupiers of new development (for example higher energy bills as a result of lower energy efficiency standards) or by wider society (for example reduced health and well-being as a result of reduced access to or quality of the natural and historic environment).

<sup>35</sup> It should be noted that, given the geographic scope and the level of detail of local plans, some locally-specific requirements might be more suited to neighbourhood plans than a borough-wide local plan

<sup>36</sup> MHCLG (2019) Viability [online] Available at: <https://www.gov.uk/guidance/viability>

**3.38** Finally, the scope to relax environmental policy requirements in the Local Plan may be curtailed by the numerous environmental regulatory requirements of international and national policies (for example in the NPPF) and laws, as described in the policy context sections of the SA Scoping Report<sup>37</sup>.

## Housing options

### Affordable housing

**3.39** Three alternative policy approaches to affordable housing provision are outlined in the Housing topic paper:

- **RA1: Keep the Local Plan 2017 affordable housing policy** - maintain the policy of 30% affordable housing for sites within the Maidstone urban area, and 40% for those sites outside.
- **RA2: Seek to maximise affordable housing** - look to maximise the amount of affordable housing.
- **RA3: Apply a more localised approach to affordable housing** - This approach draws on the current Local Plan 2017 approach but seeks to further target the provision of tenures of affordable housing based on where there is localised need. This would include setting different targets for overall, social rented, and other affordable products in different areas across the Borough.

**3.40** The SA of the Local Plan 2017 summarised its likely effects in relation to housing sustainability objectives as follows:

“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.”<sup>38</sup>

**3.41** The Council’s recently updated Strategic Housing Market Assessment (SHMA) shows that the average house price to earnings ratio in Maidstone Borough rose sharply during 2011 to 2017 and states that in 2018, the median house price was a significant 11.20 times median earnings in the Borough, higher than the ratio in Kent or the South East. The SHMA points to an affordable housing need of 464 homes per year which equates to 38% of the total housing need as derived from the government’s standard method (1,214 dwellings per annum - dpa), compared to actual delivery rates of 30% since 2011 and the current policy requirements of 30% (within Maidstone urban area)/ 40% (outside urban area). However, as the SHMA notes, the situation is complex. Although there is some

basis for considering planning for higher housing provision in order to meet the affordable housing need, the standard method implies a significant increase on historical housing delivery rates, and a substantial rate of housing growth. If this increased housing supply leads to reduced average house prices, it will reduce the need for affordable housing.

**3.42** The SHMA also identifies three housing market sub-areas in the Borough – Maidstone Urban Area; Rural Centre and North; and Rural South. The SHMA states that the annual affordable need in absolute terms is greatest in the Urban sub-area (307 dpa), with smaller requirements in the Rural Centre and North (119 dpa) and Rural South (38 dpa) sub-areas. However, it is unclear what the total need is in each of these sub-areas and hence how the affordable housing need for these sub-areas compares to the requirements set out in the Local Plan 2017 policy approach (30% for urban sites; 40% for rural sites).

**3.43** Affordable housing often accounts for the largest proportion of developer contributions. Setting a higher affordable housing requirement, as envisaged by option RA2, while likely to have positive effects in relation to SA objective 1 (Housing) could require trade-offs against other calls on developer contributions such as the provision of social and green infrastructure (such as open space). This would result in negative effects in relation to corresponding SA objectives such as SA2 Services & facilities, SA3 Community, and SA4 Health. However, by making policy requirements clear and analysing economic viability at the plan-making stage, there is a greater chance that viability issues will not prevent the delivery of sustainable development. These issues have been explored in greater depth above, in relation to the potential trade-offs associated with policy options that would strengthen environmental requirements.

**3.44** Rather than seeking higher amounts of affordable housing overall, option RA3 would gather evidence to justify more spatially specific targets than the simple urban vs. rural split seen in current Local Plan 2017 policy. Option RA3 would also set more spatially specific tenure split targets for affordable housing than the Borough-wide targets of 70% affordable rented or social rented vs, 30% intermediate affordable housing seen in current Local Plan 2017 policy.

**3.45** Since the SHMA identifies three housing market sub-areas within the Borough, separate affordable housing and housing tenure split targets for each of these sub-areas would appear logical and more likely to address unmet affordable housing needs of different groups, with positive effects in relation to SA objective 1 (Housing). It is questionable whether setting even more spatially specific affordable housing requirements, i.e. within individual housing market sub-areas,

<sup>37</sup> LUC (2019) SA Scoping for Maidstone Local Plan Review

<sup>38</sup> AECOM (2106) SA of Maidstone Local Plan Non-Technical Summary

would have significant additional benefits given that these sub-areas are presumably defined at least in part on the basis that housing provided anywhere within the sub-area is capable of meeting need arising anywhere within that sub-area.

### Housing typologies

**3.46** Two alternative policy approaches to housing typologies are outlined in the Housing topic paper:

- **RA1: Keep the Local Plan 2017 housing mix policy and add detail about typologies as set out in the NPPF** - would likely be the focus of Development Management policies, and potentially an update to the Affordable Housing Needs SPD. This approach is based on a site-by-site negotiation on planning applications.
- **RA2: Apply a neighbourhood-level housing type and mix policy** - draws on the current LP17 approach but would set different targets for the size and type of new homes in different parts of the Borough, based on local stock and need evidence.

**3.47** Policy SP 19: Housing mix of the Local Plan 2017 seeks:

“a sustainable range of house sizes, types and tenures (including plots for custom and self-build) that reflect the needs of those living in Maidstone Borough now and in years to come”. It also states that “Accommodation profiles detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform developers to determine which house sizes should be delivered in urban and rural areas to meet the objectively assessed needs of the area”.

**3.48** The SA of the Local Plan 2017 concludes that the current Housing Mix policy will have positive effects in relation to the Housing sustainability objective and that:

“Implementation of this policy will help to improve the mix of dwelling sizes and tenures within Maidstone over the plan period.”

**3.49** Adding detail about typologies, as suggested by option RA1, would ensure compliance with the current version of NPPF<sup>39</sup> and help to ensure that the housing needs of different groups are met, with positive effects for SA objective 1 (Housing).

**3.50** The Council's latest SHMA sets out the need for homes of different sizes in the affordable rented, low cost ownership, and market housing sectors. It goes on to suggest that prescriptive figures do not necessarily need to be included within the Local Plan but that they could be used a guidelines when considering the appropriate mix on larger development sites and as a monitoring tool to ensure that future delivery is in line with the likely requirements, as driven by demographic change in the area. In light of these recommendations and the fact that Local Plan 2017 policy already cross-refers to accommodation profiles detailed in the current and future SHMAs, there may be little benefit in defining house size and tenure needs within the Local Plan policy itself, as implied by option RA2.

**3.51** There may, however, be some additional benefit in gathering more locally-specific evidence on how the required size, type, and tenure of housing varies within the Borough, since the SHMA generally only reports this for the Borough as a whole, although rented affordable need vs. affordable ownership requirements are already established for the three housing market sub-areas. This could allow new housing development to be more closely aligned with local needs (assuming that these vary significantly across the Borough), with positive effects in relation to SA objective 1 (Housing). This additional geographic detail could reside within a refined SHMA and be cross referenced in Local Plan and/or Neighbourhood Plan policies, as appropriate.

### Infrastructure options

**3.52** In addition to the options reflected in the separately appraised Spatial Approaches, one further alternative policy approaches to infrastructure provision is outlined in the Social Infrastructure topic paper:

- **Approach RA3: Apply a more localised approach to infrastructure provision** - This approach would focus on delivering more, smaller pieces of infrastructure in closer proximity to people's homes.

**3.53** The Infrastructure topic paper refers to three types of infrastructure with different spatial requirements – utilities infrastructure (water/wastewater, power, digital services); social/community services (e.g. health, education, social services); and social/community spaces (e.g. open space, leisure facilities, community facilities). The scope to provide each of these types more locally and the potential sustainability implications of doing so are considered below:

<sup>39</sup> Para. 61 states that “...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing,

families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”



### Utilities infrastructure

**3.54** Provision of water/wastewater, power, and increasingly digital services is essential to development functionality and hence needs to be provided at every dwelling or employment space. As such there is little scope to vary the consumption pattern of this type of infrastructure.

**3.55** For some utilities, such as wastewater treatment, the options for a more dispersed, localised approach to service provision may be limited by technical issues, including water supply and through flows. There may, however, be opportunities for the Local Plan to support different geographies of provision for other types of utility infrastructure. For example, rainwater harvesting and grey water recycling could be encouraged at the local level. In addition, relative to centralised energy generation, distributed generation can increase the potential to make use of heat created in the generation process that would otherwise be wasted and reduce electrical energy lost during transmission, with positive effects for SA objective 13 (Climate change). Distributed power generation can also help reduce capacity issues in traditional transmission lines, and offer businesses greater siting flexibility, although economies of scale in power generation may be lost, with mixed effects on SA objective 5 (Economy).

### Social/community services

**3.56** Social infrastructure such as new schools or healthcare facilities to serve new development typically requires a threshold level of additional demand for services before service providers (e.g. in the case of these examples, Kent County Council and Kent and Medway Clinical Commissioning Group) will consider providing new infrastructure in a location. Long term trends have generally been for smaller and more local infrastructure such as village schools and single GP medical practices to be consolidated into fewer facilities with larger catchment areas, for reasons of greater efficiency (due to economies of scale) and effectiveness (by attaining the critical mass required to provide specialist expertise).

**3.57** The scope for the Local Plan to provide for smaller facilities closer to where people live is therefore likely to be limited. Nevertheless, limited 'outreach/spoke' services, delivered from larger 'hubs' may be possible, particularly in relation to healthcare and social services. To the extent that a more localised model of provision is possible, positive sustainability effects may arise from improved access to such facilities, especially by active travel modes (e.g. in relation SA2 Services & facilities and SA7 Sustainable travel). However, smaller, more localised provision may result in increased costs of service provision due to loss of economies of scale and therefore trade-offs with the provision of other publicly or developer-funded facilities, as well as and less

potential to provide centres of expertise and excellence (e.g. negative effects in relation to SA2 Services & facilities, SA4 Health, SA5 Economy).

### Social/community spaces

**3.58** Option RA3 proposes a more localised approach to provision of social infrastructure, including social/community spaces. By improving access to open space and community facilities, especially for those without a car, there could be positive effects in relation to SA objectives 2 (Services & facilities), 3 (Community), and 4 (Health).

**3.59** While local provision of social and community spaces has sustainability benefits, for open spaces in particular, it is only part of the picture. A spatial hierarchy of open spaces linked by safe, attractive walking and cycling routes provision offers the greatest potential sustainability benefits. Neighbourhood scale green streets, pocket parks, playgrounds, and outdoor meeting places help to ensure that everyone can access these spaces with positive effects in relation to community cohesion (SA objective 3) and health and wellbeing (SA objective 4). Such spaces should be supplemented with a smaller number of more widely distributed larger public open spaces linked by walking and cycling routes that offer greater opportunities for long walks, dog walking, cycling, horse riding, access to nature, formal recreation, outdoor education, public outdoor events, appreciation of cultural heritage, and so on. Provision of these should be informed by an open space strategy to understand supply and demand for open spaces, to identify deficiencies, to secure new provision, and to improve quality through better management.

## Chapter 4

### Next steps

**4.1** The 'top-down' appraisal in this SA paper will be complemented, at a later date, by a 'bottom-up' appraisal of all reasonable alternative development site options (broadly those sites assessed as 'green' or 'amber' by the Council's SLAA process), including Garden Settlement site options.

**4.2** In parallel with this paper, SA is also being carried out of three illustrative, high-level spatial strategy options chosen by the Council to highlight the outer limits of the spatial choices to be made:

- Option RA1: Local Plan Review Continued (no garden settlements, new residential and economic development allocations located according to the existing settlement hierarchy – Maidstone, Rural Service Centres, Larger Villages and some potentially suitable sites in the Countryside).
- Option RA1a: No Maidstone (all four reasonable alternative garden settlements included, with residual new residential and economic development allocations to be located according to the existing settlement hierarchy – Rural Services Centres and Larger Villages, excluding Maidstone and Countryside sites).
- Option RA2a: Maidstone + 4 Garden Settlements (majority of new residential and economic development allocations to be located at Maidstone, including development at edges, as well as all four reasonable alternative garden settlements; and residual growth allocated to Rural Services Centres and Larger Villages).

**4.3** The various elements of SA work above will be considered by the Council together with other emerging evidence (for example from a transport modelling and a garden settlements assessment) to inform development of a further set of spatial strategy options. Unlike the earlier spatial options testing, this later SA work will consider well-defined (both spatially, and in terms of what they could provide) reasonable alternative spatial strategies for a final round of testing through the SA before a preferred spatial strategy is selected.

LUC

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