Social Infrastructure Topic Paper

Planning is a technical process, driven by legislation and government policy and advice. This topic paper uses a number of acronyms and technical terms, so the glossary below has been prepared to assist the reader.

Acronym	Term	Descriptions
CCG	Clinical Commissioning Group	Clinical Commissioning Groups are responsible for commissioning most of the hospital and community NHS services in the area they cover.
CIL	Community Infrastructure Levy	The levy will help pay for the infrastructure required to support new development. This includes development that does not require planning permission. The levy should not be used to remedy pre-existing deficiencies unless the new development makes the deficiency more severe.
	Development Plan	Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.
DPD	Development Plan Document	A DPD is a spatial planning document that is subject to independent examination. Under new regulations, DPDs are now known as local plans.
	Garden Settlement	A holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities
	Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
IDP	Infrastructure Delivery Plan	The Infrastructure Delivery Plan identifies the infrastructure schemes necessary to support the development proposed in the Local Plan and outlines how and when these will be delivered.
	Larger Villages	Most sustainable settlements in Maidstone's settlement hierarchy after the town centre, urban area and rural service centres: Boughton Monchelsea

		Coxheath Eyhorne Street (Hollingbourne) Sutton Valence Yalding
	Local Green Space	Land designated through local and neighbourhood plans which allows communities to identify and protect green areas of particular importance to them.
LP17	Maidstone Borough Local Plan	The Maidstone Borough Local Plan is the key document that sets the framework to guide the future development of the borough. It plans for homes, jobs, shopping, leisure and the environment, as well as the associated infrastructure to support new development. It explains the 'why, what, where, when and how' development will be delivered through a strategy that plans for growth and regeneration whilst at the same time protects and enhances the borough's natural and built assets. The plan covers the period from 2011 and 2031.
NPPF	National Planning Policy Framework	The NPPF was published in February 2019 and it sets out the government's planning policies for England and how these must be applied. Local plan policies must be in conformity with the NPPF.
	Neighbourhood Plan	A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.
PPG	Planning Practice Guidance	The PPG provides additional guidance on how the national policies in the National Planning Policy Framework should be interpreted and applied.
	Rural Service Centres	Most sustainable settlements in Maidstone's settlement hierarchy after the town centre and urban area: Harrietsham Headcorn Lenham Marden Staplehurst
S106	Section 106 legal agreements	Section 106 of the Town and Country Planning Act 1990 allows a local planning authority to enter into a legally binding agreement or planning obligation with a land developer in connection with the granting of planning permission for a development. The obligation is termed a Section 106 Agreement. The purpose of such agreements is to mitigate the impacts of the development proposed provided the matters being addressed are directly related to the development being permitted, and can include sums of money.
SA	Sustainability Appraisal	The SA is a tool for appraising policies to ensure they reflect sustainable development objectives, including social, economic and environmental objectives.
	Schools Capacity Survey	The school capacity survey is a statutory data collection that all local authorities must complete every year. Local authorities must submit data about: school capacity (the number if places and pupils in a school year), pupil forecasts (an estimation of how many pupils there will be in future), capital spend (the money

		schools and local authorities spend on their buildings and facilities).
SPD	Supplementary planning documents	An SPD provides further detail to a policy or a group of policies set out in a local plan. A SPD can provide additional detail about how a policy should be applied in practice. SPDs are a material consideration in planning decisions but are not part of the development plan.
	Town Centre	Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
	Windfall sites	Sites not specifically identified in the development plan

Background/Context

This topic paper considers how infrastructure should be provided alongside growth in the Local Plan Review. If focuses on social infrastructure **from a spatial perspective only**. Non-spatial matters are dealt with separately. The paper focuses on:

- Health
- Education
- Social Services
- Community spaces
- Open Space
- Leisure infrastructure
- Utilities & Digital Infrastructure.

Transport infrastructure is covered in a separate topic paper.

Legislative Requirements

Planning and Compulsory Purchase Act 2004 (as amended) - Basis for making local plans and relevant requirements for producing plans; duty to cooperate requirements; and requirements for sustainability appraisals.

Environmental Assessment of Plans and Programmes Regulations 2004 – Sustainability appraisals incorporate the requirements of these regulations.

Climate Change Act 2008 and (2050 Target Amendment) Order 2019 – Sets overarching national targets for reducing greenhouse gases. It establishes a legally binding target to reduce the UK's greenhouse gas emissions by 100% in 2050 from 1990 levels.

Localism Act 2011 - Introduced the duty to cooperate.

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - Prescribes the general form and content of local plans, policies maps, monitoring reports; the process for preparing local plans; the requirement to review local plans; consultation/notification; public participation; and examination.

Neighbourhood Planning Act 2017

- Reinforces the status of Neighbourhood Plans in the Development Plan.
- Ensures that all local planning authorities in England identify the strategic priorities for the development and use of land in their areas and interventions where documents are not in place and seeks to improve the involvement of communities and others in plan-making.
- Introduces a power for the Secretary of State to make regulations which prescribe the circumstances where certain conditions may or may not be imposed and descriptions of such conditions for the purpose of ensuring that conditions meet national policy tests in the National Planning Policy Framework.

- Shifts power from central government towards local government to set up and manage development corporations for new towns.
- Clarifications on Compulsory Purchase provisions.

National Policy and Guidance Requirements

National Planning Policy Framework (NPPF)

One of the NPPF's overarching objectives includes a social objective: to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being (paragraph 8).

Also, strategic Policies should set out an overall strategy for the pattern, scale and quality of development, and aim to achieve healthy, inclusive and safe places, provide the social, recreational and cultural facilities and services the community needs, provide for a sufficient choice of school places is available to meet the needs of existing and new communities and provide access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

National Planning Practice Guidance (NPPG)

Health

The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).

Plan-making bodies will need to discuss their emerging strategy for development at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on local context), and the implications of development on health and care infrastructure.

Education

Kent County Council forecasts the need for new school places and reports this to the Government through an annual school capacity survey. The County Council considers natural population change such as birth rates, the effects of parental choice, and estimates additional needs from new housing with reference to pupil numbers from recent developments and other evidence. The Department for Education has published the 'Securing developer contributions for education' guidance for local authorities on estimating pupil numbers from new housing and securing contributions for the creation of additional school places for all

education phases (age 0-19 years and special educational needs) over the plan period.

Plans should seek to meet the development needs of their area, including community facilities such as schools. They should, at the most appropriate level, allocate sufficient suitable land for schools to meet the need anticipated over the plan period, taking into account needs that may cross local authority boundaries. Plan makers will need to work with local authorities with education responsibilities and developers to coordinate the phasing and delivery of housing growth with the delivery of new school places, to ensure that sufficient school capacity is available at the right time. Mainstream schools must be of a viable size and format and planned for on the basis of standard class sizes.

Precise site allocation policies provide clarity and certainty by identifying the total amount of land required for education use, with regard to the Department for Education space standards, and any necessary characteristics for the school site such as its shape, accessibility and serviced provision at an appropriate time. Master planning of large developments with multiple developers can help to inform decisions about the appropriate scale and siting of new or expanded schools.

Future proofing may also be considered, for example, by designating land adjacent to education sites to allow for future expansion if required. Where a plan safeguards additional land specifically for education, the land can be made available for purchase by the local authority within a suitable period, after which other uses may be permissible. If the additional land is required for education, this will preclude alternative uses for the purposes of land valuation.

Open Space

Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development.

It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to where open space serves a wider area. (See guidance on Local Green Space designation, which may form part of the overall open space network within an area).

Local Green Space can be allocated in Development Plan documents. The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

Sports and recreation facilities

Authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities.

Waste

Kent County Council is the waste planning authority, and the allocation of land for this use will be dealt with as a 'county matter'.

Water supply and sewerage

Multiple benefits for people and the environment can be achievable through good design and mitigation. For example, flood risk can be reduced, and biodiversity and amenity improved, by designing development that include permeable surfaces and other sustainable drainage systems, removing artificial physical modifications (for example, weirs and concrete channels) and recreating natural features. Water quality can be improved by protecting and enhancing green infrastructure and further information on this can be found in the planning practice guidance on the Natural Environment.

Good design and mitigation measures can be secured through site specific policies for allocated sites and through non site-specific policies on water infrastructure and protecting the water environment. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out. Early discussions between strategic policy making authorities and water and sewerage companies can help to ensure that proposed growth and environmental objectives are reflected in company business plans. Growth that requires new water supply should also be reflected in companies' long-term water resources management plans. This will help ensure that the necessary infrastructure is funded through the water industry's price review.

Strategic policy-making authorities will also need to consider the objectives in the government's 25 Year Environment Plan to reduce the damaging abstraction of water from rivers and groundwater, and to reach or exceed objectives for rivers, lakes, coastal and ground waters that are specially protected.

Planning for water infrastructure:

Plan making may need to consider:

- Identifying suitable sites for new or enhanced wastewater and water supply infrastructure. When identifying sites, it is important to recognise that water and wastewater infrastructure can have specific locational needs (and often consists of engineering works rather than new buildings). This means exceptionally otherwise protected areas may have to be considered, where this is consistent with their designation.
- Existing and proposed development in the vicinity of a location under consideration for water and wastewater infrastructure. In two-tier areas

there will need to be close working between the district and county councils.
- Whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).
- Phasing new development so that water and wastewater infrastructure will be in place when and where needed. The impact on designated sites of importance for biodiversity should be considered to ensure the required infrastructure is in place before any environmental effects occur.

Wastewater:

Plan making may need to consider:

- The sufficiency and capacity of wastewater infrastructure
- The circumstances where wastewater from new development would not be expected to drain to a public sewer
- The capacity of the environment to receive effluent from development in different parts of a strategic policy-making authority's area without preventing relevant statutory objectives being met.

Ministerial statements

There are no Ministerial Statements that significantly change the overall approaches set out in this paper.

Maidstone Borough Local Plan 2017 (LP17) Policies: Strategic vs Non-strategic

The location and delivery of infrastructure within Maidstone borough is considered by the NPPF (paragraph 20b) to be a strategic matter which needs to be addressed by the strategic policies of the Local Plan Review (LPR).

Key Strategic Policies

SS1 (Maidstone Borough Spatial Strategy) outlines the strategy for development, considering infrastructure requirements for different parts of the borough via the settlement hierarchy, including schools, community halls, shops, public houses and a health infrastructure.

ID1 (Infrastructure Delivery) sets out the Council's approach to identifying, requiring, and delivering infrastructure capacity improvements alongside development. It includes a list of the methods of value capture that the Council will use to facilitate new infrastructure improvements, and a list of the Council's priorities when funding is limited and multiple needs are identified.

SP2 (Maidstone Urban Area: North West strategic development location) outlines Maidstone Urban Area as the most sustainable area for growth. Key infrastructure requirements include a new two form entry primary school, community centre and local shopping facilities being provided on site H1(2) as well as improvements to local health centres.

SP3 (Maidstone Urban Area: South East strategic development location) outlines Maidstone Urban Area as the most sustainable area for growth. Key infrastructure requirements include new/expansion to primary schools on sites H1(5) and H1(10), community centre and improvements to health facilities within the locality.

SP4 (Maidstone Town Centre) outlines measures through the Infrastructure Delivery Plan to improve the accessibility to the town centre.

SP5 (Rural Service Centres) outlines these areas as the focal points for growth. This policy also supports new retail spaces, community services to meet the local need in these areas as well as resisting a loss of these facilities.

SP6 (Harrietsham Rural Service Centre) outlines key infrastructure requirements for Harrietsham including the provision of a one form entry expansion to either Lenham or Harrietsham primary schools and improvement to health infrastructure including an extension and/or improvements to Glebe Medical Centre.

SP7 (Headcorn Rural Service Centre) outlines key infrastructure requirements for Headcorn including the provision of a one form entry extension to the primary school, improvements to capacity of the sewer and wastewater treatment facilities and improvements to health infrastructure at Headcorn surgery.

SP8 (Lenham Rural Service Centre) acknowledges Lenham as a broad location for growth and therefore improvements to infrastructure are required. These include the provision of a one form entry expansion at both Lenham or Harrietsham primary schools and improvements to health infrastructure at The Len Valley Practice.

SP9 (Marden Rural Service Centre) outlines key infrastructure requirements for Marden including the provision of 0.6 form entry expansion at the primary school as well as improvements to health infrastructure at Marden Medical Centre.

SP10 (Staplehurst Rural Service Centre) outlines key infrastructure requirements for Staplehurst including the provision of 0.5 form entry expansion of the primary school and improvements to health infrastructure at Staplehurst Medical Centre.

SP11 (Larger Villages) supports new retail spaces, community services to meet the local need in these areas as well as resisting a loss of these facilities.

SP12 (Boughton Monchelsea Larger Village) outlines key infrastructure requirements for Boughton Monchelsea including highways and transport infrastructure.

SP13 (Coxheath Larger Village) outlines key infrastructure requirements for Coxheath including highways and transport infrastructure and improvements to health infrastructure at Orchard Medical Centre and Stockett Lane Surgery.

SP14 (Eyhorne Street (Hollingbourne) Larger Village) outlines key infrastructure requirements for Eyhorne Street including the retention of local shops and community facilities as well as providing new community developments to meet local need.

SP15 (Sutton Valence Larger Village) outlines key infrastructure requirements for Sutton Valence including improvements to health infrastructure at Sutton Valence Surgery and Cobtree Medical Practice.

SP16 (Yalding Larger Village) outlines key infrastructure requirements for Yalding including improvements to health infrastructure at Yalding GP Practice.

Non-strategic Policies

DM8 (External Lighting) controls the development of new external lighting infrastructure in the borough.

DM19 (Open space & Recreation) sets out how new public open space should be provided alongside new development across the borough.

DM20 (Community facilities) sets out how an adequate provision of community and social facilities should be provided alongside residential development.

DM24 (Renewable and low carbon energy schemes) sets out the Council's policy for the design and setting of larger scale renewable and low-carbon energy products.

DM25 (Electronic communications) sets out the Council's policy for the design and setting of electric communications networks.

Relevant Supplementary Planning Documents (SPD) and Planning Policy Advice Notes

There are no specific SPDs on social infrastructure at the current time.

Maidstone Strategic Plan Requirements

The Strategic Plan sets out the Council's vision through to 2045 as '*Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential'.* Relevant priorities based on the vision are:

Embracing Growth and Enabling Infrastructure.

- Infrastructure is in place to meet the growing needs of the economy and residents.
- Sufficient infrastructure is planned to meet the demands of growth

Homes and Communities

- Community facilities and services in the right place at the right time to support communities

- A diverse range of community activities is encouraged.

The requirements in meeting these priorities include:

- Sufficient infrastructure is planned to meet the demands of growth.
- Working with partners to get infrastructure planned, funded and delivered.
- Ensuring that sufficient provision is made for community infrastructure.
- Ensuring that sufficient provision is made for health and education to serve the new development that is planned.
- Ensuring sufficient utilities infrastructure is provided to serve the new development that is planned.

Kent County Council (KCC) Policy Framework

Kent Minerals & Waste Local Plan 2013-2030 - Sets out the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent, and the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning.

Key policies relating to waste as an infrastructure function are:

- Policy CSW 3: Waste Reduction
- Policy CSW 16: Safeguarding of Existing Waste Management Facilities.

Increasing Opportunities, Improving Outcomes - KCC's strategic statement for 2015 - 2020. It sets out a vision for improving lives by ensuring every pound spent in Kent is delivering better outcomes for Kent's residents, communities and businesses.

The Commissioning Plan for Education Provision in Kent - A 5 year rolling plan which is updated annually. The 2020-2024 version shows how KCC will make sure there are:

- Enough high quality education places
- Places located in the right areas
- Places for all learners.

Joint health and wellbeing strategy - KCC's strategy for improving health care services in Kent.

Joint Strategic Needs Assessment - Looks at the need, demand and supply of health and social care services across Kent.

Delivering better healthcare for Kent - Explains how health reform can lead to better use of public sector money and better outcomes for people.

Libraries, Registration and Archives Strategy - Kent's strategy and vision for libraries, registrations and archives in the county.

Kent Joint Municipal Waste Management Strategy – The strategy has been developed by the 13 councils in the Kent Resource Partnership (12 district/borough councils and Maidstone Borough Council). The strategy sets out how the Kent Resource Partnership intends to manage its household waste. The strategy was refreshed in 2018/19. The original Joint Waste Management Strategy was adopted in 2007/08.

Kent Adult Carers' Strategy - Sets out KCC's vision for carers across Kent. KCC will build on the progress established through the carers grant funding and use the framework set out in the National Carers Strategy. In Kent, KCC has committed to deliver the national strategy in 5 years rather the suggested 10.

Across Kent, KCC has made a commitment to work together to ensure that taking on a vital caring role does not mean people having to take less care of their own health or career opportunities or suffer from social exclusion. KCC believes that carers are entitled to their own lives and are important in their own right as individuals not just for the role they provide.

Central to the development of this strategy and the general approach towards the carers in Kent is the principle that carers are the main providers of community care who should be supported in their role. KCC does not underestimate carers' contribution to society. If carers were to give up providing the care and support they offer it would be akin to losing the whole of the NHS.

The services and support that KCC designs in the future must be flexible and able to adapt to meet the needs of a wide range of people; therefore delivering greater levels of choice and control to carers will be a priority.

Accommodation Strategy for Adult Social Care (Better Homes: Greater Choice) - Identifies how the provision, demand and aspiration for housing, care and support services will be met for adult social care clients should they need to move to access care. The vision is that people should live independently in their own home receiving the right care and support. However, if that option is no longer suitable, the right accommodation solutions have to be in the right places across the county, and they have to be the right type, tenure and size. This vision is coupled with improved commissioning of services across each of the six adult social care client groups.

Kent County Council has a statutory responsibility to fund people who are eligible for care services and it has become essential to agree a strategic direction and provide clear market positions statements to all providers who want to work and develop in Kent.

Accommodation maps have been developed by district and client groups, detailing the current supply of accommodation against deprivation.

Other Key Plans and Strategies (incl. Neighbourhood Plans)

Neighbourhood Plans - Form part of the Maidstone Development Plan. There are four made plans:

- North Loose Neighbourhood Plan 2015 – 2031 (2016)
- Staplehurst Neighbourhood Plan 2016 – 2031 (2016)
- Loose Neighbourhood Plan 2018 – 2031 (2019)
- Marden Neighbourhood Plan 2017 – 2031 (2020).

The neighbourhood plans have consideration for the social infrastructure needs of the neighbourhood plan area.

Kent and Medway Growth and Infrastructure Framework (GIF) 2018 update - Sets out emerging development and infrastructure requirements to support growth across Kent and Medway. The main sustainability issues for Maidstone itself are:

- The highway network is severely congested including in the centre of Maidstone.
- Maidstone has experienced one of the largest net inflows of internal (within UK) migration for 2011 to 2016.
- Health care provision struggling to keep up with growth.
- Deficiencies in early years, primary and secondary education, especially in areas of growth.

Maidstone Borough Local Plan Infrastructure Delivery Plan (2019) - Identifies infrastructure schemes necessary to support developments outlined in Maidstone's Local Plan and when these are to be delivered.

Community Infrastructure Levy (CIL) (2018) – CIL is a planning charge, introduced as a tool for local authorities to help deliver infrastructure to support the development of their areas. Maidstone's charging schedule was approved, alongside the CIL regulation 123 list, with an implementation date of 1st October 2018.

Democratic Resolutions (Full Council/Committees)

None of relevance for this topic paper.

Meeting Objectively Assessed Need

The driver for the spatial strategy is need regarding housing, employment and retail. This topic paper considers how social infrastructure considerations may influence the spatial strategy.

Supporting Evidence (Current and Future)

Infrastructure Delivery Plan (IDP) 2020 – The Council's latest update of the IDP groups infrastructure schemes by broad location and into eight broad infrastructure types. For each infrastructure type and broad location, the IDP sets out the borough's requirements; where and when it is required; why it is needed and an update on the delivery of the infrastructure to date. It also sets out what key progress is expected over the next year. Each infrastructure type is accompanied by an Infrastructure Delivery Schedule table which provides further

detail on who will be delivering the required infrastructure, funding sources and estimated total costs, as well as prioritising the projects and identifying the risk associated with the delivery of each project.

Local Plan Review Infrastructure Capacity Update - The LPR infrastructure capacity update provides evidence in respect to the capacity of local services to grow to accommodate future growth. This document builds on existing plans and strategies (e.g. the Council's Infrastructure Delivery Plan, KCC strategies and CCG forecasting) to understand what new infrastructure is needed to support the deliverability of the preferred spatial strategy, and underpins compliance of the plan with national policies and legislative frameworks.

The following providers were approached in January 2020 to establish the capacity of infrastructure that falls within their jurisdiction: KCC Highways, KCC Waste, KCC Education, the CCG, Network Rail & Southeastern Rail, Highways England, MBC parks and leisure, Sport England, and utilities network providers. To help infrastructure providers understand and assess potential development levels, an indicative maximum potential quantum of development was expressed for each growth location within the borough. Service providers were specifically asked to comment on:

- How the maximum potential capacities would be serviced
- What problems or opportunities these levels and locations of development may present
- Potential trigger/tipping points for the provision of infrastructure
- Known capacity or phasing issues arising from the potential development
- Whether there are any absolute constraints to infrastructure delivery
- Provisional infrastructure costs
- Other forms of mitigation
- Potential funding sources.

Feedback has been received from most providers and discussions are ongoing with those who have yet to formally respond. The responses will be fed into discussions on potential patterns of growth, and feedback from providers will be sought during the course of testing the Council's preferred approach.

Sports Facilities Strategy & Playing Pitch Strategy – The strategies form part of the Council's evidence base for the review of the Maidstone Borough Local Plan, and will inform development management decisions. A base date of mid-2016 is used to calculate the quantitative need for additional new facilities arising from the borough's population growth to 2031, as set out in the LP17. An update to the strategies, to reflect growth identified in the Local Plan Review, is being undertaken in 2020.

Duty to Cooperate

Water supply and water quality issues often cross local authority boundaries and can be best considered on a catchment basis. Liaison between strategic policy-making authorities, the Environment Agency, catchment partnerships and water and sewerage companies from the outset (at the plan scoping and evidence gathering stages of plan-making) will help to identify water supply and quality

issues, the need for new water and wastewater infrastructure to fully account for proposed growth and other relevant issues such as flood risk. The duty to cooperate across boundaries applies to water supply and quality issues, and should be evidenced through a statement of common ground.

Development Management (DM) Input

There are no comments that seek to change the overall direction of relevant strategic policies.

Regulation 18a (Scoping Themes and Issues) References

It is important to set out how high-quality digital infrastructure will be upgraded, as well as providing connections for new developments with priority given to full fibre connection. Effort will also go into securing supply of clean water; and there will be continued liaison with energy related partners to get energy related infrastructure delivered. Education and Health related infrastructure will also be planned and delivered with partners with improved access to primary care and sufficient choices of schools; there will be support for KCC in providing library service.

An important role of the review is to help communities take charge of their wellbeing with interventions like recreational and sports facilities. Opportunities will be provided for active travel choice as well as working with developers to provide shared and multipurpose community facilities.

It appears that all relevant matters have been addressed as part of this consultation, in relation to the social infrastructure topic area.

Public Consultation Regulation 18a

OQ1: What can the Local Plan Review do to make the growth we need 'good growth'?

- Ensure roads, infrastructure and public transport are delivered in conjunction with/before new developments are built. Residents (57); Parish Councils (11); Developers (5); Expert Agency (7); County Council (2); Councillors (5); Residents Association (2)
- Holistic approach to housing, infrastructure and community facilities that not only meet today's needs but future needs. Residents (14); Developers (3); Councillor (2); Residents Association (1); Parish Council (6)

OQ2: What could the Local Plan Review do to help make our town and village centres fit for the future?

- Ensure that key facilities are retained or added to new developments (GPs, post office, banks, shops, schools, pubs). Residents (44); Developers (4); Expert Agency (1); Councillor (2); Residents Association (1); Parish Council (6)

- To ensure that infrastructure meets the need of the villages and infrastructure is in place before new developments are built. Residents (30); Parish Councils (10); Developers (4); Expert Agency (3); Councillor (1); County Council (1); Residents Association (1)
- Proposal to promote full fibre (fibre-to-the-premise connections) in both new and existing development welcomed in line with current Government policy (statutory consultee comment).

OQ3: How can the Local Plan Review ensure community facilities and services are brought forward in the right place and at the right time to support communities?

- Liaise with parish councils, organisations, and local communities to produce a strategy for moving forward in new developments (e.g. Sport England). Residents (280); Parish Councils (10); Developers (7); Expert Agency (4); County Council (1); Residents Association (3)
- Make sure that new housing developments pay for the services and infrastructure needed to create a sustainable community. Residents (21); Developers (3); Expert Agency (1); Councillor (2); Parish Council (3)
- To ensure infrastructure is more resilient to expanding communities and climate change impacts. Residents (7); Expert Agency (2); Councillor (1)
- Ensure community facilities/ infrastructure are provided in conjunction with/before new developments are built (schools, GPs). Residents (176); County Council (1); Expert Agency (2); Councillor (3); Petition (1), Developer (1), Parish Council (7)
- The County Council generally favours growth strategies that include sustainable larger development sites, as they are more capable of supporting new infrastructure, including schools, early years, childcare, libraries and community centres (statutory consultee comment).
- CCG is engaged in the local plan review process and will continue to assess the implications, specifically with general practices, in order to review and refresh local priorities in relation to infrastructure; both strategically and operationally (statutory consultee comment).

OQ4: What overall benefits would you want to see as a result of growth?

- Ensure there is a sufficient amount of open space with trees and shrubs to reduce the effects of climate change (renewables). Residents (14); County Council (1); Expert Agency (7); Developer (1); Councillors (3); Resident Association (1);Parish Councils (4)
- Create more local facilities in local areas to reduce the amount of people having to travel to larger towns. Residents (124); Expert Agency (1); Councillor (1); Residents Association (1); Parish Councils (11)
- Development should not occur if facilities and infrastructure are not put in place first. Residents (20); Developers (1); Parish Councils (6)
- The County Council would like to see new development being brought forward with innovative design that maximises sustainability in build quality and construction standards (statutory consultee comment)

OQ5: What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?

- Community and retail facilities for all ages and in walking distance (GPs, Shops, pub schools etc). Residents (223); Developers (6); Expert Agency (4); Councillors (2); Parish Councils (7); County Council (1)
- Ensure that infrastructure is continually upgraded to meet demand and changing landscapes and create sustainable communities (broadband, EV power points, water supply etc.). Residents (24); Parish Councils (7); Developers (4); Expert Agency (5); Councillor (1); County Council (1) Resident Association (2)
- It is likely that wastewater facilities will need expansion to accommodate the growth. Water companies plan for this, and for any increase in water supply, using figures for growth that the local plan provides (statutory consultee comment).
- KCC supports the commitment for close collaboration between key partners to ensure that required infrastructure is planned, funded and delivered in a timely manner – this is as important to the success of a new development as the type of infrastructure brought forward to ensure a sustainable community is created and/or maintained (statutory consultee comment).
- Development should consider a mix of formal and informal areas/spaces (indoor and out), where people can be active. This can include walking routes and open spaces (statutory consultee comment).

TQ12: For your preferred option, what infrastructure would you want to see brought forward as a priority?

- Expansion or creation of facilities (GP, Schools etc). Residents (253); Developer (1); Expert Agency (2); Councillor (1); Resident Association (1); Parish Councils (3)
- s106 money that has been allocated needs to be spent on infrastructure. Residents (191); Developer (1); Residents Association (1)
- All infrastructure/services should be provided before new developments are built. Residents (6); Developers (14); Expert Agency (2); Councillor (1); County Council (1); Parish Councils (5)
- Consultation with Parish councils and decisions taken on a village by village basis. Residents (8); Developer (2); Expert Agency (1)
- The infrastructure brought forward would need to be judged based on the requirements of individual settlements. Residents (4); Developers (11); Expert Agency (1); County Council (1)
- Infrastructure should seek to reduce the environmental impact of new development with high quality sustainable design that is fully funded and delivered in a timely manner (statutory consultee comment).

TQ20: How can the Local Plan Review best plan for the new infrastructure that will be needed to support growth?

- Ensure that infrastructure is sustainable (solar farms etc) and adaptable to new and current developments. Residents (54); Developers (5); Expert Agency (6); Councillors (3); Parish Council (7)
- Liaise with residents, service providers, organisations and councils to understand their viewpoints. Residents (246); Developers (4); Expert Agency (2); County Council (1); Residents Association (1); Parish Councils (7)
- The ability to best plan can only genuinely be determined once the spatial direction of travel has been determined. Residents (173); Residents Association (1)
- Local Plan policies should ensure that new or upgrades infrastructure is included within policies (statutory consultee comment).

TQ22: How can the Local Plan Review best integrate health and wellbeing into the planning of new development?

- Ensure new developments have access to green, open and natural spaces. Residents (25); Developers (2); Expert Agency (3); Councillors (2); Residents Association (2); Parish Councils (8)
- Liaise with professionals and local residents to understand their views (NHS and welfare agencies). Residents (8); Developers (2); Expert Agency (1); Parish Councils (4)
- Ensure local infrastructure and community facilities provision matches the needs of the community. Residents (30); Parish Councils (9); Developers (4); Expert Agency (3)
- Development should seek to reduce social isolation as well as crime and fear of crime through the design of safe, inclusive and accessible public spaces and amenity for all (statutory consultee comment).
- Historic houses and parks and gardens can provide a key role in integrating health and wellbeing into new development (statutory consultee comment).

TQ29: How can the Local Plan Review best provide for open space in new development?

- Ensure that current/new open spaces are sustainable and protected. These should all be incorporated into new developments. Residents (28); Developers (3); Expert Agency (1); County Council (1); Councillors (4); Residents Association (1); Parish Council (9)
- Liaise with developers/parishes/local community to consider what is required from each development. Residents (12); Developers (3); Parish Councils (2)
- The Council needs a clear policy base for open space provision. Residents (7); Developers (4); Expert Agency (1); Parish Councils (4)

- The Local Plan Review should address the imbalance of green spaces and improve opportunities to access this resource in deprived areas (statutory consultee comment).

TQ30: What community facilities do you consider are the most important to a successful new development?

- To make sure new developments have resilient infrastructure to deal with population growth, climate change (Parking spaces, connectivity etc). Residents (12); Developers (1); Expert Agency (2); Councillor (2); Parish Council (10)
- Facilities such as GP, local shops, post office, bank and village halls should be present for any new developments (or a community building). Residents (46); Developers (4); Expert Agency (6); County Council (1); Councillors (2); Parish Councils (6)
- New developments should incorporate open spaces and protect biodiversity of the area. Residents (8); Developers (4); Expert Agency (1); Agent (1); Residents Association (1); Parish Council (2))
- Facilities that bring the community/village together. Residents (8); Developers (2); Expert Agency (4); Parish Council (2)
- Ensure community facilities match the demographics for the area (youth clubs etc). Residents (15); Developers (1); Expert Agency (1); Petition (1); Parish Council (4)
- Engagement with, and adoption by the existing community. Residents (16); Developers (2); Expert Agency (1); Parish Councils (4)

Public Consultation Regulation 18b

To be completed following Regulation 18b consultation.

Public Consultation Regulation 19

To be completed following Regulation 19 consultation.

Deliverability

Infrastructure impacts on the deliverability of development in a number of ways:

- Utilities and other essential infrastructure need to be delivered alongside new development. The spatial distribution of new development has the potential to increase or decrease this relative cost having regard to location (i.e. site-specific and locational constraints), and scale (wherein requirements for new pieces of equipment, and potentially economies of scale may be exploited).

- Open space is currently required on new development sites in the borough. This is effectively a deduction from the developable area on allocated sites proportionate to the size of the site. This varies with density; higher density sites should make a larger open space contribution as a proportion of the site.

- Social infrastructure can be delivered on new sites either as the sole use (wherein the site should be allocated for the infrastructure use, and a business case for funding rather than a development viability model may well be used), or as a part of a mixed use scheme, where some of the floorspace is reserved for an infrastructure use. This will have an impact on the viability, and therefore deliverability of the overall site.

- Off-site monies are collected both directly (through section 106 obligations) and indirectly (through the Community Infrastructure Levy). These ensure that sites make a contribution to infrastructure even when it isn't possible or desirable to locate an infrastructure asset on the site in question.

Potential Objective(s)

The following objectives in the current Local Plan are pertinent:

> 2: To transform the offer, vitality and viability of Maidstone town centre including its office, retail, residential, leisure, cultural and tourism functions together with significant enhancement of its public realm and natural environment including the riverside.

Additional wording will likely be required to reflect the need for infrastructure uplift in the town centre as a result of the increasing population residing here.

> 4: To reinforce the roles of the rural service centres through the retention of existing services, the addition of new infrastructure where possible, and the regeneration of employment sites including the expansion of existing employment sites where appropriate.

This could potentially be strengthened to reflect an increased emphasis on new infrastructure being targeted to complement growth in Rural Service Centres, rather than meeting need "where possible".

> 11: To ensure that key infrastructure and service improvements needed to support delivery of the Maidstone Borough Local Plan are brought forward in a coordinated and timely manner, and that new development makes an appropriate contribution towards any infrastructure needs arising as a result of such new development.

This objective remains appropriate.

Reasonable Alternative Approaches

Broadly speaking, the different types of infrastructure can be grouped into three distinct categories, which each could have different spatial approaches and implications:

1. Utilities infrastructure: those infrastructure types that are integral to development functionality. Primarily this includes utilities and digital

infrastructure. These will be required wherever development occurs.

2. Social/community services: those infrastructure types necessary to support development through the provision of essential community services including health care, education and social services. Each require certain (and differing) population thresholds to justify their provision and should generally be in proximity to the population they serve. However, there is often a degree of spatial flexibility within broad catchment areas.

3. Social/community spaces: those infrastructure types that support development through the provision of social gathering spaces such as open space, leisure and community facilities e.g. community hall. Open space provision is calculated using population thresholds. There is flexibility in the spatial location of this infrastructure. Generally, the larger the infrastructure the greater the catchment area and population it is intended to serve, and therefore the greater the locational choice.

These different categories and their differing spatial requirements should be borne in mind when assessing the reasonable approaches as set out below.

Approach A: Continue to allocate infrastructure assets according to the hierarchy set out in the current Local Plan 2017

This approach would continue the allocation of services to existing settlements, in line with the current settlement hierarchy.

Approach B: Allocate development and associated infrastructure to one or more Garden Settlement location(s)

Garden Settlements present opportunities for new patterns of infrastructure provision. They should secure 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.

Approach C: 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. It is broadly the result of the Garden Settlement approach which leverages large new pieces of infrastructure through a concentrated development location.

Tests of Soundness

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

   Consultation with infrastructure providers has taken place with regards to the full potential range of locations of growth in the borough. As the Council

continues to refine the plan's spatial strategy this engagement will continue to ensure that needs are met across the borough, and that development complements infrastructure.

2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

   The Sustainability Appraisal and Transport Modelling will test the relative sustainability of the different patterns of growth.

3. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

   Consultation with infrastructure providers has taken place with regards to the full potential range of locations of growth in the borough. As the Council continues to refine the plan's spatial strategy this engagement will continue to ensure that needs are met across the borough, and that development complements infrastructure.

4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

   Each scenario responds to the delivery of infrastructure in a different way, but each seeks to identify a sufficiency of land to meet local needs.

Unreasonable Alternatives

An alternative that did not seek to meet a particular infrastructure need would be unreasonable. At present no-one has proposed this alternative approach.

Sustainability Appraisal (SA)

The SA will provide input to help select a preferred approach.

What Mitigations Are Required including Infrastructure and Design

To be completed following publication of the SA.

Are the Preferred Approach and Alternatives Reasonable (Yes/No)

To be completed following publication of the SA.

MATRICES

Utilities Infrastructure Matrix

	Criteria	Approach A: LP17	Approach B: Garden Settlements	Approach C: Apply a more localised approach to infrastructure
Policy	**NPPF/ NPPG consistency**	GREEN: Includes scope for NPPF requirements to be met.	GREEN: Includes scope for NPPF requirements to be met.	GREEN: Includes scope for NPPF requirements to be met.
	Legislative compliance	GREEN: legislative requirements would be met.	GREEN: legislative requirements would be met.	GREEN: legislative requirements would be met.
	Strategic Plan alignment	GREEN: plans positively for growth including infrastructure.	GREEN: plans positively for growth including infrastructure.	GREEN: plans positively for growth including infrastructure.
	KCC Policy support	GREEN: Will enable the delivery of KCC infrastructure	GREEN: Will enable the delivery of KCC infrastructure	AMBER: Potentially conflicts with KCC's preferred delivery models by producing more piecemeal development.
	Other Plans & Strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies
Political & Public	**SPI**	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue
	Full Council	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue
	Public Consultation - Reg 18a	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.
	Public Consultation - Reg 18b	N/A	N/A	N/A
	Public Consultation - Reg 19	N/A	N/A	N/A
Technical	**Meeting Objectively Assessed Need**	GREEN: The approach has the potential to meet OAN.	GREEN: The approach has the potential to meet OAN.	GREEN: The approach has the potential to meet OAN.
	Supported by evidence	GREEN: Building on existing infrastructure networks is an accepted industry practice.	GREEN: Creation of planned, large-scale additions to the network allows the industry to plan necessary infrastructure upgrades.	AMBER: Additional localised evidence would be required to inform localised targets/ policy
	Duty to Co-operate	GREEN: Required infrastructure will be provided in this approach.	GREEN: Required infrastructure will be provided in this approach.	GREEN: Required infrastructure will be provided in this approach.
	DM Input	GREEN: No spatial concerns raised.	GREEN: No spatial concerns raised.	GREEN: No spatial concerns raised.
	Deliverability	GREEN: Building on existing infrastructure networks is an accepted industry practice.	GREEN: Creation of planned, large-scale additions to the network allows the industry to plan necessary infrastructure upgrades.	AMBER: Delivering more localised, smaller facilities may not exploit economies of scale in a way that providers support.
	Plan Period Implications	GREEN: None	AMBER: Infrastructure may be delivered in a longer-term, more widely phased approach.	GREEN: None
	Tests of Soundness	GREEN: No issues.	GREEN: No issues.	GREEN: No issues.
Potential Objective for topic area		GREEN: No issues.	GREEN: No issues.	GREEN: No issues.
SUSTAINABIILTY APPRAISAL		N/A	N/A	N/A
What Mitigations are required incl. infrastructure and design?		N/A	N/A	N/A
Is the approach Reasonable?		N/A	N/A	N/A

Social/Community Services Matrix

	Criteria	Approach A: LP17	Approach B: Garden Settlements	Approach C: Apply a more localised approach to infrastructure
Policy	**NPPF/ NPPG consistency**	GREEN: Includes scope for NPPF requirements to be met.	GREEN: Includes scope for NPPF requirements to be met.	GREEN: Includes scope for NPPF requirements to be met.
	Legislative compliance	GREEN: legislative requirements would be met.	GREEN: legislative requirements would be met.	GREEN: legislative requirements would be met.
	Strategic Plan alignment	GREEN: plans positively for growth including infrastructure.	GREEN: plans positively for growth including infrastructure.	GREEN: plans positively for growth including infrastructure.
	KCC Policy support	GREEN: Will enable the delivery of KCC infrastructure	GREEN: Will enable the delivery of KCC infrastructure	AMBER: Potentially conflicts with KCC's preferred delivery models by producing more piecemeal development.
	Other Plans & Strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies
Political & Public	**SPI**	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue
	Full Council	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue
	Public Consultation - Reg 18a	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.
	Public Consultation - Reg 18b	N/A	N/A	N/A
	Public Consultation - Reg 19	N/A	N/A	N/A
Technical	**Meeting Objectively Assessed Need**	GREEN: The approach has the potential to meet OAN.	GREEN: The approach has the potential to meet OAN.	GREEN: The approach has the potential to meet OAN.
	Supported by evidence	GREEN: Building on existing infrastructure networks is an accepted industry practice.	GREEN: Creation of planned, large-scale additions to the network allows the industry to plan necessary infrastructure upgrades.	AMBER: Additional localised evidence would be required to inform localised targets/ policy
	Duty to Co-operate	GREEN: Required infrastructure will be provided in this approach.	GREEN: Required infrastructure will be provided in this approach.	GREEN: Required infrastructure will be provided in this approach.
	DM Input	GREEN: No spatial concerns raised.	GREEN: No spatial concerns raised.	GREEN: No spatial concerns raised.
	Deliverability	GREEN: Building on existing infrastructure networks is an accepted industry practice.	GREEN: Creation of planned, large-scale additions to the network allows the industry to plan necessary infrastructure upgrades.	AMBER: Delivering more localised, smaller facilities may not exploit economies of scale in a way that providers support.
	Plan Period Implications	GREEN: None	AMBER: Infrastructure may be delivered in a longer-term, more widely phased approach.	GREEN: None
	Tests of Soundness	GREEN: No issues.	GREEN: No issues.	GREEN: No issues.
Potential Objective for topic area		GREEN: No issues.	GREEN: No issues.	GREEN: No issues.
SUSTAINABIILTY APPRAISAL		N/A	N/A	N/A
What Mitigations are required incl. infrastructure and design?		N/A	N/A	N/A
Is the approach Reasonable?		N/A	N/A	N/A

Social Community Spaces Matrix

	Criteria	Approach A: LP17	Approach B: Garden Settlements	Approach C: Apply a more localised approach to infrastructure
Policy	**NPPF/ NPPG consistency**	GREEN: Includes scope for NPPF requirements to be met.	GREEN: Includes scope for NPPF requirements to be met.	GREEN: Includes scope for NPPF requirements to be met.
	Legislative compliance	GREEN: legislative requirements would be met.	GREEN: legislative requirements would be met.	GREEN: legislative requirements would be met.
	Strategic Plan alignment	GREEN: plans positively for growth including infrastructure.	GREEN: plans positively for growth including infrastructure.	GREEN: plans positively for growth including infrastructure.
	KCC Policy support	GREEN: Will enable the delivery of KCC infrastructure	GREEN: Will enable the delivery of KCC infrastructure	AMBER: Potentially conflicts with KCC's preferred delivery models by producing more piecemeal development.
	Other Plans & Strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies	GREEN: This approach would allow for the consideration of relevant key plans and strategies
Political & Public	**SPI**	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue
	Full Council	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue	GREEN: Not considered to be a major political issue
	Public Consultation - Reg 18a	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.	GREEN: Addresses concerns regarding the provision of sufficient infrastructure across the borough.
	Public Consultation - Reg 18b	N/A	N/A	N/A
	Public Consultation - Reg 19	N/A	N/A	N/A
Technical	**Meeting Objectively Assessed Need**	GREEN: The approach has the potential to meet OIN.	GREEN: The approach has the potential to meet OIN.	GREEN: The approach has the potential to meet OIN.
	Supported by evidence	GREEN: Building on existing infrastructure networks is an accepted industry practice.	GREEN: Creation of planned, large-scale additions to the network allows the industry to plan necessary infrastructure upgrades.	AMBER: Additional localised evidence would be required to inform localised targets/ policy
	Duty to Co-operate	GREEN: Required infrastructure will be provided in this approach.	GREEN: Required infrastructure will be provided in this approach.	GREEN: Required infrastructure will be provided in this approach.
	DM Input	GREEN: No spatial concerns raised.	GREEN: No spatial concerns raised.	GREEN: No spatial concerns raised.
	Deliverability	GREEN: Building on existing infrastructure networks is an accepted industry practice.	GREEN: Creation of planned, large-scale additions to the network allows the industry to plan necessary infrastructure upgrades.	AMBER: Delivering more localised, smaller facilities may not exploit economies of scale in a way that providers support.
	Plan Period Implications	GREEN: None	AMBER: Infrastructure may be delivered in a longer-term, more widely phased approach.	GREEN: None
	Tests of Soundness	GREEN: No issues.	GREEN: No issues.	GREEN: No issues.
Potential Objective for topic area		GREEN: No issues.	GREEN: No issues.	GREEN: No issues.
SUSTAINABIILTY APPRAISAL		N/A	N/A	N/A
What Mitigations are required incl. infrastructure and design?		N/A	N/A	N/A
Is the approach Reasonable?		N/A	N/A	N/A