

# Maidstone Local Plan

## Sustainability Appraisal

Addendum to (SUB002 (I))

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## 1. Introduction

1.1.1 This short addendum to the Housing Sites Options Addendum (SUB002 (I)) provides a response to the Inspectors Question 3.13

**Question 3.13:** ....[with regards to Site HO3-313]...“Why did the SA addendum consider a wholly residential development rather than the mixed development sought by the Representors?”

1.1.2 To answer this question, the site appraisal findings for omission sites (i.e. site options that were considered following the October 2015, Regulation 18 Consultation) were revisited to determine whether any changes / clarifications needed to be made.

1.1.3 Whilst the appraisal was being revisited to answer this question, an error in **Appendix IV table 5 (SUB002)** was identified in relation to the site in question at Detling (i.e. HO3-313). The appraisal table has therefore been updated as necessary, and is presented in Section 4 of this addendum along with a discussion of the changes made.

## 2. Responding to the Inspectors Question 3.13

2.1.1 AECOM received details for site HO3-313 from the Council prefixed as a housing site option (i.e. HO3-313). The site was therefore appraised in our GIS model as a housing site option (as were all others sites with this prefix/ID). Other mixed use sites appraised throughout the process were prefixed as ‘MX’. Upon review of the site information, it is clear that details about the proposed site uses for site HO3-313 were set out at 1250 dwellings, a commercial element, country park and park and ride. The proforma for HO3-313 therefore contained an inaccurate site description (see below).

2.1.2 The potential housing yield figure included on the AECOM proforma for site HO3-313 was 5,325 dwellings (based upon an average density of thirty dwellings per hectare). This was an error in the site description, given that the proposed residential element for the site is actually set out at 1,250 dwellings within the site proposal.

- 2.1.3 The site appraisal process within the SA is based largely on an objective assessment of potential effects dependent upon the site footprint and proximity to a range of services and environmental receptors. This assessment results in a broad 'red, amber, green' categorisation to identify potential issues and opportunities based on distance and distance thresholds.
- 2.1.4 The quantum and site use do not affect this element of the assessment and is not factored into the appraisal at this stage to ensure that sites were considered consistently on a level playing field. Therefore, the error in the site description would not affect the site appraisal findings.
- 2.1.5 The red-line boundary provided by the Council / respondent was utilised to undertake the appraisal using a GIS model. The potential for open space or other mitigation / enhancement measures was not factored into the appraisal, as this would not result in a consistent and fair treatment of all site options (given that most site options did not contain such information).
- 2.1.6 The SA site assessments set out the 'raw' findings (i.e. the current baseline and objective distances) and then this formed part of the evidence in the wider decision making process. The Council could of course take other factors into account such as further details on site uses and enhancement measures after considering the 'raw' findings presented by the SA. This is the process that was undertaken by the Council.

### 3. Rectifying errors

- 3.1.1 Whilst the appraisal was being revisited to answer this question, a single error in **Appendix IV table 5 (SUB002)** was identified. Instead of a 'green' categorisation for the criteria 'Proximity to greenspace', table 5 illustrated an orange category for site HO3-313. This is not correct, and as stated on the corresponding site proforma for HO3-313, the site is in close proximity to greenspace and therefore ought to have been categorised as green in the summary table.

## 4. Amendments to SA Site Summary Table

4.1.1 The table below updates Appendix IV Table 5 to the SA Report (SUB002). One change has been made as follows:

- HO3-313 has been amended from ‘amber’ to ‘green’ for the criteria ‘proximity to greenspace’. The corresponding proforma for site HO3-313 has also been updated (See Appendix I).

4.1.2 No further changes have been made.

Site ID	Site Name	Location	Access to centres	Access to GP or medical hub	Access to Secondary School	Access to Primary School	Proximity to Post Office	Proximity to outdoor sports	Proximity to play space	Proximity to greenspace	Proximity to employment sites/ Proximity to local centre	Loss of employment land?	Proximity to bus stop	Proximity to train station	Cycle routes	Noise	Air quality	Agricultural land	Land use	Scheduled Ancient Monument	Listed Building	Conservation Area	Archaeology	Kent Downs AONB	Green Belt	Landscape character assessment	Flood zone	Flood risk	Ancient woodland	SSSI	Local Wildlife sites
HO3-313	Land adjacent Detling Aerodrome Industrial Estate	Detling	Red	Red	Red	Red	Red	Yellow	Yellow	Green	Green	Red	Green	Red	Red	Green	Green	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Green	Red	Green	Green	Yellow	Green	Yellow

## Appendix A: Revised Site Proforma for HO3-313

1. Site Information	
Number (linked to GIS database)	HO3-313
Site name/address	Land ad. Detling Aerodrome Industrial Estate
Site area (ha)	Approximately 177.5ha
Approximate yield	1250
Proposed no. of pitches	N/A
Site description	<p>The site is situated on the dip slope of the North Downs ridge, to the north of the A249 Stockbury Valley road that connects Maidstone/M20 junction 7 with M2 Junction 5 and Sittingbourne/Isle of Sheppey.</p> <p>To the south west lies the existing County showground that has a number of permanent out buildings and cattle-sheds on it.</p> <p>Gently falling to N/NE but predominantly level land.            Large open fields            Site is clearly visible from A249 to S/SW            CAA navigation beacon on SW boundary of site.</p> <p>The site is proposed as a mixed use development comprising 40 ha residential, Commercial 24ha, Country Park 100ha, 1000+space Park &amp; Ride car park.</p>
Current use	Agricultural Land and existing industrial estate
Adjacent uses	Kent County Showground, some sporadic residential, petrol station, restaurant garage/workshop, contractors yard but predominantly agriculture

SA Topic: Community wellbeing		
Accessibility to existing centres and services:		
Appraisal Question	Criteria	Answer/Evidence
How far is the site from the Maidstone Urban Area or a Rural Service Centre?	<p><b>R</b> = Not adjacent to the Maidstone Urban Area, or a rural service centre and would not be more accessible to services even if other sites were allocated</p> <p><b>A</b> = Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well</p> <p><b>G</b> = Within the Maidstone Urban Area or a rural service centre</p>	<p><b>R</b> = Not adjacent to the Maidstone Urban Area, or a rural service centre and would not be more accessible to services even if other sites were allocated</p>
How far is the site from the nearest medical hub or GP service?	<p><b>R</b> = &gt;800m</p> <p><b>A</b> = 400m – 800m</p> <p><b>G</b> = &lt;400m</p>	<p><b>R</b> = Site is 3772m from GP</p>
How far is the site from the nearest secondary school?	<p><b>R</b> = &gt;3900m</p> <p><b>A</b> = 1600-3900m</p> <p><b>G</b> = &lt;1600m;</p>	<p><b>R</b> = Site is 4835m to a secondary school</p>
How far is the site from the nearest primary school?	<p><b>R</b> = &gt;1200m</p> <p><b>A</b> = 800-1200m</p> <p><b>G</b> = &lt;800m;</p>	<p><b>R</b> = Site is 2724m to a primary school</p>
How far is the site from the nearest post office?	<p><b>R</b> = &gt;800m</p> <p><b>A</b> = 400m – 800m</p> <p><b>G</b> = &lt;400m</p>	<p><b>R</b> = Site is 3772m to a post office</p>



Accessibility to outdoor facilities and greenspace:		
Appraisal Question	Criteria	Answer/Evidence
How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)?	<b>A</b> = >1.2km <b>G</b> = <1.2km	<b>A</b> = Site is 1.3km to outdoor sports facilities
How far is the site from the nearest children's play space?	<b>A</b> = >300m from 'neighbourhood' children's play space <b>G</b> = <300m	<b>A</b> = Site is 2.5km to the nearest children's play space
How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	<b>A</b> = >300m (ANGST) <b>G</b> = <300m	<b>G</b> = Site is adjacent/includes greenspace  The proposed use includes a Country Park. This is not factored into the score though.
SA Topic: Economy		
Appraisal Question	Criteria	Answer/Evidence
How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)	<b>R</b> = >2400m <b>A</b> = 1600-2400m <b>G</b> = <1600m	<b>G</b> = Site is 127m to the nearest employment site  <b>R</b> = Site is over 3km to the nearest local centre
Will allocation of the site result in loss of employment land/space?	<b>R</b> = Allocation will lead to significant loss of employment land/space  <b>A</b> = Allocation will lead to some loss of employment land/space  <b>G</b> = Allocation will not lead to the loss of employment land/space	<b>G</b> = Allocation will not lead to the loss of employment land/space  Allocation will lead to the provision of employment land, but this is not covered by criteria.

SA Topic: Transport and Accessibility		
Appraisal Question	Criteria	Answer/Evidence
How far is the site from the nearest bus stop?	<b>R</b> = >800m <b>A</b> = 400 - 800m <b>G</b> = <400m	<b>G</b> = Site is 60m from the nearest bus stop
How far is the site from the nearest train station?	<b>R</b> = >800m <b>A</b> = 400 - 800m <b>G</b> = <400m	<b>R</b> = Site is over 3km from the nearest train station  Park and ride proposed, but this is not part of the assessment.
How far is the site from the nearest cycle route?	<b>R</b> = >800m <b>A</b> = 400 - 800m <b>G</b> = <400m	<b>R</b> = Site is 3.9km from the nearest cycle route
SA Topic: Noise, air quality and causes of climate change		
Appraisal Question	Criteria	Answer/Evidence
Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site?	<b>A</b> = Potential adverse impact <b>G</b> = Unlikely adverse impact <b>N</b> = No information available at this stage	<b>G</b> = Unlikely adverse impact
Is the site within or near to an AQMA?	<b>R</b> = Within or adjacent to an AQMA <b>A</b> = <1km of an AQMA <b>G</b> = >1km of an AQMA	<b>G</b> = Site is over 2km from an AQMA

### SA Topic: Water resources and quality

Not addressed by the Pro Forma. Development management policies will address this issue.

### SA Topic: Land use, landscape and the historic environment

#### Land Use:

Appraisal Question	Criteria	Answer/Evidence
Will allocation of the site lead to loss of the best and most versatile agricultural land?	<p><b>A</b> = Includes Grade 1, 2 or 3 agricultural land</p> <p><b>G</b> = Does not include 1, 2 or 3 agricultural land</p>	<b>A</b> = Grade 3
Will allocation of the site make use of previously developed land?	<p><b>R</b> = Does not include previously developed land</p> <p><b>A</b> = Partially within previously developed land</p> <p><b>G</b> = Entirely within previously developed land</p>	<b>A</b> = Predominantly greenfield/some PDL

#### Landscape, townscape and the historic environment:

Appraisal Question	Criteria	Answer/Evidence
Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)?	<p><b>A</b> = On a SAM OR Allocation will lead to development adjacent to a SAM with the potential for negative impacts</p> <p><b>G</b> = Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.</p>	<b>A</b> = The Scheduled Ancient Monument of Binbury Castle is situated beyond the existing industrial estate but its wider setting could be adversely affected by development of this land.
Is the allocation of the site likely to impact upon a listed building?	<p><b>A</b> = Contains or is adjacent to a listed building and there is the potential for negative impacts.</p> <p><b>G</b> = Not on or adjacent to a listed building and is unlikely to have an impact on a nearby listed</p>	<b>A</b> = The remains of Binbury Castle buildings (listed Grade II) are situated beyond the existing industrial estate and their wider setting could be adversely affected by development of this land.

	building.	
Is the allocation of the site likely to impact upon a Conservation Area?	<p><b>A</b> = Within or adjacent to a Conservation Area and there is the potential for negative impacts.</p> <p><b>G</b> = Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.</p>	<p><b>G</b> = Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.</p>
Does the site lie within an area with significant archaeological features/finds or where potential exists for archaeological features to be discovered in the future?	<p><b>A</b> = Within an area where significant archaeological features are present, or it is predicted that such features could be found in the future.</p> <p><b>G</b> = Not within an area where significant archaeological features have been found, or are likely to be found in the future.</p> <p><b>N</b> = No information available at this stage</p>	<p><b>G</b> = Some potential possibly but not in safeguarded area</p>
Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?	<p><b>A</b> = In close proximity to the Kent Downs AONB and/or there is the potential for negative impacts.</p> <p><b>G</b> = Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.</p>	<p><b>A</b> = Wholly within the Kent Downs AONB</p> <p>Country park is not factored in as a potential mitigation measure.</p>
Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?	<p><b>A</b> = Within or adjacent to the Green Belt and development could potentially cause harm to the purposes of the Green Belt designation and/or its openness</p> <p><b>G</b> = Not within or adjacent to the Green Belt</p>	<p><b>G</b> = Not within or adjacent to the Green Belt</p>
Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved?	<p><b>R</b> = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is unlikely to be appropriately mitigated</p> <p><b>A</b> = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is</p>	<p><b>R</b> = Site forms part of the AONB, the guidelines for this area are to restore and improve. The assessment states any development on this site could be visually intrusive and harmful to the current openness of the site with the long distance</p>

<p><i>*Based upon 2012 Landscape Character Assessment and officer comments</i></p>	<p>likely to be appropriately mitigated</p> <p><b>G</b> = Opportunity to enhance landscape character or there is unlikely to be an adverse impact</p>	<p>views to the north and the character of the AONB.</p> <p>The development of a country park is not factored into this assessment, which establishes the baseline conditions only.</p>
<p>Capacity of the Landscape to accommodate change</p> <p><i>*Based upon Landscape Character Assessment 014</i></p>	<p><b>R</b> = Low</p> <p><b>A</b> = Moderate</p> <p><b>G</b> = High</p>	<p>N/A</p>
<p><b>SA Topic: Flood Risk</b></p>		
<p>Appraisal Question</p>	<p>Criteria</p>	<p>Answer/Evidence</p>
<p>Is allocation of the site within a flood zone?</p>	<p><b>R</b> = Flood risk zone 3b</p> <p><b>A</b> = Flood risk zone 2 or 3a</p> <p><b>G</b> = Flood risk zone 1</p>	<p><b>G</b> = Flood risk zone 1</p>
<p>Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk? See table 3 (page 8) of the technical guidance.</p>	<p><b>R</b> = Development should not be permitted</p> <p><b>A</b> = Exception test is required</p> <p><b>G</b> = Development is appropriate</p>	<p><b>G</b> = Development is appropriate</p>

SA Topic: Biodiversity and Green Infrastructure		
Appraisal Question	Criteria	Answer/Evidence
Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?	<b>R</b> = Includes AW/ASNW <b>A</b> = <400m from an AW/ASNW <b>G</b> = >400m	<b>A</b> = Adjacent to ancient woodland
Is the allocation of the site likely to impact upon a Site of Special Scientific Interest (SSSI)?	<b>A</b> = Potential impacts identified by County Council Ecologist <b>G</b> = No likely impacts identified at this stage	<b>G</b> = No likely impacts identified at this stage
Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?	<b>A</b> = Potential impacts identified by County Council Ecologist <b>G</b> = No likely impacts identified at this stage	<b>A</b> = Local Wildlife Site (Murrain Wood) immediately adjacent to NW corner of site



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