

**Draft Sustainability
Appraisal Report – Non-
Technical Summary**

Updates to the Kent Minerals and
Waste Local Plan 2013-30 in light
of the Five Year Review

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1. Non-Technical Summary

1.1. Background

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the preparation of updates to the Kent Minerals and Waste Local Plan (KMWLP) following a Five Year Review. This report presents the interim outcomes of this process up to Regulation 18 stage. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives.

This is the third iteration of the SA of updates to the KMWLP, which is an update of the second draft SA (published in October 2022) and takes account of the following:

- Comments received on the second SA and, in particular, changes made to the SA framework in light of those comments.
- Further proposed updates to the KMWLP which cover the following matters:
 - Proposed changes to the planned provision of aggregate in Policy CSM 2;
 - proposed deletion of Policy CSW 5 concerning the strategic allocation of an extension to Norwood Quarry for landfill; and,
 - proposed deletion of the commitment to plan for the management of a specific quantity of non-hazardous waste arising in London.

1.2. What is the plan seeking to achieve?

The KMWLP was originally adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. Following its adoption, the Kent Minerals and Waste Local Plan was subject to an 'Early Partial Review' and changes resulting from this review were adopted by the Council in September 2020. Also in September 2020, the Council adopted a Minerals Sites Plan which allocates three areas of land suitable for development associated with the extraction of sand and gravel.

The KMWLP as proposed to be amended is a high-level document planning from 2024 to 2039 which:

- sets out the vision and strategy for mineral provision and waste management in Kent;
- contains a number of development management policies for evaluating minerals and waste planning applications;
- considers strategic site provision for all minerals and waste management facilities but does not identify any areas where key strategic development should take place.

The National Planning Policy Framework (2021) (NPPF) and legislation require that Local Plans should be reviewed to assess whether they need updating at least once every five years. Having been adopted five years ago, KMWLP has been reviewed to assess whether updates to it are required. The review needs to consider whether the Vision, Strategic Objectives and policies of the Plan are still consistent with national policy and local context and whether the policies have been effective in achieving the intended outcomes relating to the use of land for minerals and waste development in Kent.

The updates resulting from the Five Year Review make amendments to certain policies and supporting text of the KMWLP and these were first consulted on between December 2021 and February 2022. A second series of updates were consulted on in December 2022. This third round of amendments represents the third Regulation 18 consultation on the draft updated KMWLP and is taking place alongside a separate, but related, Regulation 18 consultation on an updated Mineral Sites Plan.

The review and modification of the Vision, Strategic Objectives, policies and supporting text mentioned above will ensure the development plan for Kent is relevant and effective, reflecting changes in policy and other circumstances.

1.3. What's the situation now and how would it change without the plan (sustainability 'baseline')?

The following is a summary of the sustainability baseline characteristics in Kent.

Environmental baseline

- The amount of residual waste collected per household in Kent has generally fallen in recent years, to 554kg in 2021/22. 44% of household waste was reused, recycled or composted, less than 1.5% is landfilled and most of the remainder is incinerated with energy recovery.
- Some 7 million tonnes of waste of all kinds (the majority being construction and demolition waste) were reported as being managed at Kent waste management facilities in 2021. This compares with around 1.85 million tonnes of Kent waste managed outside the county. However, this export is more than offset by imports so, taking a simple balance, Kent remains net self-sufficient. Of the imports, just over 360,000 tonnes came from London, of which 126,000 tonnes were managed by Energy from Waste and around 500 tonnes to non-inert landfill. 224,000 tonnes were managed at/by inert landfill/permanent deposit to land.
- Construction aggregates (sand, gravel and ragstone (a type of hard rock)) are the main types of economically important minerals extracted in Kent at this time, although brickearth (for stock brick manufacture), clay (for tile manufacture and engineering clay) and chalk (for engineering and agricultural lime applications) is also extracted. This is supplemented with imports and recycled aggregates.

- Kent is considered to be one of the UK's most wildlife-rich counties. This is a result of its varied geology, long coastline, landscape history and southerly location / proximity to mainland Europe.
- Natura 2000 habitat is concentrated around the coast, particularly around the Thames Gateway (much within Medway Unitary Authority), the Isle of Thanet, the Stour Estuary and Dungeness. Sites of Special Scientific Interest (SSSI) cover 8.5% of the county. The county contains c.10% of England's ancient woodland.
- The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- The last century has seen major losses and declines of species within Kent. Amongst the most important drivers of biodiversity loss in Kent are: the direct loss of land of value to wildlife to built-development or intensive farming, which has reduced and fragmented populations; and the effects of climate change.
- Kent is considered to be the most at risk local flood authority in England. Flooding has a significant impact on residents and the economy, with such effects predicted to worsen due to climate change.
- Since 2006 there has been a steady reduction in carbon dioxide emissions, to 4.1 tonnes per capita in 2021. This is slightly lower than national emission levels.
- In 2017 it is estimated that 922 early deaths occurred as a result of PM2.5 air pollution across Kent & Medway.
- Kent has the highest number of listed buildings in the South East, which is second only to the South West for numbers at regional level.
- The Kent Downs AONB covers nearly a quarter of the County, whilst the High Weald AONB is shared with East Sussex.
- Green Belt comprises the majority of Sevenoaks, Tonbridge and Malling and Gravesham Districts, as well as a proportion of Tunbridge Wells and Dartford Boroughs and a small part of Maidstone Borough.
- There are relatively extensive areas of high quality (grade one) agricultural land in Kent. This land tends to be concentrated in the north of the county, running in a band from Gillingham in the west through to Deal in the east. A pocket of high quality agricultural land can also be found in the area surrounding New Romney.
- Road traffic has grown fairly steadily over the decade from 2011, apart from 2020 when COVID-19 particularly affected car traffic. The effect on LGVs and HGVs was less marked, although still showed a decrease. Kent is a major gateway for the movement of international freight through the Channel

Tunnel, the ports of Dover, Ramsgate and Sheerness. Road haulage is the dominant means of transport in this sector.

- In Kent there are many catchments where there is little or no water available for abstraction during dry periods. Pressures are particularly notable in Kent as it is one of the driest parts of England and Wales, coupled with high population density and household water use. Over the next few decades, there will be increasing pressures from the rising population and associated development. Looking further ahead, climate change could have a major impact on the water that will be available for consumption.

Social baseline

- Kent had an estimated population of 1,589,100 in mid-2020. By 2032, the population of Kent is projected to increase to 1,724,263, an increase of c. 8%.
- Although Kent is ranked within the least deprived 50% of upper-tier local authorities in England for 4 out of 5 summary measures of the IMD2019, significant areas within Kent are amongst England's most deprived 20% and levels of deprivation have increased in nine out of 12 local authorities in Kent.
- Life expectancy is 9 years lower for men and 6 years lower for women in the most deprived populations in Kent compared to the least deprived populations.
- Early death rates from cancer, heart disease and stroke have fallen and are better than the England average. A quarter of children aged 4-5 are classified as being obese, higher than the average for England. However, estimated levels of adult obesity are similar to the England average.
- Climate change projections highlight an increase in risk to people from flooding and hotter, drier summers leading to public health risks.

Economic baseline

- In 2018, the gross disposable household income in Kent was £22,164 per resident, 4.4% above the national average.
- Between 2010 and 2020, the number of active enterprises grew by 26%, to 70,815, which is below the national average of 27.7% growth.
- The overall employment rate in Kent has risen since the KMWLP was adopted, from 73.8% in 2016 to 78.4% in 2021.
- Apart from a slight decline in 2009-2010, GVA per head in Kent and Medway has risen steadily in the 21st century. In 2019 it was £24,877 per head, up from £14,029 in 2000, a rise of 77%. However, per capita GVA is lower than for the South East as a whole and lower than for England.

- The largest sector for employment is wholesale and retail trade at 17.6%, followed by human health and social work at 13.3% and education at 9.6%. The distribution sector generated the highest gross value added in Kent, a fifth of the total.

How would the baseline change without the updated KMWLP?

There is a degree of uncertainty about how the baseline might change without the adoption of the updated KMWLP. Developments will still be required to comply with the development management policies of the KMWLP. This includes policies on the protection and enhancement of: biodiversity value, landscape, Green Belt, heritage assets, the water environment, health and amenity (including air quality) and transportation. Long term trends in environmental quality are likely to continue. However, fewer biodiversity benefits would be secured without the requirement for a net gain in biodiversity and without inclusion of National Nature Reserves in the development management policy on biodiversity. There would also be weaker emphasis on the creation of green and blue infrastructure, with fewer sites likely to be delivered with fewer benefits for biodiversity, wellbeing and landscape. There are likely to be higher emissions of greenhouse gases from waste facilities without the stronger emphasis on carbon reduction in the updated KMWLP from other recovery, landfill and wastewater treatment. Without this, it could increase climate change effects including flooding with risks for communities, wildlife and habitats. Other climate change pressures may be increased with effects on biodiversity and communities, including increased temperatures and more frequent extreme weather events. There may be more adverse impacts on groundwater quality without the stronger protection proposed in the updated KMWLP.

Current trends in waste generation and management are likely to continue, although without the updated KMWLP there will be less strong emphasis on implementing the waste hierarchy and circular economy principles will not be promoted, resulting in less reuse and recycling than with the updated KMWLP. Some radioactive wastes from Dungeness would need to be managed elsewhere other than onsite. Air pollution control residues may be imported from outside Kent for landfill.

Without the updated KMWLP there is likely to be an undersupply of crushed rock, with insufficient reserves currently identified. This would result in minerals being transported from outside the county which will have adverse effects on transport networks, air quality, greenhouse gas emissions and cost. Alternatively, increased quantities may need to be secured from secondary and recycled aggregates and/or marine dredged aggregates. If sufficient minerals of the right type cannot be found, construction and industrial growth may be checked. This could lead to insufficient homes and infrastructure being provided with adverse effects on people and communities. Minerals in Kent would not provide sufficient material to support economic growth and industrial activity, in which case employment levels could reduce and GDP and household incomes may fall. There could be adverse impacts on communities in the vicinity of mineral sites if blasting were to take place without proper assessment of the impacts.

Population and levels of deprivation are unlikely to be significantly different with or without the updated KMWLP.

1.4. Characteristics of areas likely to be significantly affected

The SEA Directive requires that the appraisal describes the characteristics of areas likely to be significantly affected by the updated KMWLP. In deciding which areas are likely to be significantly affected, the SA has considered whether there is a spatial element to the proposed policy changes and therefore whether some parts of the county will be particularly affected. There is only one policy with a spatial element, CSW 17 relating to the Dungeness Nuclear Estate. The appraisal of this policy has not identified any significant effects arising. It is therefore concluded that there are no areas likely to be significantly affected.

1.5. Areas of Particular Environmental Importance

In the KWMLP, there is one policy which allocates a site which is close to two of these internationally important nature conservation sites:

- CSW 17 (Dungeness): adjacent to Dungeness, Romney Marsh and Rye Bay SPA and Ramsar and Dungeness Special Area of Conservation (SAC).

The importance of each of these sites is described in Section 3.8.

1.6. SA Framework and Sustainability Objectives

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies, collecting baseline information and identifying sustainability issues and problems. These issues have informed the development of the sustainability appraisal framework, which consists of a set of sustainable development policy objectives (sustainability objectives) as set out in Table 1. The framework was published for consultation in the SA Scoping Report and the table below also incorporates some additional detailed criteria following comments received on the Scoping Report when it was published for consultation between December 2021 and February 2022. It also incorporates one addition as a result of a comment received in the consultation on the Scoping Report for the SA of the updated MSP published in December 2022. This is highlighted in bold in table 1.

Table 1 SA Framework

Sustainability Objectives		Detail – including addition resulting from consultation on Scoping Report for updated MSP
1	Biodiversity	<p>Ensure that development will not impact on important elements of the biodiversity resource and where possible contributes to the achievement of the Kent Biodiversity Action Plan (BAP) and other strategies.</p> <ul style="list-style-type: none"> – Add to the biodiversity baseline by creating opportunities for targeted habitat creation (which, ideally, contributes to local or landscape scale habitat networks). – Avoid hindering plans for biodiversity conservation or enhancement. – Support increased access to biodiversity. – Provide a net gain in biodiversity value.
2	Climate change	<p>Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources.</p> <ul style="list-style-type: none"> – Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals and waste operations. <p>– Promote climate change adaptation</p>
3	Community and well-being	<p>Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being; and support the delivery of housing targets.</p> <ul style="list-style-type: none"> – Help to redress spatial inequalities highlighted by the Index of Multiple deprivation. – Help to tackle more hidden forms of deprivation and exclusion, such as that which is experienced in urban and coastal areas and particular socio-economic groups within communities. – Ensure that the necessary aggregates are available for building, and that the necessary waste infrastructure is in place to support housing and economic growth – Ensure that minerals and waste development does not contribute to poor air quality with particular reference to PM2.5 and NOx – Protect and enhance public rights of way and access – Protect local green space – Avoid loss of tranquillity

4	Sustainable economic growth	<p>Support economic growth and diversification.</p> <ul style="list-style-type: none"> – Support the development of a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities – Stimulate economic revival and targeted employment generation in deprived areas
5	Flood risk	<p>Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment.</p> <ul style="list-style-type: none"> – Ensure that development does not lead to increased flood risk on or off site – Seek to mitigate or reduce flood risk through developments that are able to slow water flow and promote groundwater recharge
6	Land	<p>Make efficient use of land and avoid sensitive locations.</p> <ul style="list-style-type: none"> – Make best use of previously developed land – Avoid locations with sensitive geomorphology – Seek to safeguard the best and most versatile agricultural land and recognise its economic and other benefits - Prevent inappropriate development in the Green Belt
7	Landscape and the historic environment	<p>Protect and enhance Kent's countryside and historic environment.</p> <ul style="list-style-type: none"> – Protect the integrity of the AONBs and their setting and other particularly valued or sensitive landscapes – Take account of the constraints, opportunities and priorities demonstrated through landscape characterisation assessments and other studies at the landscape scale. – Avoid light pollution – Protect important heritage assets and their settings, as well as take account of the value of the character of the wider historic environment
8	Transport	<p>Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible</p> <ul style="list-style-type: none"> – Minimise minerals and waste transport movements and journey lengths; and encourage transport by rail and water. – Ensure that minerals and waste transport does not impact on sensitive locations, including locations already experiencing congestion and locations where planned growth or regeneration is reliant on good transport networks.

9	Water	<p>Maintain and improve the water quality of Kent's rivers, ground waters and coasts, and achieve sustainable water resources management</p> <ul style="list-style-type: none"> – Ensure that minerals and waste development seeks to promote the conservation of water resources wherever possible with particular reference to abstraction. – Avoid pollution of ground or surface waters, particularly in areas identified as being at risk or sensitive
10	Waste	<p>Ensure the sustainable management of waste</p> <ul style="list-style-type: none"> – Manage waste in accordance with the waste hierarchy – Prevent adverse effects from waste on human health and the environment – Ensure waste is managed as near as possible to its place of production

1.7. Likely Significant Effects of the Updated KMWLP

The SA has appraised each of the strategic objectives and policies as amended by the Five Year Review. The methodology and assumptions used in undertaking the appraisal are set out in Section 5.

The detailed findings of the SA of the amended policies are set out in Appendix B and summarised below. The SA of the strategic objectives and recommendations arising are set out in section 6 of this report.

The KMWLP has several policies promoting minimisation of greenhouse gas emissions and energy and water consumption, helping to reduce the likely impacts of climate change, for example by promoting the waste hierarchy and energy recovery, minimising emissions from transport, requiring greenhouse gas dioxide capture and promoting use of low carbon energy sources. It also requires developments to build in climate change adaptation measures where these are appropriate. Greenhouse gas emissions may nevertheless rise as requirements for waste management and minerals production increase above existing levels.

The KMWLP seeks to avoid unacceptable adverse impacts of a development on the community and surrounding land uses, through reducing noise, odour, emissions and light, as well as visual intrusion and traffic. It requires that air quality impacts are mitigated, particularly in areas of poor air quality and makes provision for the preparation of a Health Impact Assessment. Measures to maintain mineral supply will provide materials for construction of housing and infrastructure to sustain communities and support economic/industrial activity.

The KMWLP contains several development management policies that require protection, enhancement, management and creation of biodiversity value. Maximum biodiversity net gain is required where practicable. Other policies contain provisions that would indirectly benefit biodiversity including protection and improvement of water quality and preventing unacceptable adverse impacts from noise, light, dust,

vibration, odour and emissions.

Restricting increases in greenhouse gas emissions and avoiding increased flood risk will benefit communities and biodiversity by avoiding the worst impacts of climate change, while protecting biodiversity, landscape, historic assets and Green Belt and ensuring access to public rights of way will benefit communities.

By promoting climate change adaptation measures, including sustainable drainage systems, and requiring no increase in flood risk in areas prone to flooding, the KMWLP will help to minimise the impact of development on flood risk and is likely to help to alleviate flood risk in the local area. Protection of green spaces may also help to alleviate flood risk.

The KMWLP requires high standards of restoration and aftercare of sites. If restored to agricultural use, the best and most versatile agricultural land should be protected in the long term. Removal of all buildings, plant and structures not necessary for the management of the site will restore long-term openness on Green Belt land, if applicable to the site. Maintaining capacity for secondary and recycled aggregates will help to avoid adverse impacts on land that could occur from primary extraction, although the significance and likelihood of these impacts are unknown.

Likely impacts on landscape and the historic environment are strongly dependent on sensitivities at particular development sites, the locations of which are largely unknown at this stage. However, development policies aim to preserve and enhance landscapes and the historic environment and require developments to mitigate their impacts on assets, therefore significant adverse impacts are unlikely and benefits are possible. The KMWLP requires landscape opportunities and heritage and landscape features to be addressed in site restoration plans. Facilitating development for the extraction of building stone will help to support the sympathetic restoration of older buildings and use of traditional materials.

Likely impacts on transport are uncertain as the location of most development is unknown. However, policy seeks to minimise transport and promote the most sustainable modes possible, although in practice opportunities are likely to be limited. Other measures seek to minimise the impacts of transport, such as safeguarding transport infrastructure, ensuring the network can accommodate the traffic that would be generated and taking particular measures in areas of poor air quality. Nevertheless, waste transport may increase although this is dependent on the degree to the new capacity replaces existing capacity and how well-located they are to the source of arisings.

The KMWLP prevents the deterioration of water bodies and requires improvement in their ecological status. Positive impacts on the water environment are therefore likely. Development management policy requires the minimisation of water consumption and emission of pollutants which will help to safeguard the quantity and quality of water and promote sustainable water resource management.

The updated KMWLP gives strong support to sustainable waste management, promoting the waste hierarchy and the circular economy, avoiding adverse impacts on human health and the environment, and promoting

recovery of energy and carbon capture and minimising waste transport. This will help to ensure the provision of waste infrastructure to support economic activity.

1.8. Recommendations for Mitigating Adverse Effects

The SA has considered whether there is scope for making recommendations for measures to prevent, reduce and, as fully as possible, offset any significant adverse effects of the updated KMWLP. A series of recommendations are made for amendments to strategic objectives, policies and supporting text. These are set out in detail in Section 6 and Appendix B.

1.9. Reasons for Selecting Alternatives Dealt With

The SA is required to appraise reasonable alternatives to the updated KMWLP as proposed. The reasonable alternatives that have been identified largely derive from a 'do nothing' option, in other words, not to make the changes proposed in the updated KMWLP, and from comments received in response to the first consultation. The following have been identified as reasonable alternatives to the updated KMWLP as proposed, here referred to as 'options'.

Option A

- To allocate land for waste facilities as envisaged in the KMWLP adopted in 2016.

Option A would be to produce a Waste Sites Plan as originally envisaged in the KMWLP. It would be possible for Kent County Council to identify and allocate sites as suitable for waste-related development even though no capacity gap has been identified and therefore this has been appraised as a reasonable alternative.

In respect of a 'do nothing' option, each proposed amendment to the policies has been considered in turn to identify whether a 'do nothing' option is reasonable. In the case where an amendment is required to make the KMWLP consistent with policy elsewhere, a 'do nothing' option is not considered reasonable. Where there are other reasons for making the amendment, each has been considered on its merits. The conclusions of this review are set out in Appendix C. Two policies have been identified as having a reasonable 'do nothing' alternative to the policy amendment proposed. These have been identified as option B and option C:

- Option B: Do not strengthen groundwater protection in policy DM 10 Water Environment;
- Option C: Retain policy CSW 5 Strategic Site for Waste;

Each of the alternatives identified above have been appraised against the SA framework and an assessment made of the likely impacts on sustainability objectives. The detailed results are set out in Appendix D and summarised in Section 6.2.

1.10. Methodology

The SA has appraised each of the strategic objectives and policies as proposed to be amended, as well as the alternatives described in the previous section. The appraisal was done by assessing each policy amendment and each alternative against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

Table 2 Effect Symbols

Nature of effect	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some negative effect	-
Significant negative effect	--
Uncertain effect	?

Further details on the methodology, including assumptions made, are given in Section 5 of the main report. Information on the difficulties encountered is provided in Section 4 of the main report. These relate to the lack of available data in some instances, lack of quantification and uncertainties about the scale and nature of some impacts.

1.11. Monitoring Recommendations

The sustainability appraisal has developed a set of recommendations for monitoring the predicted and unforeseen impacts of implementation of the updated KMWLP as proposed. These are set out as a series of indicators related to the sustainability appraisal framework based on the likely and possible impacts of the updated KMWLP. The recommended indicators should be incorporated into the Annual Monitoring Report for the KMWLP and are set out in Section 7.

