

Non-Technical Summary – SA of the draft Early Partial Review of the Kent Minerals and Waste Plan 2013-30

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Executive Summary

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Kent Minerals and Waste Local Plan (KMWLP) Early Partial Review preparation process. This report presents a non-technical summary of the final outcome of this process up to Main Modifications stage. The full findings of the SA are set out in a separate SA Report, the purpose of which is to provide information to the Kent County Council Environment and Transport Committee about the sustainability of the Early Partial Review as proposed and its likely impacts when adopted. The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. The Early Partial Review seeks to amend the KMWLP in several respects:

- The adopted Plan identifies a shortfall in capacity for some types of waste facility over the Plan period, however a review of the future needs for waste management facilities in Kent has recently been undertaken and this has concluded that there is now no need for the development of this additional capacity. Through the Early Partial Review there will be no commitment by Kent County Council to prepare a Waste Sites Plan.
- Two policies in the KMWLP set out criteria to allow development that may affect safeguarded sites to proceed in certain prescribed circumstances. These will be amended by the Early Partial Review to ensure that the Council's safeguarding approach is effective.
- The Early Partial Review proposes to add a clause providing for assurances that the Strategic Site Allocation at Norwood Quarry can be suitably restored in the event that the void space may no longer be used for management of flue dust residues. In addition, it is proposed to delete the requirement for an assessment of alternative management methods for flue ash given that significant tonnages are already being managed through other treatment routes.
- The Early Partial Review amends a policy in the KMWLP which states that sites will be identified and allocated in the Mineral Sites Plan for the extraction of brickearth and chalk. Data shows that existing permitted reserves of these minerals are in fact sufficient to meet needs.

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 as set out in Table 1 of the report. The Early Partial Review has been appraised against this set of sustainability objectives and the findings of that appraisal are as follows.

The Early Partial Review will promote increased reuse, recycling and recovery, which will have climate change benefits and support the move towards a circular economy.

Ensuring restoration of the landfill in the event that insufficient flue-ash is available to complete the landform

will help to improve the landscape impacts of the site and remove any amenity impacts on communities from an unrestored site. Restoration plans include biodiversity benefits and these would be secured earlier than with original plans.

Promotion of energy recovery and heat will reduce emissions of greenhouse gases, helping to attenuate the effects of climate change, particularly the pressures resulting on biodiversity and communities including from flood risk. Energy recovery will also recover economic benefits from waste and provide heat for homes and communities.

Improved safeguarding of mineral resources will help to ensure the availability of aggregates to support housing construction to sustain communities and support economic/industrial activity, although encouraging use of a non-renewable resource is not sustainable. Improved safeguarding of infrastructure for minerals and waste management and transport will also help to support communities and economic/industrial activity and help to ensure the economic transport of materials and availability of sustainable modes of transport. Not allocating sites for brickearth and chalk will have no impacts.

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 Early Partial Review. In practice, no significant adverse effects have been identified and therefore no mitigation recommendations are made.

The SA is required to appraise reasonable alternatives to the Early Partial Review 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 by the Early Partial Review. The following have been identified as reasonable alternatives to the Early Partial Review, here referred to as 'options'.

Option A

- To allocate land for waste facilities and for extraction of brickearth and chalk as envisaged in the adopted KMWLP;

Option B

- Option B1: To retain the targets for recycling, recovery and landfill in policy CSW 4 of the adopted KMWLP;
- Option B2: To retain targets for recycling and reduce targets for landfill in policy CSW 4 of the adopted KMWLP;

Option C

- Not to strengthen safeguarding in policies DM 7 and DM 8.

These alternatives have been appraised against this set of sustainability objectives and the findings of that appraisal are set out in the report.

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1. Non-Technical Summary

1.1. Background

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Kent Minerals and Waste Local Plan (KMWLP) Early Partial Review preparation process. 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 report presents the final outcome of this process up to Main Modifications stage. The purpose of the report is to provide information to the Kent County Council Environment and Transport Committee about the sustainability of the Early Partial Review as proposed and its likely impacts when adopted.

1.2. What is the plan seeking to achieve?

The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. The adopted Plan identifies a shortfall in capacity of the following types over the Plan period (to 2030):

- Waste recovery capacity - energy from waste and organic waste treatment;
- Hazardous waste (due to the identified need for additional capacity to allow for the continued landfilling of asbestos)
- Disposal of dredgings.

Policies CSW 7, CSW 8, CSW 12 and CSW 14 of the KMWLP state that a Waste Sites Plan will be prepared that will identify sites suitable for accommodating facilities needed to address the identified capacity shortfalls. A review of the future needs for waste management facilities in Kent has recently been undertaken and this has concluded that there is now no need for the development of this additional capacity. Through the Early Partial Review there will be no commitment by Kent County Council to prepare a Waste Sites Plan.

Policies DM 7 and DM 8 set out criteria to allow development that may affect safeguarded sites to proceed in certain prescribed circumstances. Policies DM 7 and DM 8 will be amended by the Early Partial Review to ensure that the Council's safeguarding approach is effective.

Policy CSW 5 sets out the criteria to be applied to the assessment of any forthcoming application relating to the Strategic Site Allocation at Norwood Quarry. The Early Partial Review proposes to add a clause providing for assurances that the proposed site can be suitably restored in the event that the void space may no longer be used for management of flue dust residues due to a possible change in government policy. Currently national policy allows landfilling of such waste under a special derogation from the Landfill Directive waste acceptance criteria requirements. This has been subject to review in the past and

may change in future. In addition, it is proposed to delete the requirement for an assessment of alternative management methods for flue ash given that significant tonnages are already being managed through other treatment routes.

Policy CSM2 states that sites will be identified in the Mineral Sites Plan for the supply of brickearth and chalk. However, information shows that the existing permissions for these minerals are sufficient to meet needs and additional reserves are not required.

In parallel with the development of the Early Partial Review, Kent County Council is also developing a Minerals Sites Plan. This has identified three sites in the county as being suitable for new mineral extraction.

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

- Kent is considered to be one 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 UA), 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.
- Analysis at the County level has informed the location of 16 Biodiversity Opportunity Areas (BOAs) across Kent covering 40% of the land area (BOAs cover 35% of the South East).
- Since 2008 there has been a reduction in carbon dioxide emissions of 0.8 tonnes per capita. Nonetheless, this figure remains higher than regional and national emission levels.
- In 2010 it is estimated that 1050 early deaths occurred as a result of just PM2.5 air pollution across Kent & Medway [KMAQM, 2015]
- 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.
- 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. [EA, 2012]

Social baseline

- Kent had an estimated population of 1,466,500 in mid-2011. By 2021 the population of Kent is projected to increase by 9.4% from 2012. The age group with the greatest projected percentage change in population is 65+ (21.2%).
- In mid-2011, Kent had the largest rural population of any county in the South East (29%) and identified problems of 'rural deprivation', e.g. associated with access to services, facilities and housing affordability.
- In terms of the 'Index of Multiple Deprivation', Kent ranks within England's least deprived third of authorities. However, significant areas within Kent are amongst England's most deprived 20%. Life expectancy is 8.2 years lower for men and 4.5 years lower for women in the most deprived areas of Kent than in the least deprived areas.
- Early death rates from cancer, heart disease and stroke have fallen and are better than the England average. About 18.4% of Year 6 children are classified as being obese, lower than the average for England. However, estimated levels of adult obesity are worse than the England average.
- Climate change projections highlight an increase in risk to people from flooding; and hotter and sunnier summers leading to public health risks.

Economic baseline

- In 2011, the Gross Domestic Household Income (GDHI) in Kent was £16,855, 5.1% above the UK average, while the South East region was 12.8% above the UK average.
- 2011 was the first year since 2008 that the 'birth' of enterprises in the Kent exceeded the number of 'deaths'.
- During the period October 2011 to September 2012, the employment rate for residents of Kent was 71.1%, a lower figure than that for the South East (74.6%) and close to that for England (70.7%).
- In Kent, the unemployment rate for October 2011 to September 2012 was 7.4% of the population aged 16 years and over; greater than the rate for the South East (5.8%) and close to the rate for England (7.9%).
- The 'public administration, education and health' sector employs the highest proportion of persons aged 16 to 64 (30.7%). Agriculture and fishing employs the lowest proportion of the population aged 16 to 64 (1.6%). These are also the lowest / highest employers at regional and national levels.

How would the baseline change without the Early Partial Review?

There is a degree of uncertainty about how the baseline might change without the adoption of the Early Partial Review. 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, without the Early Partial Review there is the potential for oversupply in waste capacity as policies in the KMWLP identify a capacity need. This may result in waste being transported from outside the county to provide inputs to waste facilities which will have which will have adverse effects on transport networks, air quality and greenhouse gas emissions.

Without the Early Partial Review it is possible that some mineral resources will be lost to other developments through weaker safeguarding policy. Kent may be less able to provide enough minerals to support the expected future demand for minerals from construction and industry. In such an event, there would be a need to source minerals from elsewhere. This may mean importing minerals from other parts of the country, which will have adverse effects on transport networks, air quality 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 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.

Loss of transport and other infrastructure for minerals and waste without the Early Partial Review is likely to result in materials being transported further with consequent impacts on air quality and transport networks and could result in the loss of sustainable transport modes. This would increase transport and material costs which would adversely affect the profitability of industry. It would also result in loss of capacity and increased demand for new sites.

Without the adoption of the Early Partial Review, emissions of carbon dioxide will be greater than with its adoption. The aim is to reduce the targets for the percentage of waste going to landfill and to manage it at higher levels of the waste hierarchy and to promote the recovery of energy from waste. Without this, there could be increased 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.

Landscape in the locality of the strategic site for waste could be negatively affected if the Early Partial Review is not adopted. If insufficient flue ash is available to restore the landfill, the landfill may not be restored in line with original plans which could have lasting landscape impacts and may affect the amenity of nearby residents.

The social baseline is unlikely to be affected without the adoption of the Early Partial Review. Population, levels of deprivation and health are unlikely to be significantly different with or without the Early Partial Review.

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 Early Partial Review. 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 and that is the policy relating to Norwood Quarry, the strategic site for waste. The appraisal of the change to

this policy has not identified any significant effects arising from change to the policy. It is therefore concluded that there are no areas likely to be significantly affected.

1.5. Areas of Particular Environmental Importance

A Habitats Regulations Assessment has been undertaken for the Early Partial Review¹. This identified that impacts from one strategic site, Norwood Quarry Extension, requires consideration because of the potential for impact on two designated sites:

- Medway Estuary and Marshes SPA and Ramsar;
- Swale SPA and Ramsar

The characteristics of these designated sites are described in detail in Section 3.6 of the main report.

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. Following due diligence in terms of the context and baseline conditions, the Framework and Sustainability Objectives for the SA of the Early Partial Review has been developed using that produced by URS (2013). The relationship between the 2010 Scoping and 2013 SA Report objectives is presented in Table 1 below, which also expands on the detail of the objectives and the additions made following the 2017 Scoping exercise and review of recent key policy developments at national level².

¹ Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30 & Kent Mineral Sites Plan: Appropriate Assessment, Ecus Ltd, November 2018

² NPPF 2019; 25 Year Environment Plan; Clean Air Strategy; Our Waste, Our Resources: A Strategy for England; Amendment to Climate Change Act

Sustainability Objectives (URS, 2013)		Corresponding SO (Scott Wilson, 2010)	Detail – including additions resulting from MPS SA Scoping (Amey, 2017) and additions resulting from review of recent key policy developments
1	Biodiversity	SO2	<p>Ensure that development will not impact on important elements of the biodiversity resource and where possible contributes to the achievement of the Kent 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
2	Climate change	SO5	<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 operations.
3	Community and well-being	SO9, SO7	<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 rural 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 growth – Ensure that minerals development does not contribute to poor air quality particular reference to PM2.5 and NOx. – Protect and enhance public rights of way and access – Protect local green space
4	Sustainable economic growth	SO11	<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	SO1	<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	SO8	<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 – Recognise the economic and other benefits of the best and most versatile agricultural land - Prevent inappropriate development in the Green Belt
7	Landscape and the historic environment	SO3	<p>Protect and enhance Kent's countryside and historic environment</p> <ul style="list-style-type: none"> – Protect the integrity of the AONBs 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. – 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	SO6	<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	SO4	<p>Maintain and improve the water quality of the 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 particular reference to abstraction. – Avoid pollution of ground or surface waters, particularly in areas identified as being at risk or sensitive
Scoped out of URS (2013)		SO10 [waste]	

Table 1 SA Framework

1.7. Likely Significant Effects of the Main Modifications Early Partial Review

The SA has appraised each of the policy amendments which are proposed by the Early Partial Review. The methodology and assumptions used in undertaking the appraisal are set out in Section 5.

The detailed findings of the SA of policy changes are set out in Appendix B and summarised below.

Policy	Sustainability Objective								
	1 Biodiversity	2 Climate change	3 Community and wellbeing	4 Sustainable economic growth	5 Flood risk	6 Land	7 Landscape and the historic environment	8 Transport	9 Water
CSM 2	0	0	0	0	0	0	0	0	0
CSWS 4	+	0	+	+	0	0	0	?	0
CSW 5	+	0	?	0	0	0	+	0	0
CSW 6	0	0	0	0	0	0	0	0	0
CSW 7	+	0	+	+	0	0	0	?	0
CSW 8	+	+	+	+	+	0	0	0	0
CSW 12	0	0	0	0	0	0	0	0	0
CSW 14	0	0	0	0	0	0	0	0	0
DM 7	0	0	++	++/-	0	0	0	0	0
DM 8	0	0	+	++/-	0	0	0	+	0
Overall impacts	+	+	++	++/-	+	0	+	+	0

Table 2: Summary of Findings of SA of Partial Review Overall

Increased reuse, recycling and recovery will have climate change benefits and support the move towards a circular economy.

Ensuring restoration of the landfill in the event that insufficient flue-ash is available to complete the landform will help to improve the landscape impacts of the site and remove any amenity impacts on communities from an unrestored site. Restoration plans include biodiversity benefits and these would be secured earlier than with original plans.

Promotion of energy recovery and heat will reduce emissions of greenhouse gases, helping to attenuate the effects of climate change, particularly the pressures resulting on biodiversity and communities including from flood risk. Energy recovery will also recover economic benefits from waste and provide heat for homes and communities.

Improved safeguarding of mineral resources will help to ensure the availability of aggregates to support housing construction to sustain communities and support economic/industrial activity, although encouraging use of a non-renewable resource is not sustainable. Improved safeguarding of infrastructure for minerals and waste management and transport will also help to support communities and economic/industrial activity and help to ensure the economic transport of materials and availability of sustainable modes of transport. Not allocating sites for brickearth and chalk will have no impacts.

1.8. Recommendations for Mitigating Adverse Effects

The SA has considered whether there is scope for making recommendations for measures to prevent, reduced and as fully as possible offset any significant adverse effects of the Early Partial Review. In practice, no significant adverse effects have been identified and therefore no mitigation recommendations are made.

1.9. Reasons for Selecting Alternatives Dealt With

The SA is required to appraise reasonable alternatives to the Early Partial Review 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 by the Early Partial Review. The following have been identified as reasonable alternatives to the Early Partial Review, here referred to as 'options'.

Option A

- To allocate land for waste facilities and for extraction of brickearth and chalk as envisaged in the adopted KMWLP;

Option B

- Option B1: To retain the targets for recycling, recovery and landfill in policy CSW 4 of the adopted KMWLP;
- Option B2: To retain targets for recycling and reduce targets for landfill in policy CSW 4 of the adopted KMWLP;

Option C

- Not to strengthen safeguarding in policies DM 7 and DM 8.

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. Option A also includes the option to identify sites for the extraction of brickearth and chalk as stated in the adopted KMWLP. It would be possible for Kent County Council to identify and allocate sites for extraction of these resources even though existing permitted reserves are sufficient.

Options B1 and B2 are alternative waste hierarchy targets to those proposed by the Early Partial Review. The Early Partial Review proposes a reduced target for landfill and recycling and an increased target for other recovery. It would be reasonable to retain the targets set by the adopted KMWLP, as these were considered reasonable when it was adopted in 2016. However, a reduced recycling target in the Early Partial Review could be considered a reduction in ambition for sustainable waste management, while retaining a higher landfill target in the adopted KMWLP could similarly be seen as insufficient ambition for sustainable waste management. A third option would therefore be to avoid both of these situations, retaining the recycling ambition of the KMWLP and reducing the landfill target to promote more sustainable waste management.

Option C constitutes the 'do nothing' option in regard to safeguarding.

The 'do nothing' option in respect of the restoration of the landfill at Norwood Quarry is not considered a reasonable alternative to that proposed in the Partial Review. To leave the landfill unrestored would not be an acceptable approach to waste management activity.

1.10. Methodology

The SA has appraised each of the changes to policy proposed by the Early Partial Review, 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:

	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	-
Significant adverse 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 Early Partial Review 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 Early Partial Review. The recommended indicators should be incorporated into the Annual Monitoring Report for the KMWLP and are set out in Section 7.