amey consulting

Draft Sustainability Appraisal Report – Regulation 18 Consultation

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

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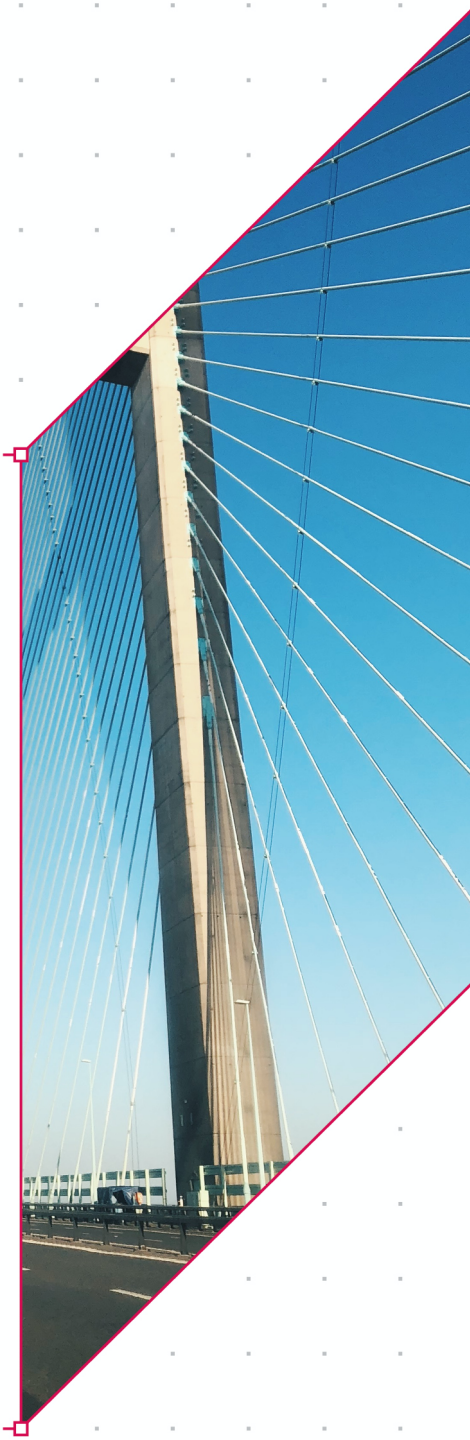

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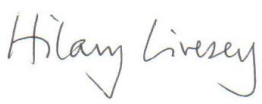
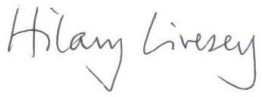
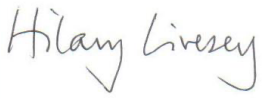
Rev 0 Reg 18 Consultation Draft for client comment	Name: Hilary Livesey Signature:  Date: 14/4/2023	Name: Jenefer Taylor Signature:  Date:	Name: Jenefer Taylor Signature:  Date:
Rev 1 Final for Consultation – Updated to include client comments	Name: Hilary Livesey Signature:  Date: 29/4/23	Name: Jenefer Taylor Signature:  Date:	Name: Jenefer Taylor Signature:  Date:
Rev 2 Final for Consultation – Updated to include further client comments	Name: Hilary Livesey Signature:  Date: 11/5/23	Name: Jenefer Taylor Signature:  Date: 12/5/23	Name: Jenefer Taylor Signature:  Date: 12/5/23

Executive Summary

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. Following the review, updates are proposed to the objectives, policies and supporting text of the adopted KMWLP to ensure consistency with national and local policy and to ensure effectiveness in achieving its intended outcomes.

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 a set of sustainable development objectives. The updated KMWLP as proposed has been appraised against these objectives and the findings are as follows.

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 housing and infrastructure to sustain communities and support economic 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 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 network capacity and taking particular measures in areas of poor air quality. Nevertheless, waste transport may increase although this is dependent on the degree to which 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.

The SA has made a number of recommendations for measures to prevent, reduce and as fully as possible offset any significant adverse effects of the updated KMWLP.

The SA is required to appraise reasonable alternatives to the updated KMWLP as proposed. The following have been identified and appraised as reasonable alternatives to the proposed updates:

- Option A: To allocate land for waste facilities as envisaged in the KMWLP adopted in 2016;
- Option B: Do not strengthen groundwater protection in policy DM 10;
- Option C: Retain policy CSW 5.

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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 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 lead 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	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. – 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	Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources. – Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals and waste operations. **– Promote climate change adaptation**
3	Community and well-being	Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being; and support the delivery of housing targets. – 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	Support economic growth and diversification. – 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	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. – 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	Make efficient use of land and avoid sensitive locations. – 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	Protect and enhance Kent's countryside and historic environment. – 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	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible – 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	Maintain and improve the water quality of Kent's rivers, ground waters and coasts, and achieve sustainable water resources management – 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	Ensure the sustainable management of waste – 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.

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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.

2. Introduction

2.1. Background

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the preparation of updates to the Kent Minerals and Waste Local Plan 2013-30 (KMWLP) following a Five Year Review. 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.

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    - proposed deletion of Policy CSW5 concerning the strategic allocation of an extension to Norwood Quarry for landfill; and,
    - proposed deletion of commitment to plan for the management of a specific quantity of non hazardous waste arising in London.

2.2. The SA Process

It is a legal requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the retained EU Strategic Environmental Assessment (SEA) Directive.

The Regulations require that a report - which for the purposes of SA is known as the 'SA Report' – is published for consultation alongside the Regulation 18 consultation document of the updated KMWLP and then taken into account, alongside consultation responses, when finalising the updated KMWLP. Essentially, the SA Report must 'identify, describe and evaluate' the likely significant effects of implementing the updated KWMLP, and 'reasonable alternatives' to the updated KMWLP as proposed.

In line with regulatory requirements, Sustainability Appraisal has already been undertaken throughout the drafting and adoption of the KMWLP (most recently, for the Early Partial Review and the Minerals Sites Plan of 2020). Kent County Council are currently undertaking a Five Year Review of the KMWLP as required by government guidance, which will amend many of the policies in the KWMLP. This SA Report has informed the development of the policy amendments proposed in the Regulation 18 consultation by undertaking an assessment of the likely effects of the KMWLP as amended by the proposed changes.

A scoping exercise has been undertaken, leading to the production in October 2021 of a Scoping Report which explained the rationale behind the SA Framework proposed for this SA of the updated KMWLP. This

SA Report has been produced in order to address the statutory appraisal questions as detailed in Table 3, to ensure that the strategic objectives and policies of the updated KMWLP have been assessed, any matters of significance noted and mitigation proposed if appropriate.

Table 3 Questions that must be answered within the SA Report

APPRAISAL QUESTION	CORRESPONDING REQUIREMENT OF THE SEA DIRECTIVE (The report must include...)
1) What is the plan seeking to achieve?	"**an outline of the contents, main objectives of the plan** or programme and relationship with other relevant plans and programmes" (Annex I(a))
2) What's the sustainability context?	"an outline of the contents, main objectives of the plan or programme and **relationship with other relevant plans and programmes**" (Annex I(a)) "**the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan** or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I(e))
3) What's the situation now?	"**the relevant aspects of the current state of the environment** and the likely evolution thereof without implementation of the plan or programme" (Annex I(b)) "**the environmental characteristics of areas likely to be significantly affected**" (Annex I(c))
4) What would the situation be without the plan?	"the relevant aspects of the current state of the environment and **the likely evolution thereof without implementation of the plan** or programme" (Annex I(b))
5) What are the key issues that should be a particular focus of the appraisal?	"**any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance**, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC" (Annex I(d)) (Note impacts on European sites will be specifically addressed through Habitats Regulations Assessment)
6) How has the plan developed up to this point (including the influence of SA)?	"**an outline of the reasons for selecting the alternatives dealt with**, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information" (Annex I(h)) "the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and **the way those objectives and any environmental considerations have been taken into account during its preparation**" (Annex I(e))
7) How has the appraisal at this current stage been undertaken?	"an outline of the reasons for selecting the alternatives dealt with, and **a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered** in compiling the required information" (Annex I(h))
8) What are the appraisal findings / recommendations at this current stage?	"**the likely significant effects (1) on the environment**, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors" (Annex I(f)) "**the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment** of implementing the plan or programme" (Annex I(g))
9) How might we monitor the plan's impacts?	"**a description of the measures envisaged concerning monitoring...**" (Annex I(i))

2.3. Compliance with the SEA Directive and Regulations

The updated KMWLP is subject to legislation in England and Wales, the Environmental Assessment of Plans & Programmes Regulations 2004 – Statutory Instrument 2004 No. 1633. These regulations transposed the requirements of the European Union's Directive on the Environmental Assessment of Certain Plans and Programmes 2001/42/EC (the SEA Directive) when the UK was a member of the European Union, and which remain in place to date.

The SA of the updated KMWLP was designed and undertaken to meet the legal requirements for the environmental assessment of plans. Throughout the report, the term 'Sustainability Appraisal' should be interpreted as encompassing the SA process as required under the Planning & Compulsory Purchase Act 2004 and the Strategic Environmental Assessment process as required under the England and Wales Regulations on the Environmental Assessment of Plans and Programmes 2004.

The following table indicates the components of the SA Report that make up the Environmental Report, as required by domestic law on the environmental assessment of plans.

Table 4 Requirements of SEA Directive and Compliance of SA Report

Requirements for Environmental Report	**Component of SA Report**
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 3.2
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 3.4
c) The environmental characteristics of areas likely to be significantly affected;	Section 3.6
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Sections 3.4 and 3.7
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Section 3.3
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 6 and Appendix B
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 6.1.1
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4.3 and 5 and Appendix C
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 7
j) a non-technical summary of the information provided under the above headings	Section 1

3. The Scope of the Sustainability Appraisal

3.1. The SA Scoping Report

As required by regulation, an SA Scoping Report was produced to inform the scope and development of the SA process. This explained the background of the KMWLP and accompanying SA and how these have evolved over time. It undertook a review of all available baseline data to describe the relevant environmental, social and economic conditions in Kent. It also undertook a review of all relevant policy and strategy documents at local, national and international level to determine the policy objectives for sustainable development in Kent relevant to waste and minerals planning. Arising from these reviews, the framework of sustainable development objectives used to undertake the SA in previous process was reviewed and updated where required.

The Scoping Report was published for consultation in October 2021 and made available on the KCC website. Comments were invited from statutory consultees and any other stakeholders wishing to make a comment. Comments were received from five stakeholders and these are summarised in Appendix A, along with the response and any action taken. In particular, some amendments were made to the SA appraisal framework. Changes to the framework are highlighted in table 7.

3.2. What is the plan seeking to achieve?

Rather than being a strategy document in itself, the update resulting from the Five Year Review makes amendments to certain policies and supporting text of the KMWLP.

The KMWLP sets out the vision and objectives for Kent's minerals supply and waste management capacity and development. 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 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.

Kent County Council has also developed and adopted (in 2020) a Minerals Sites Plan. The updated KMWLP does not allocate specific sites suitable for minerals and waste development but identifies that the specific sites for minerals developments would be set out in the separate Minerals Sites Plan. The

selection of sites was based on the policies of the KMWLP and sites proposed for development will be required to comply with the policies of the KMWLP. As a result of the decision to change the timeframe covered by the KMWLP, it has become apparent that there is a need to allocate an additional site for crushed rock. An update to the Minerals Sites Plan therefore commenced in late 2022 and is subject to SA.

The Kent Municipal Waste Management Strategy sets objectives for the management of municipal waste. In particular, it sets targets for the percentage of household waste arisings that will be recycled or composted and landfilled. The KMWLP seeks to support implementation of this Strategy by providing land use policies to permit and manage waste developments that will enable the objectives and targets of the Strategy to be achieved.

The government has published the National Planning Policy Framework (July 2021), which sets out planning policies for achieving sustainable development. Emphasis has been placed on the importance of ensuring that Local Plan policies contribute to achieving sustainable development. The updated KMWLP has been prepared in compliance with the National Planning Policy Framework (NPPF).

The current piece of work is to undertake SA of the updated KMWLP to inform the third Regulation 18 consultation on the updated KMWLP.

3.3. What's the sustainability context?

URS answered this question in 2013 primarily by reviewing the National Planning Policy Framework (NPPF) and considering the contextual messages established through other plans, policies, strategies and initiatives. Although the NPPF (2012) was subsequently amended and augmented by the publication of various Planning Guidance documents, the themes of importance largely remain the same. Where a new aspect of context has been identified, this is identified in the following paragraphs and has been incorporated into the updated baseline, below. This information was set out in detail in the SA Scoping Report[1] published in October 2021. Since the publication of that report, two additional documents of importance to the SA have been published, the Environment Act 2021 and the Kent Council Strategy 2022-26. These documents are reviewed below.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these should be applied by local planning authorities. At the heart of the framework is the presumption of sustainable development (Paragraph 11). Achieving sustainable development means that the planning system has three overarching objectives - economic, social and environmental - which should be delivered through the KMWLP and MSP.

[1] Scoping Report: Sustainability Appraisal of Updates to the Kent Minerals and 'Waste Local Plan 2013-2030 in Light of the Five Year Review, Amey, October 2021

The extracts below from the NPPF summarises policies that are most relevant to the assessment, allocation and development of mineral sites.

Economy

Significant weight should be placed on the need to support economic growth and productivity. Planning policies should positively and proactively encourage sustainable economic growth, allow for new and flexible working practices, and enable a rapid response to changes in economic circumstances.

Open space

Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users.

Transport

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks and the environment can be addressed, including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be taken up; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.

Green Belt

Certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, including mineral extraction. Planning policies and decisions should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

Flood risk

Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. New development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Development should only be allowed in areas at risk of flooding where it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- the development is appropriately flood resistant and resilient;
- it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- any residual risk can be safely managed; and
- safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Natural environment

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

Heritage assets

Great weight should be given to the conservation of heritage assets. Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Minerals

Planning policies should:

- provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction;
- so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;
- safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);

- set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;
- safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;
- set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;
- when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and
- ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place.

Waste

The NPPF should be read in conjunction with the Government's separate National Planning policy for Waste.

Environmental Improvement Plan 2023

The 25 Year Environment Plan[2] (25YEP) published in 2018 set out the Government's vision for action to help the natural world regain and retain good health. This Environmental Improvement Plan 2023 is the first review of the 25YEP. It reinforces the intent of the 25YEP: where the 25YEP set out the framework and vision, this document sets out the plan to deliver.

To achieve its vision, the 25YEP set ten goals. These continue to provide the basis for the 2023 Plan. The apex goal is for thriving plants and wildlife. In order to achieve this, the Government will aim to achieve the following.

Air quality:

- Cut overall air pollution by tackling the key sources of emissions
- Tackle specific air quality hotspots by challenging councils to improve air quality more quickly
- Reduce ammonia emissions

Water quality:

[2] A Green Future: Our 25 Year Plan to Improve the Environment, Defra, 2018

- Tackle nutrient pollution, including by upgrading wastewater treatment works and supporting a shift to sustainable agricultural techniques.
- Restore 400 miles of river through the first round of Landscape Recovery projects and establish 3,000 hectares of new woodlands along England's rivers.
- Roll out water efficiency labelling across appliances and ensure water companies deliver a 50% reduction in leakages by 2050.

Chemical exposure:

- Develop a new Chemicals Strategy to establish our regulatory approach and priorities for the sustainable use of chemicals.
- Help farmers transition to Integrated Pest Management utilising nature to tackle pests and reducing reliance on manufactured pesticides.

Use of resources:

- Work with business to implement packaging extended producer responsibility from 2024 so that polluters pay to recycle packaging.
- Introduce a deposit return scheme for plastic and metal drinks containers from October 2025 to drive higher recycling rates.
- Implement consistent recycling between different councils, to boost recycling rates.
- Ban the supply of single-use plastics from October 2023 and explore options for the production of coffee cups and behavioural science in how they are used.
- Grow a sustainable and long-term UK timber supply by investing in tree planting, skills, innovation and capacity, as well as improving regulatory processes.
- Publish a baseline map of soil health for England by 2028 and bring at least 40% of England's agricultural soil into sustainable management by 2028.
- Tackle illegal deforestation in our supply chains.

Climate change:

- Update on our progress and plans to reach net zero.
- Publish a Land Use Framework in 2023, setting out how we will balance multiple demands on our land including climate mitigation and adaptation.

- Publish the third National Adaptation Programme in 2023 that will set out our five year strategy to build the UK's climate resilience.
- Continue our role as a global leader in tackling climate change, biodiversity loss and land degradation and push for an integrated approach to international action.

Environmental hazards:

- Deliver our investment plan to improve coastal and flood defences, including £100 million on the most frequently flooded areas.
- Reward farmers for actions to reduce risks and impacts from floods, droughts, and wildfires through our new future farming schemes.

Biosecurity:

- Deliver the five-year action plan of the 2023 Plant Biosecurity Strategy
- Tailor border import controls with a new targeted and risk-based model.

Nature, heritage and engagement:

- Fulfil a commitment that everyone should live within 15 minutes walk of a green or blue space.
- Continue our delivery of the England Coast Path and the Coast to Coast National Trail.
- Identifying key areas for nature restoration within the Green Belt.
- Invest in a new national landscapes partnership for National Parks, Areas of Outstanding Natural Beauty and National Trails.
- Extend the delivery of our Farming in Protected Landscapes programme.
- Invest in active travel, with a vision for half of all journeys in towns and cities to be cycled or walked by 2030.

Our Waste, Our Resources: A Strategy for England, 2018

The Strategy recognises that natural capital is one of our most valuable assets and sets out how the government plans to preserve the stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. The Strategy also sets out the aim to minimise damage to the natural environment and is aligned to the UK Government's 25 Year Environment Plan.

The government will address information barriers to the use of secondary materials as one element of the strategy.

Planning Practice Guidance - Minerals, MHCLG, 2014

The guidance sets out how mineral planning authorities should develop planning policies for the management of mineral extraction, supply, processing and transport and the issues that must be taken into consideration. It states that mineral planning authorities should plan for the steady and adequate supply of minerals in one or more of the following ways (in order of priority):

1. Designating Specific Sites – where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;

2. Designating Preferred Areas, which are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or

3. Designating Areas of Search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply.

The suitability of each proposed site, whether an extension to an existing site or a new site, must be considered on its individual merits, taking into account issues such as:

- need for the specific mineral;
- economic considerations (such being able to continue to extract the resource, retaining jobs, being able to utilise existing plant and other infrastructure), and;
- positive and negative environmental impacts (including the feasibility of a strategic approach to restoration).
- the cumulative impact of proposals in an area.

Planning authorities should also safeguard existing, planned and potential storage, handling and transport sites to:

- ensure that sites for these purposes are available should they be needed; and
- prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.

The principal issues that mineral planning authorities should address, bearing in mind that not all issues will be relevant at every site to the same degree, include:

- noise associated with the operation;
- dust;

- air quality;
- lighting;
- visual impact on the local and wider landscape;
- landscape character;
- archaeological and heritage features;
- traffic;
- risk of contamination to land;
- soil resources;
- geological structure;
- impact on best and most versatile agricultural land;
- blast vibration;
- flood risk;
- land stability/subsidence;
- internationally, nationally or locally designated wildlife sites, protected habitats and species, and ecological networks;
- impacts on nationally protected landscapes (National Parks, the Broads and Areas of Outstanding Natural Beauty);
- nationally protected geological and geo-morphological sites and features;
- site restoration and aftercare;
- surface and, in some cases, ground water issues;
- water abstraction.

DCLG (2014) National Planning Policy for Waste[3]

Positive planning plays a pivotal role in delivering this country's waste ambitions through:

- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste

[3] https://www.gov.uk/government/publications/national-planning-policy-for-waste

management up the waste hierarchy;

- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

The protection of Green Belt from waste development has been enhanced in this document.

DEFRA (2021) The Waste Management Plan for England[4]

The Waste Management Plan for England focuses on waste arisings and their management. It is a high-level, non-site specific document. It provides an analysis of the current waste management situation in England and evaluates how the Plan will support implementation of the objectives and provisions of the Waste (England and Wales) Regulations 2011. It will be supplemented by a Waste Prevention Programme for England which will set out plans for preventing products and materials from becoming waste, including by greater reuse, repair and remanufacture supported by action to ensure better design to enable this to be done more easily. The plan includes changes to waste management plan requirements which have been made by the Waste (Circular Economy) (Amendment) Regulations where these could be incorporated in the Plan.

There are comprehensive waste management policies in England which taken together deliver the objectives of The Waste (England and Wales) Regulations 2011: to protect the environment and human health by preventing or reducing the generation of waste, the adverse impacts of the generation and management of waste, and by reducing overall impacts of resource use and improving the efficiency of such use. It is not, therefore, the intention of the Plan to introduce new policies or to change the landscape of how waste is managed in England. Its core aim is to bring current waste management policies under the umbrella of one national plan.

Planning and Compulsory Purchase Act 2004

[4] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/955897/waste-management-plan-for-england-2021.pdf

Section 19 of the Planning and Compulsory Purchase Act requires local planning authorities to include in their Local Plans policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

Climate Change Act 2008 (2050 Target Amendment) Order 2019

The Act sets out a legal framework to commit the government to tackling climate change, including through the setting of five-yearly carbon budgets to drive decarbonisation. Climate change adaptation is also covered in the Act as it provides a legal framework for adaptation policy. The amendment introduces the national target for net zero carbon by 2050, which increases the required percentage reduction of greenhouse gas emissions from at least 80% to at least 100% from the 1990 baseline in the UK by 2050.

The Environment Act 2021

The Environmental Governance Part of the Environment Act (Part 1) includes provisions to:

- allow the government to set long-term targets (of at least 15 years duration) in relation to the natural environment and people's enjoyment of the natural environment via statutory instrument;
- require the government to meet long-term targets, and to prepare remedial plans where long-term targets are not met;
- require the government to set, by October 2022, at least one long-term target in each of the priority areas of air quality, water, biodiversity, and resource efficiency and waste reduction;
- require the government to set and meet an air quality target for fine particulate matter in ambient air (PM2.5);
- require the government to set and meet a target relating to the abundance of species;
- require the government to have, and maintain, an Environmental Improvement Plan, a plan to significantly improve the natural environment;
- require the publication of a policy statement on environmental principles setting out how environmental principles specified under the Act are to be interpreted and applied by Ministers of the Crown during the policymaking process.

The Waste and Resource Efficiency Part of the Environment Act (Part 3) includes provisions to:

- require producers to pay the full net cost of managing their products at end of life to incentivise more sustainable use of resources;
- allow deposit return schemes to be established, whereby a deposit is included in the price of an in-scope item (such as a drink in a bottle or can);

- enable producer responsibility obligations to be applied at all levels of the waste hierarchy to, for example, facilitate the prevention of food waste and increase the redistribution of food surplus;
- enable charges to be applied to specified single-use items;
- require local authorities in England to collect the same range of materials for recycling from households;
- ensure households have a weekly separate food waste collection;
- ensure businesses and public bodies in England present recyclable materials for separate collection and arrange for its separate collection;
- allow the Environment Agency to be more flexible and responsive in managing exempt waste sites and ensure proportionate controls are in place to avoid environmental harm or illegal activity as waste market practices change;
- fill a gap in existing powers to ensure that waste can be collected and disposed of when normal processes fail;
- enable the Secretary of State to regulate the import, export or transit of waste for export, and hazardous waste.

The Air Quality and Environmental Recall Part of the Environment Act (Part 4) includes provisions to:

- amend Part 4 of the Environment Act 1995 (which creates the Local Air Quality Management Framework) to strengthen the requirements in respect of the National Air Quality Strategy;
- amend the Local Air Quality Management Framework to clarify duties and enable greater cooperation between different levels of local government, and other relevant public bodies, in the preparation of Local Air Quality Action Plans.

The Water Part of the Environment Act (Part 5) includes provisions to:

- change the procedural requirements for Water Resources Management Plans and Drought Plans, and enable increased collaboration between different water undertakers to better manage water resources;
- place new duties on government, the Environment Agency and sewerage undertakers to require actions for reducing the frequency and harm of discharges from storm overflows on the environment;
- enable future updates to the lists of priority substances in water quality legislation.

The Nature and Biodiversity Part of the Environment Act (Part 6) includes provisions to:

- amend section 40 of the Natural Environment and Rural Communities Act 2006 to strengthen and improve the duty on public bodies to conserve and enhance biodiversity;
- mandate net gain in biodiversity through the planning system, requiring a 10% increase in biodiversity after development, compared to the level of biodiversity prior to the development taking place;
- require the preparation and publication of Local Nature Recovery Strategies, a tool to direct action for nature, and place an emphasis on supporting local leadership of nature improvement;
- provide for Species Conservation and Protected Site Strategies to improve the conservation and protection of the most vulnerable species and habitats;
- provide powers to amend Regulation 9 and Part 6 of the Conservation of Habitats and Species Regulations 2017 to re-focus the Regulations to support delivery of domestic biodiversity priorities.

Kent Forum (2012) Vision for countywide strategy for the social, economic and environmental wellbeing of Kent's communities

Three Ambitions: Grow the economy; Tackle disadvantage; Put the citizen in control.

Three cross-cutting themes:

- Protecting and enhancing the environment. Everything we do to develop and improve Kent's infrastructure must be sustainable. In growing the economy, we need to support low carbon technologies and help businesses operate more resource-efficiently. Tackling climate change is everyone's responsibility, and we will support and encourage people and communities to play their parts, including through volunteering. We must make the most of Kent's natural environment for people to enjoy, contributing to their wellbeing, and to attract business and tourism. The Kent Environment Strategy sets out the priorities in this area.
- Improving community safety, crime and antisocial behaviour. In order to build a strong economy, improve our lives and take control, the people and communities of Kent need to feel safe, protected from crime, anti-social behaviour, fires and accidents. There is more that we can do to reinforce a sense of community across the county.
- Improving Health. Seeing improvements in residents' overall health, while, at the same time, tackling the health inequalities' gap is hugely important. Improvements will only be made with the support of employers, the voluntary and communities sector and residents themselves. Business can support positive physical and mental health measures for a healthy workforce. Residents need to accept greater responsibility for their health and by doing so improve life expectancy.

KCC (2015) Kent State of the Environment Report

Key issues:

- Air quality: It has been estimated that poor air quality contributes to approximately five percent of deaths per year and possibly contributes to more mortality and morbidity than passive smoking. There are currently 40 air quality management areas in the county where air pollutants have been known to exceed objectives set by Government.
- Transport: The county of Kent is currently facing increased congestion on both road and rail, impacting Kent's economy, health and environment. A shift to active travel, such as walking and cycling, and an increase in use of public transport can help alleviate congestion pressures, improve air quality and extend the capacity of our transport infrastructure over a longer timeframe.
- Water: In Kent we are already using most of the capacity in the county and in some places already exceeding it. This water stress will be exacerbated by a growing population and climate change. In addition, the quality of our water affects our health, our economy and our natural environment but is under increasing pressure from pollution, reduced river flow s and physical modifications to water bodies.
- Severe weather, heat and flooding: Severe weather events impact infrastructure, homes, communities and the delivery of services, to the detriment of Kent partners, residents and businesses. Kent has the highest risk of local flooding of all local authorities in England. Our health is also impacted by severe weather. For example, daily mortality in South East England increases at temperatures above about 27°C and heat-related mortality is projected to increase steeply in the UK in the 21st century.
- Land-use change: Our increasing population, housing development, transport link s, industry and agriculture all require space and resources, putting pressure on the county's landscapes and changing how we use the land. This also has an impact on the quality of our soils and their ability to sustain life, reduce carbon emissions and support resilience to climate change and its impacts such as flooding. The decisions we make in how growth is delivered for Kent will be vital to maintain the assets our residents value.
- Biodiversity: In Kent we have not met our Biodiversity 2010 targets and with biodiversity continuing to decline, it is likely that we will also fail to meet our Biodiversity 2020 targets without targeted interventions. A healthy natural environment, rich in biodiversity, provides more effective services; the economic impact that degraded habitats have on ecosystem services, for example through the decline in pollinators, is increasingly recognised.
- Energy consumption and generation: Kent is committed to reducing greenhouse gas emissions by 34% by 2020 and 60% by 2030 from a 2005 baseline. In the context of planned growth of our population and housing development across Kent, additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure we meet our targets and benefit from the opportunities for innovation in these sectors.

KCC (2016) Kent Environment Strategy

Development of the strategy provides a framework to ensure that resources are utilised to greatest impact.

Our challenges, learning and opportunities together underpin the priorities we have identified in the themes of the strategy.

- Theme One: Building the Foundations for Delivery. Outcome: Our policies, actions and decisions are based on a clear evidence base and resources are in place for delivery.
- Theme Two: Making best use of existing resources and minimising negative impacts. Outcome: All sectors are aware of their impact on the environment and how to avoid or reduce this through evidence based decision making, reducing resource usage and wasting less.
- Theme Three: Toward a sustainable future. Outcome: Kent is actively addressing the risks, impacts and opportunities from environmental and climate change, whilst delivering wider economic and health opportunities.

KCC (2017) Environment Strategy: a strategy for Environment, Health and Economy Implementation Plan 2017

- Priority 5: Conserve and enhance the quality and supply of the county of Kent's natural and historical resources and assets
- Priority 6: Improve our resource efficiency such as energy, water and land
- Priority 7: Ensure sustainable access and connectivity for businesses and communities
- Priority 8: Influence future sustainable growth for the county of Kent
    - S F 8.1: Ensure that key environmental risks such as flooding, water scarcity and heat are informing policy decisions and development
    - SF8.2: Address the environmental challenges and ambitions identified in the Growth and Infrastructure Framework and local plans, such as sustainable and alternative transport options, green infrastructure, energy, water and flooding
- Priority 9: Improve the county of Kent's environmental, social and economic resilience to environmental change
    - SF9.2: Ensure that public sector services have assessed key environment and severe weather risks and opportunities and are taking action accordingly
- Priority 10: Supporting growth in the rural economy and low carbon and environmental services sector
    - SF 10.2: Maximise opportunities for the rural sector.

Climate Emergency Statement, KCC, 2019

KCC recognises the UK environment and climate emergency and will continue to commit resources and align its policies to address this. Through the framework of the Energy and Low Emissions Strategy, KCC will facilitate the setting and agreement of a target of net zero emissions by 2050 for Kent and Medway.

Kent and Medway Low Emissions Strategy, 2020

The strategy has four strategic aims including, on policy and strategy, to facilitate the development of evidence-based policy and strategy to future-proof economic recovery, tackle emerging issues and realise opportunities. Its priority for planning and development is to ensure that climate change, energy, air quality and environmental considerations are integrated into Local Plans, policies and developments, by developing a clean growth strategic planning policy and guidance framework for Kent and Medway, to drive down emissions and incorporate climate resilience.

Framing Kent's Future: Our Council Strategy 2022-2026, Kent County Council, May 2022

The new Council Strategy was adopted in May 2022 and includes the following priorities and commitments.

Priority 1: Levelling Up Kent

Commitments:

- To support the Kent economy to be resilient and successfully adapt to the challenges and opportunities it faces over the coming years.
- To work with partners to develop a skills system for Kent that delivers skills that are resilient to changing workforce needs and opportunities and supports people to higher level skills.
- To maintain KCC's strategic role in supporting schools in Kent to deliver accessible, high quality education provision for all families.
- To see significant improvements in the economy, connectivity, educational attainment, skills and employment rates and public health outcomes in deprived communities in coastal areas so that they improve faster than the rest of Kent to reduce the gaps.
- To work with our partners to hardwire a preventative approach into improving the health of Kent's population and narrowing health inequalities.

Priority 2: Infrastructure for Communities

Commitments:

- To ensure that new development provides the appropriate physical and social infrastructure necessary to support new and existing communities' quality of life.
- To improve digital connectivity and access across Kent by supporting the delivery of both Government-led and local programmes.
- To support our rural communities and businesses in meeting the distinctive challenges and opportunities that they face.

- To ensure residents have access to viable and attractive travel options that allow them to make safe, efficient and more sustainable journeys throughout Kent.
- To help all Kent's communities benefit from having a strong social fabric which underpins family, community and personal resilience.

Priority 3: Environmental Step Change

Commitments:

- To consider Kent's environment as a core asset that is valued, strengthened and protected.
- To work towards Kent being Net Zero by 2050.
- To support Kent to become a leading county for carbon zero energy production and use.
- To ensure the county is well placed to adapt to climate change.

A review of other key policy documents at county, national and international level was undertaken and the findings of this were included in Appendix A of the Scoping Report.

The key conclusions drawn from this review are that the appraisal framework used to assess the updated KMWLP should be amended to ensure that the following policy objectives are adequately covered in the framework:

- Ensure development provides a net gain in biodiversity;
- Ensure the sustainable management of waste.

3.4. 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 described in the Scoping Report. This has been informed by the previous SA work on the KMWLP and the review of baseline data undertaken for the Scoping Report. It has been updated taking account of more recent information contained in the Scoping Report for the updated MSP.

Environmental baseline

- The amount of residual waste collected per household in Kent has generally fallen in recent years, to 554kg in 2021/22. Total arisings of household waste fell again in 2019-20 by 3.6% to just under 695,000 tonnes. 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 was 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) 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 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.
- Kent is considered to be the most at risk lead 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 2008-2009, 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 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.

3.5. 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.

3.6. What are the key sustainability issues?

Following review of context and baseline, the SA Scoping Report set out the key sustainability issues in Kent as follows. Following the addition of waste as an SA framework objective as part of the current review and update process (see Section 1.6 and Table 1), key sustainability issues have been added for waste below.

Biodiversity

- Ambitious BAP targets have been set, including for habitat creation and for reducing fragmentation and improving connectivity. Landscape scale projects are underway with biodiversity conservation and access to biodiversity as central components.
- It is possible to increase the connectivity between important habitat patches by incorporating habitat creation as part of new development. There is a particular need to maximise the biodiversity benefits associated with restoration of minerals sites.
- Biodiversity benefits relate to the minerals and waste development management strategy, which is set to ensure that negative effects associated with minerals extraction and waste management are avoided or mitigated, and the potential for minerals and waste development to contribute to biodiversity objectives is realised.

Climate change

- There is the potential to promote technologies that increase the carbon efficiency of minerals and waste operations, including increased reuse and recycling of both waste and minerals.
- Transport is a significant contributor to greenhouse gas emissions that should be addressed through the plan.

Community and well-being

- Clear spatial variation across Kent exists in terms of income, employment and health deprivation.
- The highest levels of deprivation can be seen in both coastal regions and urban areas.
- Deprivation is focused amongst particular socio-economic groups.
- Community impacts associated with the proximity of quarries and lorry movements are an issue of strategic importance.
- Traffic on the motorway and A-road network is the cause of the majority of designated Air Quality Management Areas (AQMAs).
- Future development at existing population centres is likely to put further pressure on the road network and lead to new and worsened occurrences of poor air quality.
- There remain instances where point source air pollution is a strategic issue.

Sustainable economic growth

- There are ambitious plans for economic growth and regeneration, for example in East Kent and the Kent Thames Gateway.
- There are local disparities in economic activity (including problems of 'rurality')
- Economic benefits relate to the targeted measures that are proposed as part of the minerals strategy; in particular, around ensuring supply of materials for strategically important industries / economic activities.

Flood risk

- There is extensive flood risk in Kent, and this situation is set to become worse with climate change.

Land

- There is a need to make best use of previously developed land and avoid the loss of the County's best and most versatile agricultural land. There is also a need to avoid conflict with coastal geomorphology.
- 'Land' and 'landscape' benefits relate to the support that is provided for construction and demolition waste recycling (i.e. aggregate recycling), which reduces the need to extract primary aggregates. There is also a focus on ensuring that the non-recyclable fraction of this inert waste is targeted at quarry restoration projects as a priority. In addition, the KMWLP is supportive of efforts to increase the movement of minerals via wharves which should have the effect of encouraging supply of marine dredged aggregates and hence reducing the need for land won aggregates.

Landscape and the historic environment

- There is a need to protect the integrity of the most valued and sensitive landscapes as well as to avoid damage to the landscape character more widely (signs of change inconsistent with countryside character have been identified in several areas).
- Along with a loss of the distinctiveness of the landscape character there has been a noticeable decrease in the tranquillity of landscapes and landscapes that are genuinely 'wild and remote' and an increase in levels of light pollution.
- Specific landscape impacts can be associated with minerals and waste development. Appropriate restoration should be sought to mitigate effects.
- There is a need to take account of designated heritage assets and their settings as well as undesignated assets and wider historic character.
- Heritage / historic environment benefits (which are relatively small magnitude and hence of unclear significance) relate to the support that is provided by extraction of minerals for heritage building products with a view to maintaining a diverse supply.
- There remains ongoing debate about the potential for impacts to the AONB, e.g. from silica sand extraction, but the stringency of policy has been strengthened and so effects are now unlikely.

Transport

- Much of the primary road network operates at, or above, capacity and there is a shortage of freight paths on the rail network.
- There is a need to adhere to the proximity principle wherever possible.
- There is a need to increase the amount of waste and, in particular, minerals transported by alternatives to road.
- Plans are in place to improve the transport infrastructure within and to Kent. The related Investment Plan, currently still draft, proposes several packages for investment in Kent relating to improving rail infrastructure and bus and ferry services, creating a Lower Thames Crossing and providing highway improvements.
- 'Transport' (and hence also climate change mitigation) benefits relate to the fact that the waste strategy is geared towards ensuring strict adherence to the 'proximity principle', i.e. a situation whereby waste is managed close to the source of production. It is also the case that the minerals strategy includes a focus on the safeguarding of wharves and railheads across the County to enable the ongoing importation of marine dredged aggregates, crushed rock and other minerals by sea and rail, rather than by road.

Water

- Water scarcity is set to become a greater problem in coming years as a result of population growth, climate change and the need to comply with the requirements of the Water Framework Directive.
- Groundwater and surface water pollution from a range of sources is evident across much of Kent.

Waste

- Amounts of household waste generated in Kent have fallen steadily over the last few years. Almost half (47%) is recycled, but the 50% target in 2021 was not quite met. The target for landfill reduction (no more than 2%) continued to be surpassed. The remainder of Kent's Local Authority Collected Waste was incinerated with energy recovery.
- It is anticipated that Commercial and Industrial waste will continue to increase.
- Kent remains net self-sufficient in waste management capacity.
- Illegal waste disposal continues to be an issue across Kent, creating major health and safety issues.

3.7. 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 from the policy. It is therefore concluded that there are no areas likely to be significantly affected.

3.8. Areas of Particular Environmental Importance

Kent contains a number of designated sites of international nature conservation importance. In addition, there are further sites outside Kent but within 10km of the county boundary. These sites are listed in the SA Scoping Report. 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 SAC.

The importance of each of these two sites is described below.

Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site

Dungeness, Romney Marsh and Rye Bay is located on the south coast of England, on the border of East Sussex and Kent between Hastings and New Romney. This is a large area with a diverse coastal landscape comprising a number of habitats, which appear to be unrelated to each other. However, all of them exist today because coastal processes have formed and continue to shape a barrier of extensive shingle beaches and sand dunes across an area of intertidal mud and sand flats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing nationally important saline lagoons, natural freshwater pits and basin fens. Rivers draining the Weald to the north were diverted by the barrier beaches, creating a sheltered saltmarsh and mudflat environment, which was gradually in-filled by sedimentation, and then reclaimed on a piecemeal basis by man. Today this area is still fringed by important intertidal habitats, and contains relict areas of saltmarsh, extensive grazing marshes and reedbeds. Human activities have further modified the site, resulting in the creation of extensive areas of wetland habitat due to gravel extraction. As a whole, Dungeness, Romney Marsh and Rye Bay is important for breeding, wintering and passage waterbirds, wetland plants, bryophytes and invertebrates, and natural or near-natural wetland habitats. In addition to the internationally important wetland habitats and species, the Ramsar site and adjacent areas are also of national and international importance for a variety of non-wetland habitats and species.

Dungeness SAC

Dungeness is the UK's largest shingle structure. The site retains very large areas of intact parallel ridges with characteristic zonation of vegetation. It has the most diverse and most extensive examples of stable vegetated shingle in Europe, including the best representation of scrub on shingle, notably prostrate forms of broom *Cytisus scoparius* and blackthorn *Prunus spinosa*. A feature of the site, thought to be unique in the UK, is the small depressions formed within the shingle structure, which support fen and open-water communities. The Dungeness foreland has a very extensive and well-developed shoreline, although with sparse vegetation. The strandline community on this site comprises Babington's orache *Atriplex glabriuscula*, which occurs mostly on the accreting eastern shoreline, although it is also present on the eroding southern shoreline. This extensive site also hosts a large and viable great crested newt *Triturus cristatus* population in a range of natural and anthropogenic habitats. These include natural pools and those resulting from gravel extraction and other activities. Terrestrial habitat of importance for feeding and shelter is provided by a range of open shingle vegetation with scrub in the vicinity of some of the waterbodies.

Habitats Regulations Assessment

A draft Habitats Regulations Assessment[5] (HRA) has been undertaken for the updated KMWLP in relation to policy CSW 17. This has made an assessment of any likely impacts of the KMWLP on the Dungeness, Romney Marsh and Rye Bay SPA and Ramsar and Dungeness SAC.

The draft HRA concluded that the policy is unlikely to have any adverse impacts on the SAC, SPA, Ramsar and SSSI from noise, vibration, visual disturbance, or changes in water quality and hydrology. Adverse effects are possible if importation of waste occurs which increases air pollution. The draft HRA therefore advised that to enable KCC (and Folkestone and Hythe DC) to carry out their legal duties as competent authorities under the Habitats Regulations, applicants should establish a current baseline at the start of the period covered by this plan updated with regular monitoring programmes of both vehicle movements to and from the Dungeness nuclear sites and of air quality (including monitoring for ammonia NH_3, nitrous oxides NO_x and sulphur dioxide SO_2). The baseline levels and monitoring programmes should be established as soon as possible, and the results then used to inform all further planning applications with respect to air pollution impacts on the Dungeness SAC.

5 Habitats Regulations Assessment (HRA) – Kent Minerals and Waste Local Plan Update, KCC, August 2022

4. How has the plan developed up to this point?

4.1. Background to the Development of the KMWLP and SA

The process of making the KMWLP commenced in 2009, with Sustainability Appraisal starting simultaneously and leading first to the publication of the MWLP SA Scoping Report (Scott Wilson, 2010). This Scoping Report set out a Framework for the subsequent Sustainability Appraisal of the KMWLP. This comprised a set of sustainable development policy objectives (Sustainability Objectives; SO) which were used to assess the effect of the KMWLP and the reasonable alternatives to its proposals on sustainable development in Kent and beyond. These are presented in Table 5.

Table 5 Sustainability Objectives established during SA Scoping (Scott Wilson, 2010)

Sustainability Objective (SO)	
SO1	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment
SO2	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 and other strategies
SO3	Protect and enhance Kent's countryside and historic environment
SO4	Maintain and improve the water quality of the Kent's rivers, ground waters and coasts, and achieve sustainable water resources management
SO5	Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources
SO6	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible
SO7	Plan for the correct waste management facilities, in the right place at the right time
SO8	Make efficient use of land and avoid sensitive locations
SO9	Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being
SO10	Support the delivery of housing targets
SO11	Support economic growth and diversification

In 2011, these SOs were used to appraise the options which were at the time presented for Minerals and Waste Sites. This was undertaken on a site-by-site basis (Atkins, 2011). In 2012 a similar process was used to assess the Preferred Options (URS, 2012). By 2013 these SOs had been further developed, and the Consultation Draft of the SA Report (URS, 2013) presented the following Assessment Framework (Table 6):

Table 6 Sustainability Appraisal Framework Used in SA Report (Consultation Draft) (URS, 2013)

	Appraisal Objectives
1	Biodiversity
2	Climate change
3	Community and well-being
4	Sustainable economic growth
5	Flood risk
6	Land
7	Landscape and the historic environment
8	Transport

	Appraisal Objectives
9	Water

Further iterations of the SA Report were subsequently published (URS, 2014[6]; URS, 2015). The Sustainability Appraisal process culminated in publication of the final SA Report and Addenda (AECOM, 2015a and 2015b) and the SA Adoption Statement (AECOM, 2016). The KMWLP was adopted in 2016.

The KMWLP is a high-level document which describes:

- 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.

The currently adopted KMWLP identifies and sets out the following subjects for the period from 2013 to 2030:

- the long-term Spatial Vision and Strategic Objectives for Kent's minerals and waste;
- the delivery strategy for minerals and waste planning that identifies how the objectives will be achieved in the plan period;
- two areas where strategic mineral and waste development may occur;
- the development management policies that will be used when the County Council makes decisions on planning applications; and
- the framework to enable annual monitoring of the policies within the Plan.

Following the adoption of the KMWLP in July 2016, further assessments suggested that the level of waste management capacity required to maintain net self-sufficiency had changed. It was therefore expedient to undertake an Early Partial Review of the KMWLP to amend several of the policies relating to waste management. At the same time, policy concerned with safeguarding mineral resources and waste and mineral infrastructure was amended to ensure its effectiveness. Alongside the Early Partial Review of the KMWLP, a separate but linked Minerals Sites Plan was developed, which identified and allocated a number of sites for mineral extraction.

[6] https://www.kent.gov.uk/__data/assets/pdf_file/0016/15415/Kent-Minerals-and-Waste-Plan-2013-30-Sustainability-Appraisal.pdf

Both of these documents – the Early Partial Review and the Minerals Sites Plan - were subject to SA. Separate Scoping Reports and SA Reports were produced for each of the Early Partial Review and the Minerals Sites Plan as follows:

- Sustainability Appraisal of the Kent MWLP Partial Review: Scoping Report, Amey, November 2017;
- Sustainability Appraisal of the Kent Minerals Sites Plan-Making Process, Amey, November 2017;
- Sustainability Appraisal Report – SA of the draft Early Partial Review of the Kent Minerals and Waste Plan: Main Modifications Consultation, Amey, November 2019;
- Sustainability Appraisal Report – SA of the draft Kent Minerals Sites Plan: Main Modifications Consultation, Amey, November 2019.

The Scoping Reports for these SA processes adapted the SA framework used in the earlier SA of the adopted 2016 KMWLP. This was to reflect updates to the policy context relevant to the plans since the KMWLP was adopted and changes in the baseline data describing sustainability conditions in Kent.

The Early Partial Review and the Minerals Sites Plan were adopted by KCC in September 2020.

4.2. The Current Review of the KMWLP

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, the Kent Minerals and Waste Local Plan has been reviewed to assess whether updates to the Plan 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.

National Planning Practice Guidance (PPG) states that "The review process is a method to ensure that a plan and the policies within remains effective". The PPG also sets out what authorities should consider when determining whether a Plan or policies should be updated. Information relevant to this KMWLP Review includes:

- Conformity with national planning policy;
- changes to local circumstances;
- success of policies against indicators in the KMWLP;
- significant economic changes that may impact on viability; and,
- whether any new social, environmental or economic priorities may have arisen.

To inform the process, a review of national policy changes has been undertaken. This revealed that, amongst other things, there have been changes to the National Planning Policy Framework which require updates to policies in the Kent Minerals and Waste Local Plan to ensure they remain consistent with national planning policy. Locally, since adoption of the Local Plan, the Council has published a 'Climate Emergency Statement' and adopted the Kent and Medway Energy and Low Emissions Strategy that provides local impetus for achieving net zero carbon emissions by 2050. Monitoring of the way in which planning applications have been determined has also been undertaken to assist the review of the policies. Other observations regarding the wording of the policies and supporting text have been made and some of these indicate that policies, and supporting text, should be updated to ensure the ongoing effectiveness of the KMWLP.

The review has considered each of the Vision, the Strategic Objectives and the 52 policies within the KMWLP in turn. It has identified the need for changes to the wording of both the Vision and some of the Strategic Objectives to ensure that these remain current and reflective of recent changes. One of the Strategic Objectives is proposed to be deleted (SO 10). The majority of policies within the KMWLP are also proposed for amendments of different kinds and for various reasons, as well as various amendments to the supporting text and contextual Chapters (1 and 2).

The findings of the review were used to make a number of proposed changes to the KMWLP and the updated KMWLP as proposed was published for Regulation 18 consultation in December 2021[7]. Alongside the preparation of the updated KMWLP, an SA process has commenced, beginning with the preparation of a Scoping Report[8] which was also published for consultation in December 2021.

As a result of comments received in the consultation, it was concluded that there was a need to change the timeframe of the KMWLP to cover 2024 to 2039. This has necessitated some other amendments to the KMWLP to be incorporated and a second Regulation 18 consultation to be carried out. A second Regulation 18 consultation was undertaken on the updated KMWLP to incorporate the extended timeframe and additional amendments in December 2022. An SA was carried out of the amended KMWLP and an SA Report[9] published alongside this second (2022) Regulation 18 consultation.

As a result of the extended timeframe for the KMWLP, it has become clear that additional permitted reserves of crushed rock are needed in order to maintain a 10 year landbank for crushed rock. As a result, it is necessary to allocate a new site for crushed rock and to include this in an update to the current MSP. An SA has been carried out of the updated MSP as proposed, and the SA Report[10] is published alongside the Regulation 18 consultation on the updated MSP.

[7] Kent Minerals and Waste Local Plan 2013-2030 Proposed Refresh: Regulation 18 Consultation Draft, December 2021
[8] Sustainability Appraisal of Updates to the Kent Minerals and Waste Local Plan 2013-30 in Light of the Five Year Review: Scoping Report, Amey, October 2021
[9] Sustainability Appraisal of Updates to the Kent Minerals and Waste Local Plan 2013-30 in Light of the Five Year Review: Sustainability Appraisal Report, Amey, August 2022
[10] Updates to the Kent Mineral Sites Plan: Sustainability Appraisal Report, Amey, May 2023

4.2.1. The Scope of the Third Regulation 18 Consultation

Following the second Regulation 18 consultation, some further small amendments are now proposed to the draft updated KMWLP, on London's waste and the strategic site for waste, as follows:

- to remove paragraphs in the supporting text to policy CSW 4 which states that KCC will plan for the management of waste from London;
- Removal of policy CSW 5 that allocates the strategic site for landfill of air pollution control residues.

A third Regulation 18 consultation will be carried out and accompanied by this SA Report, which provides the process, findings and recommendations arising from the SA of that third Regulation 18 updated KMWLP.

4.3. Difficulties Encountered

A number of difficulties were encountered in undertaking the appraisal:

- **Data.** A common problem affecting SA is the availability and reliability of data. Although data has been collected to illustrate a number of the conditions and trends relevant to the SA of the updated KMWLP, some data sets are more useful than others, and some data sets are known to be old, incomplete or unreliable. In some cases, no data is available. It is therefore almost impossible to quantify effects with certainty.
- **Uncertainty.** It has not been possible for the SA to quantify the predicted impacts of the policies as amended by the Five Year Review. In all cases a qualitative assessment of impacts has been made. This is particularly the case in relation to the effects on greenhouse gas emissions of encouraging the management of waste at higher levels of the waste hierarchy. While positive impacts are likely, it has not been possible to quantify these. It is also not possible to know with certainty what the implications are likely to be for the effects of climate change, including on communities, wildlife, the economy, landscape and water quality and availability. The nature and likelihood of impacts is often strongly dependent on the location of development, which for most policies is currently unknown.

5. How has the appraisal at this current stage been undertaken? [Sustainability Appraisal Methodology]

5.1. SA Framework and Sustainability Objectives

Following due diligence in terms of the context and baseline conditions, the framework and sustainability objectives for the SA of the updated KMWLP has been developed from the frameworks used for earlier SAs of the KMWLP, most recently the SA of the second Regulation 18 draft of the updated KMWLP. The framework was published for consultation in the SA Scoping Report between December 2021 and February 2022, and table 7 below incorporates some additional detailed criteria following comments received on the Scoping Report. 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 relates to climate change adaptation and is highlighted in bold in table 7.

Table 7 SA Framework

Sustainability Objectives		Detail – including **addition** resulting from consultation on Scoping Report for updated MSP
1	Biodiversity	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 – 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	Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources – Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals and waste operations. **- Promote climate change adaptation**

3	Community and well-being	Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being; and support the delivery of housing targets – 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	Support economic growth and diversification – 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	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment – 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	Make efficient use of land and avoid sensitive locations – 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	Protect and enhance Kent's countryside and historic environment – 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	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible – 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	Maintain and improve the water quality of the Kent's rivers, ground waters and coasts, and achieve sustainable water resources management – 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
10	Waste	Ensure the sustainable management of waste – 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

5.2. Applying the Framework

5.2.1. How the Appraisal Has Been Carried Out

The SA is required to undertake an appraisal of the updated KMWLP as proposed. Each of the policies and strategic objectives in the updated KMWLP has previously been subject to assessment using the SA framework set out in section 5.1 (see table 7) and the results published in the SA Report issued alongside

the second Regulation 18 consultation on the updated KMWLP in December 2022. An assessment matrix was drafted and presented in Appendix B of that report and the results summarised in Section 6.1 of the report. The assessment has been reviewed and revised to incorporate the new assessment criteria on climate change adaptation into the appraisal of all the policies and strategic objectives of the draft KMWLP.

It is considered that it is not appropriate to appraise the change to the supporting text regarding London's waste, as this requires no amendment to the policies of the KMWLP. It is also not considered appropriate to appraise the removal of policy CSW 5, as in this case there is now no policy to appraise. However, the removal of policy CSW 5 is considered in the appraisal of reasonable alternatives (see section 6.2). The revised assessment of policies is set out in detail in Appendix B of this report and the results summarised in section 6.1.

The appraisal has considered a range of different types of effects as required by Annex I of the SEA Directive. The type of effects identified are indicated in the tables in Appendix B. Factors taken into consideration were:

- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the SA objective in the county overall;
- the certainty or probability that the effect is likely to occur as a consequence of the KMWLP;
- whether the effects would be permanent or reversible;
- whether the effect will occur as a direct result of the KMWLP or not, in other words whether the Plan is key for achieving or controlling effects;
- whether the effect is more strongly dependent on other interventions or other factors; and
- how important the objective is to the scope of the KMWLP.

The SA identifies whether effects are positive, negative, nil or uncertain. The following symbols are used in this report to indicate the impact or impacts and their relative significance. Where more than one effect is predicted, multiple symbols are given separated by '/'. In order to determine the significance of effects, the appraisal has followed the criteria for determining significance as set out in Annex II of the SEA Directive.

Table 8 Effects Symbols

Type of impact	Symbol
significant positive effect	++
some positive effect	+
no effect	0
some adverse effect	-
significant adverse effect	- -
uncertain effect	?

Effects are identified in the short, medium and long term. To make this assessment, the short term has been chosen as being within the first 5 years of adoption of the Updated KMWLP, the medium term is considered to be the remainder of the Plan period for the KMWLP and the long term is after the end of the Plan period of the KMWLP.

An assessment has also been made of the probability of the identified effect occurring (low, medium or high), whether the effect is direct or indirect (i.e. primary or secondary), and whether the effect is temporary or permanent indicated by whether or not the effect could be reversed.

Cumulative and synergistic effects are discussed in Section 6.3.

The appraisal has assessed the likely effects arising from adoption of the updated KMWLP and considered whether there is scope to make recommendations for measures to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the updated KMWLP. These recommendations are made in Section 6 of this report.

5.2.2. SA of Alternatives to the Updated KMWLP as Proposed

The SA is required to appraise reasonable alternatives to the updated KMWLP as proposed. The reasonable alternatives that have been identified partly from a review of responses received to the first Regulation 18 consultation, and partly derived from a 'do nothing' option, in other words, not to make the changes proposed.

Several responses received to the first Regulation 18 consultation raised the question as to why no waste sites are allocated, in other words, why no Waste Sites Plan has been produced. Kent County Council as the Waste Disposal Authority has identified[11] that a number of Household Waste Recycling Centres are displaced and there are a number of factors that put them at risk. The Five Year Review also concluded that the spatial distribution of transfer stations and MRFs is less than optimal, although there is sufficient capacity of

[11] Kent Waste Disposal Strategy 2017-2035 Evidence Base, Kent County Council, undated

this type existing in Kent. It could reasonably be argued that to identify and allocate sites for waste management uses would facilitate the relocation of waste facilities so that a better spatial distribution is secured. Therefore this has been appraised as an option, Option A.

- 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 or to ensure internal consistency within the KMWLP, 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. Only one policy has been identified as having a reasonable 'do nothing' alternatives to the policy amendments proposed. This has been identified as Option B.

- Option B: Do not strengthen groundwater protection in policy DM 10.

Each of the alternatives identified above were appraised against the SA framework for the SA of the second Regulation 18 consultation and an assessment made of the likely impacts on sustainability objectives. The detailed results were set out in Appendix D of that report and summarised in Section 6.2 of the report. This appraisal work has been reviewed and revised to incorporate the additional appraisal criterion relating to climate change adaptation and the results set out in Appendix D of this report.

In addition, the amendments introduced to the KMWLP in this third Regulation consultation have been considered, to determine whether there are reasonable alternatives to the proposals which should be appraised. The following is identified as a reasonable 'do nothing' alternative to the current proposals:

- Option C: Do not remove policy CSW 5.

This new option has been appraised against the SA framework and the results are set out in Appendix D and summarised in section 6.2.

6. Sustainability Appraisal Findings and Recommendations

6.1. SA of the Updated KMWLP as Proposed

The SA has appraised each of the strategic objectives and policies which are proposed in the updated KMWLP. The methodology and assumptions used in undertaking the appraisal are set out in Section 5.

Table 9 below sets out the findings of the appraisal of each of the strategic objectives according to the SA appraisal framework, with some recommendations in the sections following the tables.

The detailed findings of the SA of the policies of the KMWLP as amended are set out in Appendix B and summarised in table 10 below.

Table 9 Findings of Appraisal of KMWLP Strategic Objectives

	SA Objectives										
Objective	1 Biodiversity	2 Climate Change	3 Community and Well Being	4 Sustainable Economic Growth	5 Flood Risk	6 Land	7 Landscape and Historic Environment	8 Transport	9 Water	10 Waste	Comment
General											
1 Transport	+	+	+	+	+	0	0	+	0	+	Minimising road miles and promoting low carbon modes of transport will help to minimise greenhouse gas emissions, avoiding impacts of climate change on a number of receptors
2 Climate change	+	+	+	+	+	0	0	+	0	+	Minimising the effects of climate change will help to avoid impacts on a number of receptors. Climate change adaptation is promoted.
3 Surrounding environment and communities	+	+	+	0	+	0	+	+	+	+	Minimising impacts on surrounding environment will apply to several SA objectives and may help indirectly to promote climate change adaptation.
4 Contribute to social and economic fabric	0	0	+	+	0	0	+	0	0	0	Supports wellbeing and economic benefits. KMWLP supports access to information on archaeological assets.
Minerals											
5 Maintenance of supply	0	0	+	+	0	0	0	+	0	0	Ensures availability of mineral to support construction of housing, schools, hospitals etc and support economic needs. Seeks to provide resources within the county which will help to minimise the need to import from elsewhere.
6 Recycled and secondary aggregates	+	0	?	+	0	+	0	0	0	+	Promotes the waste hierarchy and efficient use of land and avoids potential impacts on biodiversity from development. Impact on communities is uncertain.
7 Safeguard mineral infrastructure	0	+	+	+	0	0	0	+	0	0	Supports the continued availability of minerals and mineral products and supports sustainable transport modes.
8 Building stone	0	0	0	+	0	0	+	0	0	0	Supports restoration of historic buildings and built landscapes and the industry it supports.
9 Restoration of mineral	+	?	+	+	?	+	+	0	?	0	Provides benefits to biodiversity, communities and landscapes. Benefits for water management and flood risk should be included.

	SA Objectives										
Objective	1 Biodiversity	2 Climate Change	3 Community and Well Being	4 Sustainable Economic Growth	5 Flood Risk	6 Land	7 Landscape and Historic Environment	8 Transport	9 Water	10 Waste	Comment
sites											
Waste											
10 Waste hierarchy	+	+	+	+	+	0	0	0	0	+	Promoting the waste hierarchy will reduce greenhouse gas emissions from waste, with benefits for climate change, biodiversity, communities, the economy and flood risk.
11 Proximity principle	+	+	+	+	+	0	0	+	0	+	Promoting the proximity principle will reduce emissions from waste transport, with benefits for climate change, biodiversity, communities and flood risk and promote more sustainable economic activity.
12 Energy recovery	+	+	+	+	+	0	0	0	0	+	Recovery of renewable energy will replace fossil fuel use, with benefits for climate change, biodiversity, communities and flood risk, promote the waste hierarchy and support more sustainable economic activity.
13 Capacity for Kent's waste	+	+	+	+	+	0	0	+	0	+	Ensuring capacity to manage Kent's waste will avoid the need for longer waste transport distances, with benefits for climate change, biodiversity, communities and flood risk, promote the proximity principle and support more sustainable economic activity.
14 Waste site restoration	+	?	+	+	?	+	+	0	?	0	Restoration envisaged for biodiversity, community, economic and landscape benefits. Benefits for flood risk and water management possible but not explicit.

Table 10 Summary of Findings of SA of Policies

	SA Objectives									
Policy	1 Biodiversity	2 Climate Change	3 Community and Well Being	4 Sustainable Economic Growth	5 Flood Risk	6 Land	7 Landscape and Historic Environment	8 Transport	9 Water	10 Waste
CSM 1	+	+	+	+	+	+	+	+	+	+
CSM 2	-/+	0	0/?	-	0	-/0	-/?/+	+	?	+

	SA Objectives									
Policy	1 Biodiversity	2 Climate Change	3 Community and Well Being	4 Sustainable Economic Growth	5 Flood Risk	6 Land	7 Landscape and Historic Environment	8 Transport	9 Water	10 Waste
CSM 4	?	?	?	+	?	?	?	?	?	0
CSM 5	0	+	0	+	0	0	0	+	0	0
CSM 6	0	+	0	+	0	0	0	+	0	0
CSM 7	0	0	0	+	0	0	0	+	0	0
CSM 8	0/?	?/+	0/?	+	0	0/?	0/?	+	0	+
CSM 9	0	0	0	+	+	0	0/+	0	0	0
CSM 10	0	0	0	+/0	0	0	0	0	0	0
CSM 11	?	0	?	?	?	?	?	?	?	0
CSM 12	0	+	+/0	+	+	0	0	+	0	0
CSW 1	+	+	+	+	+	+	+	+	+	+
CSW 2	+	+	+	++	+	0	0	?	0	++
CSW 3	+	+	+	++	+	0	0	+	0	++
CSW 4	0	+/?	0	++	0	0	0	?	0	++
CSW 6	0	?	0	+	0	0	0/?	?	0	++
CSW 7	+	+	+	++	+	0	0	?	0	++
CSW 8	+	+	+	+	+	0	0	0	0	++
CSW 9	+	+	+	+	+	0	0	0	0	++
CSW 10	+	+	+	0	+	+	0	0	0	++
CSW 11	+	+	+	0	0	+	+/0	?	0	++/?
CSW 12	0/+	?/+	0/+	+	0/+	0	0/?	?/0	0	++

	SA Objectives									
Policy	1 Biodiversity	2 Climate Change	3 Community and Well Being	4 Sustainable Economic Growth	5 Flood Risk	6 Land	7 Landscape and Historic Environment	8 Transport	9 Water	10 Waste
CSW 13	?	0	0	0	0	?	0	+	0	+
CSW 14	+	0	0	+	0	?	?	?	0	+
CSW 15	+	+	+	0	+	?	?	0	++	+
CSW 16	0	+	0	0	0	0	0	+	0	++
CSW 17	?/+	0	?	0	0	0	0	+/?	?	0/+/?
CSW 18	?	+	?	0	?	?	?	+	?	+
DM 1	++	++/-	++	+/-	+	0	0	0	+	++
DM 2	++/-	+	++	++	+	0	++/-	0	+/-	0
DM 3	++	0	+	+	+	0	0	0	+	0
DM 4	+/-	+/-	+/-	+/-	+/-	++/-	+/-	0	0/-	0
DM 5	+	+	++	+	+	0	++	0	0	0
DM 6	0	0	++	+	0	0	+	0	0	0
DM 7	0	0	++	++/-	0	0	0	0	0	0
DM 8	0	0	++/-	0	0	0	0	++	0	+
DM 9	0	0	0	++/-	0	0	0	0	0	0
DM 10	++	+	++	+	++	0	0	0	++	+
DM 11	++	?	++	+	0	++	0	++	?	+
DM 12	++	++	++	0	++	++	++	++	++	++
DM 13	+	+	++	+	+	0	0	++	0	++
DM 14	0/?	+	++	+	0	0	0/+	0/+	0	0

	SA Objectives									
Policy	1 Biodiversity	2 Climate Change	3 Community and Well Being	4 Sustainable Economic Growth	5 Flood Risk	6 Land	7 Landscape and Historic Environment	8 Transport	9 Water	10 Waste
DM 15	+	+	+	+	+	0	0	++	?	0
DM 16	0	0	0	0	0	0	0	0	0	0
DM 17	++	+	++	++/-	?	+	++/0	++/0	?	++
DM 18	?	0	+	?	?	0	0	0	?	0
DM 19	++	++	++	+	+	++	++	+	+	+
DM 20	?	?	?	+	?	?	?	?	?	?
DM 21	?	?	?	++/-	?	?	?	?	?	?
DM 22	0	0	0	0	0	0	0	0	0	0
Overall impacts	**++/?**	**+/?**	**+/?**	**+/-**	**+/-**	**+/?**	**+/?**	**+/?**	**+**	**++**

Discussion of Appraisal of Strategic Objectives

Taken together, the strategic objectives largely give support to the SA objectives where this is relevant. The objectives seek to ensure sufficient capacity is available locally where possible for both minerals and waste development to meet Kent's needs in a sustainable way where possible. Strong support is given to the sustainable management of waste and minimising the impacts of waste and minerals management on greenhouse gas emissions, with benefits that this will have for climate change, biodiversity, communities, the sustainability of the economy and flood risk. The objectives seek to provide benefits for communities economically, socially and environmentally and to minimise the impacts of minerals and waste management on communities and the environment. Climate change adaptation is promoted. Benefits of restoration can include water and flood risk management although these are not explicit and could be added to objectives 9 and 14.

Discussion of Appraisal of Policies

Biodiversity

The KMWLP contains several development management policies that require protection, enhancement, management and creation of biodiversity value, including for internationally, nationally, and locally designated sites, protected species and habitats and those of principal importance for conservation. Maximum biodiversity net gain is required where practicable and at least a 10% net gain. 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. Despite these measures, adverse impacts are still possible where these would be outweighed by other benefits.

Managing waste at high levels of the waste hierarchy, promotion of the circular economy, recovering energy and requiring methane capture will help to reduce the emissions of greenhouse gases from waste management activities, helping to reduce pressures on biodiversity from climate change. Restoration of landfill and mineral sites is required to a high standard which could have biodiversity benefit depending on the intended afteruse of sites. Policy on Green Belt is likely to help protect biodiversity, although losses are also possible.

Climate change

The KMWLP has a number of policies requiring minimisation of greenhouse gas emissions and energy and water consumption, helping to reduce the likely impacts of climate change. By requiring the minimisation of waste and maximising recycling of materials, use of low carbon energy sources and methane and carbon capture, this will also help to minimise greenhouse gas emissions. Policy also requires developments to build in climate change adaptation measures where these are appropriate. Achieving a BREEAM very good standard or equivalent will also promote minimisation of greenhouse gas emissions. Despite all of these

requirements, emissions of greenhouse gases may nevertheless rise as requirements for waste management and minerals production increase above existing levels.

Several policies promote non-road modes of transport for waste and minerals and reduce the demand for transport, including safeguarding mineral resources within the county, safeguarding wharves and rail depots, promoting net self-sufficiency in waste facilities and requiring secondary and recycled aggregate facilities to be well-located to the source of arisings and/or users. Managing the demand for road transport will help to minimise increases in greenhouse gas emissions from waste and minerals transport, although in practice such opportunities are likely to be limited, therefore increases in emissions are likely with increasing quantities of waste to be managed. The contribution from minerals transport is likely to remain similar to current levels.

Managing waste at high levels of the waste hierarchy, promotion of the circular economy, recovering energy, requiring methane and carbon dioxide capture and promoting heat use from waste facilities will help to reduce the emissions of greenhouse gases from waste management activities. Restoration of landfill and mineral sites is required to a high standard which could have climate change mitigation and adaptation benefits through revegetation of sites or providing flood water storage, depending on the intended afteruse of sites.

Community and wellbeing

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 restrict increases in greenhouse gas emissions will have benefits for communities and wellbeing by avoiding the worst impacts of climate change. Such measures include managing demand for transport and promoting alternatives to road transport, promoting the waste hierarchy, requiring carbon capture and heat/energy recovery. Managing the impacts of climate change through avoiding flood risk increase and protecting water quality will also benefit communities.

Communities could also benefit if the afteruse of the land is for recreation and access. By requiring developments to maximise the contribution to green and blue infrastructure, the KMWLP may help to promote opportunities for recreation and exercise and so support human health and wellbeing. Protection of sites of biodiversity, landscape and heritage importance can also have indirect benefits for recreation, health and wellbeing, as will ensuring access to public rights of way and improving access where possible and protection of Green Belt.

Measures to maintain mineral supply will support materials for construction of housing to sustain communities.

Sustainable economic growth

The KMWLP will help to ensure the supply of minerals and waste development to support economic/industrial activity. However, the exploitation of non-renewable mineral resources and hydrocarbons is not sustainable.

By facilitating mineral development on unallocated sites, ensuring resources are not sterilised by other development, safeguarding mineral infrastructure and maintaining capacity for secondary and recycled aggregates, the KMWLP will help to support economic growth by providing materials essential for construction of homes, offices, schools, hospitals and other buildings essential to support growth. The KMWLP also promotes sustainable waste management practices contributing to a sustainable economy, including by promoting the waste hierarchy and circular economy, managing transport demand and promoting non-road modes of transport, and requiring energy and heat recovery.

Minimising emissions and energy and water consumption in development will support more efficient businesses to support sustainable economic growth, as will promoting sustainable transport and safeguarding transport infrastructure.

Requiring site restoration to a high standard and conserving green space and areas designated for biodiversity, landscape and heritage value will have indirect economic benefits by creating more desirable places to live and work in and visit.

Economic benefits will be gained from avoiding flood risk and protecting water quality, reducing costs to businesses and residents.

The KMWLP provides for planning obligations for large waste and minerals developments, including conditions on the use of local workforce and provision of apprenticeships and training, which will provide local employment opportunities and appropriate training, boosting local economies. It also envisages economic gain to mitigate or compensate for effects of development.

Flood risk

By promoting climate change adaptation measures, including sustainable drainage systems, 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. The KMWLP requires no increase in flood risk in areas prone to flooding, therefore adverse impacts on flood risk are unlikely, although flood risk reduction measures are not promoted.

Site restoration measures are required to incorporate flood risk mitigation opportunities, as well as the installation of drainage, helping to avoid increases in flood risk. Restricting development which could adversely affect green spaces will help to alleviate flood risk in local areas by allowing vegetation to grow and absorb surface run-off and groundwater. Protection of Green Belt may also help to alleviate flood risk, although this is site-dependent and losses are also possible.

The KMWLP will help to reduce adverse impacts on flood risk from climate change through measures to reduce greenhouse gas emissions. These include promoting the sustainable transport of minerals and waste, promoting non-road transport, supporting the waste hierarchy, energy and heat recovery and carbon capture.

Land

The KWMLP requires development to have no unacceptable adverse impacts on surrounding land and associated permitted uses, therefore quality of surrounding land is likely to be protected. Protection of Green Belt will have a positive impact on this objective, although losses are also possible in very special circumstances or where development is appropriate in the Green Belt.

The KMWLP requires high standards of restoration and aftercare of sites, usually to a level at least equivalent to that which it was before development. This may be restored to agricultural use; therefore the best and most versatile agricultural land should be protected in the long term. The likelihood of this is uncertain and dependent on plans for restoration. 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.

By maintaining capacity for secondary and recycled aggregates, this will help to avoid adverse impacts on land that could occur from primary extraction, although the significance and likelihood of these impacts are unknown. By facilitating soil decontamination on sites that are for redevelopment, there may be benefits for land quality through decontamination of soils although this depends on redevelopment plans.

The KMWLP allows for mineral extraction on non-identified sites and incidental mineral extraction. It also allows for the development of waste facilities on unidentified sites under certain conditions. Adverse impacts on the best and most versatile agricultural land and on Green Belt are possible, although the significance depends on conditions at particular sites and therefore is largely unknown at this stage.

Landscape and the historic environment

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 the historic environment and require developments to mitigate their impacts on the fabric, setting and amenity value of assets, therefore significant adverse impacts on assets are unlikely and benefits are possible. The KMWLP also protects landscapes in terms of historic parks and gardens, conservation areas and heritage coastlines. Protection of Green Belt could also help to preserve landscapes, although this is site-dependent and losses are also possible. Development management policy broadly prohibits development which would have an adverse effect on an AONB or its setting. However, development which would have adverse impacts would be permitted if it can be demonstrated to be in the public interest, therefore adverse effects are possible.

In locating built waste management facilities, the KMWLP requires no significant adverse effects on AONBs or heritage assets and that the landscape is capable of accommodating prominent structures.

By maintaining capacity for secondary and recycled aggregates, this will help to avoid adverse impacts on landscape and historic assets that could occur from primary extraction, although the significance and likelihood of these impacts are unknown. For site restoration, the KMWLP requires landscape opportunities and heritage and landscape features to be addressed in restoration plans. A site-based landscape strategy is required and therefore the KMWLP is likely to support protection of landscape and historic assets. The supporting text indicates that industrial archaeological and landscape features may be retained, adding to the historic value of the site and protecting landscape features.

By facilitating development for the extraction of building stone, the KMWLP will help to support the sympathetic restoration of older buildings and use of traditional materials which will help to protect built landscapes and the historic environment.

Planning obligations include landscape enhancement and archaeological investigation, analysis, reporting, publication and archive deposition. The KMWLP will therefore help to secure enhancements to landscape and archaeological assets.

Transport

Likely impacts on transport are uncertain as the location of most development is unknown. However, policy directly seeks to promote transport by 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 network capacity and taking particular measures in areas of poor air quality. Other measures seek to minimise the impacts of transport, such as safeguarding transport infrastructure, ensuring that the network is able to accommodate the traffic that would be generated and taking particular measures within Air Quality Management Areas, thereby avoiding impacts on sensitive locations. It requires developments to have no unacceptable adverse impacts, including from vehicles and traffic movements associated with the development. In particular, it requires mitigation of impacts on air quality.

The KMWLP requires new waste facilities to be well-located to existing transport infrastructure, including rail and water transport, which will help to minimise any adverse effects on transport networks. Nevertheless, waste transport may increase although this is dependent on the degree to which the new capacity replaces existing capacity and how well-located facilities are to the source of arisings. By promoting increased recycling, the KMWLP is likely to result in additional vehicle movements to transport recyclables. It also promotes net self-sufficiency for Kent which will help to minimise waste transport distances. The balance and scale of the likely effects are not clear, but are unlikely to be significantly greater than managing waste at the bottom of the waste hierarchy, particularly in the context of vehicle movements within the county overall.

The KMWLP contains several policies that promote minimisation of waste transport. These include requiring facilities for secondary and recycled aggregates to be well-located to the source of inputs or need for outputs, facilitating the decontamination of soils in situ, promoting the proximity principle particularly for secondary and recycled aggregates, soils and non-nuclear radioactive waste and ensuring sufficient landbanks for minerals.

Planning obligations include highways and access improvements and traffic management measures and therefore will help to avoid adverse impacts on sensitive parts of the road network.

Water

Impacts on the water environment are dependent on the features and sensitivities at particular sites, the locations of which are largely not known. However, the KMWLP prevents the deterioration of the physical state, quality and ecological status 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, the policy will help to safeguard the quantity and quality of water and promote sustainable water resource management.

By facilitating the development or extension of wastewater facilities, the KMWLP supports the maintenance and potentially the improvement of water quality and will help to address potential problems where water quality could be at risk due to inadequate wastewater treatment.

By restricting development affecting designated nature conservation areas and other areas of biodiversity value, the policy is likely to preserve natural water ecosystem services within these areas. However, development with adverse effects would be permitted if these can be outweighed by other benefits or other considerations, therefore adverse effects are still possible.

Policy on restoration proposes a programme of aftercare which includes field drainage, irrigation, and watering facilities. The supporting text envisages the creation of waterbodies as a potential after-use.

Measures to stabilise land may affect groundwater movement and therefore may affect water levels and quality on site or elsewhere, either positively or negatively, although the significance of effects is dependent on local conditions. Policy or supporting text should ensure water quality is accounted for when addressing land instability from groundwater movement and dewatering.

Waste

The KMWLP gives strong support to sustainable waste management objectives. By promoting the management of waste at higher levels of the waste hierarchy, for example by promoting the objectives of the circular economy, promoting household waste recycling, restricting non-inert landfill and deposit of inert waste for disposal, and maintaining capacity for secondary and recycled aggregates, the KMWLP will make a direct contribution to achieving sustainable waste management objectives. It also requires replacement

capacity for any waste facilities which would be lost due to redevelopment which is at least at an equivalent level of the waste hierarchy or higher.

The policy requires developments to be designed according to a range of best practice standards on environment, and to avoid adverse impacts on human health and the environment, so supporting the sustainable management of waste. Promotion of energy recovery, recovery of heat and carbon capture will support the management of waste without harm to the environment and thus make a direct contribution to achieving sustainable waste management objectives.

The KMWLP contains several policies that promote minimisation of waste transport and requires developments to have no adverse impacts including from vehicles and traffic movements. The KMWLP aims for Kent to be net self-sufficient in waste management capacity which will help to minimise the distances waste is transported. It explicitly implements the proximity principle for secondary and recycled aggregates, soils and non-nuclear radioactive waste, and requires minimisation of adverse impacts on the environment and communities from waste transport, so supporting sustainable waste management objectives.

6.1.1. 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. These are set out in full in the appraisal tables in Appendix B and summarised in table 11 below.

Table 11 Summary of Mitigation Recommendations

Policy	**Sustainability Objective**	**Mitigation Recommendation**
CSM 10 Oil, Gas and Unconventional Hydrocarbons	Climate change	The policy could be enhanced by requiring developments to implement best practice standards for controlling fugitive emissions of greenhouse gases.
CSW 6 Location of built waste management facilities	Biodiversity	The policy should make reference to National Nature Reserves
CSW 6 Location of built waste management facilities	Landscape and the historic environment	Reference should be made to the requirement to protect the settings of AONBs
CSW 6 Location of built waste management facilities	Waste	The policy should reference the proximity principle which promotes management of waste as near as possible to the source of arisings.
CSW 11: Permanent Deposit of Inert Waste	Transport	The policy should require applications to demonstrate that they support the proximity principle for waste.
DM 1 Sustainable Design	Community and wellbeing	The policy should include benefits for communities and wellbeing from green and blue infrastructure.
DM 2 Environmental and Landscape Sites of International, National and LocalImportance	Landscape and the historic environment	Recommendations can be found in policy DM 19
DM 10 Water Environment	Flood risk	The policy should promote flood risk reduction where possible
DM 11 Health and amenity	Biodiversity	Litter and vermin should be added to the list of unacceptable adverse impacts within the policy.

Policy	Sustainability Objective	Mitigation Recommendation
DM 11 Health and Amenity	Climate change	The supporting text should make clear that emissions of greenhouse gases are included within the scope of the policy
DM 11 Health and Amenity	Flood risk	Consideration should be made of the adverse impacts which may occur from flood risk.
DM 11 Health and amenity	Water	Supporting text should clarify that emissions to water bodies can affect health and amenity and therefore should be considered. The policy should require no unacceptable adverse impacts on surrounding water bodies as well as surrounding land.
DM 12 Cumulative Impact	Flood risk	It is recommended that flood risk impacts are added to the supporting text.
DM 12 Cumulative Impact	Land	It is recommended that impacts on land quality and Green Belt are added to the supporting text
DM 12 Cumulative Impact	Landscape and the historic environment	The policy should include considerations of impacts on the landscape and historic assets and the impact of light pollution. These should be added to the supporting text.
DM 12 Cumulative Impact	Water	It is recommended that the impacts on water quality and availability are considered and added to the supporting text.
DM 13 Transportation of Minerals and Waste	Community and wellbeing	The policy should also require additional measures for sites outside AQMAs but that are likely to affect AQMAs
DM 14 Public Rights of Way	Biodiversity	The policy should ensure measure are taken to prevent the loss of biodiversity from creating a PROW diversion
DM 17 Planning Obligations	Biodiversity	The policy should include the enhancement of notable and protected species and require a net biodiversity gain to be delivered
DM 17 Planning Obligations	Flood risk	The policy should seek measures for improvement of flood risk where practicable
DM 17 Planning Obligations	Landscape and the historic environment	The policy should also include a reference to protection and enhancement of other heritage assets and avoidance of light pollution
DM 17 Planning Obligations	Transport	The policy should include reference to use of non-road modes of transport where practicable
DM 17 Planning Obligations	Water	The policy should include obligations regarding the protection and improvement of water quality and levels.
DM 18 Land Stability	Flood risk; Water	The policy or supporting text should ensure flood risk and water quality are accounted for when addressing land instability from groundwater movement and dewatering
DM 19 Restoration Aftercare and After-use	Flood risk	The policy would be more beneficial with the addition of measures to reduce flood risk where practicable
DM 19 Restoration Aftercare and After-use	Landscape and the historic environment	Information could be added to the supporting text referring to priorities for landscape enhancements identified in the Landscape Characterisation Assessments and for green space in the Kent Growth and Infrastructure Strategy.
DM 21 Incidental Mineral Extraction	All	The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment and communities

6.2. SA of the Alternatives to the Updated KMWLP as Proposed

Each of the identified alternatives 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 C and summarised below.

Option A: Allocate sites for waste management

The sustainability implications of Option A are very unclear. For a number of sustainability objectives, there may be impacts associated with the allocation of waste sites as originally envisaged in the KMWLP but these are strongly dependent on the nature, scale and location of facilities which would be developed which are currently unknown. These are effects on biodiversity, community wellbeing, flood risk, land use, landscape, historic assets and water quality and availability. However, developments will be required to comply with development management policies in the KMWLP therefore adverse effects are unlikely to be significant.

The likely effects from Option A on other sustainability objectives are also unclear because it is not known what the practical effect of allocating sites would be. Allocation of waste sites may increase or decrease the distance waste is transported, with consequent positive or negative effects on human health and the environment from transport emissions, noise and congestion, although the likelihood of impacts is not certain. Waste management facilities may be built that replace existing capacity but which are better located than existing facilities, reducing the amount of waste transport required and supporting the objective of managing waste closer to its place of production. It is also possible that facilities are built which add to existing capacity which then need to source waste streams from outside the county, increasing the distances that waste is transported which could have impacts on human health, air quality, greenhouse gas emissions and transport networks, but would bring economic resources into the county. Alternatively, if there are insufficient local sources of waste, the facilities may simply not be built and no effects will occur. However, if the primary reason for building new facilities is to improve the distribution in relation to sources of arisings and onward management, then positive impacts on air quality, greenhouse gas emissions, transport networks, human health and sustainable waste management are most likely to occur.

Option B: Do not strengthen groundwater protection in policy DM 10 Water Environment

By not strengthening the protection of groundwater, the policy would fail to protect groundwater resources outside currently designated Source Protection Zones, and particularly aquifers that could be used for abstraction in the future. The policy would still require protection of any waterbody, although would not specifically mention aquifers. The policy would not require protection of waterbodies hydrogeologically connected to the site, nor would it require hydrological assessment of the effects of development on the water environment, resulting in more limited protection and assessment than would be the case with the policy as proposed to be amended. Adverse impacts on biodiversity from the higher risk of groundwater pollution are possible, and sustainable economic growth could be adversely affected in the medium to long term, as the risks of groundwater pollution will be higher and water for abstraction is likely to require

additional treatment before use, leading to higher treatment costs and higher cost of water supply. The significance of effects is dependent on where sites are located in relation to sensitive water bodies.

Option C: Retain policy CSW 5 Strategic Site for Waste

Retaining the site allocation could hinder the development of alternative treatment solutions for fly ash, which would otherwise provide a more sustainable way of managing this by-product of incineration and could create economic opportunities from the waste stream. However, it is also possible that alternative uses will be developed and implemented regardless of the availability of landfill capacity.

Retaining the policy may promote the import of air pollution control residues from a larger catchment area than Kent. This would encourage transport of waste with associated increases in impacts including emissions to air, demand for transport infrastructure, noise and climate change impacts from increased greenhouse gas emissions. There may be impacts on congestion on the local road network from traffic accessing the site, particularly in combination with other developments in the local area.

By facilitating landfill of hazardous waste, the policy would allow management of waste at the bottom of the waste hierarchy, against sustainable waste management principles. By providing for landfill capacity for hazardous waste arising from Energy from Waste plants, the policy may facilitate the management of waste removed some distance from its place of production, although national policy recognises that there may be a need for some types of facility which accept waste from other areas.

6.3. Cumulative Effects and Inter-Relationship Between Effects

Cumulative Effects

The SEA Directive requires assessment of an additional level of impacts in addition to straightforward direct impacts. These are specified as "secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative". The following approach has been taken to identifying such impacts.

A number of different types of impact are set out in European Commission guidance:

- separate developments causing the same impact – cumulative;
- different impacts acting together on a receptor e.g. air pollution and land take – cumulative;
- plan impacts which give rise to other indirect impacts – secondary; and
- different impacts which together give rise to yet another impact – cumulative and secondary.

There is therefore a need to consider both secondary and cumulative impacts in the appraisal. Secondary impacts were considered as an integral part of the main appraisal work, and this is indicated in the appraisal matrices in Annexes B and C where impacts are either direct or indirect i.e. secondary. Certain other

attributes are common to all types of impact: these are timescales (i.e. short, medium and long-term impacts), reversibility (i.e. permanent or temporary impacts) and whether the impacts are positive or negative. These attributes were also all considered as integral aspects of impact assessment, and this is similarly indicated in the appraisal matrices in Annexes B and C. Cumulative impacts are discussed in this section of the SA Report.

There are two types of situation that could give rise to cumulative impacts:

- the same effect arising from two or more different sources; and
- different effects where there is a relationship between the effects and potentially an interaction.

Synergistic effects are a type of cumulative impact. These are effects where the cumulative impact may be greater or smaller than the sum of the separate effects. Cumulative impacts were considered in the appraisal in two ways:

- the potential for different developments to give rise to the same type of effect; and
- the potential for interaction between different types of effect.

In order to assess the cumulative impacts arising from the updated KMWLP, the appraisal considered the overall effect of the updated KMWLP as a whole on each of the SA objectives. The results of this are summarised in table 10 and discussed in section 6.1.

Cumulative Impacts in Combination with Other Plans and Strategies

The appraisal has considered the potential for effects arising from other plans and strategies which, in combination with effects arising from the updated KMWLP, may give rise to significant impacts. The results of the review of other plans and strategies and their potential to give rise to cumulative effects is set out below.

The following key plans/programmes have been identified that could give rise to significant cumulative impacts together with the updated KMWLP:

- Kent Minerals Sites Plan 2013-30, Kent County Council, September 2020
- Kent Joint Municipal Waste Management Strategy 2018/19 to 2020/21, Kent Resource Partnership, 2019
- Local Transport Plan 4: Delivering Growth Without Gridlock 2016-2031, Kent County Council
- Core Strategy Review, Folkestone and Hythe District Council, March 2022
- Maidstone Borough Local Plan, Maidstone Borough Council, October 2017
- Local Plan Review: Draft Plan for Submission (Regulation 19), Maidstone Borough Council, October 2021
- Lenham Neighbourhood Plan 2017-31, Lenham Parish Council, July 2021

- Adopted Local Plan 2030, Ashford Borough Council, February 2019
- Core Strategy, Tonbridge and Malling Borough Council, September 2007
- Core Strategy DPD, Tunbridge Wells Borough Council, June 2010
- Submission Local Plan 2020-2038, Tunbridge Wells Borough Council, October 2021
- Dartford Core Strategy, Dartford Borough Council, September 2011
- Dartford Local Plan to 2037: Pre-Submission (Publication) Document, Dartford Borough Council, September 2021
- Canterbury District Local Plan, Canterbury City Council, July 2017
- Draft Canterbury District Local Plan to 2045, Canterbury District Council, October 2022;
- Core Strategy, Dover District Council, February 2010
- Dover District Local Plan to 2040: Regulation 19 Submission, Dover District Council, October 2022
- Gravesham Local Plan Core Strategy, Gravesham Borough Council, September 2014
- Core Strategy, Sevenoaks District Council, February 2011
- The Swale Borough Local Plan, Swale Borough Council, July 2017
- Local Plan, Thanet District Council, July 2020
- The London Plan 2021, London Assembly, March 2021

Proposed measures in the Local Transport Plan are likely to increase capacity on the M20 and M26 and promote greater use of the rail network. Together these measures are likely to reduce the potential for cumulative impacts on the M20 and potentially alleviate air quality impacts on the AQMA. The balance of effects in combination with the transport impacts of the KMWLP is not known.

The KMWLP will support the recycling targets in the adopted Kent Joint Municipal Waste Strategy 2018/19 to 2020/21.

There is the potential for cumulative effects to arise in combination with District and Borough Local Plans. Development on sites in Local Plans that contain safeguarded mineral resources or safeguarded minerals and waste facilities will be required by policies DM 7 and DM 8 to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision. The review of District and Borough Local Plans has shown that this is likely to arise in the case of all Boroughs and Districts apart from Ashford, Folkestone and Hythe, Maidstone and Swale which also have policy requiring mineral safeguarding requirements to be addressed. Emerging policy in Canterbury, Dartford, Dover and Tunbridge Wells indicates that mineral safeguarding needs will be taken into account and therefore are expected not to give rise to cumulative effects once adopted.

The development of new housing and employment sites and enhancing the vitality of New Romney, Lydd and smaller settlements in the Romney Marsh area will provide housing, employment and services for the

needs of local communities. They will also contribute to increased demand for use of the road network and contribute to increased greenhouse gas emissions. Development at Lydd Airport will also increase demand for road space. This may create cumulative impacts on the road network in Romney Marsh in combination with vehicles accessing the allocated site in policy CSW 17 and may adversely affect air quality in the local area, although the likely scale of most future developments is unknown and therefore the significance of any impacts is not clear. It is recommended that any planning application for development under policy CSW 17 should be required to submit a transport assessment which examines the impact of development on the local road network in combination with other proposed developments in the Romney Marsh area.

Interrelationship Between Effects

The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of the KMWLP. This has been done as an integral part of the appraisal of the policies and options, and examples of this can be found throughout Section 6 and Annexes B and C of this report. The main interrelationships found through the appraisal are highlighted below.

Impacts on biodiversity can arise through habitat loss, disturbance from noise and human activity, changes to the water environment, reductions in air quality and deposition of dust and other pollutants. These impacts have the potential to act in synergy with each other such that multiple pressures have a greater total impact than the sum of individual impacts. These impacts also have the potential to negatively affect human amenity, along with visual impacts.

Restoration of waste and minerals sites will be of benefit to biodiversity by ensuring connectivity and protection and enhancement of green infrastructure. It will also help to protect landscape quality and help to promote the wellbeing of communities.

Changes in air quality can have significant consequences for human health and biodiversity, while improvements in air quality arising from more sustainable transport patterns will benefit human health and vulnerable species and ecosystems.

Management of flood risk and avoiding increases can have economic benefits by protecting homes and businesses from having to deal with the financial consequences of flooding.

The promotion of sustainable economic growth through provision of appropriate waste management facilities and provision of minerals will help to sustain jobs and incomes and the wellbeing of communities. The economy and communities will be supported by the securing of mineral resources for construction and industry prior to other development.

7. How might we monitor the Plan's impacts?

As required by the SEA Directive, a number of recommendations are made for indicators to monitor the likely significant impacts of the updated KMWLP. These are set out in Table 12 corresponding to the relevant impacts identified and summarised in the preceding chapters of this report.

One of the aims of monitoring as specified by the SEA Directive is to identify unforeseen adverse effects in order to be able to take appropriate remedial action. To enable this to be done, recommendations are also made in Table 12 for monitoring potential sustainability impacts that are not expected to occur as foreseen by the appraisal.

An Annual Monitoring Report is produced to monitor the implementation of the KMWLP, and the recommendations given below for monitoring should be incorporated within this.

Table 12 Monitoring Recommendations

Sustainability Objectives		Recommended Indicators
1	Biodiversity	Area of land proposed for biodiversity value through landfill restoration Area of land of biodiversity value created through restoration. % net gain in biodiversity value achieved through minerals and waste development
2	Climate change	Percentage of waste managed at different levels of waste hierarchy, by waste stream (LACW, C&I, CD&E): • Recycled/composted • Other recovery • Landfill. MW of energy generated by waste facilities
3	Community and well-being	No practical indicators identified
4	Sustainable economic growth	Sales (tonnage) of aggregates by type and end use Capacity of waste facilities by type
5	Flood risk	Number of flood events per year

6	Land	Hectares of good quality agricultural land proposed in restoration plans. Hectares of good quality agricultural land created by restoration. Hectares of Green Belt lost to development
7	Landscape and the historic environment	No practical indicators identified
8	Transport	Sales (tonnage) of aggregates at wharves Sales (tonnage) of aggregates at rail depots Imports and exports (tonnages) of minerals and waste across county boundary.
9	Water	No of water pollution events linked to waste and mineral sites.
10	Waste	Percentage of waste managed at different levels of waste hierarchy, by waste stream (LACW, C&I, CD&E): • Recycled/composted • Other recovery • Landfill. MW of energy generated by waste facilities Net self-sufficiency for different types of waste management facility

8. References

Related to SA of Kent MWLP (adopted 2016):

- AECOM, July 2016 – Sustainability Appraisal (SA) of the Kent MWDF – SA Adoption Statement
- Scott Wilson, March 2010 – SA Scoping Report – Introductory Paper URS, 2011 – Interim SA Report (Assessment of Preferred Options)
- URS, November 2013 – Sustainability Appraisal (SA) of the Kent Minerals and Waste Local Plan - SA Report (Consultation Draft)
- URS, July 2014 – Kent County Council: Draft Minerals and Waste Local Plan 2013-30 - Habitats Regulations Assessment
- URS, July 2014 – Sustainability Appraisal (SA) of the Kent Minerals and Waste Local Plan – SA Report Non-Technical Summary

Related to SA of Minerals Sites Plan and Early Partial Review (adopted 2020):

- Scoping Report: Sustainability Appraisal of the Kent Minerals Sites Plan-Making Process, Amey, November 2017
- Sustainability Appraisal Report: SA of the draft Early Partial Review of the Kent Minerals and Waste Plan 2013-30 Main Modifications Consultation, November 2019
- Sustainability Appraisal Report: SA of the draft Minerals Sites Plan Main Modifications Consultation, November 2019

Other references:

- UK Government (2004) Environmental Assessment of Plans and Programmes Regulations 2004
- UK Government (2012) The Town and Country Planning (Local Planning) (England) Regulations 2012
- UK Government (2021) The National Planning Policy Framework
- Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30
- Kent County Council (2020) Kent Minerals and Waste Local Plan 2013-30
- Kent County Council (2020) Minerals Sites Plan 2013-30
- Kent Resource Partnership (2019) Joint Municipal Waste Management Strategy (KJMWMS) 2018/19 to 2020/21

- Kent County Council (no date), Local Transport Plan 4: Delivering Growth Without Gridlock 2016-2031
- Ashford Borough Council (2019) Ashford Local Plan
- Canterbury City Council (2017) Canterbury District Local Plan
- Canterbury District Council (2022) Draft Canterbury District Local Plan to 2045
- Dartford Borough Council (2011); Dartford Core Strategy
- Dartford Local Plan to 2037: Pre-Submission (Publication) Document, Dartford Borough Council, September 2021
- Dover District Council (2010) Core Strategy
- Dover District Council (2022) Dover District Local Plan to 2040: Regulation 19 Submission
- Gravesham Borough Council (2014) Gravesham Local Plan Core Strategy
- Maidstone Borough Council (2017) Maidstone Borough Local Plan
- Local Plan Review: Draft Plan for Submission (Regulation 19), Maidstone Borough Council, October 2021
- Lenham Neighbourhood Plan 2017-31, Lenham Parish Council, July 2021
- Sevenoaks District Council (2011) Core Strategy
- Folkestone and Hythe District Council (2022) Core Strategy Review
- Swale Borough Council (2017) The Swale Borough Local Plan
- Local Plan, Thanet District Council, July 2020
- Core Strategy, Tonbridge and Malling Borough Council, September 2007
- Tunbridge Wells Borough Council (2010) Core Strategy Development Plan Document
- Submission Local Plan 2020-2038, Tunbridge Wells Borough Council, October 2021
- The London Plan 2021, London Assembly, March 2021

Appendix A: Responses to Consultation on SA Scoping Report

Consultee	Comment	Response
T Austin	Note that SA states that our Plan should "set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality". Strongly support and would advocate that we vigorously enforce this policy.	Noted. The approach to the enforcement of planning policy is set out in Policy DM 22 and to cumulative impacts in policy DM 12.
Gravesham Borough Council	The SA/SEA Scoping Report might usefully consider whether the KMWLP should be subject to scoping in relation to the need or otherwise of a Health Impact Assessment of policies etc. Doesn't appear to be reference in the SA to light pollution and/or dark skies etc. Thought might also be given to the wording of policies in the KMWLP itself to cover this aspect in more detail given potential impacts.	The Scoping Report is not required to assess whether a Health Impact Assessment is required. It is within the scope of KCC to determine the need for HIA. However, the SA framework does have an appraisal criterion on 'Community and wellbeing' that requires protection of health, so impacts on health are considered and addressed within the SA. Light pollution has been added to the SA framework to ensure its consideration by the SA.
Historic England	The document adequately covers issues that may arise in respect of the potential impacts of proposed development on heritage impacts.	Noted
CPRE	At 3.8 Noise the Baseline helpfully refers to CPRE Tranquillity Map in line with NPPF 185 b). NPPF 185 c) refers to intrinsically dark skies and the CPRE England's Light Pollution and Dark Skies mapping should be included in the baseline section. 3.10 refers to Green Belt and omits to mention that a small part of Maidstone Borough and Medway lie within the Green Belt. 3.11 Land: The county has a high proportion of Best and Most Versatile land (Grades 1 – 3a). This needs to be reflected in the baseline assessment and not limited to Grade 1 land. 3.13 Water does not mention Natural England's Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites - For Local Planning Authorities November 2020 and this should be included. 3.15 Economy. It is unclear why the age group 16-64 is used when retirement age has risen to 65 for men and women and will rise to 67 by 2028. **5. The SA Framework:**	Light pollution has been added to the SA framework to ensure its consideration by the SA. If and where the detail is relevant to the SA Report, the SA will include reference to Green Belt in Maidstone and Medway. A criterion has been added to the SA framework to seek to safeguard this BMV land. Natural England advice on nutrient neutrality is relevant to housing developments that would have an additional burden on the sewage network. The age grouping for economically active people aged 16-64 is used because this is how the data are presented in the KCC Labour Force Bulletin If and where the detail is relevant for the SA Report, the information will be edited to provide information to be

Consultee	Comment	Response
	Landscape and the historic environment should also include light pollution and dark skies. Transport: There is reference to 'Plans are in place to improve the transport infrastructure within and to the Thames Gateway, East Kent and Ashford.' Without specifically mentioning them. Are these consented and funded schemes or ones, such as the Lower Thames Crossing that have still to reach examination? Water: this should include the implications of nutrient neutrality **5.2 The SA Framework** 6 Land should seek to safeguard Best and Most Versatile Agricultural land 7 Landscape and the historic environment should include protecting tranquil areas and areas of intrinsically dark skies. Appendix A: Review of Policies, Plans and Programmes does not consider Natural England's Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites - For Local Planning Authorities November 2020.	clearer about what the transport plans are and where they apply. Tranquil areas has been added to the SA framework.
Tonbridge and Malling Borough Council	Objective 1 - Recommended that there is a stronger emphasis on biodiversity net gain within the Framework objectives to link with the Plan objectives. Objective 7 - Recommended that the framework objectives include the setting of AONB landscapes.	The requirement for biodiversity net gain has been added to the SA framework. Consideration of impacts on the setting of AONBs has been added to SA framework.

Appendix B: SA of Policies in Updated KMWLP

Key

Impacts	Probability of effects	Direct or indirect effects	Reversibility
++ significant positive effect + some positive effect 0 no effect - some adverse effect - - significant adverse effect ? uncertain effect	L low probability M medium probability H high probability	D direct effect I indirect effect	Y reversible effect N not reversible i.e. permanent effect
Where multiple symbols are shown separated by '/', this is to indicate that more than one type of effect is predicted			

Policy CSM 1 Sustainable Development

	Sustainability Objective	Comments
1	Biodiversity	Short: + / Med: + / Long: ? / Prob: H / Dir/Ind: D / Rev?: Y By taking a positive approach in favour of sustainable development, the policy will be likely to support biodiversity objectives, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.
2	Climate change	Short: + / Med: + / Long: ? / Prob: M / Dir/Ind: D / Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support climate change objectives, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.
3	Community and well-being	Short: + / Med: + / Long: ? / Prob: M / Dir/Ind: D / Rev?: Y By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for community and wellbeing, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.

4	Sustainable economic growth	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for sustainable economic growth, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.
5	Flood risk	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support flood risk objectives, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.
6	Land	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for sustainable land management, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.
7	Landscape and the historic environment	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives on landscape and the historic environment, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.
8	Transport	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y/N By taking a positive approach in favour of sustainable development, the policy will be likely to support sustainable transport objectives, although the impacts will be more strongly dependent on the detailed policies of the KWMLP
9	Water	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y/N By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for sustainable water management, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.
10	Waste	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y/N

		By taking a positive approach in favour of sustainable development, the policy will be likely to support sustainable waste management objectives, although the impacts will be more strongly dependent on the detailed policies of the KWMLP.

Policy CSM 2 Supply of Land-Won Minerals in Kent

	Sustainability Objective	Comments
1	Biodiversity	Short: -/+ | Med: -/+ | Long: ?/+ | Prob: H | Dir/Ind: D | Rev?: Y The nominated site for crushed hard rock has been subject to separate appraisal under the Minerals Sites Plan. This has concluded that biodiversity value will be lost to development but restoration to native woodland will provide a long term net gain. If a site for silica sand is proposed, this will be subject to development management policies in the KMWLP which will ensure protection of biodiversity.
2	Climate change	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Climate change impacts are not relevant to the policy.
3	Community and well-being	Short: 0/? | Med: 0/? | Long: 0 | Prob: M | Dir/Ind: D | Rev?: Y The nominated site for crushed hard rock has been subject to separate appraisal under the Minerals Sites Plan. This has concluded that there is potential for adverse impacts on residential dwellings from dust, noise, blasting, visual intrusion and light. Adequate mitigation is required under Policy DM 11 Health and Amenity. The impact on communities and their wellbeing is unknown as no new site is yet identified. If a site for silica sand is proposed, this will be subject to development management policies in the KMWLP which will ensure no unacceptable adverse impacts on communities and wellbeing.
4	Sustainable economic growth	Short: - | Med: - | Long: ? | Prob: H | Dir/Ind: I | Rev?: Y The policy will ensure that sufficient sites to support the needs of the economy are permitted and local jobs will be supported in the minerals industry. However, the use of primary mineral resources is not sustainable.
5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: H | Dir/Ind: | Rev?:

		The nominated site for crushed hard rock has been subject to separate appraisal under the Minerals Sites Plan. The site lies within flood zone 1, therefore adverse effects on flood risk are unlikely. If a site is proposed for silica sand extraction, this will be subject to development management policies which require that flood risk is not exacerbated.
6	Land	Short / Med / Long / Prob / Dir/Ind / Rev? -/0 / -/0 / -/0 / H / D / N The nominated site for crushed hard rock has been subject to separate appraisal under the Minerals Sites Plan. The grade 2 (very good) agricultural land in part of the site will be lost to development and not returned to agricultural use. The site is adjacent to a SSSI designated for its important geomorphology but this should be protected if a planning condition is imposed such that the SSSI is preserved. If a site is proposed for silica sand extraction, this will be subject to development management policies which promote efficient use of land, minimise loss of the best and most versatile agricultural land, comply with national policy on Green Belt and require land stability.
7	Landscape and the historic environment	Short / Med / Long / Prob / Dir/Ind / Rev? -/?/+ / -/?/+ / 0/-/+? / M / D / Y/N The nominated site for crushed hard rock has been subject to separate appraisal under the Minerals Sites Plan. This has concluded that there will be locally-significant landscape impacts and potential impacts on nearby listed buildings and on-site archaeology. The site would help to ensure the supply of local stone for heritage restoration projects. If a site is proposed for silica sand extraction, this will be subject to development management policies which prevent adverse effects on AONBs and their setting and on heritage assets and from light.
8	Transport	Short / Med / Long / Prob / Dir/Ind / Rev? ? / + / ? / M / D / N By ensuring sufficient minerals are available for extraction, the policy will support provision to meet expected market needs and so avoid the need for transport of mineral from further afield. If a site is proposed for silica sand extraction, this will be subject to development management policies which promote non-road modes of transport, require measures to ensure vehicle movements can be accommodated on the network and incorporate emission reduction measures particularly in areas of poor air quality.
9	Water	Short / Med / Long / Prob / Dir/Ind / Rev? ? / ? / ? / M / D / N

		The nominated site for crushed hard rock has been subject to separate appraisal under the Minerals Sites Plan. This has concluded that, with appropriate planning conditions, controls could be imposed on development to safeguard against potential impacts on water quality. If a site is proposed for silica sand extraction, this will be subject to development management policies which require protection of the water environment and improved ecological status of water bodies.
10	Waste	Short: ? / Med: + / Long: ? / Prob: M / Dir/Ind: D / Rev?: N The supporting text plans for meeting future need for sharp sand and gravel in part from recycled aggregates. This will promote management of construction and demolition waste at a high level of the waste hierarchy and sustainable use of resources.

Policy CSM 4 Non-Identified Land-Won Mineral Sites

	Sustainability Objective	Comments
1	Biodiversity	Short: ? / Med: ? / Long: ? / Prob: L / Dir/Ind: D / Rev?: N Likely impacts on biodiversity are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
2	Climate change	Short: ? / Med: ? / Long: ? / Prob: L / Dir/Ind: I / Rev?: N Likely impacts on climate change are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
3	Community and well-being	Short: ? / Med: ? / Long: ? / Prob: L / Dir/Ind: I / Rev?: N Likely impacts on community and wellbeing are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
4		Short: ? / Med: + / Long: ++ / Prob: H / Dir/Ind: I / Rev?: Y

	Sustainable economic growth	By facilitating development on unallocated sites, the policy will help to support economic growth by providing materials essential for construction of homes, offices, schools, hospitals and other buildings essential to support growth.
5	Flood risk	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>D</td><td>N</td></tr></table> Likely impacts on flood risk are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
6	Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>D</td><td>N</td></tr></table> Likely impacts on land are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
7	Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>D</td><td>N</td></tr></table> Likely impacts on landscape and the historic environment are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
8	Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>N</td></tr></table> Likely impacts on transport are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
9	Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>N</td></tr></table> Likely impacts on water quality and availability are unknown as the location of any development is unknown. In any event the impacts will be more strongly dependent on the detailed policies of the KWMLP, notably the development management policies.
10	Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table> Not relevant to sustainable waste management objectives.

Policy CSM 5 Land-Won Mineral Safeguarding

<table>
<tr><td></td><td>Sustainability Objective</td><td>Comments</td></tr>
<tr><td>1</td><td>Biodiversity</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td>M</td><td></td><td></td></tr>
</table>
No impacts on biodiversity likely</td></tr>
<tr><td>2</td><td>Climate change</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>+</td><td>+</td><td>M</td><td>I</td><td>Y</td></tr>
</table>
By ensuring that mineral resources are not unnecessarily sterilised by other development, the policy will help to safeguard future supply of minerals which otherwise may have to be imported from other parts of the country or from overseas, which will add to the impacts on climate change from transport emissions.</td></tr>
<tr><td>3</td><td>Community and well-being</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td>M</td><td></td><td></td></tr>
</table>
No impacts on community and wellbeing likely.</td></tr>
<tr><td>4</td><td>Sustainable economic growth</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>?</td><td>+</td><td>+</td><td>H</td><td>D</td><td>Y</td></tr>
</table>
By ensuring that mineral resources are not unnecessarily sterilised by other development, the policy will help to support economic growth by safeguarding future supply of materials essential for construction of homes, offices, schools, hospitals and other buildings essential to support growth.</td></tr>
<tr><td>5</td><td>Flood risk</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td>M</td><td></td><td></td></tr>
</table>
No impacts on flood risk are likely.</td></tr>
<tr><td>6</td><td>Land</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td>M</td><td></td><td></td></tr>
</table>
No impacts on land are likely.</td></tr>
<tr><td>7</td><td>Landscape and the historic environment</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td>M</td><td></td><td></td></tr>
</table>
No impacts on landscape or the historic environment likely.</td></tr>
<tr><td>8</td><td>Transport</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>?</td><td>+</td><td>+</td><td>M</td><td>D</td><td>N</td></tr>
</table>
</td></tr>
</table>

		By ensuring that mineral resources are not unnecessarily sterilised by other development, the policy will help to safeguard future supply of minerals which otherwise may have to be imported from other parts of the country or from overseas, which would add to the impacts from transport on air quality, noise, congestion and tranquillity, depending on how minerals will be transported.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: No impacts on water quality and availability are likely.
10	Waste	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to waste management objectives.

Policy CSM 6 Safeguarded Wharves and Rail Depots

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: No impacts on biodiversity likely
2	Climate change	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y By safeguarding wharves and rail depots, the policy will help to ensure that facilities for transporting minerals by non-road modes are available. This will help to limit the road transport of minerals so reducing the potential increase in greenhouse gas emissions from road transport. However, increases in emissions are still possible where alternatives to road are not viable.
3	Community and well-being	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: No impacts on community and wellbeing likely.
4	Sustainable economic growth	Short: + | Med: + | Long: + | Prob: H | Dir/Ind: D | Rev?: Y By safeguarding wharves and rail depots, the policy will help to support sustainable economic growth by ensuring the availability of non-road modes for mineral transport which is more sustainable than road transport.

5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0	M			
		No impacts on flood risk are likely.						
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0	M			
		No impacts on land are likely.						
7	Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0	M			
		No impacts on landscape or the historic environment likely.						
8	Transport	Short	Med	Long	Prob	Dir/Ind	Rev?	
		+	+	+	H	D	Y	
		By safeguarding wharves and rail depots, the policy will help to ensure the availability of non-road modes for mineral transport which is more sustainable than road transport. This will help to minimise the likelihood of impacts from transport on air quality and congestion which would otherwise occur.						
9	Water	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0	M			
		No impacts on water quality and availability are likely.						
10	Waste	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		Not relevant to waste management objectives.						

Policy CSM 7 Safeguarding Other Mineral Plant Infrastructure

	Sustainability Objective	Comments					
1	Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?
		0	0	0	M		
		No impacts on biodiversity likely					
2	Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?
		0	0	0	M		

		No impacts on climate change likely.
3	Community and well-being	Short / Med / Long / Prob / Dir/Ind / Rev? 0 / 0 / 0 / M / / No impacts on community and wellbeing likely.
4	Sustainable economic growth	Short / Med / Long / Prob / Dir/Ind / Rev? + / + / + / H / D / Y By safeguarding mineral infrastructure, the policy will help to support economic growth by ensuring the availability mineral products for the construction of necessary infrastructure.
5	Flood risk	Short / Med / Long / Prob / Dir/Ind / Rev? 0 / 0 / 0 / M / / No impacts on flood risk are likely.
6	Land	Short / Med / Long / Prob / Dir/Ind / Rev? 0 / 0 / 0 / M / / No impacts on land are likely.
7	Landscape and the historic environment	Short / Med / Long / Prob / Dir/Ind / Rev? 0 / 0 / 0 / M / / No impacts on landscape or the historic environment likely.
8	Transport	Short / Med / Long / Prob / Dir/Ind / Rev? + / + / + / H / D / Y By safeguarding mineral infrastructure, the policy will help to ensure the availability of mineral products within Kent which will help to reduce the need for import from other areas. This will help to avoid an increase in mineral transport distances which would otherwise be likely to have adverse impacts on air quality, noise, congestion and tranquillity.
9	Water	Short / Med / Long / Prob / Dir/Ind / Rev? 0 / 0 / 0 / M / / No impacts on water quality and availability are likely.
10	Waste	Short / Med / Long / Prob / Dir/Ind / Rev? 0 / 0 / 0 / / / Not relevant to waste management objectives.

Policy CSM 8 Secondary and Recycled Aggregates

<table>
<tr><td></td><td>Sustainability Objective</td><td>Comments</td></tr>
<tr><td rowspan="2">1</td><td rowspan="2">Biodiversity</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0/?</td><td>0/?</td><td>0/?</td><td>L</td><td>I</td><td>N</td></tr></table></td></tr>
<tr><td>The policy will permit facilities that accord with other relevant policies in the development plan, therefore impacts on biodiversity are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies. By maintaining capacity for secondary and recycled aggregates, this will help to avoid adverse impacts from biodiversity that could occur from primary extraction, although the significance and likelihood of these impacts are unknown.</td></tr>
<tr><td rowspan="2">2</td><td rowspan="2">Climate change</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>?/+</td><td>?/+</td><td>?/+</td><td>L/M</td><td>I/D</td><td>Y</td></tr></table></td></tr>
<tr><td>There is insufficient evidence on the relative carbon impacts of using primary, secondary and recycled aggregates. Therefore the likely impact on climate change of maintaining capacity for secondary and recycled aggregates production is not known. By requiring facilities to be well-located to the source of inputs or need for output, the emissions of greenhouse gases from transporting secondary and recycled aggregates will be minimised.</td></tr>
<tr><td rowspan="2">3</td><td rowspan="2">Community and well-being</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0/?</td><td>0/?</td><td>0/?</td><td>M/L</td><td>I</td><td>N</td></tr></table></td></tr>
<tr><td>The policy will permit facilities that accord with other relevant policies in the development plan, therefore impacts on community and well-being are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies. By maintaining capacity for secondary and recycled aggregates, this will help to avoid adverse impacts on communities that could occur from primary extraction, although the significance and likelihood of these impacts are unknown.</td></tr>
<tr><td rowspan="2">4</td><td rowspan="2">Sustainable economic growth</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>+</td><td>+</td><td>+</td><td>H</td><td>D</td><td>Y</td></tr></table></td></tr>
<tr><td>By maintaining capacity for secondary and recycled aggregates production, the policy will help to support economic growth by ensuring the availability mineral products for the construction of necessary infrastructure which are more sustainable than using primary aggregates.</td></tr>
</table>

5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0	M			
		The policy will permit facilities that accord with other relevant policies in the development plan, therefore impacts on flood risk are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.						
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0/?	0/?	0/?	M/L	I	Y	
		The policy will permit facilities that accord with other relevant policies in the development plan, therefore impacts on land are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies. By maintaining capacity for secondary and recycled aggregates, this will help to avoid adverse impacts on land that could occur from primary extraction, although the significance and likelihood of these impacts are unknown.						
7	Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0/?	0/?	0/?	M/L	I	N	
		The policy will permit facilities that accord with other relevant policies in the development plan, therefore impacts on landscape and the historic environment are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies. By maintaining capacity for secondary and recycled aggregates, this will help to avoid adverse impacts on landscape and historic assets that could occur from primary extraction, although the significance and likelihood of these impacts are unknown.						
8	Transport	Short	Med	Long	Prob	Dir/Ind	Rev?	
		+	+	+	H	D	Y	
		The policy requires facilities to be well-located to the source of inputs or need for outputs and therefore impacts of transporting secondary and recycled aggregates on air quality, noise, congestion and tranquillity will be minimised.						
9	Water	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0	M			
		The policy will permit facilities that accord with other relevant policies in the development plan, therefore impacts on water quality and availability are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.						
10	Waste	Short	Med	Long	Prob	Dir/Ind	Rev?	
		+	+	+	H/M	D	Y	

		By maintaining secondary and recycled aggregate capacity, the policy will ensure management of waste at high levels of the waste hierarchy and promote the objectives of the circular economy. By requiring facilities to comply with other policies in the plan should ensure that waste is managed without harm to human health and the environment, although this is more strongly dependent on other policies within the KMWLP, notably the development management policies.

Policy CSM 9 Building Stone in Kent

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy will permit facilities that have no unacceptable impacts on the local environment and communities, therefore impacts on biodiversity are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
2	Climate change	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to climate change objectives.
3	Community and well-being	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy will permit facilities that have no unacceptable impacts on the local environment and communities, therefore impacts on community and wellbeing are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
4	Sustainable economic growth	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By facilitating development for the extraction of building stone, the policy will help to support the construction and building restoration industries.
5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy will permit facilities that have no unacceptable impacts on the local environment and communities, therefore impacts on flood risk are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.

6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy will permit facilities that have no unacceptable impacts on the local environment and communities, therefore impacts on land are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
7	Landscape and the historic environment	Short: 0/+ | Med: 0/+ | Long: 0/+ | Prob: M/H | Dir/Ind: D | Rev?: Y The policy will permit facilities that have no unacceptable impacts on the local environment and communities, therefore impacts on landscape and the historic environment are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies. By facilitating development for the extraction of building stone, the policy will help to support the sympathetic restoration of older buildings and use of traditional materials which will help to protect built landscapes and the historic environment.
8	Transport	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy will permit facilities that have no unacceptable impacts on the local environment and communities, therefore impacts from transport on air quality, noise, congestion and tranquillity are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy will permit facilities that have no unacceptable impacts on the local environment and communities, therefore impacts on water are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
10	Waste	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to sustainable waste management objectives.

Policy CSM 10 Oil, Gas and Unconventional Hydrocarbons

	Sustainability Objective	Comments
1	Biodiversity	Short | Med | Long | Prob | Dir/Ind | Rev?

		0 | 0 | ? | H | D | N The impacts of exploration and production will be required to minimise impacts on the environment where practicable so that there are no unacceptable adverse effects locally.
2	Climate change	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | ? | H | D | N The policy requires that fugitive emissions of greenhouse gases will not lead to unacceptable adverse impacts. The supporting text indicates that the policy will be reviewed in line with advice from the Committee on Climate Change. The policy could be enhanced by requiring developments to implement best practice standards for controlling fugitive emissions. The policy facilitates the extraction and therefore subsequent burning of fossil fuel, which contributes to climate change through emission of greenhouse gases. However, this is a matter that is essentially outside of the control of the planning authority[12] and is regulated and controlled by national government through various instruments such as carbon budgets, emissions trading schemes and other financial and technical mechanisms[13].
3	Community and well-being	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | ? | H | D | N The policy requires development to have no unacceptable adverse impacts on the local environment or communities and therefore effects locally are unlikely. In particular, hydraulic fracturing will not be permitted within areas of poor air quality.
4	Sustainable economic growth	Short | Med | Long | Prob | Dir/Ind | Rev? +/0 | +/0 | ? | H | D | N The policy supports the generation of income as fossil fuels are primary energy resources. However, fossil fuels are not sustainable; therefore, the policy does not support sustainable economic growth.
5	Flood risk	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | ? | H | I | N

[12] Paragraph 91, Report on the Examination into the Kent Minerals and Waste Local Plan 2013-2030, The Planning Inspectorate, April 2016
[13] Paragraph 105, Approved Judgement in R(Finch) v Surrey County Council, December 2020

		The policy requires no unacceptable impacts on the environment and communities and therefore development should not lead to adverse effects from flood risk. Therefore in the short-term adverse effects are unlikely.
6	Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>?</td><td>H</td><td>D</td><td>N</td></tr></table> The policy requires development to have no unacceptable adverse effects on the environment and communities, and the supporting text indicates that this includes land stability. Therefore adverse impacts on areas with sensitive geomorphology should be avoided.
7	Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>?</td><td>H</td><td>D</td><td>N</td></tr></table> The policy requires development to have no unacceptable adverse effects on the environment and communities including from land stability, therefore adverse impacts on historic assets are unlikely.
8	Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td>D</td><td>Y</td></tr></table> The policy requires development to have no unacceptable adverse effects on the environment and communities, and the supporting text indicates that this includes from vehicles accessing the site. Therefore adverse impacts from traffic on sensitive areas should be avoided.
9	Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>?</td><td>H</td><td>I</td><td>N</td></tr></table> The policy requires no unacceptable adverse effects on the environment and communities, and the supporting text indicates that this includes on ground and surface water. It also requires no adverse effects on sensitive water receptors in terms of quality and quantity and prevents development within Source Protection Zones. Therefore adverse impacts on water quality and quantity should be avoided.
10	Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table> Unlikely to affect the sustainable management of waste.

Policy CSM 11 Prospecting for Carboniferous Limestone

	Sustainability Objective	Comments
1	Biodiversity	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: N The supporting text indicates that the deposits are overlain by or near to important designated and undesignated habitats. Any development will be required to comply with other policies in the plan, therefore impacts on biodiversity are unknown but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
2	Climate change	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to climate change objectives.
3	Community and well-being	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: N/Y Any development will be required to comply with other policies in the plan, therefore impacts on community and wellbeing are unknown but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
4	Sustainable economic growth	Short: 0 | Med: ? | Long: + | Prob: M | Dir/Ind: D | Rev?: Y By facilitating prospecting for carboniferous limestone, the policy will help to ensure the future availability of aggregates for construction of infrastructure necessary to support economic growth.
5	Flood risk	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: N Any development will be required to comply with other policies in the plan, therefore impacts on flood risk are unknown but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
6	Land	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: N Any development will be required to comply with other policies in the plan, therefore impacts on land are unknown but are more strongly dependent on other policies within the KMWLP, notably the development management policies.

7	Landscape and the historic environment	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: N Any development will be required to comply with other policies in the plan, therefore impacts on landscape and the historic environment are unknown but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
8	Transport	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: Y/N Any development will be required to comply with other policies in the plan, therefore impacts of transport on air quality, noise, congestion and tranquillity are unknown but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
9	Water	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: Y Any development will be required to comply with other policies in the plan, therefore impacts on water are unknown but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
10	Waste	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to sustainable waste management objectives.

Policy CSM 12 Sustainable Transport of Minerals

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: ? | Prob: M | Dir/Ind: I | Rev?: N By promoting the sustainable transport of minerals, the policy will help to avoid significant increases in greenhouse gas emissions from road transport. This will help to reduce adverse impacts on biodiversity arising from climate change. Developments will be required to comply with other policies in the plan, therefore impacts on biodiversity are unlikely but in any event are more strongly dependent on other policies within the KMWLP, notably the development management policies.
2	Climate change	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: Y

		By promoting the sustainable transport of minerals, the policy will help to avoid some greenhouse gas emissions from road transport. This will help to reduce adverse impacts of climate change that might otherwise occur.
3	Community and well-being	Short: +/0 | Med: +/0 | Long: +/0 | Prob: M | Dir/Ind: I | Rev?: Y By promoting the sustainable transport of minerals, the policy will help to avoid significant greenhouse gas emissions from road transport. This will help to reduce adverse impacts of climate change including on communities and well-being. Any development will be required to comply with other policies in the plan, therefore adverse impacts on community and wellbeing are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
4	Sustainable economic growth	Short: + | Med: + | Long: + | Prob: H | Dir/Ind: D | Rev?: Y By promoting the sustainable transport of minerals, the policy will help to ensure the availability of aggregates for construction of infrastructure necessary to support economic growth which are transported in a more sustainable way than by road.
5	Flood risk	Short: + | Med: + | Long: + | Prob: H | Dir/Ind: D | Rev?: Y By promoting the sustainable transport of minerals, the policy will help to avoid significant greenhouse gas emissions from road transport. This will help to reduce adverse impacts on flood risk from climate change.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: Any development will be required to comply with other policies in the plan, therefore impacts on land are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: Any development will be required to comply with other policies in the plan, therefore impacts on landscape and the historic environment are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
8	Transport	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: Y

		By promoting the sustainable transport of minerals, the policy will help to avoid the need for road transport. This will help to reduce adverse impacts from transport on air quality, noise, congestion and tranquillity.
9	Water	Short: 0 / Med: 0 / Long: 0 / Prob: M / Dir/Ind: / Rev?: Any development will be required to comply with other policies in the plan, therefore impacts on water are unlikely but are more strongly dependent on other policies within the KMWLP, notably the development management policies.
10	Waste	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: Not relevant to sustainable waste management objectives.

Policy CSW 1 Sustainable Development

	Sustainability Objective	Comments
1	Biodiversity	Short: + / Med: + / Long: ? / Prob: H / Dir/Ind: D / Rev?: Y By taking a positive approach in favour of sustainable development, the policy will be likely to support biodiversity objectives, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
2	Climate change	Short: + / Med: + / Long: ? / Prob: M / Dir/Ind: D / Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support climate change objectives, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
3	Community and well-being	Short: + / Med: + / Long: ? / Prob: M / Dir/Ind: D / Rev?: Y By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for community and wellbeing, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
4		Short: + / Med: + / Long: ? / Prob: M / Dir/Ind: D / Rev?: Y

	Sustainable economic growth	By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for sustainable economic growth, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
5	Flood risk	Short: +; Med: +; Long: ?; Prob: M; Dir/Ind: D; Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support flood risk objectives, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
6	Land	Short: +; Med: +; Long: ?; Prob: M; Dir/Ind: D; Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for sustainable land management, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
7	Landscape and the historic environment	Short: +; Med: +; Long: ?; Prob: M; Dir/Ind: D; Rev?: N By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives on landscape and the historic environment, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
8	Transport	Short: +; Med: +; Long: ?; Prob: M; Dir/Ind: D; Rev?: Y/N By taking a positive approach in favour of sustainable development, the policy will be likely to support sustainable transport objectives, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
9	Water	Short: +; Med: +; Long: ?; Prob: M; Dir/Ind: D; Rev?: Y/N By taking a positive approach in favour of sustainable development, the policy will be likely to support objectives for sustainable water management, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.
10	Waste	Short: +; Med: +; Long: ?; Prob: M; Dir/Ind: D; Rev?: Y/N By taking a positive approach in favour of sustainable development, the policy will be likely to support sustainable waste management objectives, although the impacts will be more strongly dependent on the detailed policies of the KMWLP.

Policy CSW 2 Waste Hierarchy

	Sustainability Objective	Comments
1	Biodiversity	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: I | Rev?: Y By promoting waste being managed at the highest practicable level of the waste hierarchy, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels, and therefore will help to avoid adverse impacts on biodiversity from climate change.
2	Climate change	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: N By promoting waste being managed at the highest practicable level of the waste hierarchy, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels and therefore will help to avoid adverse impacts from climate change.
3	Community and well-being	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y By promoting waste being managed at the highest practicable level of the waste hierarchy, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels, and therefore will help to avoid adverse impacts on communities and well-being arising from climate change.
4	Sustainable economic growth	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By promoting waste being managed at the highest practicable level of the waste hierarchy, the policy will promote more sustainable waste management practices and therefore help to support a more sustainable waste management sector and a more sustainable, circular economy generally, as indicated in the supporting text.
5	Flood risk	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: I | Rev?: Y By promoting waste being managed at the highest practicable level of the waste hierarchy, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels, and therefore will help to avoid adverse impacts on flood risk from climate change.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?:

		Not relevant to objectives for sustainable land management.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to objectives for landscape and the historic environment.
8	Transport	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: Y The impact on transport of managing waste at higher levels of the waste hierarchy are uncertain and more strongly dependent on other policies in the KMWLP.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to water objectives.
10	Waste	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By promoting the management of waste at higher levels of the waste hierarchy, the policy will make a direct contribution to achieving sustainable waste management objectives.

Policy CSW 3 Waste Reduction

	Sustainability Objective	Comments
1	Biodiversity	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: I | Rev?: Y By promoting the circular economy and household waste recycling, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels of the waste hierarchy, and therefore will help to avoid adverse impacts on biodiversity from climate change.
2	Climate change	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: N By promoting the circular economy and household waste recycling, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels and therefore will help to avoid adverse impacts from climate change.

3	Community and well-being	Short: + | Med: + | Long: ? | Prob: M/H | Dir/Ind: D | Rev?: Y By promoting the circular economy and household waste recycling, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels, and therefore will help to avoid adverse impacts on communities and well-being arising from climate change. The policy also requires adequate storage facilities for waste and high quality design, therefore communal facilities should be of a good standard and avoid adverse impacts on occupiers.
4	Sustainable economic growth	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By promoting the circular economy and household waste recycling, the policy will promote more sustainable waste management practices and therefore help to support a more sustainable waste management sector and a more sustainable, circular economy generally.
5	Flood risk	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: I | Rev?: Y By promoting the circular economy and household waste recycling, the policy will promote a reduction in greenhouse gas emissions associated with waste management at lower levels, and therefore will help to avoid adverse impacts on flood risk from climate change.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to objectives for sustainable land management.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to objectives for landscape and the historic environment.
8	Transport	Short: + | Med: + | Long: + | Prob: L | Dir/Ind: I | Rev?: Y By promoting the circular economy, the policy should help to encourage the retention of existing structures in redevelopments and so reduce the need for transport of materials to development sites. However, the significance of the effects is uncertain and more strongly dependent on other policies in the KMWLP.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?:

		Not relevant to water objectives.
10	Waste	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By promoting the objectives of the circular economy and household waste recycling, the policy will promote the management of waste at higher levels of the waste hierarchy and thus make a direct contribution to achieving sustainable waste management objectives.

Policy CSW 4 Strategy for Waste Management Capacity

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: ? | Prob: M | Dir/Ind: I | Rev?: Y The policy will encourage recycling of aggregates and therefore help to reduce the demand for virgin aggregates, thereby avoiding pressure for new mineral sites which could otherwise have adverse impacts on biodiversity.
2	Climate change	Short: +/? | Med: +/? | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y The policy will encourage increased reuse, recycling and recovery and therefore should have an overall positive impact upon climate change by reducing demand on resources and production of greenhouse gases. Increased recycling may increase the need for waste transport which would increase greenhouse gas emissions, but the increase is not likely to be significant for the county as a whole.
3	Community and well-being	Short: 0 | Med: 0 | Long: ? | Prob: M | Dir/Ind: I | Rev?: Y There are not likely to be any significant impacts on amenity and wellbeing as no new facilities are required to be developed by the policy. By promoting increased recycling, the policy will help to encourage the supply of recycled aggregates to support housing construction and avoid amenity impacts on communities from new mineral developments.
4	Sustainable economic growth	Short: ++ | Med: ++ | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y Increased reuse, recycling and recovery would contribute towards meeting agreed targets and support sustainable economic activity and the circular economy. Encouragement of increased recycling of aggregates will reduce the demand upon non-renewable resources and promote sustainable construction practices.

5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: H | Dir/Ind: I | Rev?: N The policy is not specific to any particular sites, therefore is unlikely to have a significant demonstrable effect upon flood risk.
6	Land	Short: 0 | Med: 0 | Long: ? | Prob: H | Dir/Ind: D | Rev?: N The policy is unlikely to have a significant effect on greenfield or Green Belt land or land with sensitive geology as no new developments will be required.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: ? | Prob: H | Dir/Ind: D | Rev?: N The policy is unlikely to have a significant effect on landscape or historic assets as no new developments will be required.
8	Transport	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: N By promoting increased recycling, the policy is likely to encourage additional vehicle movements to transport recyclables. The scale of the likely effect is not clear, but it is unlikely to be significantly greater than managing waste at the bottom of the waste hierarchy, particularly in the context of vehicle movements within the county overall.
9	Water	Short: 0 | Med: 0 | Long: ? | Prob: H | Dir/Ind: D | Rev?: N The policy is unlikely to have a significant effect on water quality and availability as no new developments will be required.
10	Waste	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy promotes the sustainable management of waste by requiring waste to be managed at high levels of the waste hierarchy. Targets exceed the current national recycling rate.

N.B. It is proposed that Policy CSW5 (Strategic Site for Waste) be deleted and hence the appraisal of this policy has been removed from this section. Consideration of a reasonable alternative of not deleting the policy is considered below.

CSW 6 Location of built waste management facilities

<table>
<tr><td></td><td>Sustainability Objective</td><td>Comments</td></tr>
<tr><td>1</td><td>Biodiversity</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr>
</table>
The policy requires no adverse effect on designated local, national and international nature conservation sites. No reference is made to National Nature Reserves and this should be included.
</td></tr>
<tr><td>2</td><td>Climate change</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>N</td></tr>
</table>
The policy requires development to be well-located to transport infrastructure, including rail and water transport, and therefore will help to reduce potential emissions of greenhouse gases, limiting the effect on climate change. It also requires energy producing facilities to be located near to heat users, thereby promoting the generation and use of combined heat and power which will reduce greenhouse gas emissions. New development may nevertheless increase greenhouse gas emissions although this is dependent on the degree to which new capacity replaces existing capacity and whether it is well-located in terms of proximity to arisings. The overall balance of effects is uncertain.
</td></tr>
<tr><td>3</td><td>Community and well-being</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td>H</td><td>I</td><td>N/Y</td></tr>
</table>
The policy requires facilities that generate bioaerosols to be at least 250m from sensitive receptors, thereby avoiding potential effects on human health. It does not address other potential effects on community and wellbeing. However, any new facilities will be required to comply with development management policies which require no adverse effects on communities, including DM 11 Health and Amenity which ensures that any development permitted will have no unacceptable adverse impacts noise, dust, illumination, visual intrusion, traffic and air quality particularly within an AQMA. Therefore adverse impacts are unlikely on communities and wellbeing.
</td></tr>
<tr><td>4</td><td>Sustainable economic growth</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>?</td><td>+</td><td>+</td><td>M</td><td>I</td><td>N</td></tr>
</table>
The policy facilitates the development of waste management facilities which are required to support economic growth which have no adverse effects on certain aspects of the environment.
</td></tr>
<tr><td>5</td><td>Flood risk</td><td>
<table>
<tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr>
<tr><td>0</td><td>0</td><td>0</td><td>H</td><td>I</td><td>N</td></tr>
</table>
</td></tr>
</table>

		The policy requires development to avoid flood zone 3b and therefore will avoid the functional flood plain. Development management policies require developments not to exacerbate flood risk and therefore adverse effects are unlikely.
6	Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table> The policy prioritises developed land for the location of new waste facilities and prevents inappropriate development in the Green Belt therefore adverse impacts are unlikely to be significant.
7	Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0/?</td><td>0/?</td><td>0/?</td><td>H/L</td><td>D</td><td>N</td></tr></table> The policy requires no significant adverse effects on AONBs or heritage assets and that the landscape is capable of accommodating prominent structures. Reference should be made to the requirement to protect the setting of AONBs. Light pollution is controlled by policy DM 11 Health and Amenity.
8	Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>M/L</td><td>D/I</td><td>N</td></tr></table> The policy requires new waste facilities to be well-located to existing transport infrastructure, including rail and water transport, which will help to minimise any adverse effects on transport networks. 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 balance of effects is uncertain.
9	Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td></td><td></td></tr></table> The policy requires waste development to avoid groundwater source protection zones and prevents significant adverse impacts on groundwater. No effect on groundwater quality is therefore likely, and impacts on surface water quality and quantity are also unlikely from waste facilities. Development management policies require protection of water quality and therefore adverse effects are not likely.
10	Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>++</td><td>++</td><td>H</td><td>D</td><td>N</td></tr></table> The policy requires waste development to avoid adverse impacts on human health and the environment, so supporting the sustainable management of waste. Reference should be made to the proximity principle which promotes management of waste as near as possible to the source of arisings.

Policy CSW 7 Waste Management for Non-Hazardous Waste

<table>
<tr><th></th><th>Sustainability Objective</th><th>Comments</th></tr>
<tr><td>1</td><td>Biodiversity</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>I</td><td>Y</td></tr>
</table>
The policy seeks to maximise the recovery of energy from waste in diverting it from landfill. This will help to reduce the greenhouse gas emissions associated with managing waste at lower levels of the hierarchy, thus helping to avoid adverse impacts on biodiversity from climate change effects.
</td></tr>
<tr><td>2</td><td>Climate change</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>D</td><td>Y</td></tr>
</table>
The policy aims to move waste up the hierarchy and to maximise the recovery of energy and therefore should have an overall positive impact upon climate change by reducing the production of greenhouse gases associated with managing waste at lower levels of the hierarchy.
</td></tr>
<tr><td>3</td><td>Community and well-being</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>I</td><td>Y</td></tr>
</table>
The policy aims to move waste up the hierarchy and to maximise the recovery of energy and therefore should have an overall positive impact upon climate change by reducing the production of greenhouse gases associated with managing waste at lower levels of the hierarchy, thereby avoiding potential adverse impacts on communities from climate change.
</td></tr>
<tr><td>4</td><td>Sustainable economic growth</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>++</td><td>++</td><td>++</td><td>H</td><td>D</td><td>Y</td></tr>
</table>
The policy seeks to move waste up the waste hierarchy and promote energy recovery which will support a more sustainable waste management sector and sustainable economy more broadly.
</td></tr>
<tr><td>5</td><td>Flood risk</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>I</td><td>Y</td></tr>
</table>
The policy aims to move waste up the hierarchy and to maximise the recovery of energy and therefore should have an overall positive impact upon flood risk from climate change by reducing the production of greenhouse gases associated with managing waste at lower levels of the hierarchy.
</td></tr>
<tr><td>6</td><td>Land</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr>
</table>
</td></tr>
</table>

		The policy does not deal with the location of facilities and therefore will have no impact on land use.
7	Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table> This policy is not specific to any particular sites or the effects of development, therefore is unlikely to have any effect upon landscape or the historic environment.
8	Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>M</td><td>D</td><td>Y</td></tr></table> By promoting increased recycling, the policy is likely to encourage additional vehicle movements to transport recyclables. It also promotes net self-sufficiency for Kent which will help to minimise waste transport distances. The balance and scale of the likely effects are not clear, but are unlikely to be significantly greater than managing waste at the bottom of the waste hierarchy, particularly in the context of vehicle movements within the county overall.
9	Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table> The policy does not address the locations or effects of development therefore is unlikely to affect water quality and availability.
10	Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>++</td><td>++</td><td>++</td><td>H</td><td>D</td><td>N</td></tr></table> The policy aims for Kent to be net self-sufficient in waste management capacity which will help to minimise the distances waste is transported. It also seeks to move waste up the waste hierarchy, so supporting the sustainable management of waste.

Policy CSW 8 Other Recovery Facilities for Non-Hazardous Waste

	Sustainability Objective	Comments
1	Biodiversity	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>+</td><td>+</td><td>?</td><td>M</td><td>I</td><td>Y</td></tr></table> By promoting energy recovery, recovery of heat and carbon capture, the policy will help to miminise greenhouse gas emissions which will contribute to reducing the pressure on biodiversity from climate change.

2	Climate change	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: Y The policy promotes energy recovery, recovery of heat and carbon capture which will promote minimisation of climate change impacts arising from non-hazardous waste recovery facilities.
3	Community and well-being	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By promoting energy recovery, recovery of heat and carbon capture, the policy will contribute to reducing the adverse effects on communities from climate change and could provide heat for homes.
4	Sustainable economic growth	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: D | Rev?: N By promoting energy recovery and recovery of heat, the policy will contribute to recovering resources from waste which will make a contribution to sustainable economic growth.
5	Flood risk	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: I | Rev?: N By promoting energy recovery, recovery of heat and carbon capture, the policy will contribute to reducing climate change impacts associated with waste and will make a contribution to reducing the risks of flooding.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy is unrelated to land use.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy is unrelated to protection and enhancement of landscape and the historic environment.
8	Transport	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy is unrelated to sustainable transport objectives.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?:

		The policy is unrelated to maintenance and improvement of water quality or sustainable water resource management.
10	Waste	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By promoting energy recovery, recovery of heat and carbon capture, the policy will promote the management of waste at higher levels of the waste hierarchy than landfill and thus make a direct contribution to achieving sustainable waste management objectives.

Policy CSW 9 Non-Inert Waste Landfill in Kent

	Sustainability Objective	Comments
1	Biodiversity	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: I/D | Rev?: Y By restricting capacity for landfill and requiring waste to be managed at higher levels of the hierarchy if possible, and by requiring 85% methane capture, the policy will help to miminise greenhouse gas emissions which will contribute to reducing the pressure on biodiversity from climate change. Restoration to a high standard could potentially have long term benefits for biodiversity if standards are adopted with nature conservation objectives.
2	Climate change	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: Y By restricting capacity for landfill and requiring waste to be managed at higher levels of the hierarchy if possible, and by requiring 85% methane capture, the policy will help to minimise greenhouse gas emissions and impacts on climate change. Requiring developments to result in environmental benefits could include climate change adaptation benefits, although this is not explicit.
3	Community and well-being	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By restricting capacity for landfill and requiring waste to be managed at higher levels of the hierarchy if possible, and by requiring 85% methane capture, the policy will contribute to reducing greenhouse gas emissions from waste management and so help to avoid adverse effects on communities from climate change.
4		Short: + | Med: + | Long: + | Prob: H | Dir/Ind: D | Rev?: N

	Sustainable economic growth	By restricting capacity for landfill and requiring waste to be managed at higher levels of the hierarchy if possible, and by requiring 85% methane capture, the policy will contribute to recovering resources from waste which will make a small contribution to sustainable economic growth.
5	Flood risk	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>+</td><td>+</td><td>+</td><td>M</td><td>I</td><td>N</td></tr></table> By restricting capacity for landfill and requiring waste to be managed at higher levels of the hierarchy if possible, and by requiring 85% methane capture, the policy will contribute to reducing climate change impacts associated with waste and will make a contribution to reducing the risks of flooding.
6	Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>+</td><td>M</td><td>D</td><td>N</td></tr></table> By requiring restoration to a high standard, the policy could have benefits for land quality if restoration is to a standard suitable for agriculture. The likelihood of this is uncertain and dependent on plans for restoration.
7	Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>+/?</td><td>H/M</td><td>D</td><td>N</td></tr></table> The policy envisages restoration that accords with local landscape character and therefore long-term benefits for landscape are likely. This may additionally have benefits for historic landscapes but will depend on the location of the landfill.
8	Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table> The policy is unrelated to sustainable transport objectives.
9	Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table> The policy is unrelated to maintenance and improvement of water quality or sustainable water resource management. Non-inert landfill has the potential for adverse impacts on water quality, depending on standards at a particular site. Control of impacts is dependent on policy DM 10 Water Environment.
10	Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>++</td><td>++</td><td>?</td><td>H</td><td>D</td><td>N</td></tr></table> By restricting landfill and requiring management at higher levels of the waste hierarchy where possible, the policy will promote the management of waste at higher levels of the waste hierarchy than landfill and thus make a direct contribution to achieving sustainable waste management objectives.

Policy CSW 10 Development at Closed Landfill Sites

<table>
<tr><th></th><th>Sustainability Objective</th><th>Comments</th></tr>
<tr><td>1</td><td>Biodiversity</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>D/I</td><td>Y</td></tr>
</table>
There could be benefits for biodiversity if afteruse of the land for nature conservation benefit is sought although the likelihood of this being an objective for afteruse at any site is unknown. By making maximum use of landfill gas, the policy will help to minimise greenhouse gas emissions both from reducing fugitive emissions from the site and by replacing energy generated from fossil fuels, which will contribute to reducing the pressure on biodiversity from climate change.
</td></tr>
<tr><td>2</td><td>Climate change</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>D</td><td>Y</td></tr>
</table>
By making maximum use of landfill gas, the policy will help to miminise greenhouse gas emissions both from reducing fugitive emissions from the site and by replacing energy generated from fossil fuels, which will contribute to mitigating climate change. Restoration to an identified afteruse could include uses that incorporate climate change adaptation measures.
</td></tr>
<tr><td>3</td><td>Community and well-being</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>I</td><td>Y</td></tr>
</table>
By making maximum use of landfill gas, the policy will help to miminise greenhouse gas emissions both from reducing fugitive emissions from the site and by replacing energy generated from fossil fuels and so help to avoid adverse effects on communities from climate change. Communities could also benefit if the afteruse of the land is for recreation and access, although it is not certain that this will be an objective for the afteruse.
</td></tr>
<tr><td>4</td><td>Sustainable economic growth</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr>
</table>
Unlikely to have a significant impact on sustainable economic growth.
</td></tr>
<tr><td>5</td><td>Flood risk</td><td>
<table>
<tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr>
<tr><td>+</td><td>+</td><td>+</td><td>M</td><td>I</td><td>N</td></tr>
</table>
By making maximum use of landfill gas, the policy will help to miminise greenhouse gas emissions both from reducing fugitive emissions from the site and by replacing energy generated from fossil fuels, which will contribute to reducing climate change impacts associated and will make a contribution to reducing the risks of flooding associated with climate change.
</td></tr>
</table>

6	Land	Short: ? | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: N By facilitating the improvement of landfill sites to an agreed afteruse, the policy is likely to support the improvement of the quality of land, or restoration to its former standard. This may in some circumstances, result in restoration for agricultural use which may be to the best and most versatile agricultural land. The likelihood of this is uncertain and dependent on plans for restoration.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant effect on landscape quality or historic assets.
8	Transport	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy is unrelated to sustainable transport objectives.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy is unrelated to maintenance and improvement of water quality or sustainable water resource management.
10	Waste	Short: ++ | Med: ++ | Long: ++ | Prob: H | Dir/Ind: D | Rev?: Y By requiring maximum use of landfill gas, the policy will promote the management of waste without harm to the environment and thus make a direct contribution to achieving sustainable waste management objectives.

Policy CSW 11 Permanent Deposit of Inert Waste

	Sustainability Objective	Comments
1	Biodiversity	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By allowing the deposit of inert waste for restoration of landfill sites and mineral workings, there would be benefits for biodiversity if afteruse of the land for nature conservation benefit is sought although the likelihood of this being an objective for afteruse at any site is unknown. If deposit of inert waste were not facilitated, the benefits are likely to take longer to deliver, or may not be delivered at all.

2	Climate change	Short: 0 | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: Y Restoration to an identified afteruse could include uses that incorporate climate change adaptation measures.
3	Community and well-being	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By allowing the deposit of inert waste for restoration of landfill sites and mineral workings, there would be benefits for communities if afteruse of the land for recreation and access is sought, although the likelihood of this being an objective for afteruse at any site is unknown. If deposit of inert waste were not facilitated, the benefits are likely to take longer to deliver, or may not be delivered at all.
4	Sustainable economic growth	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant impact on sustainable economic growth.
5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant impact on flood risk
6	Land	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: N By facilitating the improvement of landfill sites and mineral workings to an agreed afteruse, the policy is likely to support the improvement of the quality of land, or restoration to its former standard. This may, in some circumstances, result in restoration for agricultural use which may be to the best and most versatile agricultural land. The likelihood of this is uncertain and dependent on plans for restoration.
7	Landscape and the historic environment	Short: +/0 | Med: +/0 | Long: +/0 | Prob: H | Dir/Ind: D | Rev?: N By allowing the deposit of waste to restore landfills and mineral workings, the policy will help to reduce the landscape impacts of such sites if not restored. Unlikely to have a significant impact on historic assets or light pollution.
8	Transport	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: N

		By permitting hazardous waste facilities regardless of the catchment area for the waste, the policy may be facilitating unnecessary increases in waste transport distances, although the significance of effects is unknown at this stage. The policy should require applications to demonstrate that they support the proximity principle for waste.
9	Water	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: The policy is unrelated to maintenance and improvement of water quality or sustainable water resource management.
10	Waste	Short: ++/? / Med: ++/? / Long: ++/? / Prob: H/L / Dir/Ind: D / Rev?: Y/N By only allowing the deposit of the minimum amount of inert waste to achieve the benefit sought, the policy supports management of other inert waste at levels of the hierarchy higher than landfill. By permitting hazardous waste facilities regardless of the catchment area for the waste, the policy may be facilitating unnecessary increases in waste transport distances, although the significance of effects is unknown at this stage. The policy should require applications to demonstrate that they support the proximity principle for waste.

Policy CSW 12 Identifying Sites for Hazardous Waste

	Sustainability Objective	Comments
1	Biodiversity	Short: 0/+ / Med: 0/+ / Long: 0/? / Prob: M / Dir/Ind: I/D / Rev?: Y Effects described in appraisals of CSW 6 and CSW 9
2	Climate change	Short: ?/+ / Med: ?/+ / Long: ?/+ / Prob: L/M / Dir/Ind: I/D / Rev?: N/Y Effects described in appraisals of CSW 6 and CSW 9
3	Community and well-being	Short: 0/+ / Med: 0/+ / Long: 0/+ / Prob: H/M / Dir/Ind: I / Rev?: N/Y Effects described in appraisals of CSW 6 and CSW 9
4		Short: ?/+ / Med: + / Long: + / Prob: M/H / Dir/Ind: I/D / Rev?: N

	Sustainable economic growth	Effects described in appraisals of CSW 6 and CSW 9
5	Flood risk	Short: 0/+ | Med: 0/+ | Long: 0/+ | Prob: H/M | Dir/Ind: I | Rev?: N Effects described in appraisals of CSW 6 and CSW 9
6	Land	Short: 0 | Med: 0 | Long: 0/+ | Prob: M | Dir/Ind: D | Rev?: N Effects described in appraisals of CSW 6 and CSW 9
7	Landscape and the historic environment	Short: 0/? | Med: 0/? | Long: 0/?/+ | Prob: H/M/L | Dir/Ind: D | Rev?: N Effects described in appraisals of CSW 6 and CSW 9
8	Transport	Short: ?/0 | Med: ?/0 | Long: ?/0 | Prob: M/L | Dir/Ind: D/I | Rev?: N Effects described in appraisals of CSW 6 and CSW 9
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: H | Dir/Ind: | Rev?: Effects described in appraisals of CSW 6 and CSW 9
10	Waste	Short: ?/++ | Med: ++ | Long: ++/? | Prob: H | Dir/Ind: D | Rev?: N Effects described in appraisals of CSW 6 and CSW 9

Policy CSW 13 Remediation of Brownfield Land

	Sustainability Objective	Comments
1	Biodiversity	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: Y The policy facilitates soil decontamination on sites that are for redevelopment. There may be benefits for biodiversity through decontamination of soils, but these will be dependent on the plans for redevelopment which are unknown.

2	Climate change	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to make a significant contribution to reducing climate change
3	Community and well-being	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have significant impacts on communities and well-being.
4	Sustainable economic growth	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant impact on sustainable economic growth.
5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant impact on flood risk
6	Land	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: N By facilitating soil decontamination on sites that are for redevelopment, there may be benefits for land quality through decontamination of soils, but these will be dependent on the plans for redevelopment which are unknown.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant impact on landscape or historic assets.
8	Transport	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By facilitating the decontamination of soils in situ, the policy will help to avoid the need to transport contaminated soils offsite and import fresh soil, so reducing the need for transport of materials.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy is unrelated to maintenance and improvement of water quality or sustainable water resource management.
10	Waste	Short | Med | Long | Prob | Dir/Ind | Rev?

		+	+	+	H	D	Y	
		By facilitating the decontamination of soils on site, the policy implements the proximity principle thereby contributing to sustainable waste management objectives.						

Policy CSW 14 Disposal of Dredgings

	Sustainability Objective	Comments						
1	Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?	
		+	+	?	H	D	Y	
		By requiring dredgings to be used for biodiversity enhancement where possible, the policy supports a biodiversity gain through the use of dredgings.						
2	Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		Landfill of dredgings is unlikely to have climate change impacts as methane capture at landfills is required by other policies and good practice standards.						
3	Community and well-being	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		Unlikely to have significant impacts on communities and well-being.						
4	Sustainable economic growth	Short	Med	Long	Prob	Dir/Ind	Rev?	
		+	+	?	H	I	Y	
		By facilitating the disposal of dredgings, the policy will help to maintain the navigability of channels within and around the coast of Kent. This will help to support sustainable economic growth by ensuring that water-based transport for goods and people remains viable, although the contribution to growth is likely to be small.						
5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		Unlikely to have a significant impact on flood risk						
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?	
		?	?	?	L	D	N	

		Granting permission for new disposal sites may have adverse impacts on land quality, although the type and scale of impacts will depend on where the sites are located, which is not known.
7	Landscape and the historic environment	Short: ? Med: ? Long: ? Prob: L Dir/Ind: D Rev?: N Granting permission for new disposal sites may have adverse impacts on landscape quality and potentially also on historic assets, although the type and scale of impacts will depend on where the sites are located, which is not known.
8	Transport	Short: ? Med: ? Long: ? Prob: L Dir/Ind: I Rev?: Y Transport of dredgings to sites in Kent may require truck movements on the road network, although the scale of impacts will depend on where the sites are located, which is not known.
9	Water	Short: 0 Med: 0 Long: 0 Prob: Dir/Ind: Rev?: The policy is unrelated to maintenance and improvement of water quality or sustainable water resource management.
10	Waste	Short: + Med: + Long: + Prob: H Dir/Ind: D Rev?: Y By requiring applicants to demonstrate that the reuse of dredgings is not possible, the policy supports the principles of the waste hierarchy.

Policy CSW 15 Wastewater Development

	Sustainability Objective	Comments
1	Biodiversity	Short: + Med: + Long: ? Prob: H Dir/Ind: I Rev?: Y By requiring biogas from anaerobic digestion to be recovered and used for energy generation, the policy will help to avoid greenhouse gas emissions from biogas escape and from fossil fuel generation of energy. This will help to avoid adverse impacts on biodiversity from climate change.
2	Climate change	Short: + Med: + Long: ? Prob: H Dir/Ind: D Rev?: Y

		By requiring biogas from anaerobic digestion to be recovered and used for energy generation, the policy will help to avoid greenhouse gas emissions from biogas escape and fossil fuel generation of energy.
3	Community and well-being	Short: + / Med: + / Long: ? / Prob: H / Dir/Ind: I / Rev?: Y By requiring biogas from anaerobic digestion to be recovered and used for energy generation, the policy will help to avoid greenhouse gas emissions from biogas escape and from fossil fuel generation of energy. This will help to avoid adverse impacts on communities from climate change.
4	Sustainable economic growth	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: Unlikely to have a significant impact on sustainable economic growth.
5	Flood risk	Short: + / Med: + / Long: ? / Prob: H / Dir/Ind: I / Rev?: Y By requiring biogas from anaerobic digestion to be recovered and used for energy generation, the policy will help to avoid greenhouse gas emissions from biogas escape and from fossil fuel generation of energy. This will help to avoid adverse impacts on flood risk from climate change.
6	Land	Short: ? / Med: ? / Long: ? / Prob: L / Dir/Ind: D / Rev?: N Granting permission for new or extended wastewater facilities may have adverse impacts on land quality, although the type and scale of impacts will depend on where the sites are located, which is not known.
7	Landscape and the historic environment	Short: ? / Med: ? / Long: ? / Prob: L / Dir/Ind: D / Rev?: N Granting permission for new or extended facilities may have adverse impacts on land quality, light pollution and potentially also on historic assets, although the type and scale of impacts will depend on where the sites are located, which is not known. Policy DM 11 Health and Amenity requires no unacceptable adverse impacts from light.
8	Transport	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: Unlikely to have a significant impact on transport objectives.

9	Water	Short: ++ | Med: ++ | Long: ++ | Prob: H | Dir/Ind: D | Rev?: Y By facilitating the development or extension of wastewater facilities, the policy supports the maintenance and potentially the improvement of water quality and will help to address potential problems where water quality could be at risk.
10	Waste	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By requiring biogas capture and use, the policy will help to reduce the potential for harm to the environment and communities.

Policy CSW 16 Safeguarding of Existing Waste Management Facilities

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Not relevant to biodiversity objectives
2	Climate change	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y By safeguarding existing waste management facilities, the policy will help to retain net self-sufficiency for Kent's waste, thereby avoiding the need for potentially greater waste transport distances and therefore reducing greenhouse gas emissions from the transport of waste.
3	Community and well-being	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No significant impacts on communities and wellbeing.
4	Sustainable economic growth	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant impact on sustainable economic growth.
5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have significant impacts on flood risk

6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?		
		0	0	0					
		Unlikely to have significant impacts on land quality							
7	Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?		
		0	0	0					
		Unlikely to have significant impacts on landscape or the historic environment.							
8	Transport	Short	Med	Long	Prob	Dir/Ind	Rev?		
		+	+	+	M	D	Y		
		By safeguarding existing waste management facilities, the policy will help to retain net self-sufficiency for Kent's waste, thereby avoiding the need for potentially greater waste transport distances and impacts from waste transport.							
9	Water	Short	Med	Long	Prob	Dir/Ind	Rev?		
		0	0	0					
		Not relevant to objectives for water quality and availability.							
10	Waste	Short	Med	Long	Prob	Dir/Ind	Rev?		
		++	++	?	H	D	Y		
		By safeguarding existing waste management facilities, the policy will help to retain net self-sufficiency for Kent's waste, thereby supporting the management of waste nearer to its source of arisings than might otherwise be the case.							

Policy CSW 17 Waste Management at Dungeness Nuclear Estate

	Sustainability Objective	Comments					
1	Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?
		?/+	?/+	?/+	M	D	N

<table>
<tr><td></td><td></td><td>The site is adjacent to Dungeness SAC, Dungeness, Romney Marsh and Rye Bay Ramsar site, Dungeness SSSI and Dungeness National Nature Reserve. The policy allows mitigation of environmental impacts to an acceptable level, therefore adverse effects are possible although not certain. Adverse effects could arise from waste management activities on the site, including noise and dust affecting species within the designated sites and vehicle movements to and from the site from construction vehicles and potentially the importation of waste, although the supporting text indicates that importation is not anticipated. However, the policy requires a net gain in biodiversity value and therefore any adverse effects will be outweighed by positive gain.

The draft HRA has concluded that the policy is unlikely to have any adverse impacts on the SAC, SPA, Ramsar and SSSI from noise, vibration, visual disturbance, or changes in water quality and hydrology. Adverse effects are possible if importation of waste occurs which increases air pollution.

The policy requires planning applications to demonstrate that impacts on the environment can be controlled to an acceptable level, therefore adverse impacts are unlikely. Policies DM 2 and DM 3 require no unacceptable adverse impacts on designated sites unless in exceptional circumstances and therefore these policies also help to ensure no unacceptable adverse impacts.</td></tr>
<tr><td>2</td><td>Climate change</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table>No impacts on climate change are likely.</td></tr>
<tr><td>3</td><td>Community and well-being</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>N</td></tr></table>The policy allows mitigation of environmental impacts to an acceptable level, therefore adverse effects are possible although not certain. Community impacts are managed by policy DM 11 Health and Amenity.

The policy allows for the importation of waste from elsewhere, although the supporting text indicates that this is not anticipated. If importation of waste were to occur, the additional vehicle movements will add to emissions from vehicles already using the site and could potentially lower air quality, although there are no areas of poor air quality currently within the District and therefore adverse impacts are unlikely. In addition, the policy requires planning applications to demonstrate that adverse impacts on the environment can be mitigated to an acceptable level.</td></tr>
<tr><td>4</td><td>Sustainable economic growth</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table>Unlikely to have a significant impact on sustainable economic growth.</td></tr>
</table>

5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have significant impacts on flood risk
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: D | Rev?: N Unlikely to have adverse impacts on land additional to existing development.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have significant impacts on landscape or the historic environment.
8	Transport	Short: +/? | Med: +/? | Long: +/? | Prob: H/L | Dir/Ind: D | Rev?: Y By allowing management of wastes onsite, the policy will avoid the need for transport of waste to other sites. However, the policy permits importation of waste from elsewhere, although the supporting text indicates that this is not anticipated and the likely number of vehicle movements if this were to occur is not known. Dungeness nuclear facility has a dedicated railhead which may be used for importation. The policy requires planning applications to demonstrate that environmental impacts can be mitigated to an acceptable level and therefore adverse impacts are unlikely.
9	Water	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: N The policy allows mitigation of environmental impacts to an acceptable level, therefore adverse effects are possible on water quality and hydrology, although not certain. Policy DM 10 requires no unacceptable adverse impacts on the water environment.
10	Waste	Short: 0/+/? | Med: 0/+/? | Long: 0/+/? | Prob: M/H/L | Dir/Ind: D | Rev?: N The supporting text indicates that the waste hierarchy is relevant to consider in the management of nuclear wastes and policy CSW 2 requires demonstration that the wastes to be managed onsite cannot be managed at higher levels of the waste hierarchy. By allowing management of wastes onsite, the policy will help to implement the proximity principle for those wastes by managing at its source of arising. The supporting text indicates that importation of waste from elsewhere is not anticipated. However, while this is possible under policy CSW 17, it is unknown whether this may or may not be in accordance with the proximity

		principle.

Policy CSW 18 Non-Nuclear Industry Radioactive Low Level Waste Management

	Sustainability Objective	Comments
1	Biodiversity	Short: ? Med: ? Long: ? Prob: L Dir/Ind: Rev?: Impacts on biodiversity are dependent on the features and sensitivities at particular sites, the location of which is not known.
2	Climate change	Short: + Med: + Long: ? Prob: M Dir/Ind: D Rev?: Y By promoting the proximity principle for non-nuclear radioactive waste, the policy will help to encourage the management of waste closer to the source of its arising than might otherwise be the case, thereby avoiding unnecessary climate change impacts of waste transport.
3	Community and well-being	Short: ? Med: ? Long: ? Prob: L Dir/Ind: Rev?: Impacts on communities and well-being are dependent on the features and conditions at particular sites, the location of which is not known.
4	Sustainable economic growth	Short: 0 Med: 0 Long: 0 Prob: Dir/Ind: Rev?: Unlikely to have a significant impact on sustainable economic growth.
5	Flood risk	Short: ? Med: ? Long: ? Prob: L Dir/Ind: Rev?: Impacts on flood risk are dependent on the features and sensitivities at particular sites, the location of which is not known.
6	Land	Short: ? Med: ? Long: ? Prob: L Dir/Ind: Rev?: Impacts on land quality are dependent on the features and sensitivities at particular sites, the location of which is not known.
7		Short: ? Med: ? Long: ? Prob: L Dir/Ind: Rev?:

	Landscape and the historic environment	Impacts on landscape and the historic environment are dependent on the features and sensitivities at particular sites, the location of which is not known.
8	Transport	Short: + / Med: + / Long: + / Prob: M / Dir/Ind: D / Rev?: Y By promoting the proximity principle for non-nuclear radioactive waste, the policy will help to encourage the management of waste closer to the source of its arising than might otherwise be the case, thereby avoiding unnecessary impacts of waste transport.
9	Water	Short: ? / Med: ? / Long: ? / Prob: L / Dir/Ind: / Rev?: Impacts on the water environment are dependent on the features and sensitivities at particular sites, the location of which is not known.
10	Waste	Short: + / Med: + / Long: ? / Prob: H / Dir/Ind: D / Rev?: Y By promoting the proximity principle for non-nuclear radioactive waste, the policy directly supports one of the objectives of sustainable waste management.

Policy DM 1 Sustainable Design

	Sustainability Objective	Comments
1	Biodiversity	Short: + / Med: + / Long: + / Prob: H / Dir/Ind: D / Rev?: N The policy requires developments to maximise biodiversity net gain through green and blue infrastructure, leading to positive impacts for biodiversity. Biodiversity impacts are addressed in other development management policies, most notably policy DM 2.
2	Climate change	Short: ++/- / Med: ++/- / Long: ++/? / Prob: H/M / Dir/Ind: D / Rev?: N

<table>
<tr><td></td><td></td><td>The policy will help to minimise the contribution of waste and minerals development to climate change by minimising greenhouse gas emissions and energy and water consumption. By requiring the minimisation of waste and maximising recycling of materials and use of low carbon energy sources, this will also help to minimise greenhouse gas emissions. It also requires developments to build in climate change adaptation measures where these are appropriate. Achieving a BREEAM very good standard or equivalent will also promote minimisation of greenhouse gas emissions. Despite all of these requirements, emissions of greenhouse gases may nevertheless rise with increasing requirements for waste management and minerals production.</td></tr>
<tr><td>3</td><td>Community and well-being</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>++</td><td>++</td><td>?</td><td>H</td><td>D</td><td>Y</td></tr></table>By requiring developments to maximise the contribution to green and blue infrastructure, the policy could help to promote opportunities for recreation and exercise and so support human health and wellbeing, although it requires this for biodiversity net gain only. Item 7 in the policy should include benefits for communities and wellbeing. Minimising the emission of pollutants will help to avoid adverse effects on air quality and health.</td></tr>
<tr><td>4</td><td>Sustainable economic growth</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>+/-</td><td>+/-</td><td>?</td><td>H</td><td>D</td><td>Y</td></tr></table>Minimising emissions and energy and water consumption in development will support more efficient businesses to support sustainable economic growth. The policy will help to ensure the supply of minerals and waste development to support economic/industrial activity. However, the exploitation of non-renewable resources is not sustainable.</td></tr>
<tr><td>5</td><td>Flood risk</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>+</td><td>+</td><td>+</td><td>M</td><td>I</td><td>N</td></tr></table>By promoting climate change adaptation measures, including sustainable drainage systems, the policy will help to minimise the impact of development on flood risk and is likely to help to alleviate flood risk in the local area. However, the impact on flood risk is more strongly dependent on other policies in the KMWLP, including DM 10 Water Environment.</td></tr>
<tr><td>6</td><td>Land</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td>D</td><td>N</td></tr></table>The policy requires developments to minimise the loss of the best and most versatile agricultural land and achieve an efficient use of land, therefore adverse impacts on land are unlikely.</td></tr>
</table>

7	Landscape and the historic environment	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | | | No effect on landscape and the historic environment from the policy
8	Transport	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | | | No effect on transport from the policy
9	Water	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | ? | H | I | N By requiring minimisation of water consumption and emission of pollutants, the policy will help to safeguard the quantity and quality of water and promote sustainable water resource management. Adverse effects are therefore unlikely.
10	Waste	Short | Med | Long | Prob | Dir/Ind | Rev? ++ | ++ | ++ | H | D | N The policy promotes sustainable waste management and mineral facilities by requiring design according to a range of best practice standards on environment. Adverse effects are therefore unlikely. The policy is not relevant to the waste hierarchy or the location of facilities near to the source of arisings.

Policy DM 2 Environmental and Landscape Sites of International, National and Local Importance

	Sustainability Objective	Comments
1	Biodiversity	Short | Med | Long | Prob | Dir/Ind | Rev? ++/- | ++/- | ? | H | D | Y/N The policy will help maintain and conserve the existing biodiversity within the designations, by refusing proposals for waste and minerals development that would have unacceptable adverse impacts on designated sites of international, national and local importance and other sites with nature conservation value. The supporting text emphasises the need for biodiversity net gain. However, the policy allows for development to proceed if adverse effects can be outweighed by other benefits or other considerations.
2	Climate change	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | ++ | H | D | N The policy helps mitigate the effects of climate change by restricting development on important habitats. By protecting wild spaces, the growth of vegetation will allow carbon sequestration and help to mitigate other effects of climate change such as water absorption and cooling. As vegetation increases the benefits will increase over time.
3		Short | Med | Long | Prob | Dir/Ind | Rev?

	Community and well-being	++ ++ ++ H D Y By restricting developments in designated green areas, the policy will benefit communities and the wider population. Access to green spaces is vital for mental and physical health and provides opportunity for recreation, exercise and personal development.
4	Sustainable economic growth	Short Med Long Prob Dir/Ind Rev? + ++ ? M I Y The policy helps to conserve green spaces and designations which will attract visitors and tourists, boosting local economies and housing markets. The benefits are likely to increase over time.
5	Flood risk	Short Med Long Prob Dir/Ind Rev? + + + M I Y Restricting development which could adversely affect green spaces will help to alleviate flood risk in the local area by allowing vegetation to grow and absorb surface run off and groundwater. However, the impact on flood risk is more strongly dependent on other policies in the KMWLP and on the location of any development.
6	Land	Short Med Long Prob Dir/Ind Rev? 0 0 0 The policy does not address Green Belt, agricultural land or greenfield land more generally.
7	Landscape and the historic environment	Short Med Long Prob Dir/Ind Rev? ++/- ++/- ? H D Y/N The policy broadly prohibits development which would have an adverse effect on an AONB or its setting. However, development which would have adverse impacts would be permitted if it can be demonstrated to be in the public interest, therefore adverse effects are possible. However the policy does not include effects in other undesignated areas, or how a development would integrate within existing landscapes, although policy DM 11 Health and Amenity requires developments not to have unacceptable adverse impacts from light and visual intrusion on communities and the environment. Recommendations to address this are made under policy DM 19 Restoration, Aftercare and After-use. Not relevant to historic assets.
8	Transport	Short Med Long Prob Dir/Ind Rev? 0 0 0 No effect on transport from the policy.
9	Water	Short Med Long Prob Dir/Ind Rev? +/- +/- +/- H I Y/N By restricting development affecting designated nature conservation areas and other areas of biodiversity value, the policy is likely to preserve natural water ecosystem services within these areas. However, development with adverse effects would be permitted if these can be outweighed by other benefits or other considerations, therefore adverse effects are still possible.
10	Waste	Short Med Long Prob Dir/Ind Rev? 0 0 0 No effect on waste from the policy

Policy DM 3 Ecological Impact Assessment

	Sustainability Objective	Comments
1	Biodiversity	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy requires that developments cause no unacceptable adverse impacts on important biodiversity assets including internationally, nationally, and locally designated sites, protected species and habitats and those of principal importance for conservation. The policy also requires positive contribution to the protection, enhancement, management and creation of biodiversity along with an ecological assessment of the site. Any adverse impacts must be mitigated and/or compensated for and it must be demonstrated that at least a 10% biodiversity net gain will be achieved and maximum gain unless outweighed by other considerations. Therefore, overall adverse impacts on biodiversity are unlikely and a net gain should be secured.
2	Climate change	Short: 0 | Med: 0 | Long: ? | Prob: H | Dir/Ind: | Rev?: Unlikely to have a significant effect on greenhouse gas emissions, although protecting habitats will help to absorb carbon dioxide and help to mitigate some of the impacts of climate change.
3	Community and well-being	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: I | Rev?: Y By ensuring the protection of areas of importance for biodiversity and geodiversity, the policy will have a positive impact on local communities, by ensuring the protection of the local environment and access to open spaces.
4	Sustainable economic growth	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y The policy requires ecological assessments to be undertaken and demonstration of a 10% biodiversity net gain for developments, which will contribute to the local economy through visitors and tourism and benefit economically through the provision of ecosystem services.
5	Flood risk	Short: + | Med: + | Long: + | Prob: L | Dir/Ind: I | Rev?: Y By protecting areas designated for biodiversity and geodiversity, the policy will preserve open spaces which have absorptive capacity and so will help to alleviate flood risk. However, the significance of the impacts depends on the location of development which is not known.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy does not address Green Belt, agricultural land or greenfield land more generally.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: The policy does not address landscape or the historic environment.
8	Transport	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effects on transport.

9	Water	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | ? | M | I | Y The policy aims to protect designated sites, species and habitats; therefore the policy will help to protect water quality where this is an important feature of the biodiversity interest. However, the protection of water relies strongly on other policies in the KWMLP.
10	Waste	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | H | D | N No effect on waste from the policy.

Policy DM 4 Green Belt

	Sustainability Objective	Comments
1	Biodiversity	Short | Med | Long | Prob | Dir/Ind | Rev? +/- | +/- | +/? | M | D | N By complying with national policy on Green Belt, the policy will help to preserve and enhance biodiversity on Green Belt land by preventing inappropriate development, although development may proceed under very special circumstances and therefore biodiversity value may be lost.
2	Climate change	Short | Med | Long | Prob | Dir/Ind | Rev? +/- | +/- | +/? | M | D | N The policy will help to preserve green areas and open spaces which will allow for carbon capture and potentially alleviate flood risk depending on location. However, development is possible under very special circumstances which could lose the carbon capture function and add to flood risk.
3	Community and well-being	Short | Med | Long | Prob | Dir/Ind | Rev? +/- | +/- | +/? | M | D | N The policy will be benefit communities by ensuring access to green spaces which will increase mental and physical health. Adverse effects are also possible if very special circumstances exist which permit development, resulting in lost access.
4	Sustainable economic growth	Short | Med | Long | Prob | Dir/Ind | Rev? +/- | +/- | +/? | L | I | Y The policy may help to promote sustainable economic growth by retaining open spaces and attracting visitors to the protected Green Belt areas and access to the outdoors. This may also influence the local economy and local housing market from prospective home owners. Loss of Green Belt if very special circumstances exist could contribute to the opposite effect if significant loss occurs in combination with other developments.
5	Flood risk	Short | Med | Long | Prob | Dir/Ind | Rev? +/- | +/- | +/? | M | D | N By retaining open spaces within the Green Belt, the policy will help to allow natural water drainage and could attenuate run-off rates, helping to reduce flood risk. Loss of Green Belt if very special circumstances exist may exacerbate flood risk through the loss of absorptive land.
6	Land	Short | Med | Long | Prob | Dir/Ind | Rev?

		++/- ++/- ++/? M D/I N The policy requires the maintenance of open Green Belt land and seeks to prevent inappropriate development in the Green Belt, which may also indirectly help to encourage development on previously developed land. However, the policy allows for development in very special circumstances which would lose Green Belt land to development and lose openness.
7	Landscape and the historic environment	Short Med Long Prob Dir/Ind Rev? +/- +/- +/? M D N The policy requires the preservation of the openness of the Green Belt and therefore may help to retain some landscapes, although this is dependent on the particular location. Adverse effects on landscape are possible in very special circumstances. Impacts on the historic environment depend on the sensitivities of particular sites which is unknown.
8	Transport	Short Med Long Prob Dir/Ind Rev? 0 0 0 No effect on transport from the policy.
9	Water	Short Med Long Prob Dir/Ind Rev? 0/- 0/- 0/- H I N No effect on water from the policy.
10	Waste	Short Med Long Prob Dir/Ind Rev? 0 0 0 H D Y No effect on waste from the policy.

Policy DM 5 Heritage Assets

	Sustainability Objective	Comments
1	Biodiversity	Short Med Long Prob Dir/Ind Rev? + + ? M I Y The policy requires developments to conserve and enhance the local heritage assets of the site, including historical parks and gardens. The biodiversity of these sites is therefore likely to be protected., although this is more strongly dependent on other policies within KMWLP.
2	Climate change	Short Med Long Prob Dir/Ind Rev? + + ? M I Y By protecting historic parks and gardens, the policy helps to mitigate the effects of climate change by allowing for carbon capture and storage by the flora within the designated areas.
3	Community and well-being	Short Med Long Prob Dir/Ind Rev? ++ ++ ? H D N The policy will benefit the community by conserving the local cultural heritage of the area, giving opportunities for education and recreation. The preservation of historical sites also boosts community mood with aesthetic and cultural values. The preservation of these sites is vital to the community to ensure they provide the same benefits for generations to come.

4	Sustainable economic growth	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | ? | H | I | Y The protection of heritage sites will encourage visitors and tourists to the local area and be attractive to potential residents, boosting local economies and housing markets.
5	Flood risk	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | + | L | I | Y By protecting historic parks and gardens, the policy will preserve open spaces which have absorptive capacity and so will help to alleviate flood risk. However, the significance of the impacts depends on the location of development which is not known.
6	Land	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | H | D | Y Adverse impacts agricultural land and Green Belt land are unlikely.
7	Landscape and the historic environment	Short | Med | Long | Prob | Dir/Ind | Rev? ++ | ++ | ++ | H | D | Y The policy aims to preserve and enhance the historic environment, therefore adverse impacts on assets are unlikely and benefits possible. The policy also protects landscapes in terms of historic parks and gardens, conservation areas and heritage coastlines.
8	Transport	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | | | No effect on transport from the policy
9	Water	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | | | No effect on water from the policy
10	Waste	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | | | No effect on waste from the policy

Policy DM 6 Historic Environment Assessment

	Sustainability Objective	Comments
1	Biodiversity	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | | | Unlikely to have significant impacts on biodiversity.
2	Climate change	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | 0 | | | Unlikely to have significant impact on climate change
3	Community and well-being	Short | Med | Long | Prob | Dir/Ind | Rev? ++ | ++ | ? | H | D | N

		The policy will benefit local and wider communities by assessing, preserving and recording assets, including interpreting the assets and providing access to information, improving awareness, knowledge, understanding and appreciation.
4	Sustainable economic growth	Short: + / Med: + / Long: ? / Prob: L / Dir/Ind: I / Rev?: Y The assessment of assets, preservation and recording information may help to encourage visitors and tourists to the local area depending on the significance of the assets, so boosting local economies.
5	Flood risk	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: No effect on flood risk for the policy
6	Land	Short: 0 / Med: 0 / Long: 0 / Prob: H / Dir/Ind: D / Rev?: Y Adverse impacts on land are unlikely.
7	Landscape and the historic environment	Short: + / Med: + / Long: ? / Prob: H / Dir/Ind: D / Rev?: Y The policy permits development which would affect heritage assets, although it requires developments to mitigate their impacts on the fabric, setting and amenity value of assets, therefore significant adverse impacts on assets are unlikely. It requires archaeological assets to be preserved or excavated, recorded, interpreted and made accessible therefore benefits in relation to archaeological assets are likely to be delivered.
8	Transport	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: No effect on transport from the policy
9	Water	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: No effect on water from the policy
10	Waste	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: No effect on waste from the policy

Policy DM 7 Safeguarding Mineral Resources

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: No effect on biodiversity from the policy

2	Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		No effect on climate change from the policy						
3	Community and well-being	Short	Med	Long	Prob	Dir/Ind	Rev?	
		++	++	?	H	D	Y	
		The policy aims to ensure that mineral resources will not be needlessly sterilised. This will help to ensure the supply of minerals to support housing construction to sustain communities.						
4	Sustainable economic growth	Short	Med	Long	Prob	Dir/Ind	Rev?	
		++/-	++/-	?	H	D	Y	
		The policy aims to ensure that mineral resources will not be needlessly sterilised. This will help to ensure the supply of minerals to support economic/industrial activity. However, the exploitation of non-renewable resources is not sustainable.						
5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		No effect on flood risk from the policy						
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		No effect on land use from the policy						
7	Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		No effect on landscape and the historic environment from the policy						
8	Transport	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		No effect on transport from the policy						
9	Water	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		No effect on water quality and sustainable water resource management from the policy						
10	Waste	Short	Med	Long	Prob	Dir/Ind	Rev?	

		0	0	0			
		No effect on waste management from the policy					

Policy DM 8 Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities

	Sustainability Objective	Comments					
1	Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?
		0	0	0			
		No effect on biodiversity from the policy					
2	Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?
		0	0	0			
		No effect on climate change from the policy					
3	Community and well-being	Short	Med	Long	Prob	Dir/Ind	Rev?
		++	++	?	H	D	Y
		The policy aims to ensure that mineral supply infrastructure will not be needlessly lost. This will help to ensure the economic supply of minerals to support housing construction to sustain communities and that waste management infrastructure is in place to support housing growth. It also requires that impacts from the safeguarded facilities would not be unacceptable to occupants of any development proposed within 250m of a safeguarded facility.					
4	Sustainable economic growth	Short	Med	Long	Prob	Dir/Ind	Rev?
		++/-	++/-	?	H	D	Y
		The policy aims to ensure that mineral and waste infrastructure will not be needlessly lost. This will help to ensure the economic supply of minerals and waste management infrastructure to support economic/industrial activity. However, the exploitation of non-renewable resources is not sustainable.					
5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?
		0	0	0			
		No effect on flood risk from the policy					
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?
		0	0	0			

		No effect on land use from the policy
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on landscape and the historic environment from the policy
8	Transport	Short: ++ | Med: ++ | Long: ++ | Prob: M | Dir/Ind: D | Rev?: Y By ensuring that waste and minerals transport infrastructure is not needlessly lost, the change to policy will help to ensure waste and minerals can travel economically and will help to promote the use of sustainable modes of transport.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on water quality and sustainable water resource management from the policy
10	Waste	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy requires replacement capacity for any waste facilities which would be lost which is at least at an equivalent level of the waste hierarchy or higher, thus promoting sustainable waste management.

Policy DM 9 Prior Extraction of Minerals in Advance of Surface Development

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: ? | Prob: M | Dir/Ind: | Rev?: The policy requires no adverse effect on the environment therefore adverse impacts on biodiversity are unlikely, although this is more strongly dependent on other policies within the KMWLP.
2	Climate change	Short: 0 | Med: 0 | Long: ? | Prob: M | Dir/Ind: | Rev?: The policy requires no adverse effect on the environment therefore adverse impacts on climate change are unlikely, although this is more strongly dependent on other policies within the KMWLP.

3	Community and well-being	Short: 0 | Med: 0 | Long: ? | Prob: M | Dir/Ind: | Rev?: The policy requires no adverse effect on the communities therefore adverse impacts are unlikely, although this is more strongly dependent on other policies within the KMWLP
4	Sustainable economic growth	Short: ++/- | Med: ++/- | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy aims to ensure that mineral resources can be extracted and not lost to other development. This will help to ensure the economic supply of minerals and waste management infrastructure to support economic/industrial activity. However, the exploitation of non-renewable resources is not sustainable.
5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy requires no adverse effect on the environment therefore adverse impacts on flood risk are unlikely, although this is more strongly dependent on other policies within the KMWLP
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: H | Dir/Ind: | Rev?: Although land is likely to be lost to mineral extraction, it is also likely to be lost to subsequent development regardless of whether the extraction takes place, therefore the policy will not result in any greater effects on land quality than would be likely to occur anyway.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: M | Dir/Ind: | Rev?: The policy requires no adverse effect on the environment therefore adverse impacts on landscape and historic assets are unlikely, although this is more strongly dependent on other policies within the KMWLP
8	Transport	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on transport objectives
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on water quality and sustainable water resource management from the policy

10	Waste	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
		No effect on sustainable waste management objectives.						

Policy DM 10 Water Environment

	Sustainability Objective	Comments
1	Biodiversity	Short: ++ | Med: ++ | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y The policy requires that developments cause no deterioration and improve the ecological status and water quality of all water bodies which are hydrologically or hydrogeologically connected to the site and that adverse effects are mitigated to an acceptable level. The policy will therefore help to preserve or improve current water quality and the biodiversity that relies on this.
2	Climate change	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: I | Rev?: Y The policy requires no deterioration to the physical state, water quality and ecological status of water bodies, as well as not exacerbating flood risk within the area. This will help to avoid exacerbating the impact of climate change, helping to ensure ecological services are functioning effectively.
3	Community and well-being	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: I | Rev?: Y By ensuring the maintenance of water quality within the area, the policy will help to preserve community and well-being by maintaining the quality of accessible surface water. Along with this, the policy will help avoid increasing flood risk which will help to protect mental health and well-being.
4	Sustainable economic growth	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: I | Rev?: Y By ensuring the quality of water bodies within and connected to developments, the policy is helping to maintain economic benefits in terms of avoided flood risk and reduced water treatment requirements.
5	Flood risk	Short: ++ | Med: ++ | Long: ++ | Prob: M | Dir/Ind: D | Rev?: N The policy requires no increase in flood risk in areas prone to flooding, therefore adverse impacts on flood risk are unlikely. The policy should promote flood risk reduction where possible.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Adverse effects on land are unlikely.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on landscape or the historic environment from the policy.
8	Transport	Short | Med | Long | Prob | Dir/Ind | Rev?

		0 | 0 | 0 | | | No effect on transport from the policy. However, by avoiding increasing flood risk the policy will help protect transport infrastructure from flooding.
9	Water	Short | Med | Long | Prob | Dir/Ind | Rev? ++ | ++ | ++ | H | D | Y The policy prevents the deterioration of the physical state, quality and ecological status of water bodies and requires improvement in their ecological status. Positive impacts on the water environment are therefore likely.
10	Waste	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | + | M | I | Y The policy prohibits the deterioration of water quality; therefore waste is likely to be managed without adverse impacts on the water environment.

Policy DM 11 Health and Amenity

	Sustainability Objective	Comments
1	Biodiversity	Short | Med | Long | Prob | Dir/Ind | Rev? ++ | ++ | ? | H | D | Y The policy requires no adverse impacts from noise, light, dust, vibration, odour and emissions which will help to avoid adverse impacts on biodiversity near to the site. Litter and vermin can also have adverse impacts on biodiversity; therefore these should be added to the list of unacceptable adverse impacts.
2	Climate change	Short | Med | Long | Prob | Dir/Ind | Rev? ? | ? | ? | L | I | N It is not clear whether emission of greenhouse gases is included in the scope of the policy, although these will have adverse impacts on health and amenity. The supporting text should make clear that these are included within the scope of the policy.
3	Community and well-being	Short | Med | Long | Prob | Dir/Ind | Rev? ++ | ++ | ? | H | D | Y The policy aims 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. The community will benefit from this policy.
4	Sustainable economic growth	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | ? | H | I | Y The policy will contribute to sustainable economic growth as it aims to reduce the adverse impacts of a development on the local environment, making the area more attractive to current and potential residents, which may positively influence the local housing market and economies.
5	Flood risk	Short | Med | Long | Prob | Dir/Ind | Rev? 0 | 0 | ? | M | D | N

		No effect on flood risk from the policy. However, flood risk has adverse effects on health and amenity, therefore consideration should be made of the adverse impacts which may occur from flood risk.
6	Land	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy requires development to have no unacceptable adverse impacts on surrounding land and associated permitted uses, therefore land quality is likely to be protected.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on landscape or historic environment from the policy.
8	Transport	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy requires developments to have no unacceptable adverse impacts, including from vehicles and traffic movements associated with the development. In particular, it requires mitigation of impacts on air quality.
9	Water	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: Y The policy requires development to have no unacceptable adverse impacts on the environment, including through emissions although it is not clear whether this includes emissions to water. The supporting text should clarify that emissions to water bodies can affect health and amenity and therefore should be considered. The policy should require no unacceptable adverse impacts on surrounding water bodies as well as surrounding land.
10	Waste	Short: + | Med: + | Long: + | Prob: H | Dir/Ind: D | Rev?: Y The policy aims 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. This supports the management of waste without impacts on human health and the environment.

Policy DM 12 Cumulative Impact

	Sustainability Objective	Comments
1	Biodiversity	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. The supporting text indicates that this includes biodiversity interests, including from vehicle movements and emissions and therefore biodiversity should be protected.
2	Climate change	Short: ++ | Med: ++ | Long: ++ | Prob: H | Dir/Ind: D | Rev?: N

		The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. The supporting text indicates that this includes climate change impacts, including from vehicle emissions and therefore increases in greenhouse gas emissions and associated climate change impacts should be minimised.
3	Community and well-being	Short: ++ / Med: ++ / Long: ? / Prob: H / Dir/Ind: D / Rev?: Y The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. The supporting text indicates that this includes amenity impacts and impacts from vehicle movement and associated emissions, therefore communities and wellbeing should be protected.
4	Sustainable economic growth	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: Unlikely to have a significant impact on sustainable economic growth.
5	Flood risk	Short: ++ / Med: ++ / Long: ? / Prob: M / Dir/Ind: D / Rev?: Y The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. This should include consideration of flood risk impacts although this is not explicitly stated in the supporting text. It is recommended that flood risk impacts are added to the supporting text.
6	Land	Short: ++ / Med: ++ / Long: ++ / Prob: M / Dir/Ind: D / Rev?: N The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. This should include consideration of impacts on land quality and Green Belt, although this is not explicitly stated in the supporting text. It is recommended that these are added to the supporting text.
7	Landscape and the historic environment	Short: ++ / Med: ++ / Long: ? / Prob: M / Dir/Ind: D / Rev?: N The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. This should include consideration of landscape and historic assets and the impact of light pollution, although this is not explicitly stated in the supporting text. It is recommended that these are added to the supporting text.

8	Transport	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. The supporting text indicates that this includes impacts from vehicle movement and associated emissions particularly if development is near to or within an AQMA, therefore sensitive areas should be protected from impacts.
9	Water	Short: ++ | Med: ++ | Long: ? | Prob: M | Dir/Ind: D | Rev?: N The policy permits development that does not have unacceptable adverse cumulative impacts on the environment or communities. This should include consideration of water quality and availability, although this is not explicitly stated in the supporting text. It is recommended that these are added to the supporting text.
10	Waste	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By ensuring no adverse impacts on the environment and communities from waste management including transport, the policy supports sustainable waste management objectives.

Policy DM 13 Transportation of Minerals and Waste

	Sustainability Objective	Comments
1	Biodiversity	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: Y The policy requires the traffic associated with development to have no adverse impact on the environment, which should include biodiversity, therefore biodiversity should be protected. The supporting text indicates that this will be particularly the case where development is 200m from a Habitat site. By promoting non-road modes of transport, the policy will help to reduce emissions and their effects on biodiversity, although in practice such opportunities are likely to be limited.
2	Climate change	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: N

		By promoting non-road modes of transport, the policy will help to minimise increases in greenhouse gas emissions from waste and minerals transport, although in practice such opportunities are likely to be limited, therefore increases in emissions are likely with increasing quantities of waste to be managed. The contribution from minerals transport is likely to remain similar to current levels.
3	Community and well-being	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y The policy requires developments to demonstrate that emissions from associated transport are minimised as far as practicable, that the traffic generated does not have adverse impacts on local communities and that additional measures will be implemented for developments within AQMAs. Therefore adverse impacts on communities are likely to be minimised, particularly from poor air quality. The policy should also require additional measures for sites outside AQMAs but that are likely to affect AQMAs.
4	Sustainable economic growth	Short: + | Med: + | Long: ? | Prob: L | Dir/Ind: D | Rev?: Y By promoting non-road modes of transport and ensuring no adverse impacts on the environment and communities, the policy supports sustainable transport of waste and minerals which will help to promote sustainable economic growth.
5	Flood risk	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By promoting non-road transport of waste and minerals, the policy will help to minimise the increased emissions of greenhouse gases and therefore help to avoid exacerbating flood risk. The impact is likely to be minor in view of limited opportunities for non-road transport in Kent.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on land use from the policy
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on landscape and the historic environment from the policy
8	Transport	Short: ++ | Med: ++ | Long: ++ | Prob: H | Dir/Ind: D | Rev?: Y

		The policy directly seeks to promote transport by the most sustainable modes possible, although in practice opportunities are likely to be limited. It also seeks to ensure that the network is able to accommodate the traffic that would be generated and to take particular measures within AQMAs, thereby avoid impacts on sensitive locations. The policy therefore promotes sustainable transport objectives.
9	Water	Short: 0 / Med: 0 / Long: 0 / Prob: / Dir/Ind: / Rev?: No effect on water quality and sustainable water resource management from the policy
10	Waste	Short: ++ / Med: ++ / Long: ? / Prob: H / Dir/Ind: D / Rev?: Y By ensuring no adverse impacts on the environment and communities from waste transport, the policy supports sustainable waste management objectives.

Policy DM 14 Public Rights of Way

	Sustainability Objective	Comments
1	Biodiversity	Short: 0/? / Med: 0/? / Long: 0/? / Prob: L / Dir/Ind: I / Rev?: Y No effect on biodiversity from the policy. However, creating a diversion may encroach into habitats or areas with high or recovering biodiversity, although this is dependent on local circumstances. The policy should ensure measures are taken to prevent the loss of biodiversity from creating a PROW diversion.
2	Climate change	Short: + / Med: + / Long: + / Prob: M / Dir/Ind: D / Rev?: N The policy aims to improve access to the countryside on foot which will help to reduce the climate impact by encouraging walking or cycling as opposed to travelling by car.
3	Community and well-being	Short: + / Med: ++ / Long: ++ / Prob: H / Dir/Ind: D / Rev?: N The policy ensures the public have access (improved where possible) to the countryside and any new paths which are built must be safe and ensure the same standard of surface level as the original PROW. This will improve pedestrian connectivity and community well-being by providing easier access to the outdoor activity, boosting mental and physical health.
4	Sustainable economic growth	Short: + / Med: + / Long: + / Prob: M / Dir/Ind: I / Rev?: N By ensuring people have easier access to the countryside, the policy will encourage sustainable economic growth by attracting visitors and tourists which will boost the local economy.

5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to affect flood risk
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to have a significant impact on land quality. No effect on Green Belt.
7	Landscape and the historic environment	Short: 0/+ | Med: 0/+ | Long: 0/+ | Prob: L | Dir/Ind: I | Rev?: N Unlikely to have significant direct effect on landscape, although the policy may indirectly encourage more visitors to the countryside, which may enhance people's appreciation and inspire the protection and restoration of the natural landscape in Kent. No effect on historic environment or light pollution.
8	Transport	Short: 0/+ | Med: 0/+ | Long: 0/+ | Prob: M | Dir/Ind: I | Rev?: Y No effect on minerals and waste transport, although the policy improves pedestrian access to the outdoors which may help to reduce the use of private vehicles, which is beneficial to both road traffic and the environment.
9	Water	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on water from the policy
10	Waste	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No impact on waste from the policy.

Policy DM 15 Safeguarding of Transport Infrastructure

	Sustainability Objective	Comments
1	Biodiversity	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By safeguarding rail and water transport infrastructure, the policy will help to preserve modes of transport more sustainable than road-based transport. This will help to avoid increases in greenhouse gas emissions which will benefit biodiversity by avoiding the worst impacts of climate change.
2	Climate change	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By safeguarding rail and water transport infrastructure, the policy will help to preserve modes of transport more sustainable than road-based transport. This will help to avoid increases in greenhouse gas emissions and avoid the worst impacts of climate change.
3	Community and well-being	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: I | Rev?: Y By safeguarding rail and water transport infrastructure, the policy will help to preserve modes of transport more sustainable than road-based transport.

		This will help to avoid increases in greenhouse gas emissions which will benefit communities by avoiding the worst impacts of climate change.
4	Sustainable economic growth	Short: + | Med: + | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By safeguarding transport infrastructure, the policy will help to ensure the economy is not adversely affected by deterioration in the quality and availability of infrastructure to support growth.
5	Flood risk	Short: + | Med: + | Long: + | Prob: L | Dir/Ind: I | Rev?: Y By safeguarding rail and water transport infrastructure, the policy will help to preserve modes of transport more sustainable than road-based transport. This will help to avoid increases in greenhouse gas emissions and so avoid increasing flood risk.
6	Land	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No impacts on land quality.
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on landscape or historic environment from the policy.
8	Transport	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y By safeguarding transport infrastructure, the policy will help to ensure that minerals and waste development do not have impacts on infrastructure, including in sensitive areas and areas reliant on good networks.
9	Water	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: Y By safeguarding river and sea transport infrastructure, the policy may help to protect water quality, although this is not certain and more strongly dependent on other policies within the KMWLP.
10	Waste	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No impact on waste from the policy.

Policy DM 16 Information Required in Support of an Application

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No biodiversity impacts predicted.

2	Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No climate change impacts predicted						
3	Community and well-being	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on communities or well-being predicted.						
4	Sustainable economic growth	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on sustainable economic growth predicted.						
5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on flood risk predicted						
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on land quality predicted						
7	Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on landscape or the historic environment predicted.						
8	Transport	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on transport objectives predicted.						
9	Water	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on water quality and sustainable water resource management predicted.						
10	Waste	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on sustainable waste management objectives predicted.						

Policy DM 17 Planning Obligations

	Sustainability Objective	Comments
1	Biodiversity	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y Planning obligations include the protection and enhancement of important sites, the protection of notable and protected species and delivery of biodiversity targets. The policy will therefore promote the protection and enhancement of biodiversity. The policy should include the enhancement of notable and protected species and require a net biodiversity gain to be delivered.
2	Climate change	Short: + | Med: + | Long: ? | Prob: L | Dir/Ind: D | Rev?: N Measures for environmental or community gain may include those designed to provide climate change adaptation benefits, although this is not explicit in the policy.
3	Community and well-being	Short: ++ | Med: ++ | Long: ? | Prob: H | Dir/Ind: D | Rev?: N Planning obligations include landscape enhancement, improvements to the public rights of way network, beneficial after-use and recreational and community gain to mitigate effects. The policy also envisages highways and access improvements and traffic management measures, which will help to protect communities from adverse impacts from traffic and congestion. The policy will therefore protect local communities from potential adverse effects and provide additional benefits from enhancements.
4	Sustainable economic growth	Short: ++/- | Med: ++/- | Long: ? | Prob: H | Dir/Ind: D | Rev?: Y/N For large waste developments, the policy allows for conditions on the use of local workforce and provision of apprenticeships and training, which will provide local employment opportunities and appropriate training, boosting local economies. It also envisages economic gain to mitigate or compensate for effects of development. Other measures include highways and access improvements and extraction in advance of development, which will support economic growth albeit not necessarily sustainable growth.
5	Flood risk	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: | Rev?: N The policy does not address potential impacts on flood risk therefore adverse impacts are possible but dependent on conditions at particular sites. The policy should seek measures for improvement of flood risk where practicable.
6	Land	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: N Planning obligations include the establishment or maintenance of beneficial after-use, therefore the policy is likely to protect land quality in the long term, although this is dependent on the afteruse provided for and therefore the significance of effects is uncertain.
7	Landscape and the historic environment	Short: ++/0 | Med: ++/0 | Long: ? | Prob: M | Dir/Ind: D | Rev?: N Planning obligations include landscape enhancement and archaeological investigation, analysis, reporting, publication and archive deposition. The policy

		will therefore help to secure enhancements to landscape and archaeological assets. The policy should also include a reference to protection and enhancement of other heritage assets and avoidance of light pollution.
8	Transport	Short / Med / Long / Prob / Dir/Ind / Rev? ++/0 / ++/0 / ? / M / D / N Planning obligations include highways and access improvements and traffic management measures and therefore will help to avoid adverse impacts on sensitive parts of the road network. The policy should also include reference to use of non-road modes of transport where practicable.
9	Water	Short / Med / Long / Prob / Dir/Ind / Rev? ? / ? / ? / L / / Impacts on water quality and availability are uncertain. Planning obligations include provision of alternative water supply should existing supplies be affected, but other water quality and availability measures are not included. The policy should include obligations regarding the protection and improvement of water quality and levels.
10	Waste	Short / Med / Long / Prob / Dir/Ind / Rev? ++ / ++ / ? / H / D / Y By including planning obligations to protect and enhance the environment and communities, the policy supports sustainable waste management objectives.

Policy DM 18 Land Stability

	Sustainability Objective	Comments
1	Biodiversity	Short / Med / Long / Prob / Dir/Ind / Rev? ? / ? / ? / M / D / Y The potential effect on biodiversity is unclear. The supporting text indicates that where instability is possible, a stability report should accompany an application which considers possible effects on conservation interest and any remedial measures, which must be environmentally acceptable, although the significance of any impacts is uncertain.
2	Climate change	Short / Med / Long / Prob / Dir/Ind / Rev? 0 / 0 / 0 / / / No effect on climate change
3	Community and well-being	Short / Med / Long / Prob / Dir/Ind / Rev? + / + / ? / H / D / N By preventing land instability, the policy will protect local communities from potential adverse effects, public stress and improve mental health and well-being.
4	Sustainable economic growth	Short / Med / Long / Prob / Dir/Ind / Rev? ? / ? / ? / L / I / N The cost of mitigation of unstable land may be significant in the short term, but this will offset costs of future remediation which may be greater. The significance is uncertain and dependent on conditions at a particular site.
5	Flood risk	Short / Med / Long / Prob / Dir/Ind / Rev?

		? ? ? L I Y Impacts on flood risk are uncertain. Measures to stabilise land may affect groundwater movement and therefore may change flood risk on site or elsewhere, either positively or negatively, although the significance of effects is dependent on local conditions. The policy or supporting text should ensure flood risk is accounted for when addressing land instability from groundwater movement and dewatering.
6	Land	Short Med Long Prob Dir/Ind Rev? 0 0 0 H D Y The supporting text indicates that developments may need to have a stability report and ensure environmentally acceptable mitigation measures are identified. It addresses the physical capability of the land, impacts on adjacent land as well as amenity and conservation interests. Adverse impacts on land are therefore unlikely.
7	Landscape and the historic environment	Short Med Long Prob Dir/Ind Rev? 0 0 0 M D Y By preventing land instability, the policy will prevent potential adverse impacts on landscape and the historic environment although the likelihood and significance of these are dependent on local conditions and sensitivities. Measures to ensure stability may have adverse impacts on landscape and/or historic assets, although the supporting text indicates that any mitigation measures must be environmentally acceptable, therefore adverse impacts on landscape and historic environment are unlikely.
8	Transport	Short Med Long Prob Dir/Ind Rev? 0 0 0 L I Y No direct effect on transport from the policy. By ensuring land stability the policy will help to protect transport infrastructure, however the significance of impacts is uncertain and dependent on local conditions.
9	Water	Short Med Long Prob Dir/Ind Rev? ? ? ? L I N Impacts on water quality and availability are uncertain. Measures to stabilise land may affect groundwater movement and therefore may affect water levels and quality on site or elsewhere, either positively or negatively, although the significance of effects is dependent on local conditions. The policy or supporting text should ensure water quality is accounted for when addressing land instability from groundwater movement and dewatering.
10	Waste	Short Med Long Prob Dir/Ind Rev? 0 0 0 No impact on sustainable waste management.

Policy DM 19 Restoration, Aftercare and After-use

	Sustainability Objective	Comments
1	Biodiversity	Short Med Long Prob Dir/Ind Rev? + ++ ++ H D Y The policy is likely to have positive impacts for the restoration of biodiversity, requiring maximum net gain unless outweighed by other considerations and requiring the meeting or exceeding of biodiversity targets. It incorporates

		many different aspects of establishing and improving biodiversity including native woodland, shrubs and hedges, as well as proposing targets for biodiversity gain in relation to Kent Biodiversity Opportunity Areas and Greater Thames Marshes Nature Improvement areas. Biodiversity benefits can also be secured through creation of water bodies, which is noted in the supporting text. The supporting text indicates that geological features may be retained, adding to knowledge and understanding of local geology.
2	Climate change	Short | Med | Long | Prob | Dir/Ind | Rev? + | ++ | ++ | H | D | N The policy will be highly beneficial for climate change by restoring the biodiversity, soil quality, habitat management etc. which will increase carbon capture and sequestration, improving local air quality and helping to reduce greenhouse gases and their effects.
3	Community and well-being	Short | Med | Long | Prob | Dir/Ind | Rev? + | ++ | ++ | H | D | Y The policy will be beneficial for the community, providing for afteruses that benefit Kent's communities socially, economically or environmentally. Well-planned restoration will increase mental and physical health by allowing increased access to outdoor recreation and improving the quality of local countryside. Adverse effects are unlikely.
4	Sustainable economic growth	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | + | H | I | Y The policy is likely to have a positive effect on promoting sustainable economic growth: restoring the site will attract visitors to the countryside and promote local businesses and economies as well as potentially making the area more attractive for prospective homeowners, which could boost local housing markets.
5	Flood risk	Short | Med | Long | Prob | Dir/Ind | Rev? + | + | + | M | D | Y The policy requires restoration measures to incorporate flood risk mitigation opportunities, as well as the installation of drainage, therefore it is likely to avoid increases in flood risk. The policy would be more beneficial with the addition of measures to reduce flood risk where practicable.
6	Land	Short | Med | Long | Prob | Dir/Ind | Rev? + | ++ | ++ | H | D | N The policy requires high standards of restoration and aftercare of sites, usually to a level at least equivalent to that which it was before development. This may be restored to agricultural use; therefore 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.
7	Landscape and the historic environment	Short | Med | Long | Prob | Dir/Ind | Rev? + | ++ | ++ | H | D | N The policy requires landscape opportunities and heritage and landscape features to be addressed in restoration plans. A site-based landscape strategy is required and therefore the policy is likely to support protection of landscape and historic assets. The supporting text indicates that industrial archaeological and landscape features may be retained, adding to the historic value of the site and protecting landscape features. Information could be added to the supporting text referring to priorities for landscape enhancements identified in

		the Landscape Characterisation Assessments and for green space in the Kent Growth and Infrastructure Strategy.
8	Transport	Short: + | Med: + | Long: + | Prob: M | Dir/Ind: D | Rev?: Y The supporting text indicates that soil importation will be permitted only if necessary. In most cases soil will be required to be reused on site. This will help to reduce the need for additional transport of soils.
9	Water	Short: + | Med: + | Long: + | Prob: H | Dir/Ind: D | Rev?: Y The policy proposes a programme of aftercare which includes field drainage, irrigation, and watering facilities. The supporting text indicates that plans for biodiversity can include restoration to a water body for biodiversity or recreational benefit.
10	Waste	Short: + | Med: + | Long: + | Prob: H | Dir/Ind: D | Rev?: N The policy supports the landfill of waste for restoration purposes. While this is does not support the movement of waste up the waste hierarchy, the hierarchy may be departed from if wider environmental benefits can be secured and therefore is in accordance with its principles in such a case.

Policy DM 20 Ancillary Development

	Sustainability Objective	Comments
1	Biodiversity	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: ? | Rev?: ? The policy envisages that there may be environmental impacts and therefore biodiversity impacts are possible if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.
2	Climate change	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: I | Rev?: N The policy envisages that there may be environmental impacts and therefore climate change impacts are possible if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.
3	Community and well-being	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: ? | Rev?: ? The policy envisages that there may be impacts on communities if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.

4	Sustainable economic growth	Short: + | Med: + | Long: ? | Prob: M | Dir/Ind: D | Rev?: N By allowing ancillary development that would allow the main development to proceed, the policy supports the minerals and waste industries which in turn support economic growth, although the sustainability of operations is unknown.
5	Flood risk	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: ? | Rev?: ? The policy envisages that there may be environmental impacts and therefore impacts on flood risk are possible if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.
6	Land	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: ? | Rev?: ? The policy envisages that there may be environmental impacts and therefore impacts on land quality are possible if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.
7	Landscape and the historic environment	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: ? | Rev?: ? The policy envisages that there may be environmental impacts and therefore impacts on landscape and the historic environment are possible if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.
8	Transport	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: ? | Rev?: ? The policy envisages that there may be environmental and community impacts and therefore effects from waste and minerals transport on the environment and communities are possible if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.
9	Water	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: ? | Rev?: ? The policy envisages that there may be environmental impacts and therefore impacts on water quality and availability are possible if these are outweighed by other benefits. The likelihood and significance of these impacts are unknown.
10	Waste	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: ?

		The policy envisages that there may be environmental and community impacts if these are outweighed by other benefits, which would be contrary to sustainable waste management objectives. The likelihood and significance of these impacts are unknown.

Policy DM 21 Incidental Mineral Extraction

	Sustainability Objective	Comments
1	Biodiversity	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: Y The policy permits incidental mineral extraction provided only that it is for a temporary period. Adverse impacts on biodiversity are possible, although the significance depends on conditions at particular sites and therefore is unknown at this stage. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment.
2	Climate change	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: N The policy permits incidental mineral extraction provided only that it is for a temporary period, therefore adverse impacts on greenhouse gas emissions are possible. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment.
3	Community and well-being	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: Y The policy permits incidental mineral extraction provided only that it is for a temporary period. Adverse impacts on communities are possible, although the significance depends on conditions at particular sites and therefore is unknown at this stage. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on communities.
4	Sustainable economic growth	Short: ++/- | Med: ++/- | Long: ? | Prob: H | Dir/Ind: D | Rev?: N By facilitating incidental mineral extraction, the policy will support extraction of materials to support economic growth. However, extraction of primary mineral resources is not sustainable.
5	Flood risk	Short: ? | Med: ? | Long: ? | Prob: L | Dir/Ind: D | Rev?: Y

		The policy permits incidental mineral extraction provided only that it is for a temporary period. Adverse impacts on flood risk are possible, although the significance depends on conditions at particular sites and therefore is unknown at this stage. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment.
6	Land	Short: ? Med: ? Long: ? Prob: L Dir/Ind: D Rev?: Y The policy permits incidental mineral extraction provided only that it is for a temporary period. Adverse impacts on the best and most versatile land and on Green Belt are possible, although the significance depends on conditions at particular sites and therefore is unknown at this stage. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment.
7	Landscape and the historic environment	Short: ? Med: ? Long: ? Prob: L Dir/Ind: D Rev?: Y/N The policy permits incidental mineral extraction provided only that it is for a temporary period. Adverse impacts on landscape and the historic environment are possible, including from light pollution, although the significance depends on conditions at particular sites and therefore is unknown at this stage. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment.
8	Transport	Short: ? Med: ? Long: ? Prob: L Dir/Ind: D Rev?: Y The policy permits incidental mineral extraction provided only that it is for a temporary period. Adverse impacts on sensitive areas from transport are possible, although the significance depends on conditions at particular sites and therefore is unknown at this stage. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment.
9	Water	Short: ? Med: ? Long: ? Prob: L Dir/Ind: D Rev?: Y/N The policy permits incidental mineral extraction provided only that it is for a temporary period. Adverse impacts on water quality and availability are possible, although the significance depends on conditions at particular sites and therefore is unknown at this stage. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment.
10	Waste	Short: ? Med: ? Long: ? Prob: L Dir/Ind: D Rev?: ?

		The supporting text indicates that unacceptable adverse impacts on the environment or communities will not be permitted, which supports sustainable waste management objectives. However, the policy does not require this. The policy should make clear that such developments will be required to have no unacceptable adverse impacts on the environment or communities.

Policy DM 22 Enforcement

	Sustainability Objective	Comments
1	Biodiversity	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No biodiversity impacts predicted.
2	Climate change	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No climate change impacts predicted
3	Community and well-being	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No impacts on communities or well-being predicted.
4	Sustainable economic growth	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No impacts on sustainable economic growth predicted.
5	Flood risk	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No impacts on flood risk predicted
6	Land	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No impacts on land quality predicted
7	Landscape and the historic environment	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No impacts on landscape or the historic environment predicted.
8	Transport	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No impacts on transport objectives predicted.
9	Water	Short: 0 | Med: 0 | Long: ? | Prob: | Dir/Ind: | Rev?: No impacts on water quality and sustainable water resource management predicted.

10	Waste	Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	?				
		No impacts on sustainable waste management objectives predicted.						

Appendix C: Consideration of 'Do Nothing' Option for Policies as Proposed

Policy reference in adopted KMWLP	Change and rationale	Is a 'do nothing' option reasonable?
CSM 1	Policy and supporting text require review to ensure consistency with national policy and that the wording in the policy is effective. Reference to 'associated Planning Practice Guidance' should be deleted.	No. Change for consistency with national policy.
CSM 2	The policy also sets out how sites will be selected in the Minerals Sites Plan. This is now in existence as an adopted plan. It is therefore considered that the specific reference to the 'Minerals Sites Plan' should be deleted in the sub-title and the first sentence of the policy prior to the criteria that will be used to screen sites for suitability for identification as future allocations. The requirement quanta for aggregate have been updated in light of the new plan period and changes to sales averages.	No. MSP is now in existence.
CSM 3	Deleted	No. Planning permission has been granted and implemented.
CSM 4	No change	No
CSM 5	No change	No
CSM 6	No change	No
CSM 7	No change	No
CSM 8	Remove reference to sites being identified in a Minerals Sites Plan and replace the maintenance of 'at least 2.7mtpa' over the remainder of the plan period with 4.0mtpa, which is the existing production capacity to be maintained.	No. MSP is now in existence and to reduce capacity for secondary and recycled aggregates would be contrary to national policy and sustainable development principles.
CSM 9	The Policy is no longer consistent with national policy and needs to be updated due to a change in the National Planning Policy Framework involving deletion of the term 'small scale'. The policy should also be updated to reflect the fact that stone is extracted in Kent to main historic buildings beyond the County. The third criterion in the policy should be deleted to avoid inconsistency with those development management policies in the Plan intended to achieve the same aim which are applied to all forms of mineral and waste development.	No. Changes are to ensure consistency with other policy and to reflect current market practices.
CSM 10	Change to supporting text to be consistent with national policy	No.
CSM 11	Change to supporting text to reflect likely EIA requirements	No.

Policy reference in adopted KMWLP	Change and rationale	Is a 'do nothing' option reasonable?
CSM 12	Change to supporting text to make reference to carbon neutrality and sustainability.	No. Change is for consistency with international policy.
CSW 1	Change to policy to ensure consistency with national policy.	No. Change is for consistency with national policy.
CSW 2	Change to policy to clarify requirement for sustainability and compliance with waste hierarchy.	No. Change is for clarity and consistency with national policy.
CSW 3	Update to the policy and supporting text are necessary to ensure development comes forward in a way which is consistent with circular economy principles. The supporting text should be updated to confirm how developers may be required to make financial contributions for the provision of capacity required to manage the additional household waste arising.	No. Policy change is required to ensure consistency with national policy and supporting text clarifies purpose of financial contributions.
CSW 4	An amendment to the target for non-inert Construction, Demolition and Excavation waste such that it is expressed as % of the non-inert fraction only. Updates to the supporting text which set out issues concerning the management of waste in Kent area are recommended to cover the need for the development of additional Local Authority Collected Waste transfer capacity. Removal of text which states that Kent will provide capacity to manage waste from London, to be consistent with The London Plan.	No. The update to the target calculation is a more accurate measure of performance of non-inert CD&E waste management. No. The update to the supporting text reflects the need for additional transfer capacity. No. The London Plan states that London will be net self-sufficient by 2026.
CSW 5	Deleted because capacity for landfill of air pollution control residues is not consistent with the waste hierarchy and options for management which are more preferred than landfill are now available.	Yes. Site allocation could be retained to cater for a larger catchment area though this may still be contrary to the waste hierarchy.
CSW 6	Updates to the policy are required to ensure consistency within the Plan and with national policy on heritage assets, the setting of AONBs and heat users.	No
CSW 7	Policy CSW7 should be updated to avoid duplication with policies CSW2 and CSW8. Further changes to policy CSW7 are considered necessary to ensure it is effective and consistent with national policy.	No
CSW 8	Changes to policy to reflect national policy, agreed sectoral targets and the County Council Climate Emergency Statement. Other changes to clarify use of terms 'other recovery' and 'residual non-hazardous waste'.	No
CSW 9	The policy could be strengthened to ensure proposals consider how methane will be captured and utilised while a non-inert landfill site is operational. Other policy wording changes to strengthen discouragement of the landfill of waste.	No. Change supports national policy on methane management and principles of sustainable waste management.

Policy reference in adopted KMWLP	Change and rationale	Is a 'do nothing' option reasonable?
CSW 10	A minor update to the text of criterion 1 is required to ensure it is clear and effective. Updates to criteria 2 and 3 are needed to avoid duplication and ensure the most efficient use of methane gas is promoted.	No. Changes clarify the policy and support efficient methane use.
CSW 11	Changes to the supporting text and policy are needed to ensure that the policy provides more flexibility for deposit to land options for inert waste, and disposal, via landfill, of inert waste is not promoted.	No. Changes are to allow for acceptable uses of inert waste on land and to avoid promotion of disposal to landfill, in line with national policy and regional Joint Position Statement.
CSW 12	Policy change to remove requirement for net self-sufficiency in hazardous waste and to allow consideration of replacement hazardous landfill capacity to ensure internal consistency within the KMWLP.	No. Changes are to be consistent with national policy and consistent cross-referencing within the KMWLP.
CSW 13	No change	No
CSW 14	No change	No
CSW 15	Amendment to supporting text to remove reference to locational criteria not within policy. Changes to policy to discourage disposal without treatment and promote recovery and use of biogas.	No. Changes support principles of sustainable waste management and greenhouse gas capture and use as fuel.
CSW 16	The text of Policy CSW16 should be updated to remove the reference to the Waste Sites Plan and to expand the scope of safeguarded sites.	No. The Waste Sites Plan does not exist and safeguarded sites should include those with temporary permissions for the duration of the permission.
CSW 17	Changes to policy to allow for use of low-level and very low level radioactive waste for backfilling of voids from demolition of structures on site.	No. Change is to provide consistency with national policy.
CSW 18	Change to remove requirement for some waste to arise within Kent	No. Change is to provide consistency with national policy.
DM 1	Policy DM1 should be updated to reflect more stringent targets and policy relating to mitigation and adaptation to climate change and other related updates to national planning policy.	No. Change is to provide consistency with national and local policy.
DM 2	Policy DM2 should be updated to reflect changes to the National Planning Policy Framework on geodiversity and Areas of Outstanding Natural Beauty and law on Biodiversity Net Gain. Inclusion of National Nature Reserves and ancient/veteran trees in nationally important sites. Inclusion of reference in supporting text to Local Nature Recovery Strategies. The supporting text should be updated to refer to the Kent Environment Strategy 2016 and Kent State of the Environment Report 2015.	No. Changes are to provide consistency with national and local policy.
DM 3	The policy wording and supporting text should be updated to reflect the requirements concerning	No. The changes reflect local policy on biodiversity net gain

Policy reference in adopted KMWLP	Change and rationale	Is a 'do nothing' option reasonable?
	biodiversity net gain. Criterion 5 strengthened to reflect the net-gain objective. Policy DM3 and the supporting text should be updated to reflect changes to the National Planning Policy Framework and regulations on habitats sites.	and national policy on habitats sites.
DM 4	No change	No
DM 5	The supporting text of Policy DM5 should be updated to include reference to the Historic England (2015) Historic Environment Good Practice Advice in Planning Notes. The final sentence of Policy DM5 should be updated to add 'unacceptable adverse' before 'impact' to be consistent with the National Planning Policy Framework.	No. Changes reflect national policy.
DM 6	The supporting text of Policy DM5 should be updated to include reference to the Historic England (2015) Historic Environment Good Practice Advice in Planning Notes.	No. The change references national policy.
DM 7	No change	No
DM 8	No change	No
DM 9	Some policy wording is unclear and does not adequately express the intention of the policy.	No. Change is for improved clarity.
DM 10	Policy changed to strengthen protection of groundwater.	Yes. Consider a do nothing option.
DM 11	Addition of impacts from blasting to be consistent with national guidance and impacts from vehicles to be consistent with national policy. Change to clarify requirements regarding surrounding land uses.	No. Changes to be consistent with national policy and guidance and for improved clarity.
DM 12	Change to supporting text to highlight need to consider cumulative impacts of vehicle emissions.	No. Change to supporting text only and to reflect changes to air quality legislation.
DM 13	The policy and supporting text should be updated to ensure effectiveness and consistency with national policy, with regards to the connection between vehicle movements and climate change and sustainable transport initiatives in the National Planning Policy Framework.	No. Change for consistency with national policy.
DM 14	No change	No
DM 15	No change	No
DM 16	Supporting text amended to refer to habitats sites.	No. Supporting text change for consistency with national policy.
DM 17	Change to policy wording to refer to targets in Kent Biodiversity Strategy and actions in Kent Rights of Way Improvement Plan.	No. Change for consistency with local policy.
DM 18	Additional supporting text to explain issues regarding land stability.	No. Change for information.
DM 19	Change to policy to reflect national and local policy on biodiversity net gain and referencing targets in local strategies and plans. Addition of	No. Change for consistency with national and local policy.

Policy reference in adopted KMWLP	Change and rationale	Is a 'do nothing' option reasonable?
	reference to financial guarantees to reflect national policy.	
DM 20	Addition of consideration of community impacts for consistency with national policy.	No. Change for consistency with national policy.
DM 21	No change	No
DM 22	Removal of reference to EU legislation	No. Change for consistency with national policy.

Appendix D: Detailed Findings of Appraisal of Alternatives to Updated KMWLP as Proposed

Key:

Impacts	Probability of effects	Direct or indirect effects	Reversibility
++ significant positive effect + some positive effect 0 no effect - some adverse effect - - significant adverse effect ? uncertain effect	L low probability M medium probability H high probability	D direct effect I indirect effect	Y reversible effect N not reversible i.e. permanent effect
Where multiple symbols are shown separated by '/', this is to indicate that more than one type of effect is predicted			

Option A: Allocate sites for waste management

	Sustainability Objective	Comments
1	Biodiversity	Short: ? / Med: ? / Long: ? / Prob: L / Dir/Ind: D / Rev?: N Allocation of sites may have adverse impacts on biodiversity, but these will be dependent on the nature, scale and location of sites which is unknown.
2	Climate change	Short: + / Med: + / Long: + / Prob: M / Dir/Ind: D / Rev?: N

<table>
<tr><td></td><td></td><td>Allocation of waste sites could have positive or negative impacts on climate change, although the likelihood of impacts is not certain. Waste management facilities may be built that replace existing capacity but which are better located than existing facilities, which would reduce the amount of waste transport required. It is also possible that facilities are built which add to existing capacity which then need to source waste streams from outside the county, which would increase greenhouse gas emissions from waste transport. Alternatively, if there are insufficient local sources of waste, the facilities may simply not be built. However, if the primary reason for building new facilities is to improve the distribution in relation to sources of arisings and onward management, then positive impacts on climate change are most likely to occur.</td></tr>
<tr><td rowspan="2">3</td><td rowspan="2">Community and well-being</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>+</td><td>+</td><td>+</td><td>M</td><td>D</td><td>N</td></tr></table></td></tr>
<tr><td>Allocation of sites for waste management may have adverse impacts on communities in the locality of sites from waste management activities and from waste transport, but these will be dependent on the nature, scale and location of sites which is unknown.

Allocation of waste sites may increase or decrease the distance waste is transported and therefore associated impacts on air quality from vehicle emissions, although the likelihood of impacts is not certain. Waste management facilities may be built that replace existing capacity but which are better located than existing facilities, reducing the amount of waste transport required and potential adverse impacts on air quality from vehicle emissions. It is also possible that facilities are built which add to existing capacity which then need to source waste streams from outside the county, increasing the distances that waste is transported which could have impacts on air quality. Alternatively, if there are insufficient local sources of waste, the facilities may simply not be built. However, if the primary reason for building new facilities is to improve the distribution in relation to sources of arisings and onward management, then positive impacts on air quality are most likely to occur.</td></tr>
<tr><td rowspan="2">4</td><td rowspan="2">Sustainable economic growth</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td></td><td></td></tr></table></td></tr>
<tr><td>Allocation of waste sites which are not required for Kent's waste may increase the economic contribution of the waste sector to Kent's economy although the likelihood of impacts is not certain. Waste management facilities may be built that then source waste streams from outside the county, so bringing an economic resource into the county. Alternatively, if there are insufficient local sources of waste, the facilities may simply not be built. However, if the primary reason for building new facilities is to improve the distribution in relation to sources of arisings and onward management by replacing existing capacity, then positive impacts on the economy from importing waste as a resource are unlikely to occur.</td></tr>
</table>

5	Flood risk	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>D</td><td>N</td></tr></table> Allocation of waste sites may have adverse or beneficial impacts on flood risk in the locality of sites, but these will be dependent on the nature, scale and location of sites which is unknown.
6	Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>D</td><td>N</td></tr></table> Allocation of waste sites may have adverse impacts on the efficient use of land and on sensitive locations, but these will be dependent on the nature, scale and location of sites which is unknown.
7	Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>D</td><td>N</td></tr></table> Allocation of waste sites may have adverse impacts on landscape and historic assets, but these will be dependent on the nature, scale and location of sites which is unknown.
8	Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>+</td><td>+</td><td>+</td><td>M</td><td>D</td><td>N</td></tr></table> Allocation of waste sites may increase or decrease the distance waste is transported, although the likelihood of impacts is not certain. Waste management facilities may be built that replace existing capacity but which are better located than existing facilities, reducing the amount of waste transport required. It is also possible that facilities are built which add to existing capacity which then need to source waste streams from outside the county, increasing the distances that waste is transported. Alternatively, if there are insufficient local sources of waste, the facilities may simply not be built. However, if the primary reason for building new facilities is to improve the distribution in relation to sources of arisings and onward management, then positive impacts on transport are most likely to occur.
9	Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>D</td><td>N</td></tr></table> Allocation of waste sites may have adverse impacts on water quality and availability, but these will be dependent on the nature, scale and location of sites which is unknown.
10	Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>+</td><td>+</td><td>+</td><td>M</td><td>D</td><td>N</td></tr></table>

		Allocation of waste sites may increase or decrease the distance waste is transported, with consequent effects on human health and the environment from emissions, noise and congestion, although the likelihood of impacts is not certain. Waste management facilities may be built that replace existing capacity but which are better located than existing facilities, reducing the amount of waste transport required and supporting the objective of managing waste closer to its place of production. It is also possible that facilities are built which add to existing capacity which then need to source waste streams from outside the county, increasing the distances that waste is transported which could have impacts on human health and the environment and managing waste distant from its place of production. Alternatively, if there are insufficient local sources of waste, the facilities may simply not be built. However, if the primary reason for building new facilities is to improve the distribution in relation to sources of arisings and onward management, then positive impacts on sustainable waste management are most likely to occur.

Option B: Do not strengthen groundwater protection in policy DM 10

	Sustainability Objective	Comments
1	Biodiversity	Short: - | Med: - | Long: - | Prob: M | Dir/Ind: D | Rev?: N Not strengthening the protection of groundwater could have an adverse impact on biodiversity from the risk of groundwater pollution.
2	Climate change	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: No effect on climate change.
3	Community and well-being	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?: Unlikely to affect communities or wellbeing.
4	Sustainable economic growth	Short: ? | Med: - | Long: - | Prob: L | Dir/Ind: D | Rev?: N Not strengthening protection of groundwater could have an adverse impact on sustainable economic growth in the medium to long term, as the risks of groundwater pollution will be higher and water for abstraction is likely to require additional treatment before use, leading to higher treatment costs and higher cost of water supply. The significance of effects is dependent on where sites are located in relation to sensitive water bodies.
5	Flood risk	Short: 0 | Med: 0 | Long: 0 | Prob: | Dir/Ind: | Rev?:

<table>
<tr><td></td><td></td><td>Not likely to have an impact on flood risk.</td></tr>
<tr><td>6</td><td>Land</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table>Not likely to affect land quality</td></tr>
<tr><td>7</td><td>Landscape and the historic environment</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table>No effect on landscape and the historic environment</td></tr>
<tr><td>8</td><td>Transport</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table>No impact on transport.</td></tr>
<tr><td>9</td><td>Water</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>N</td></tr></table>By not strengthening the protection of groundwater, the policy would fail to protect groundwater resources outside currently designated Source Protection Zones, and particularly aquifers that could be used for abstraction in the future. The policy would still require protection of any waterbody, although would not specifically mention aquifers. The policy would not require protection of waterbodies hydrogeologically connected to the site, nor would it require hydrological assessment of the effects on the water environment, resulting in more limited protection and assessment than would be the case with the policy as proposed to be amended.</td></tr>
<tr><td>10</td><td>Waste</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0</td><td>0</td><td>0</td><td></td><td></td><td></td></tr></table>No effect on sustainable waste management.</td></tr>
</table>

Option C: Retain policy CSW 5 Strategic Site for Waste

<table>
<tr><td></td><td>Sustainability Objective</td><td>Comments</td></tr>
<tr><td>1</td><td>Biodiversity</td><td><table><tr><td>Short</td><td>Med</td><td>Long</td><td>Prob</td><td>Dir/Ind</td><td>Rev?</td></tr><tr><td>0/?</td><td>0/?</td><td>0/?</td><td>H</td><td>D</td><td>Y</td></tr></table></td></tr>
</table>

<table>
<tr><td></td><td></td><td>The site is 2.3km from the Swale SPA and Ramsar and 4.6km from the Medway Estuary and Marshes Ramsar. The policy would require an assessment of the impacts on the sites and mitigation if necessary, therefore adverse impacts would be avoided. The site is also 2.3km from Elmley NNR and Swale SSSI and 1.3km from Sheppey Cliffs and Foreshore SSSI, all of which are dealt with under policy DM 2. Adverse impacts would therefore be possible but unlikely to occur.</td></tr>
<tr><td>2</td><td>Climate change</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-</td><td>-</td><td>-</td><td>M</td><td>D</td><td>N</td></tr></table>By retaining the site allocation, the policy may promote the import of air pollution control residues from a larger catchment area than Kent. This would encourage transport of waste with associated increases in greenhouse gas emissions, exacerbating climate change impacts.</td></tr>
<tr><td>3</td><td>Community and well-being</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>H</td><td>D</td><td>N/Y</td></tr></table>The site is directly adjacent to Norwood Manor and 300m from properties along Eastchurch Road and Oldhook Manor on Lower Road. Health and amenity impacts will be managed under policy DM 11 and therefore adverse impacts would be possible but unlikely.</td></tr>
<tr><td>4</td><td>Sustainable economic growth</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>Y</td></tr></table>Retaining the allocation could hinder the development of alternative treatment solutions for flue ash, which would otherwise provide a more sustainable way of managing the by-product of incineration and could create economic opportunities from the waste stream. However, it is also possible that alternative uses will be developed and implemented regardless of the availability of landfill capacity.</td></tr>
<tr><td>5</td><td>Flood risk</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>H</td><td>D</td><td>Y</td></tr></table>The site is crossed by lines of increased risk of flooding from surface water, therefore adverse impacts would be possible. Flood risk is controlled by policy DM 10 Water Environment which requires developments not to exacerbate flood risk, therefore adverse impacts would be unlikely.</td></tr>
<tr><td>6</td><td>Land</td><td><table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>0</td><td>M/H</td><td>D</td><td>Y</td></tr></table>The site is grade 3 agricultural land and therefore adverse impacts on the best and most versatile agricultural land would be possible. However, the policy would require restoration to a high standard therefore would be likely to be returned to high quality land in the long term.</td></tr>
</table>

7	Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0/?</td><td>0/?</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table> The site is not close to any designated assets and therefore adverse effects would not be likely. The policy would require restoration to a high standard that accords with the local landscape character and therefore any adverse effects on local views in the short or medium term would be removed.
8	Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-</td><td>-</td><td>-</td><td>M</td><td>I/D</td><td>N</td></tr></table> By retaining the site allocation, the policy may promote the import of air pollution control residues from a larger catchment area than Kent. This would encourage transport of waste with associated increases in impacts including emissions to air, demand for transport infrastructure and noise. There may be impacts on congestion on the local road network from traffic accessing the site, particularly in combination with other developments in the local area.
9	Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td>I</td><td>N</td></tr></table> The policy would be unlikely to have a significant effect on water quality and availability. Any potential effects would be controlled by policy DM 10 Water Environment.
10	Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-/0</td><td>-/0</td><td>-/0</td><td>M</td><td>D</td><td>N</td></tr></table> By facilitating landfill of hazardous waste, the policy would allow management of waste at the bottom of the waste hierarchy. By providing for landfill capacity for hazardous waste arising from Energy from Waste plants, the policy may facilitate the management of waste removed from its place of production, although national policy recognises that there may be a need for some types of facility which accept waste from other areas. Impacts on human health and the environment will be controlled through other policies.

Appendix E: Contribution of Other Plans and Strategies to Cumulative Effects

Kent Minerals Sites Plan 2013-30, Kent County Council, September 2020

Arising from the requirement for minerals identified in policy CSM 2 of the KMWLP, the Minerals Sites Plan identifies and allocates sites for the extraction of sharp sand and gravel and soft sand as follows:

- Stonecastle Farm Quarry Extensions, Hadlow (M13) – an extension to the existing quarry (total yield of 1,000,000 tonnes), and
- Land at Moat Farm, Five Oak Green (M10) - a proposed new quarry (total yield of 1,500,000 tonnes)
- Chapel Farm (West), Lenham (M3) - a proposed new quarry (total yield 3,200,000 tonnes)

Contribution to Cumulative Effects[14]

Each of the sites contain or are adjacent to some form of biodiversity asset or biodiversity value and impacts are possible in each case.

The Minerals Sites Plan is likely to increase emissions of greenhouse gases overall by generating additional HGV movements and increasing the energy requirements for mineral processing on site. However, these are insignificant when considered in the context of emissions from the county as a whole.

Some negative impacts are possible on community wellbeing, mainly due to the potential for negative impacts on residential amenity from operations and transport, and also on the diversion of footpaths.

The Minerals Sites Plan will help to contribute to economic growth by providing a supply of minerals to support construction and potentially other economic sectors that depend on aggregates. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource, which cannot be considered sustainable.

Two of the minerals sites lie within Flood Zone 3. In these cases, it must be demonstrated that development can take place without adversely affecting flood risk and where possible contributing to a reduction in overall flood risk.

There is the potential for the sites to have limited impacts on landscape and on the historic environment.

[14] Findings from Sustainability Appraisal of Minerals Sites Plan, Amey, November 2020

The scale of the cumulative impact of the MSP on traffic is not expected to be great given the predicted number of movements and the context of all traffic movements in the county.

Each of the minerals sites have the potential for significant impacts on hydrology/hydrogeology and water quality.

Contribution to Cumulative Effects

Each of the mineral sites is sufficiently distant from the site allocated in CSW 17 that no cumulative impacts are expected in combination with the KMWLP.

Kent Joint Municipal Waste Management Strategy 2018/19 to 2020/21, Kent Resource Partnership, 2019

The Kent Resource Partnership (KRP) will support the transformation of Kent into a circular economy, where the value of material resources flowing into and through the region are retained, generating employment, skills and training opportunities, and realising wider economic, environmental, health and wellbeing benefits for the local and regional community and beyond.

The KRP is committed to delivering efficiency and quality in resource management and waste services, with focus on: -

- Maximising the 'value' of resources that we manage from households, in terms of realising the social, environmental and economic opportunities;
- Providing the best possible value for money service to the Kent taxpayer, taking into account whole service costs;
- Realising opportunities to improve services now and in the future through engagement, collaboration and working in partnership with the supply chain; and
- Supporting future thinking through ongoing research and evidence that will facilitate the transition into a circular economy for Kent.

Up until 2020/21, the KRP will achieve a year on year reduction to its Kent-wide residual household waste per household (kg/h'hold) tonnage.

By 2020/21, the KRP will:

- recycle and compost at least 50% of household waste tonnage
- ensure no more than 5% of Kent's municipal waste ends at landfill.

- develop a joint approach to facilitate the procurement of third sector/reuse providers/charities in managing and delivering a reuse service for bulky waste.

The KRP will explore the possibility of implementing recycling on-the-go initiatives, and other similar activities aimed at recovering resources. Additionally, the KRP will look to engage and work with the supply chain to deliver recycling on-the-go in keys areas.

The KRP will publish its Materials End Destinations Publication on an annual basis and continue its transparent approach to reflect where all material resources end up.

Contribution to Cumulative Effects

The Joint Municipal Waste Management Strategy will promote sustainable economic growth by maximising the resources gained from waste materials and assisting the transition to a circular economy in Kent.

By reducing the amount of waste generated and increasing recycling and composting, the strategy will encourage reduced greenhouse gas emissions from waste management which will help to reduce the pressures on biodiversity and communities from climate change impacts. It will also promote a more sustainable economy. Minimising landfill will avoid potential landscape and water quality impacts and impacts on communities from new landfill sites.

Local Transport Plan 4: Delivering Growth Without Gridlock 2016-2031, Kent County Council

The Council's strategic transport priorities include the following:

- Enabling Growth in the Thames Estuary with a range of measures including Crossrail extension to Dartford and Ebbsfleet and an expanded Fastrack bus network.
- Bifurcation of Port Traffic: traffic for the Eastern Docks would be encouraged to use the M2/A2. Bifurcation will also facilitate growth of Whitfield, Folkestone, Ashford and Maidstone by releasing capacity on the M20.
- Port Expansion: The Western Docks will provide a cargo terminal with a port-centric distribution centre, allowing the existing cargo operations to move out of the Eastern Docks so a dedicated ferry terminal and an increase in freight vehicle space can be delivered. The Port of London has set its goal to become the busiest it has ever been by 2035, including greater use of the Thames wharves for river transport of freight that will take up to 400,000 lorries of the region's roads. The Port of Sheerness largely handles bulk goods and also has significant expansion plans. The Port of Ramsgate has potential for growth and could also contribute to the strategic priority of bifurcation.

- A Solution to Operation Stack: delivery of a Lorry Area that will reduce the need to use the M20 to queue freight vehicles during times of disruption to cross-Channel services

Transport schemes that have a countywide impact (particularly in terms of supporting sustainable travel) are:

- Kent Thameside Local Sustainable Transport Fund (£4.5m LGF funding), a capital programme of works for Dartford and Gravesham delivering schemes to promote the use of alternative modes of transport to the private car, e.g. cycle parking, cycle and walking routes and bus infrastructure.
- West Kent Local Sustainable Transport Fund (£4.9m LGF funding), a capital programme of works delivering schemes to promote the use of alternative modes of transport to the private car, including Snodland Station forecourt, Tonbridge Station access improvements, Maidstone East Station improvements and Swanley Station improvements.
- 'Smart' (managed) motorway to increase capacity on the M20 and M26.

Priorities for Maidstone include M20 junctions 3 to 5 'smart' (managed) motorway system.

Contribution to Cumulative Effects

Proposed measures are likely to increase capacity on the M20 and M26 and promote greater use of the rail network. Together these measures are likely to reduce the potential for cumulative impacts on the M20 and potentially alleviate air quality impacts on the AQMA, although the balance of effects is not known. Impacts on greenhouse gas emissions are uncertain.

Core Strategy Review, Folkestone and Hythe District Council, March 2022

The Core Strategy Review aims to provide 13,284 new homes for the period 2019/20 to 2036/37, or 738 dwellings per year.

Housing will be delivered through a new sustainable, landscape-led settlement, with supporting town centre and community uses, based on garden town principles in the North Downs Area. The garden town will maximise opportunities arising from the location, access to London and continental Europe and strategic infrastructure. Housing and supporting community uses will also be delivered through growth in Sellindge.

Elsewhere in the district, priority will continue to be given to previously developed land in the Urban Area in Folkestone, for main town centre uses and housing, to enhance the town's role as a sub-regional centre, with opportunity for increased densities within the town centre and maximisation of employment opportunities at key locations.

The Core Strategy aims to regenerate Romney Marsh through a positive approach to sustainable economic development and infrastructure opportunities, and through increasing the strategic role of New Romney town in serving the area, as the key service, health, education and employment hub for the Marsh.

The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding.

The strategic growth of New Romney is supported to allow the market town to fulfil its potential to sustainably provide for the bulk of the housing, community infrastructure and commercial needs of the Romney Marsh Area. The development as a whole should provide around 300 dwellings.

The vision for Lydd and St Mary's Bay is that they will have upgraded their appeal and local services to become highly popular to visitors and as places to live, and with flood risks safely managed. The economy in Lydd town will be boosted, capitalising on its historic centre, including by an expansion at Lydd Ranges of defence employment and training, and through residential and commercial investment on key approaches. Dymchurch will continue to be the primary coastal tourist resort for the Marsh, with visitors particularly benefiting from accessibility and environmental improvements. Development which helps to maintain and support the local role of the market town of Lydd can meet priority needs. Opportunities also exist for employment development at London Ashford Airport at Lydd, through the implementation of the existing planning permission. The council acknowledges the positive impact that Lydd Airport could deliver in supporting the regeneration of Romney Marsh and surrounding areas. Should development proposals come forward for the further expansion of London Ashford Airport at Lydd, the council will work with the airport, local community and other stakeholders to prepare and adopt an Action Area Plan for the site.

The Plan identifies that an element of the area allocated for the new garden settlement is protected by a minerals safeguarding designation and notes that there may be a requirement to remove the minerals prior to development. Policy SS8 requires a minerals assessment to be undertaken which examines the practicality and viability of prior extraction.

Contribution to Cumulative Effects

The development of new housing and employment sites and enhancing the vitality of New Romney, Lydd and smaller settlements in the Romney Marsh area will provide housing, employment and services for the needs of local communities. They will also contribute to

increased demand for use of the road network and contribute to increased greenhouse gas emissions. Development at Lydd Airport will also increase demand for road space. This is likely to create cumulative impacts on the road network in Romney Marsh in combination with vehicles accessing the allocated site in policy CSW 17 and may adversely affect air quality in the local area.

Development at the new garden settlement that contains safeguarded mineral resources will be required to assess the practicality and viability of prior extraction. This may have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Maidstone Borough Local Plan, Maidstone Borough Council, October 2017

An expanded Maidstone urban area will be the principal focus for development in the borough. Approximately 1,846 new dwellings will be delivered on 23 sites, with approximately 11,400m^2 of retail floorspace, approximately 6,000m^2 of employment floorspace and a medical campus of up to 100,000m^2 floorspace. Key infrastructure requirements include improvements to highway and transport infrastructure, including junction improvements, capacity improvements and improved pedestrian/cycle access and bus prioritisation measures.

The council and its partners will:

- Ensure the transport system supports the growth projected by Maidstone's local plan and facilitates economic prosperity;
- Deliver modal shift through managing demand on the transport network through enhanced public transport and the continued Park and Ride services and walking and cycling improvements;
- Improve highway network capacity and function at key locations and junctions across the borough;
- Improve transport choice across the borough and seek to influence travel behaviour;
- Address the air quality impact of transport.

A prestigious business park at Junction 8 of the M20 that is well connected to the motorway network will provide for a range of job needs up to 2031. The site will make a substantial contribution to the need for new office space in the borough as well as meeting the 'qualitative' need for a new, well serviced and well connected mixed use employment site suitable for offices, industry and warehousing.

Rural service centres including Harrietsham and Lenham will be a secondary focus for housing development with the emphasis on maintaining and enhancing their role and the provision of services to meet the needs of the local community. Suitably scaled employment opportunities will also be permitted, building on and expanding existing provision in these locations.

In Harrietsham, key services will be retained and supported. In addition to minor development and redevelopment of appropriate sites, approximately 242 new dwellings will be delivered on three allocated sites. Two existing sites are designated as Economic Development Areas in order to maintain employment opportunities in the locality. Key infrastructure requirements for Harrietsham include improvements to highway and transport infrastructure including improvements to the A20 Ashford Road, improvements to Church Road and the provision of additional pedestrian crossing points

At the rural service centre of Lenham, key services will be retained and supported. In addition to minor development and redevelopment of appropriate sites, approximately 155 new dwellings will be delivered on two allocated sites, Tanyard Farm and Glebe Gardens, both to the east of Lenham on the Old Ashford Road. Three existing sites are designated as Economic Development Areas in order to maintain employment opportunities in the locality. Key infrastructure requirements for Lenham include improvements to highway and transport infrastructure including junction improvements, a variety of measures to improve sustainable transport infrastructure, and improvements to pedestrian access. The council will seek to maintain and enhance the existing retail function and supporting community uses in The Square.

Lenham is also identified as a broad location for growth for the delivery of approximately 1,000 dwellings post April 2021. Master planning of the area will be essential to achieve a high quality design and layout, landscape and ecological mitigation, and appropriate provision of supporting physical, social and green infrastructure. Housing site allocations and associated infrastructure requirements will be made through the Lenham Neighbourhood Plan or through the local plan review to be adopted by April 2021. The broad location for growth is on the east side of Lenham, between the current built up area and the Northdown Business Park on the Ashford Road to the west of mineral site M3.

The Local Plan notes safeguarded mineral areas in allocated sites and requires an assessment of viability and practicability of extraction prior to development.

Contribution to Cumulative Effects

Proposed housing and economic development in Maidstone and at junction 8 of the M20 will provide housing, employment and services to meet the needs of communities, contributing to their wellbeing. It will increase traffic on the M20 and through junction 8 of the M20. Policy on managing the transport impacts of development may help to avoid or reduce increased demand for road space. The development of new sites for housing and employment is likely to increase pressures on biodiversity. Greenhouse gas emissions will be increased.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Local Plan Review: Draft Plan for Submission (Regulation 19), Maidstone Borough Council, October 2021

There is a local housing need for 1,157 dwellings per annum in Maidstone Borough, which equates to 17,355 dwellings over the proposed 2022-37 plan period for the Local Plan Review (LPR). At Invicta Barracks, 500 units are expected to come forward during the Local Plan 2017 period (2011- 2031), with the remaining 800 units coming forward over the period 2022-2037. The remainder will be delivered as windfall sites.

The minimum floorspace required to meet need based on job growth forecasts is 101,555m^2 (gross) for employment uses over the period 2022-2037.

The plan will allocate floorspace to meet the forecast retail needs over the first 10 years of the plan period, to 2032 only. The total floorspace required is therefore 10,847m^2 to 2032.

The emphasis will be on increasing skilled employment opportunities in the borough alongside developing learning opportunities, having regard to the roles of centres across the borough and existing and improved accessibility patterns:

- Principally within the Maidstone urban area, with a particular focus on the renewal of the town centre, including the Invicta Barracks strategic development location;
- Within two new garden communities at Heathlands and Lidsing;
- With significant employment locations at the former Syngenta Works and Woodcut Farm;
- To a lesser extent at the six rural service centres of Harrietsham, Headcorn, Lenham, Marden, Coxheath and Staplehurst consistent with their range of services and role;
- Limited development at the four larger villages of East Farleigh, Eyhorne Street (Hollingbourne), Sutton Valence and Yalding; and

- To support the sustainable future of smaller villages and hamlets where appropriate.

The Council will seek to ensure that key infrastructure and service improvements needed to support delivery of the Maidstone Borough LPR are brought forward in a coordinated and timely manner. The infrastructure will support the growth projected by the Local Plan to 2031 and LPR by 2037 with a focus on large scale developments, such as proposals at the new garden communities at Heathlands and Lidsing.

Developments within, and with the potential to adversely impact the boroughs AQMA will be required to mitigate their impact, including on human health, having regard to both on-site design and travel patterns and modes of travel.

Maidstone's urban area will be revitalised by the regeneration of key commercial and residential sites and areas of existing deprivation, supported by the creation of employment opportunities, the regeneration of key sites, continued investment in the town centre and improvements to access. The town centre will be regenerated by encouraging a wide range of new development including shops, businesses, residential development, cultural and tourism facilities, and enhanced public spaces for people to enjoy and for activities that will attract residents and visitors.

A prestigious business park at Junction 8 of the M20 that is well connected to the motorway network will provide for a range of job needs up to 2037. The site will make a substantial contribution to the need for new office space in the borough as well as meeting the 'qualitative' need for a new, well serviced and well connected mixed use employment site suitable for offices, industry and warehousing, and will thereby help to diversify the range of sites available to new and expanding businesses in the borough. Redevelopment of the former Syngenta Works site near Yalding will make a significant contribution to the provision of employment uses. A number of smaller sites for employment use are allocated around the borough to accommodate a diverse range of employment types.

Heathlands Garden Community

A new Heathlands Garden Community will provide approximately 5,000 new homes, including 1,400 homes within the period 2029-37. This will become a new sustainably planned place with connected, walkable, vibrant, sociable neighbourhoods for the residents of Heathlands, Lenham, Lenham Heath and Charing in which to live and work. There will be new local jobs, community facilities, schools, cafes shops and leisure facilities. To facilitate healthy lifestyles, high quality connected landscapes and green infrastructure will be for exercise, sport, play, walking, cycling, and leisure, sitting alongside facilities for growing food. Pedestrians, cyclists, and public transport will be priorities helping sustainable travel opportunities with convenient and safe linkages within Heathlands, to surrounding communities and to new community

facilities. There will be a sensitive transition between the AONB and Heathlands, with a heathland landscape and strong planting in the northern parcels, and landscaped spaces for village greens, parks, commons and naturalistic green spaces throughout. A new Heathlands Rail Station along the Ashford-Maidstone line will be explored to achieve a wider sustainable connected network, providing opportunities for residents and businesses along the A20 corridor. There will be a new District Centre adjacent to a potential new railway station, including a significant knowledge-based employment offer; two new Local Centres, one as part of the early phases of development, and one as part of later phase, each including an element of employment space; and a minimum of 14 hectares of dedicated new employment land.

Infrastructure requirements include the delivery of an improved or new waste water treatment facility;

The following requirements are identified for transport connections:

- A business case for a new rail station will continue to be explored on the Maidstone-Ashford rail line, with suitable alternative connectivity to the existing station at Lenham if the case is not made;
- Two new access connections on to the A20 will be provided to the north of the development, on routes which cross the Maidstone-Ashford rail line to connect with the southern part of the site.
- A good public transport facility through the site with new bus routes that provide linkages to the potential new station or existing Lenham Station and between the homes, district and local centres, Lenham secondary school, new schools and other local facilities and adjacent local areas;
- A network of pedestrian and cycle paths throughout the site, linking the district centre and local centres to the housing and employment areas, and beyond to the open countryside and to surrounding settlements;
- Potential connection to a new M20 junction as a result of cumulative development between M20 Junctions 8 & 9

The western portion of the site is constrained due to an existing minerals allocation and the existing Lenham Wastewater Treatment facility, and these constraints will be addressed through phasing and masterplanning; with the need for phasing to ensure that the minerals allocation is not compromised.

Lidsing Garden Community

The Lidsing Garden Community proposal provides a large, deliverable development that could come forward from the middle years of the LPR period. The site will operate as an urban extension to the Medway urban area, providing 2000 homes and focusing on improving connectivity in south Medway. The site contains the opportunity for a significant employment offer as part of the development mix, and the council considers that this is appropriate given the strategic access granted to the M2 via Junction 4. Improved connectivity will be in the form of a connection between North Dane Way and a new motorway junction on the M2. Routes across the site will be significantly improved and particularly a new orbital bus route will be a benefit to the wider community. A new Local centre of not less than 1,500m^2 of retail, leisure and services will be created and 14 Ha of new employment space will be created, focused on the improved motorway access. New half-hourly bus services to be provided between the site and Chatham via North Dane Way. Cycling & walking links throughout the site, and strategically north-south along the Capstone Valley and into the wider Medway area will be created.

Lenham

Approximately 145 new dwellings will be delivered on one allocated site (Tanyard Farm), in addition to six allocations in the Lenham Neighbourhood Plan which will deliver around 1,000 new dwellings.

Two pitches are allocated for Gypsy and Traveller accommodation.

Three existing sites are designated as Economic Development Areas in order to safeguard and maintain employment opportunities in the locality.

One new employment site allocation (Ashford Road) will deliver 2,500m^2 employment space.

Key infrastructure requirements for Lenham include improvements to highway and transport infrastructure including junction improvements, a variety of measures to improve sustainable transport infrastructure, and improvements to pedestrian access.

Harrietsham

Approximately 49 new dwellings will be delivered on a site at Mayfield Nursery on Ashford Road, and 100 at Kielen Manor and land south of A20.

Two existing sites are designated as Economic Development Areas in order to maintain employment opportunities in the locality.

Key infrastructure requirements for Harrietsham include improvements to the A20 Ashford Road, improvements to Church Road and the provision of additional pedestrian crossing points.

The Submission Plan contains no policy or text on mineral safeguarding requirements.

Contribution to Cumulative Effects

Proposed housing and economic development in Maidstone and at junction 8 of the M20 and at Heathlands Garden Community and to a lesser extent at Lenham and Harrietsham will provide housing, employment and services to meet the needs of communities, contributing to their wellbeing. It will increase traffic on the A20, M20 and through junction 8 of the M20. Policy on managing the transport impacts of development may help to avoid or reduce increased demand for road space. The development of new sites for housing and employment is likely to increase pressures on biodiversity. Greenhouse gas emissions will be increased.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Lenham Neighbourhood Plan 2017-31, Lenham Parish Council, July 2021

Allocates seven potential development sites to accommodate housing in the Lenham area, to the north east and north west of the Chapel Farm mineral site.

Contribution to Cumulative Effects

Proposed housing development at Lenham will help to address the needs of communities, contributing to their wellbeing. The sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Adopted Local Plan, Ashford Borough Council, February 2019

A total housing target of 13,118 net additional dwellings applies for the Borough between 2018 and 2030. The majority of new housing development will be at Ashford and its periphery, as the most sustainable location within the Borough based on its range of services and facilities, access to places of employment, access to public transport hubs and the variety of social and

community infrastructure available. In addition to existing commitments, new land allocations to deliver 4,872 dwellings are proposed.

Job growth and economic prosperity will be supported in order to enable the achievement of a sustainable economy with the intention to deliver 63 hectares of new employment land and a total of 11,100 jobs in the Borough between 2014-30.

A regenerated Ashford Town Centre will significantly expand its leisure, cultural, educational and residential offer. A new Commercial Office Quarter next to the railway station will be a major economic impetus for the area, helping to substantially increase employment, trigger more spending in the town centre economy, and improve wage rates and skills levels.

The other rural service centres, including Charing, will remain important providers of local shops and services, whilst delivering new development of a scale appropriate to the individual characteristics of the settlement. Smaller rural settlements will also provide smaller scale new development, to help sustain local communities.

Land at Northdown Service Station in Charing is proposed for residential development for up to 20 dwellings. Development proposals for this site shall provide vehicle access onto the A20 Maidstone Road.

The land south of the Arthur Baker playing fields in Charing is proposed for residential development, up to 35 units. Development proposals for this site shall provide a vehicular, pedestrian and cycle link from the A20 through the site to the adjoining Arthur Baker playing fields and be designed to include a built-up frontage to the A20.

Land adjacent to Poppyfields at Charing is proposed for residential development, up to 180 dwellings. This should be accessed directly from the A20.

Provision of new employment premises, and the redevelopment, enhancement and reconfiguration of existing employment premises will be permitted within or adjoining the built-up confines of Ashford, Tenterden and the rural settlements, provided that any impact upon the local road network can be mitigated. In the rural settlements, it must be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it.

The Plan notes that the site at Brockman's Lane lies within a Mineral Safeguarding area and requires a mineral assessment to be undertaken to establish whether any prior extraction is required.

Contribution to Cumulative Effects

The provision of housing and employment sites in the Borough will help to meet the needs of communities leading to increased wellbeing. Development of greenfield sites is likely to lead to increased pressure on biodiversity. The Plan requires mitigation of impacts on the road network, so effects should be minimised although this is uncertain. Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Core Strategy, Tonbridge and Malling Borough Council, September 2007

Provision is made for the development of at least 6,375 dwellings in the period 2006-2021.

Development will be concentrated within the confines of the urban areas of:

- Tonbridge (including Hilden Park);
- The Medway Gap (i.e. the major developed parts of Kings Hill, Leybourne, East Malling, Larkfield, Lunsford Park, Ditton and Aylesford south of the River Medway, Aylesford Forstal, and Snodland);
- The part of the Medway Towns urban area that lies within Tonbridge and Malling Borough (Walderslade).

Development adjoining these urban areas will only be proposed in the LDF, or otherwise permitted, where there is an identified need and there are no suitable sites within the urban areas. Priority will be afforded to the use of previously developed land.

Housing and employment development or redevelopment, conversions and changes of use will be proposed or otherwise permitted within the confines of the following rural settlements which are defined as Rural Service Centres: Borough Green; Hildenborough; East Peckham; West Malling; Hadlow.

Major new housing development will be met at following strategic sites:

- Holborough (with permission) – 938 dwellings to be developed between 2006 and 2016;
- Kings Hill (with permission) –1446 dwellings to be developed between 2006 and 2016;
- Leybourne Grange (with permission) – 723 dwellings to be developed between 2008 to 2016;
- Peters Pit (with permission) - 1000 dwellings to be developed mainly in the post 2011 period.

New employment provision will be met at Kings Hill and on vacant sites within the main employment areas as well as through the intensification or redevelopment of existing employment sites.

Land at Bushey Wood is safeguarded for housing development post 2021. Assessment of its development potential must have regard to the need to avoid sterilising any viable mineral reserves within the area which have permission for mineral working. However, the Core Strategy contains no other more general policy or text on the approach to sites that contain safeguarded mineral resources or waste or minerals facilities.

Contribution to Cumulative Effects

The proposed housing and employment growth within Tonbridge and Malling will enable the needs of communities for jobs and homes to be met. However, the growth will result in increased greenhouse gas emissions. Development of new sites is likely to lead to increased pressure on biodiversity from habitat loss and disturbance. This is particularly the case with the strategic sites at Holborough, Kings Hill, Leybourne Grange and Peters Pit. Impacts of development on the transport network may be offset to some degree by the requirement for measures to mitigate effects, although the overall balance of effects is not certain. Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

The proposed housing and employment growth within Tonbridge and Malling will enable the needs of communities for jobs and homes to be met. However, the growth will result in increased greenhouse gas emissions. Development of new sites is likely to lead to increased pressure on biodiversity from habitat loss and disturbance. This is particularly the case with the strategic sites at Holborough, Kings Hill, Leybourne Grange and Peters Pit. Impacts of development on the transport network may be offset to some degree by the requirement for measures to mitigate effects, although the overall balance of effects is not certain. Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Core Strategy DPD, Tunbridge Wells Borough Council, June 2010

Policy for development in Royal Tunbridge Wells provides for approximately 4,200 net additional dwellings over the period 2006 to 2026. It encourages a greater proportion of office space (B1) within the town centre, with approximately 23,500m^2 (net) additional comparison retail

floorspace to be provided by 2017 in the town centre. The Core Strategy emphasises the role of the town centre as a focal point for a mix of employment, retail and complementary uses.

Approximately 300 net additional dwellings will be delivered in Southborough. In the order of 500m^2 (net) additional comparison floorspace will be delivered by 2017. Infrastructure improvements to encourage the uptake of sustainable transport modes, such as walking, cycling and use of public transport, will be pursued in order to reduce congestion and improve transport links to Royal Tunbridge Well. Measures to improve air quality within the Air Quality Management Area will be investigated and pursued.

The Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or minerals or waste facilities.

Contribution to Cumulative Effects

Proposed developments in Royal Tunbridge Wells and Southborough are likely to contribute to increased wellbeing by meeting the needs of communities for homes and jobs. However, they will contribute to increased greenhouse gas emissions and increased demand for space on the road network, although this may be offset to some degree by measures to encourage sustainable transport use and air quality improvements.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Submission Local Plan 2020-2038, Tunbridge Wells Borough Council, October 2021

The broad development strategy for Tunbridge Wells borough over the period 2020-2038 is to ensure that a minimum of 12,204 dwellings and 14 hectares of employment (Use Classes B and E) land are developed, together with supporting infrastructure and services.

The Plan provides for the growth of settlements, having regard to their role and function, constraints and opportunities, together with the development of two strategic sites, namely major, transformational expansion of Paddock Wood (including land at east Capel) following garden settlement principles and providing flood risk solutions and the creation of a new garden settlement: Tudeley Village between Paddock Wood and Tonbridge.

The Plan also provides for a prestigious new business park to the north of North Farm/Kingstanding Way, Royal Tunbridge Wells, well connected to the improved A21.

The majority of housing growth is located as follows:

- Royal Tunbridge Wells: 1416 to 1536 dwellings
- Paddock Wood to the west, north and east of the existing settlement: 3932 to 4032 dwellings
- Tudeley Village: 2100 dwellings

Four employment land allocations are identified, including:

- 13.4 ha in Royal Tunbridge Wells
- 6.6 ha at Paddock Wood
- 4.6 ha at Paddock Wood

There is a package of significant transport measures to support the growth at the Strategic Sites at Paddock Wood (including land at east Capel) and Tudeley Village, including new road junctions/links, bus links and services and active travel provision (including towards Royal Tunbridge Wells and Tonbridge). There is a further package of measures for Royal Tunbridge Wells and Pembury, including improvements to road junctions/links, bus priority measures, and upgraded and new cycle routes and pedestrian links.

The Council will work with Kent County Council and National Highways (formerly Highways England) to deliver strategic and local highway improvements to mitigate and address the impact on the highway network. These measures will be funded by development, although other funding opportunities will be investigated. Mitigation measures include:

- part off-line, part on-line improvements to the A228;
- the provision of a highway link bypassing Five Oak Green;
- measures along the A228/A264, including junction capacity improvements at Woodsgate Corner and a roundabout at the Pembury Road/Halls Hole Road/Blackhurst Lane.

The routes for major and strategic road improvements, including a route for an entirely off-line A228 strategic link (Colts Hill bypass) as part of the wider major roads network (to deliver wider economic benefits and links to north east Kent (and potentially the Lower Thames Crossing), and the dualling of the A21 from Kippings Cross to Lamberhurst will be safeguarded.

The Submission Local Plan notes the need for development proposals to comply with the safeguarding policies in the KMWLP. It notes potential mineral constraints at Paddock Wood, Tudeley Village and Tunbridge Wells Garden Centre.

Contribution to Cumulative Effects

Proposed developments in Royal Tunbridge Wells and Southborough are likely to contribute to increased wellbeing by meeting the needs of communities for homes and jobs. However, they will contribute to increased greenhouse gas emissions and increased demand for space on the road network, although this may be offset to some degree by measures to encourage sustainable transport use and air quality improvements.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Dartford Core Strategy, Dartford Borough Council, September 2011

Dartford Town Centre and Northern Gateway are to provide up to 3070 homes and 1500 jobs and up to 24,000m^2 net shopping floorspace. Of this, Northern Gateway will provide up to 2,040 homes, 1200 jobs in B1, B2 and B8 uses and provision of a mix of uses and the creation of a new area of public realm around the Mill Pond. Uses may include local shops and leisure uses, a hotel, community facilities and cafes, pubs and restaurants fronting onto the waterside.

The Core Strategy will create multifunctional greenspace alongside the River Darent and within and across the Northern Gateway site, providing at least 30% open space across the site, with provision for biodiversity and landscape improvements as well as recreational, sporting and amenity areas. Land at Dartford Fresh Marsh, the Mill Pond and the provision of a park on the eastern side will form part of the provision.

The Core Strategy seeks to minimise the amount of traffic generated by the Northern Gateway site, with an emphasis on sustainable forms of travel, with Fastrack provision through the site, direct access to Dartford station and foot and cycle connectivity. Planning applications must be supported by a transport assessment which takes into account all planned development in the town centre as well as the Northern Gateway. In advance of a Community Infrastructure Levy (CIL), a proportionate contribution will be required towards short-term mitigation measures to address any impact of the proposal on Junction 1a of the M25 (A282). A Travel Plan will be required for each application.

New residential communities will be focused on Ebbsfleet Valley and Stone, providing up to 7,850 homes within the Plan period, with further development beyond 2026. The Plan will also provide 9,700 jobs in offices and other B1 uses within the Plan period, with a concentration of these in the Ebbsfleet Valley. A centre of excellence for sport and recreation will be provided at

Stone Lodge, expanding on the existing Olympic-level provision on the site. Options for the evolution of Bluewater which provide for a wider range of uses will be explored. At Ebbsfleet Valley, a community of up to 10,000 homes, (up to 5,250 assumed to be provided in the Plan period) with a business district providing approximately 16,900 jobs, (up to 9,500 assumed to be provided in the Plan period) and leisure and retail uses to support local residents, workers and visitor.

The Kent Thameside Strategy for the waterfront seeks to open up access to the river for existing and future communities and to produce a high quality riverscape. Recent piecemeal development of the Thames Waterfront has not achieved the full potential that co-ordinated development of the riverside could bring. A number of potential sites on the Thames Waterfront present a unique opportunity to create mixed use development, bringing life and activity back to the river. The Council will promote the creation of a vibrant mixed-use riverfront, incorporating sustainable communities, new employment opportunities, leisure use of the river /riverside and use of the river for sustainable transport, by supporting residential development of up to 3,750 homes and provision of up to 456,000m^2 of employment floorspace.

The Core Strategy seeks to protect and enhance Black Duck Marsh and Dartford Marshes as areas of biodiversity value and public recreational areas for quiet enjoyment, to the extent that the ecological protection of the area permits. New development will be expected to include connecting corridors of natural habitat along the river to enhance biodiversity linkages and to protect s41 species and other species of local ecological value.

In order to reduce the need to travel, minimise car use and make the most effective use of the transport network, the Council will:

- Encourage mixed use development and close interrelationship between complementary land uses: homes, jobs, shops and leisure, recreational and community facilities;
- Require major development sites to make provision for Fastrack as part of planning proposals.

In order to enable the transport network to respond to the pressures of new development, the Council will work with its partners to deliver a Strategic Transport Infrastructure Programme to ensure that the transport network operates at acceptable levels and that the transport infrastructure is in place to support new development.

The following infrastructure improvements are identified:

- Provision of Fastrack route through the Northern Gateway site by 2021
- A206/Marsh Street - replacement of roundabout with signal controlled junction by 2021

- Junction 1A improvements by 2021

The Core Strategy requires development of wharves to be subject to a study demonstrating cargo handling at the wharf is not viable. It notes safeguarded wharves at Johnsons Wharf.

However, it contains no policy or text on the approach to sites that contain safeguarded mineral resources or other minerals or waste facilities.

Contribution to Cumulative Effects

Planned housing and employment developments in Dartford will contribute to the wellbeing of communities by providing homes and jobs to meet identified needs. It will also contribute to increased greenhouse gas emissions and increased demands for space on the road network. Transport infrastructure improvements may help to reduce the level of additional demand. The Core Strategy is likely to contribute to biodiversity enhancement and public wellbeing by providing multifunctional greenspace and improved habitat connectivity.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Dartford Local Plan to 2037: Pre-Submission (Publication) Document, Dartford Borough Council, September 2021

The total 15 year housing requirement is for 11,900 homes, or 790 homes per annum. The Plan also seeks approximately an average rate of 22,000m^2 per annum of new commercial, business and services uses, and community and learning uses (including offices, health facilities and schools); and approximately an average rate of 25,000m^2 per annum of new industrial/ distribution premises.

The overriding priority for development in the Borough is at Central Dartford and Ebbsfleet Garden City. These growth locations will be regenerated with the provision of new and improved infrastructure and strategic mixed use development. Development is directed to brownfield land not within the Green Belt and sites with good access by public transport and walking/ cycling to a range of local supporting services/ infrastructure.

Significant jobs, major commercial activity and new employment premises will be prioritised within Central Dartford and Ebbsfleet Garden City. Economic development will occur at locations elsewhere in the urban area where this is consistent with sustainable growth patterns and provides suitable improvement and expansion/ intensification of commercial locations.

The network of retail centres comprises

i) Dartford Town Centre, which will attract a wide range of new businesses;

ii) Bluewater, which will continue its regional economic contribution;

iii) District Centres at Dartford, Ebbsfleet, Swanscombe and Longfield; and

iv) Local Centres in the urban area and at villages.

Community uses, including education, health, sports facilities, cultural services and local shops, will be retained, and new facilities delivered. Development will ensure communities have good quality and sustainable access to the day-to-day facilities they need including local services and jobs.

New development will be located where well-served by public transport, and within easy walking distance of local facilities and jobs (for new homes, or the labour force/ primary catchment as applicable for other developments). All major development will feature significant measures to provide improved safe and secure active travel routes integrated with the surrounding area. Large and trip generating developments should support public transport use and new infrastructure.

In Central Dartford, the Council seeks to secure major transport investment to: mitigate the current adverse impacts of traffic congestion; increase public transport capacity and services, reducing dependency on car travel; and enhance walking and cycling. The Council will seek full integration of rail, bus and Fastrack services, particularly at a new railway station and with new rail services for Dartford.

A 21st century garden city at Ebbsfleet will continue to be created, sensitively integrated into its environment and surroundings, providing high quality new greenspace, infrastructure, homes and business investment and ensuring climate resilience. This will be achieved by the co-ordinated delivery of integrated and accessible sustainable transport, and well-designed and well-served mixed neighbourhoods. These will include workplaces, schools, health facilities and centres which serve and are well linked to neighbouring communities and towns, encourage walking and cycling and are connected by modern public transport systems. It will become an important destination for recreation and leisure uses.

A new urban heart will be created at Ebbsfleet Central around a transport hub focussed on Ebbsfleet International Station, and plans for new neighbourhoods at Alkerden and Ashmere. The neighbourhoods at Ebbsfleet Green, Castle Hill, and north west of Swanscombe will be completed. Further development may come forward at suitable land north of London Road, Swanscombe.

Development in Ebbsfleet Garden City should ensure wherever possible that Swanscombe benefits from:

a) access to better facilities and public transport, including upgrades to the accessibility of, and services from, Swanscombe railway station (or a new station); and

b) improvements to existing connections and the delivery of new green walking and cycling connections, in particular linking in to improvements towards the River Thames and Ebbsfleet International Station.

At Swanscombe, environmental and infrastructure enhancements, including to upgrade public transport and walking/ cycling connections, will be sought.

Supporting text notes that some parts of the Borough are in Mineral Safeguarding Areas under the KMWLP and indicates that development in MSAs should be avoided where possible or otherwise will be considered in accordance with policy DM 7 of the KMWLP.

Contribution to Cumulative Effects

Proposed developments within Dartford Borough are likely to contribute to increased wellbeing by meeting the needs of communities for homes and jobs. However, they will contribute to increased greenhouse gas emissions and increased demand for space on the road network, although this may be offset to some degree by measures to encourage sustainable transport use and air quality improvements.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Canterbury District Local Plan, Canterbury City Council, July 2017

The Local Plan identifies that between 2011 and 2031, the following will be required:

- 16,000 housing units
- 96,775m^2 of employment land
- 33,800m^2 of comparison retail
- 2608m^2 of convenience retail

Strategic sites are allocated in Canterbury, Sturry/Broad Oak, Herne Bay, Whitstable, Hersden and Thanington.

The urban areas of Canterbury, Herne Bay and Whitstable will continue to be the principal focus for development, with a particular focus at Canterbury, together with development at the rural service centres and local centres.

The Council has developed an Infrastructure Delivery Plan, seeking to identify the key elements of infrastructure that would be required to support the level and distribution of development being proposed in this Plan. Key elements of infrastructure include:

- Provision of fast bus links into Canterbury
- Road improvements at Sturry and Herne
- Additional Park & Ride provision to serve Canterbury
- Provision of new cycle paths/footpaths
- Completion of bus lanes in key areas
- New/improved A2 junction at Bridge
- New eastbound off slip road and extended westbound slip road off the A2 at Wincheap, Canterbury

In considering the location of new development, or the relocation of existing activities, the Council will always take account of the following principles of the Transport Strategy:

- Controlling the level and environmental impact of vehicular traffic including air quality;
- Providing alternative modes of transport to the car by extending provision for pedestrians, cyclists and the use of public transport;
- Reducing cross-town traffic movements in the historic centre of Canterbury;
- Providing public car parking and controlling parking having regard to the Parking Strategy;
- Assessing development proposals in the light of transport demands and the scope for choice between transport modes; and
- Seeking the construction of new roads and/or junction improvements which will improve environmental conditions and/or contribute towards the economic well-being of the District.

The Plan notes that East Quay at Whitstable is safeguarded as a mineral transport facility and states that any proposals will have to have regard to policy CSM6 of the KMWLP.

However, there is no policy or text on the approach to sites that contain safeguarded mineral resources or minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised

or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Draft Canterbury District Local Plan to 2045, Canterbury District Council, October 2022

Between 2020 and 2045 provision is made through the granting of planning permission and the allocation of sites for:

(a) An average of 1,252 new dwellings per year and 26 pitches for gypsy and traveller accommodation;

(b) 38,480 m2 floorspace for office use;

(c) 52,030 m2 floorspace for light industrial use;

(d) 15,270 m2 floorspace for general industrial use;

(e) 66,440 m2 floorspace for warehousing use;

(f) 414 m2 floorspace for convenience retail use; and

(g) 5,290 sqm floorspace for comparison retail use.

Canterbury urban area will be the principal focus for development in the district. Whitstable urban area and Herne Bay urban area will be the secondary focus for development in the district. A new Garden Community Broad Location is identified at Cooting Farm, Adisham Road which will provide new homes, jobs, services and infrastructure.

New development should be designed to achieve Net Zero operational carbon emissions, should make efficient use of land and should be designed to maximise energy and water efficiency.

New communities of more than 300 homes should contain comprehensive and accessible community hubs to reduce the need to travel for day-to-day services and facilities. Community facilities and services such as healthcare, education and local shopping and employment uses should be co-located at the heart of new such developments, within or next to the community hub and provided early within the development.

The network of green and blue infrastructure will be protected, maintained and enhanced. New developments should provide and sustain a multifunctional and coherent green and blue infrastructure network, which maximises the locally influenced ecological potential of existing assets, new open space provision, tree planting and other features of the development such as sustainable drainage systems and landscape buffers. Opportunities for carbon sequestration and for the development of renewable and low-carbon sources of energy will be actively supported within all developments. The network of green and blue infrastructure in the district will be protected, maintained and enhanced.

Working with partners, including Kent County Council, the council will deliver a comprehensive programme of sustainable transport infrastructure measures to improve neighbourhoods, accommodate new growth and to facilitate a significant shift to low carbon and active travel journeys, particularly for short trips. Key infrastructure requirements of the new Canterbury Circulation Plan include:

(a) The relocation of key city centre car parking to locations outside of the inner ring road;

(b) The delivery of a comprehensive city-wide network of segregated cycle lanes and cycle parking infrastructure, with links to the coast and rural areas;

(c) Enhanced public realm and pedestrian environment on key routes and within the city centre;

(d) Improved public transport connectivity across the city, with bus priority measures and enhanced park and ride infrastructure, and upgrades at Canterbury West and Canterbury East rail stations;

(e) Delivery of "shared streets" within existing neighbourhoods to improve neighbourhood environments and support active travel journeys;

(f) Implementation of an ANPR-based sectoring system and modal filters to limit cross-city trips;

(g) The delivery of enhanced road infrastructure to improve connectivity, facilitate alternative access points to the city, and enable the delivery of the measures at a-f including:

(i) upgrades at the A2 junction at Harbledown and at Rough Common Road;

(ii) new A2 access to the Kent and Canterbury Hospital and links to the A28 at Thanington; and

(iii) a new movement corridor to connect the A28 at Sturry with the A2 at Bridge.

New development should ensure easy and safe pedestrian and cycle connectivity is available Walking, cycling and active, low carbon, sustainable transport modes (such as public transport stops) should be prioritised over private cars. New development should be designed to help

improve the air quality of the district as a whole. Several of the sites allocated for development within the draft Plan are required to undertake a minerals assessment in accordance with the KMWLP. These sites are in Canterbury (C6, C8, C12, C13, C14, C15, C20, C21, C22), Whitstable (W5), Herne Bay (HB4, HB6) and rural areas (R12, R15, R16, R26).

Contribution to Cumulative Effects

Proposed developments within Canterbury District are likely to contribute to increased wellbeing by meeting the needs of communities for homes, jobs, community infrastructure and open space. However, they will contribute to increased greenhouse gas emissions and increased demand for space on the road network, although this may be offset to some degree by measures to achieve net zero operational emissions, maximise energy and water efficiency, minimise transport and encourage sustainable transport use and air quality improvements and increase the amount of green infrastructure in the District.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Core Strategy, Dover District Council, February 2010

The Strategy will focus on Dover town where there is most need for action but also where there is most potential. At Deal, Sandwich and the large rural area the Strategy will be selective responding to more localised needs although some of these, especially at Deal and Aylesham are more significant.

The Strategy's Key Features are, between 2006 and 2026, to:

- Realise forecast growth in the local economy including up to 6,500 more jobs and 347,500 m^2 of employment space
- Support a forecast population increase of around 15,500 which will increase the potential workforce by some 4,300 people. Combined with other measures to increase the proportion of people in work, this would provide a workforce to support the forecast jobs growth of around 6,500 without the likelihood of a significant increase in in-commuting
- Reduce the ageing trend of the population structure (child age group to reduce by only around 1,200) while planning to meet the needs of older people (over 65s likely to increase by around 12,500)
- Allocate land for around 14,000 new homes with the aim of providing at least 10,100 by 2026
- Provide homes that meet the changing needs of the home population but that also attract working age people and families to the District

- To realise around 54,000m^2 gross of additional shopping floorspace and reduce the need for residents to make shopping trips outside the District
- Concentrate these actions at Dover to enable its transformation
- Support these actions with the necessary range of infrastructure, including green infrastructure

The following transport infrastructure needs are identified, all of which were expected to be delivered by 2021:

- High Speed 1 train service from Dover to London via Ebbsfleet and Stratford
- Terminal 2 - Dover Western Docks Ferry Terminal (Port of Dover Masterplan)
- Package of sustainable transport measures for Dover (identified in Dover Transport Strategy)
- Dover town centre to Whitfield express bus link (Dover Transport Strategy)
- Identification of access arrangements into Whitfield from A2 and A256
- A2 Lydden to Dover dualling
- Dover Park and Ride system

The District Council supports the development of a new freight and passenger ferry terminal at Dover Western Docks provided it safeguards the aggregates wharf facility identified in the Kent Minerals Local Plan

However, the Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or other minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Dover District Local Plan to 2040: Regulation 19 Submission, Dover District Council, October 2022

Provision is made for at least 10,998 net additional homes, in the District over the Plan period. The majority of new housing development will be in Dover Town and at Whitfield. Land is therefore identified to deliver a minimum of 3,381 homes in addition to existing commitments. Development will then be focused in the District Centre of Deal, and the Rural Service Centres of Sandwich and Aylesham. Development in Deal, Sandwich and Aylesham will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services and other facilities available in these locations. Land is therefore allocated to deliver in the region of 1,099 homes, in addition to existing commitments. Development in the rural areas will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity. Land is therefore allocated to deliver in the region of 1,112 homes, in addition to existing commitments.

The Council will support the creation of healthy, inclusive and safe communities in the District by ensuring that new development is well served by services and facilities and that a mix of uses are provided in new development that support daily life, and creating opportunities for better active travel, to promote physical health, including provision for safe cycle and pedestrian routes.

The Council will seek to ensure that all new built development contributes to the mitigation of, and adaptation to, climate change through:

a Including low carbon design approaches to reduce energy consumption in buildings;

b Utilising sustainable construction techniques and optimising resource efficiency;

c Incorporating renewable and low carbon technologies;

d Providing opportunities for decentralised energy and heating;

e Maximising green infrastructure; and

f Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes.

g Ensuring that development is designed to reduce vulnerability to, and provide resilience from, the impacts arising from a changing climate, whilst not increasing the potential for increased greenhouse gas emissions in doing so;

h Incorporating multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production;

i Improving water efficiency; and

j Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding.

Economic growth will be supported in the District to deliver a minimum of 117,290 m^2 of new employment floorspace over the Plan period

The Council will work with Kent County Council, National Highways and other transport providers to deliver strategic transport improvements to mitigate and address the impact of development or remove impediment to future growth. Key strategic transport schemes are:

a) long-term improvements to the A2 from Lydden Hill to the Port of Dover
b) Strategic Highway Improvements / Mitigation at A2 junctions:

i Whitfield Roundabout

ii Duke of York Roundabout

iii A257/A256 Junction

iv A258/A256 Junction

The Council, in partnership with Network Rail, will support proposals for a journey time of less than 1 hour between Dover and St Pancras, along with additional capacity on the High Speed route and associated station improvements, including additional car parking at Dover Priory.

The Council will work with Kent County Council, National Highways and developers to ensure delivery of the Dover Fastrack Service and will support proposals for the rural demand-responsive bus service and other improvements to local bus service provision.

Supporting text on information required with planning applications states that for sites identified as being in a KCC Minerals area, a Minerals Assessment will be required in accordance with Policy DM7 of the adopted Kent Waste and Mineral Local Plan. The KCC Waste and Minerals Team should also be consulted.

Contribution to Cumulative Effects

Proposed developments within Dover District are likely to contribute to increased wellbeing by meeting the needs of communities for homes, jobs, community infrastructure and open space. However, they will contribute to increased greenhouse gas emissions and increased demand for space on the road network, although this may be offset to some degree by the requirement to incorporate climate change mitigation measures within developments, to maximise energy and water efficiency, minimise transport and encourage sustainable transport use and increase the amount of green infrastructure in the District.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Gravesham Local Plan Core Strategy, Gravesham Borough Council, September 2014

The Strategy seeks to make the most efficient use of land by concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend town centre, and at Ebbsfleet. It makes provision for at least 6,170 new dwellings during the plan period 2011 – 2028 as follows:

- Gravesend: 1670
- Northfleet: 1030
- Ebbsfleet: 690
- Rest of borough: 1550
- Unidentified sites: 1240.

It is planned to provide employment floorspace which should enable the delivery of at least 4,600 new B class jobs over the plan period, as follows:

- Gravesend: 27,900
- Northfleet: 133,550
- Ebbsfleet: 20,000
- Rest of urban area: 5,050

It also seeks to provide net retail floorspace of 18,280m^2.

Within the Northfleet opportunity area is Northfleet Cement Works Regeneration Area (sub-area 1.5), which consists of the remainder of the former Lafarge cement works site and lies at a lower level than the adjoining residential community on the banks of the River Thames. Access to the site is primarily via a road tunnel from the A226 Thames Way that passes through Vineyard Pit. A rail connection to the North Kent line has also been reinstated via Church Path Pit, a connected site to the south, which has the potential to be extended to sub-areas 1.7

(Kimberly Clark) and 1.8 (Northfleet Embankment East) in due course. There is also good deep water access via the existing Wharf.

This area is identified as a Key Site. There is a resolution to grant planning permission for around 46,000m^2 gross employment floorspace for business, industrial and storage and distribution uses under use classes B1, B2 and B8. In conjunction with this, listed building consent has also been given for the dismantling, relocation and reassembly of the Grade II listed Bevan's War Memorial. The other Grade II listed building in the vicinity of the site is the Northfleet Lower Lighthouse located at the eastern end of Wharf 42. The lighthouse is expected to remain in its present position and retain its industrial setting. The Port of London Authority also has an important navigational installation on-site, on the former cement works office block.

A planning permission also exists for the use of part of the site as a Bulk Aggregates Import Terminal, whilst a major cement importing facility has been created through the conversion of the former cement works coal store. In the short term, much of the site will be used for the importation and onward transhipment of Crossrail spoil. In the longer term, it is anticipated that the employment development will come forward.

Most of this Opportunity Area (with the exception of sub-areas 1.6 and 1.9) is within the Northfleet Industrial Air Quality Management Area which was declared because of high levels of particulate matter, i.e. dust, arising from uncontrolled emissions from industrial processes. The closure of the Northfleet Cement works has removed a major source of dust, but current activities and the open nature of some of the area mean that it remains a potential issue. It will be important to take account of air quality in bringing forward any development of the area and a key objective will be to secure continued improvements to air quality through the redevelopment and environmental improvement of sites.

Policy identifies the Northfleet Cement Works Regeneration Area Key Site, which will provide an employment development of around 46,000m^2 gross new employment floorspace comprising business, industrial, and storage and distribution facilities (use classes B1, B2 and B8) and a Bulk Aggregates Import Terminal. Such development will be required to satisfactorily relocate Bevan's War Memorial.

Adjacent to the cement works is Old Northfleet Residential Extension Key Site (sub-area 1.4), which is allocated to provide a residential development of around 530 dwellings, open space, an extension and improvements to the Hive local centre and provision of community facilities.

The Ebbsfleet (Gravesham) Opportunity Area is a substantial opportunity for a high quality, sustainable, mixed use development in line with the long-standing strategy to create a major business district at Ebbsfleet within Dartford as well as Gravesham. Development of the Key Sites will lead to the provision of around 690 new dwellings and around 20,000m^2 gross

business employment floorspace (use classes B1a, B1b and B1c), together with supporting retail (use class A1) and other facilities, leisure/entertainment floorspace (use class D2), hotels and restaurants. There is potential for the provision of additional dwellings and business floorspace in the longer term. Facilities will be provided to support development of the Springhead Quarter and Northfleet Rise Quarter Key Sites and will be accessible to both existing and future communities. These will include the provision of recycling and waste transfer facilities.

The Core Strategy seeks to:

- locate new mixed use development in areas with best access to services and facilities which minimise the need to travel, particularly by car;
- improve the local economy to reduce the need for out-commuting. This can also have an impact on air quality;
- support and where possible provide alternatives to help support a modal shift away from car based transport, e.g. improve public transport including bus, train, cycling and walking provision, and increase the use of water based transport; and
- ameliorate the implications of additional traffic for air quality.

The Core Strategy contains a strategic objective to, as a minimum, safeguard the capacity of commercial wharves and other sites needed to support the River Thames as a working waterway.

Any future proposals for the Swanscombe Peninsula East Undeveloped Area will be subject to a comprehensive masterplan approach which deals with the issues of flood risk, transport and access, ground conditions, proximity to existing industrial uses, air quality, biodiversity, utilities, navigation and the presence of the HS1 railway line.

The Core Strategy notes aggregates operations at Northfleet Embankment East Regeneration Area. The Council will seek to ensure, as a minimum, that sufficient minerals capacity is maintained through appropriate alternative provision, so that wider regeneration initiatives do not prejudice the parallel requirements of the Kent Minerals and Waste Local Plan. Proposals for the Key Site will be required to retain Red Lion Wharf for commercial river based use that is appropriate to context, subject to capacity for the transhipment of minerals being maintained through appropriate alternative provision off-site.

The Highways Agency has concerns about the impact of development in the Borough and Dartford on the strategic road network and how any impacts will be mitigated. The Council will work jointly with the Highways Agency, Kent County Council, Dartford Borough Council and all other relevant parties to ensure that the transport needs arising from new development in the

Borough are met and that the most efficient use is made of the existing highway network, e.g. through management measures and the introduction of information systems.

The Dartford Crossing is one of the UK's most important strategic connections but its capacity is considerably overloaded for large periods for the day. The Department for Transport consulted in July 2013 on three alternative options to address capacity issues in the future: enhancement of the existing crossing at Dartford; a new crossing at Swanscombe Peninsula; and a new crossing East of Gravesend. The Swanscombe Peninsula option has since been ruled out by the Secretary of State. Gravesham Borough Council objects to the East of Gravesend Option. Until such time as there is a safeguarded route, it has not been possible for the Core Strategy to take any account of the implications of additional capacity.

The Core Strategy notes that there are a number of commercial wharves on the riverside at Gravesend and Northfleet, and that the KMWLP proposes that a number of these are safeguarded, protecting them from development which could prejudice their future use for minerals importation. Subject to planning controls being applicable, the safeguarding of wharves is supported by the Council in general terms to enable river freight handling to reduce dependence on road freight transport. However, the Council considers that a more flexible approach is appropriate where wider regeneration initiatives are being sought and it is possible to rationalise assets in ways that, as a minimum, maintain necessary capacity for freight handling and provide equivalent or better facilities. This is the approach followed in Policy CS11 (Transport).

The loss of existing commercial wharves shown on the Policies Map and other land-side supporting infrastructure will not be supported unless a study and supporting evidence shows that they are no longer viable for marine related employment purposes or are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance, or appropriate alternative provision is available or will be provided as part of the rationalisation of facilities that, as a minimum, maintains capacity and provides equivalent or better facilities.

The Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or other minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay

community benefits associated with house construction or economic benefits associated with employment provision.

Development in Gravesham is focused on Gravesham, Northfleet and Ebbsfleet, all of which are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Core Strategy, Sevenoaks District Council, February 2011

The Core Strategy will deliver an annual average of 165 dwellings (net addition), equivalent to 3,300 additional dwellings over the period 2006 to 2026 The majority of new housing development will be focused in the urban areas of Sevenoaks (1331 units) and Swanley (660 units). Edenbridge (411 units) will retain its role as a rural service centre serving the surrounding villages with a range of shops, services and employment.

The Transport Strategy identifies four priority objectives, which are Improving accessibility, tackling congestion, providing safer roads and Improving air quality. These have been used to identify priorities in different parts of the District.

Priorities for Sevenoaks Urban Area:

- Improve public transport interchange facilities, in particular at the main bus and train stations in Sevenoaks District.
- Maintain and improve capacity on peak train services.
- Manage parking issues in the town centre and around train stations.
- Bring forward measures to alleviate congestion and tackle air quality issues at Riverhead, Bat and Ball and Sevenoaks Town Centre.
- Improve facilities for walking and cycling.

Priorities for Swanley:

- Improve accessibility to Swanley Station by walking and cycling.
- Ensure that development in Swanley does not have a significant negative impact on traffic on the Strategic Road Network.
- Improve bus interchange facilities in Swanley.
- Improve facilities for walking and cycling.
- Bring forward measures to alleviate congestion and tackle air quality issues near Swanley town centre.

Priorities for Edenbridge:

- Maintain and improve capacity on peak train services.

- Increasing the number of destinations that can be accessed via train services from Edenbridge, including services to Gatwick Airport / improved services to Redhill.
- Improve facilities for walking and cycling.
- Maintain and, where necessary, improve safety on main access roads to Edenbridge.

Priorities for villages and rural areas:

- Maintain and improve accessibility to jobs, shops and services by non-car means, including walking, cycling, public transport and community transport.
- Bring forward measures to alleviate congestion and tackle air quality issues, including those along the A25 corridor, at Seal and Westerham, and on the Strategic Network

The Employment Land Review shows that future employment land needs can be met largely within existing employment sites provided the great majority of these sites are retained in employment use. The distribution of employment land is based on existing development and is therefore principally at Sevenoaks (27.2 ha), Swanley (30.8 ha) and Edenbridge (22.1 ha), including a previously undeveloped site at Swanley. Other significant contributions come from the Major Developed Sites in the Green Belt (at Kemsing, Leigh, Dunton Green and Halstead).

The Council will support and promote measures to reduce reliance on travel by car both in providing for new development and in supporting measures promoted through the Transport Strategy. Specifically it will:

1. Support improvements to enhance the safety and convenience of public and community transport.

2. Seek improved facilities for cyclists and pedestrians

3. Require the inclusion of Travel Plans and other appropriate measures in new developments that generate significant traffic volumes

The design and location of new development will take account of the need to improve air quality in accordance with the District's Air Quality Action Plan. Development in areas of poor air quality or development that may have an adverse impact on air quality will be required to incorporate mitigation measures to reduce impact to an acceptable level. New development in areas of poor air quality will be required to incorporate measures in the design and orientation that demonstrate an acceptable environment will be created for future occupiers. Permission will be refused where unacceptable impacts cannot be overcome by mitigation.

The Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

The Swale Borough Local Plan, Swale Borough Council, July 2017

Land is identified by the Local Plan to meet the following development targets for the plan period 2013/14-2031:

- employment land B class: 130,000m^2
- housing 13,192 dwellings (776 per annum)

The main Borough urban centre of Sittingbourne will provide the primary urban focus for growth, where development will support town centre regeneration and underpin the town's role as the principal centre.

The other Borough urban centres of Faversham and Sheerness will provide the secondary urban focus for growth at a scale and form compatible to their historic and natural assets and where it can support their roles as local centres serving their hinterland. Additionally at Sheerness its role and functioning will be supported by the other urban local centres within the West Sheppey Triangle to meet the Island's development needs on previously developed sites or at existing committed locations and allocations well related to the urban framework and strategic transport network.

The Rural Local Service Centres will provide the tertiary focus for growth in the Borough and the primary focus for the rural area. At allocated sites relating well to the existing settlement pattern and the character of the surrounding countryside, development will provide for the local housing or employment needs for their home and surrounding communities, whilst supporting existing and new services.

Other villages with built-up area boundaries will provide development on minor infill and redevelopment sites within the built up area boundaries where compatible with the settlement's character, amenity, landscape setting, heritage or biodiversity value.

At locations in the open countryside outside the built-up area boundaries development will not be permitted, unless supported by national planning policy and able to demonstrate that it would contribute to protecting and, where appropriate, enhancing the intrinsic value, landscape setting, tranquillity and beauty of the countryside, its buildings and the vitality of rural communities.

Sittingbourne will provide 43.5% of the borough's housing need, while the other urban areas of Faversham, Sheerness, Queensborough/Rushenden and Minster/Halfway will provide 44.1%.

Totals:

- Sittingbourne: 4417 dwellings, 153,985m^2 industrial/office floorspace
- Sheerness: 0 dwellings, 7500m^2 industrial/office floorspace
- Faversham: 1739 dwellings, 53,325m^2 industrial/office floorspace
- Minster and Halfway: 1494 dwellings, 0m^2 industrial/office floorspace
- Queenborough and Rushenden: 1245 dwellings, 142,611m^2 industrial/office floorspace

To promote sustainable transport in Sittingbourne, the council is focusing on improving the quality of bus journeys, in particular the accessibility and facilities for passengers in central Sittingbourne. Within the town centre, major proposals will provide a central focus for bus and rail services in the vicinity of the station, which has been boosted by the award of £2.5m from the South East Local Economic Partnership local growth fund. Central Sittingbourne regeneration will also contribute to improvements to the highway network and traffic management within the town centre. A bus quality partnership will aim to improve public transport conditions and services at the town and in its centre, alongside additional routes to new developments and better walking and cycling routes.

On the Isle of Sheppey, settlements within the West Sheppey Triangle are the focus of development and long-term change. Development proposals will, as appropriate, bring forward economic development on allocated sites and, as available, at the 'Existing Strategic Employment Sites', including, at the Port of Sheerness, supporting diversification of its activities.

The Isle of Sheppey area strategy requires that, where appropriate, larger scale development proposals bring forward improvements to the A2500 Lower Road.

Completed transport schemes have highlighted a remaining local pinch point at the junction of Barton Hill Drive/Lower Road, Minster, where replacement of the existing traffic signals with a roundabout would relieve local congestion and facilitate better access to the eastern side of Sheppey. Key schemes identified to address the accessibility, connectivity and capacity issues

in Swale include provision of a roundabout at Lower Road/ Barton Hill Drive A2500 to facilitate better access to eastern Sheppey.

Land west of Barton Hill Drive, Minster is allocated for some 620 dwellings, together with open space, landscaping and transport improvements.

The Local Plan identifies mineral safeguarding areas on the proposals map. It states that the Council will work with Kent County Council to identify and safeguard mineral reserves and the rail heads and wharves necessary to ensure the transport, import and export of minerals.

In the event that reserves are identified on sites allocated for development by this Local Plan, the Council will ensure that the developer works with the Minerals Planning Authority to ensure the timely working of the site, provided that there is a sustainable and viable outlet for the resource which allows extraction without an unreasonable impact on development coming forward in line with the safeguarding minerals and prior extraction policies contained in the Kent Minerals and Waste Local Plan.

The Local Plan identifies where safeguarded minerals are present on allocated sites and requires investigation of prior extraction.

Contribution to Cumulative Effects

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

Local Plan, Thanet District Council, July 2020

The primary focus for new housing development in Thanet is the urban area. Within the Thanet villages, housing development is allocated primarily in Minster, with limited development at Cliffsend, Monkton and St Nicholas. No housing development is specifically allocated in Sarre, Acol or Manston, but housing development of a size and scale commensurate with the size of the relevant settlement will be permitted within village confines. All new development will be expected to fully meet its infrastructure requirements, whether directly on site and/or by way of a contribution to necessary off-site infrastructure.

A minimum of 5,000 additional jobs are planned for in Thanet to 2031. Sufficient sites and premises suited to the needs of business are identified and safeguarded for such uses. Manston Business Park is the key location for advanced manufacturing and large scale job creating development.

Land is identified and allocated to accommodate up to 53.5ha of employment space over the period to 2031.

Thanet's town centres are priority areas for regeneration and employment generating development, including tourism and the cultural and creative industries which will be supported (Manston, Ramsgate, Broadstairs, St Nicholas)

The growth of the Port of Ramsgate is supported as a source of employment and as an attractor of inward investment. The Local Plan notes that Kent Minerals and Waste Local Plan 2013-2030 proposes to safeguard the port for the importation of minerals into Kent.

Policy on development at Ramsgate Port states that this is supported where it would facilitate its improvement as a port for shipping, increase traffic through the port, and introduce new routes and complementary land based facilities including marine engineering, subject to:

- a demonstrable port-related need for any proposed land based facilities to be located in the area of the port, and a demonstrable lack of suitable alternative inland locations; and
- compatibility with the character and function of Ramsgate waterfront and the Royal Harbour as a commercial leisure facility; and
- an acceptable environmental assessment of the impact of the proposed development upon the harbour, its setting and surrounding property, and
- the impact of any proposed land reclamation upon nature conservation, conservation of the built environment, the coast and archaeological heritage, together with any proposals to mitigate the impact.

The Local Plan requires masterplanning for development of the site at Shottendane Road to undertake an assessment of the potential impact on minerals management, transportation and production and waste management facilities and to mitigate any potential impacts on waste management capacity.

The Local Plan contains no policy or text on the approach to sites that contain safeguarded mineral resources or waste or minerals facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Sites are sufficiently distant from the strategic site in policy CSW 17 that cumulative impacts are not likely.

The London Plan 2021, London Assembly, March 2021

In order to manage London's waste sustainably:

1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026

2) existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)

3) the waste management capacity of existing sites should be optimised

4) new waste management sites should be provided where required

5) environmental, social and economic benefits from waste and secondary materials management should be created.

Development Plans should:

1) plan for identified waste needs

2) identify how waste will be reduced, in line with the principles of the Circular Economy and how the remaining quantum of waste will be managed

3) allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste.

An adequate supply of aggregates to support construction in London will be achieved by:

1) encouraging re-use and recycling of construction, demolition and excavation waste within London, including on-site

2) extracting land-won aggregates within London

3) importing aggregates to London by sustainable transport modes.

Most aggregates used in the capital come from outside London, including marine sand and gravel and land-won aggregates, principally crushed rock from other regions.

Contribution to Cumulative Effects

By requiring net self-sufficiency and ensuring sufficient sites are allocated to meet London's needs, the London Plan is unlikely to place additional pressure on Kent for its waste management needs. The London Plan identifies that most aggregates used in the capital come from outside London, including marine sand and gravel which may come through wharves in Kent. The London Plan requires Boroughs to safeguard existing and future wharf capacity and

railheads within London, which will help to reduce the potential for additional pressure on Kent's wharves and road network.