

Kent and Medway Structure Plan  
mapping out the future

Working Paper 15  
Sustainability Appraisal

September 2003





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## 0.0 Summary

### 0.1 Background

This Working Paper documents the key stages and findings of the Kent and Medway Structure Plan Sustainability Appraisal.

The Sustainability Appraisal has accompanied all stages of Plan's preparation to:

- encourage the authors to fully embrace the concept of sustainable development
- assist policy makers in their thinking
- ensure that sustainability is at the heart of the plan
- guide the refinement of policies

### 0.2 The Sustainability Appraisal Issues Paper

The Paper documents the Sustainability Appraisal by providing readers with an insight into:

<b>Context -</b>	What is a sustainability appraisal?
<b>Process -</b>	An outline of the 3 key stages of the appraisal
<b>Key findings -</b>	Overview of the key findings and recommendations
<b>Further Consideration of Sustainability Issues -</b>	Matters for consideration as the Plan is tested and developed further as a result of consultation

### 0.3 Key achievements of appraisal process

- Inclusion of an overarching policy on sustainable development
- Strengthening of :
  - environmental and sustainable design policies
  - policies for the protection and enhancement of the environment
  - references to climate change and renewable energy
  - policies to enable a shift in transport modes
- Promotion of mixed use development
- Increased emphasis on reducing the need to travel
- Promotion of effective use of urban land
- Fuller recognition of the needs of all sectors of the community and the provision of community infrastructure
- Reinforcement of health, social, arts and cultural issues
- Fuller attention to the needs of rural, urban and suburban areas
- Promotion of integrated resource management
- An assessment of cumulative impacts of transport, employment and housing to ensure a balanced approach

## 1.0 Context

### 1.1 Why complete a Sustainability Appraisal?

National planning guidance (Planning Policy Guidance Note 12 on Development Plans) requires that the Deposit Structure Plan be accompanied by an Environmental Appraisal. However, it emphasizes that sustainable development is not limited to environmental concerns. Central Government has therefore placed an emphasis on broadening plan and strategy appraisal from an Environmental Appraisal to a Sustainability Appraisal. It places an emphasis on an appraisal being a *'systematic and iterative process undertaken during the preparation of a plan or strategy that identifies and reports to the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined in order that the performance of the strategy and policies is improved.'* (DETR, October 2000, Good Practice Guide on Sustainable Appraisal of Regional Planning Guidance para 2.1).

From the outset, preparation of the Kent and Medway Structure Plan has followed this guidance closely, which has led to a plan that has:

- considered the social, economic, resource and environmental needs of the County
- been informed by detailed analysis of cross cutting and potentially conflicting issues
- adopted strong sustainability principles

#### o **Building on the Kent Structure Plan 1996 Environmental Appraisal**

The 1996 appraisal of the Kent Structure Plan focused on an environmental assessment of the Plan's policies. It therefore did not include detailed consideration of social and economic factors. More recent government advice highlights the need for a wider approach to appraisal that embraces the core themes of the UK's Sustainable Development Strategy:

- recognise the importance of economic, social and environmental objectives
- promote high and stable levels of economic growth and employment
- promote social progress which recognises the needs of everyone
- protect the environment and use natural resources prudently

### 1.3 Achieving a Sustainable Balance

There are inevitable tensions between the different issues that the Structure Plan has to take into account. The purpose of the Plan is to balance competing interests and ensure that the overall approach is one of sustainable development.

One of the key roles of the Sustainability Appraisal has been to reveal these tensions to enable the Councils' to come to a view to ensure the correct balance has been struck, and that unavoidable adverse impacts have been adequately mitigated.

The Sustainability Appraisal has ensured that all positive and negative influences have been highlighted at all stages of plan preparation. These have been considered during the drafting of the Plan and recommendations have been taken on board wherever feasible. As part of the Sustainability Appraisal, rural issues were embraced within the Appraisal process, following a request by the Countryside Agency to complete a 'Rural Proofing' exercise.

The Deposit Plan has taken on board an extensive array of sustainability issues. Consultation on the Deposit Plan provides an opportunity to consider further the overall 'pitch' of the Plan on sustainability matters. Section 3.0 identifies a number of questions to assist this.

## **2.0 Sustainability Appraisal – The Process and Key Findings**

The Sustainability Appraisal of the Kent and Medway Structure Plan has been an iterative process seeking to influence each key stage of the plan's preparation in order to:

- encourage the authors to fully embrace the concept of sustainable development
- assist policy makers in their thinking
- ensure that sustainability is at the heart of the plan
- guide the refinement of policies

To provide an insight into the role of the Sustainability Appraisal this section provides an overview of its 3 key stages:

- Developing the Sustainability Appraisal Methodology (Stage 1)
- Pre-Deposit Consultation – Interim Appraisal and Workshops (Stage 2)
- Drafting the Structure Plan – Chapter, Internal and External Appraisals (Stage 3)

### **2.1 Stage 1: Developing the Sustainability Appraisal Methodology**

#### **2.1.1 The Approach**

Table 1 highlights the approach that the Sustainability Appraisal Working Group took and the key influences on the plan-making process.

From the outset attention was given to the Sustainability Appraisal. Officers were guided by government policy and took on board its shift in emphasis away from the Environmental Appraisal approach undertaken for the 1996 Kent Structure Plan, towards the more rounded Sustainability Appraisal.

To take forward the Sustainability Appraisal, a Working Group of officers from Kent County Council and Medway Council was established in May 2001. The Working Group was selected to be independent from the team preparing the Structure Plan to achieve greater objectivity, but with some officers in common to ensure that outputs from the appraisal were fed into the plan-making process.

#### **2.1.2 Key Findings**

The findings of the working group review and stakeholder workshop were used to inform the initial development of the Sustainability Appraisal Methodology. This placed an emphasis on ensuring that the Appraisal:

- encompassed a full Sustainability Appraisal to meet UK Government's Sustainable Development Strategy objectives and Planning Policy Guidance (PPG12)
- influenced and informed all stages of the plan-making process and applied to all policies in the plan
- included consideration of secondary, cumulative and long-term effects
- informed all those who need to take decisions
- remained independent from the plan-making process to ensure objectivity

**Table 1: Key steps in developing the Sustainability Appraisal Methodology**

<i>Stage (Timing)</i>	<i>Purpose</i>	<i>Method</i>	<i>Influence on Structure Plan preparation</i>
<b>Stage 1: Developing the Sustainability Appraisal Methodology</b>			
<b>A. Review of 1996 Appraisal and Government Guidance and Policy (July 2001)</b>	To define the Sustainability Appraisal approach, by drawing on past experience and the latest policy and guidance.	<ul style="list-style-type: none"> <li>The review consisted of desk based research and brainstorming to identify:               <ul style="list-style-type: none"> <li>Strengths and weaknesses of 1996 Kent Structure Plan Appraisal</li> <li>Key policy changes since last plan</li> <li>Key sustainability objectives for the Structure Plan</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The review ensured a robust framework for the development of the Sustainability Appraisal Methodology.</li> </ul>
<b>B. Sustainability Appraisal Workshop (September 2001)</b>	To informally engage with internal and external stakeholders to draw on experience in completing a Sustainability Appraisal and involve stakeholders from an early stage of the process.	<ul style="list-style-type: none"> <li>A workshop involving 21 organisations was held to learn from the experience of others and formally engage them in the Appraisal process.</li> </ul>	<ul style="list-style-type: none"> <li>Key issues and best practice identified at the workshop were used to inform the development of the Sustainability Appraisal Methodology.</li> </ul>

## **2.2 Stage 2: Pre-Deposit Consultation – Interim Appraisal and Workshops**

To inform the preparation of the Kent and Medway Structure Plan the Policy Directions Document (PDD) '*Mapping out the future*' was published for consultation in March 2002. The document set out the key policy principles and choices that the plan aimed to address. The preparation, publication and consultation on '*Mapping out the future*' was guided and complemented by activities completed as part of the Sustainability Appraisal.

### **2.2.1 The Approach**

Table 2 highlights the approach that the Sustainability Appraisal Working Group undertook during Stage 2 and the key influences on the plan-making process.

#### **Informing 'Mapping out the future'**

Sustainable development principles informed the initial drafting of '*Mapping out the future*'. Firstly, by assessing, through working papers, the effectiveness of the existing Structure plan policies and by reviewing relevant government policies and assessing how these should inform Structure Plan policy development. Secondly, by ensuring cross-disciplinary working groups contributed to background issues papers and the identification of sustainable policy directions.

To improve the overall sustainability of '*Mapping out the future*' an internal workshop, consisting of participants from across Kent County Council and Medway Council, was held during the drafting stage of the document.

#### **Interim Sustainability Appraisal**

An Interim Sustainability Appraisal was carried out on '*Mapping out the future: Future Policy Directions*', the findings of which were published alongside the PDD for consultation with stakeholders and the public. The Appraisal identified the potential strengths and weaknesses of the policy directions as set out in '*Mapping out the future*'.

#### **Stakeholder Workshops**

External and Internal workshops were held as part of consultation on '*Mapping out the future*'. The workshops focused on the key sustainability issues emerging from the proposed policy directions and the interim Sustainability Appraisal. The findings of these workshops were reported to the Joint Kent and Medway Structure Plan Advisory Board in June 2003, for consideration, prior to the preparation of the Deposit Structure Plan.

#### **Guidance Notes to Authors**

Responses to the consultation and the findings of the workshops were used to develop 'sustainability' guidance notes for chapter authors, to guide each chapter's development from a sustainable development perspective.

### **2.2.2 Key Findings**

The 'Stage 2: Pre-Deposit Consultation - Interim Appraisal and Workshops' key findings included:

- more tensions exist in the Policy Directions Document than were identified in the Interim Appraisal. See Table 3 for a summary of Sustainability 'Strengths' and 'Tensions'
- the Sustainability Appraisal stages that follow need to include a more detailed assessment beyond the four key themes of sustainability used in the Interim Appraisal
- the Appraisal should identify the positive and negative impacts of each policy.

**Table 2: Key steps in the Sustainability Appraisal during Pre-Deposit Consultation**

<i>Stage (Timing)</i>	<i>Purpose</i>	<i>Method</i>	<i>Influence on Structure Plan preparation</i>
<b>Stage 2: Pre-Deposit Consultation - Interim Appraisal and Workshops</b>			
<b>A. Informing 'Mapping out the future'</b>	To inform the Policy Directions Document 'Mapping out the future.	<ul style="list-style-type: none"> <li>• A review of government policies to inform authors.</li> <li>• Formation of cross-discipline Working Groups to prepare background papers and identify policy directions.</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainability principles informed the drafting of 'Mapping out the future'.</li> </ul>
<b>B. Interim Appraisal (March 2002)</b>	To appraise 'Mapping out the future – Future Policy Directions' and identify key sustainability issues for consideration in the drafting of the Deposit Plan.	<ul style="list-style-type: none"> <li>• Identification of emerging strengths and weaknesses in Policy Directions Document.</li> <li>• Publication and dissemination of the Interim Sustainability Appraisal alongside 'Mapping out the Future - Future Policy Directions'.</li> </ul>	<ul style="list-style-type: none"> <li>• Consultation feedback was fed back to Structure Plan team and Joint Structure Plan Advisory Board for consideration.</li> </ul>
<b>C. Stakeholder Workshops (May 2002)</b>	To engage external and internal stakeholders and identify key sustainability issues for consideration in the drafting of the Deposit Plan.	<ul style="list-style-type: none"> <li>• Workshops were held with external and internal stakeholders to review the content of the Interim Appraisal and provide guidance on how to address sustainability issues in the emerging plan.</li> <li>• A Report on Stakeholder Workshops was prepared outlining: <ul style="list-style-type: none"> <li>• key sustainability strengths and tensions</li> <li>• feedback on each of the proposed Plan chapters</li> <li>• guidance on Sustainability Appraisal methodology</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Key issues raised in the workshops informed early drafting of the Deposit Plan (Summer 2002).</li> </ul>
<b>D. Guidance to Chapter Authors (May 2002)</b>	To provide 'sustainability' guidance prior to chapter and policy drafting.	<ul style="list-style-type: none"> <li>• A Sustainability Appraisal Guidance Note was issued to chapter authors/working groups.</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainability issues influenced the drafting of Chapters from the outset of plan preparation.</li> </ul>

- Where there are negative impacts, these impacts should be justified/mitigated.
- The appraisal should reveal tensions between policies, explain how these might be resolved and highlight where trade-offs have been made.
- An external challenge element should be included at an appropriate time before the plan is finalised.

**Table 3: Pre-Deposit Consultation – Workshop feedback on Strengths and Tensions**

<b>Strengths</b>	<b>Tensions</b>
<ul style="list-style-type: none"> <li>• Promoting the use of brownfield sites while safeguarding greenfield land</li> <li>• Promoting mixed use development, high density and sustainable construction</li> <li>• Improving existing town centres and resisting further out of town developments</li> <li>• Ensuring development is supported by community facilities</li> <li>• Acknowledging the need to reduce dependence on the car</li> <li>• Promoting the effective use of resources</li> <li>• Safeguarding areas of special interest e.g. landscape, nature conservation and heritage</li> <li>• Promoting renewable energy and responding, in part to climate change i.e. flooding</li> <li>• Capitalising on the strength of individual areas</li> <li>• Seeking to balance opportunities across the County</li> </ul>	<ul style="list-style-type: none"> <li>• Some growth hubs are remote from population centres and are dependent on car use</li> <li>• Improving accessibility to London by train may prevent the reduction of commuting</li> <li>• Capitalising on areas strengths is not followed through in proposals for West Kent</li> <li>• The emphasis on brownfield sites may slow down housing supply and make it more difficult to fund/find land for community infrastructure provision</li> <li>• The public may not be attracted to brownfield/urban developments</li> <li>• The use of some greenfield sites may be required to promote self sufficient settlements, rural vitality and land intensive leisure/sports developments</li> <li>• The lack of key worker/affordable housing may constrain economic objectives and impact on the quality of life of many people who cannot afford market rates</li> <li>• None of the housing options will significantly affect market prices and stronger measures/targets are needed to deliver affordability e.g. matching house-type to need</li> <li>• Need clearer proposals to address climate change i.e. role of specific areas/proposals</li> <li>• Major road improvements will impact on environmental assets and encourage car use</li> <li>• Environmental impact of development proposals e.g. Manston need to be assessed.</li> </ul>

## **2.3 Stage 3: Drafting the Structure Plan - Chapter, Internal and External Appraisals**

### **2.3.1 The Approach**

Table 4 highlights the approach that the Sustainability Appraisal Working Group undertook during Stage 3 and its key influence on the plan-making process.

#### **Chapter Appraisal**

During November 2002 individual, draft policies were appraised to inform the emerging chapters. This involved testing each policy against a detailed set of sustainability criteria to identify where policies reinforced or prevented the achievement of sustainability objectives. Individual chapter appraisals were produced to highlight the emerging strengths and weaknesses and to recommend ways the chapters might be strengthened to address sustainability issues. Policy changes were recommended to address potential weaknesses for consideration by the drafting team.

#### **Internal Appraisal of Deposit Plan**

A full internal appraisal was carried out in January 2003, when an early full draft of the Deposit Plan emerged. This was achieved through a 2-day workshop that considered the extent to which the plan achieved sustainability objectives through a cross-referencing and a Sustainability Assessment exercise.

- *Cross-referencing*: Individual chapters were cross-referenced to ensure that the principles of sustainability are consistently applied throughout the Plan and are consistent with the Plan's Vision statement.
- *Sustainability Assessment*: A sustainability assessment of the plan in the round, was completed using the Regional Sustainable Development Framework (RSDF) to identify potentially positive and negative influences. This framework posed a series of detailed questions under the four key themes of 'Economic Growth', 'Social Progress', 'Prudent Use of Natural Resources' and 'Effective Protection of the Environment' that were used to challenge the Draft Plan. Annex 2.2 outlines the criteria used. Two additional criteria were added in addition to those set out by the RSDF relating to equal opportunities and the implementation of economic objectives. For each objective positive and negative influences were identified and suggested changes were fed back to the authors.

The findings of this workshop also fed into a schedule of outstanding issues and recommendations, which were reported to the Kent and Medway Joint Structure Plan Board in February 2003.

#### **External Appraisal**

The External Challenge was undertaken by a selected group of experts with sustainability experience at a District, County or Regional level. It focused on identifying any gaps and/or opportunities to improve the plan during its final stages of drafting, as well as strengthening the sustainability policy and reviewing the Sustainability Appraisal process itself. It interrogated the Draft Deposit Plan by testing the plan against a set of questions focusing on the following themes:

- Needs
- Impacts
- Interrelationships
- Implementation

An External Challenge Report included comments and recommendations for consideration by authors in the final redrafting stages of the Deposit Plan. As a consequence a number of further changes to draft policies were introduced.

**Table 4: Key steps in the Sustainability Appraisal during the Drafting of the Structure Plan**

<i>Stage (Timing)</i>	<i>Purpose</i>	<i>Method</i>	<i>Influence on Structure Plan preparation</i>
<b>Stage 3: Drafting the Structure Plan– Chapter, Internal and External Appraisals</b>			
<b>A. Individual Chapter Appraisals (November 2002)</b>	To provide a sustainability review of each chapter, during the drafting phase.	<ul style="list-style-type: none"> <li>• Each of the policies within the draft Chapters were assessed against sustainability criteria to identify emerging strengths and possible weaknesses.</li> <li>• A report on Individual Chapter Appraisals was feedback (December 2002) to Chapter Authors/Working Groups for consideration in redrafting of chapters.</li> <li>• The redrafted chapters were reviewed by the Sustainability Appraisal Working Group in (January 2003). Any outstanding issues were carried forward into the Internal Appraisal.</li> </ul>	<ul style="list-style-type: none"> <li>• Weaknesses were identified early, which enabled policies to be strengthened and areas of contention to be addressed, where possible in the early drafting of the Plan.</li> </ul>
<b>B. Internal Appraisal (January 2003)</b>	To complete an Internal Sustainability Appraisal of the emerging draft Deposit Structure Plan.	<ul style="list-style-type: none"> <li>• The Internal Appraisal consisted of two phases: <ul style="list-style-type: none"> <li>▪ <i>Cross-referencing</i> – Individual chapters were cross-referenced against each other to ensure that the principles of sustainability are consistent throughout the Plan and with the Plan's Vision.</li> <li>▪ <i>Sustainability Assessment</i> - A sustainability assessment of the plan, in the round, was completed using the Regional Sustainable Development Framework to identify the potentially positive and negative influences.</li> </ul> </li> <li>• An Internal Appraisal Report was prepared to inform authors of the key sustainability issues, knowledge and strategic assessment gaps and recommendations during the redrafting of the Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• Recommendations from the Internal Appraisal were considered during the redrafting of the Plan and a number of key changes were made.</li> </ul>

<p><b>C. External Appraisal (April 2003)</b></p>	<p>To validate the Sustainable Appraisal approach and challenge the Plan from an external perspective.</p>	<ul style="list-style-type: none"> <li>• A workshop was held involving expert external stakeholders to review the Sustainability Appraisal process and provide guidance on how to improve sustainability issues in the emerging plan.</li> <li>• An External Challenge Sustainability Appraisal Report was produced to guide the final drafting of the Deposit Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments and recommendations from the External Challenge have been reviewed and addressed, as appropriate, during the final drafting stages.</li> </ul>
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## 2.3.2 Key Findings

Detailed reports on the findings of the Chapter Appraisal, Internal Appraisal and External Challenge stage were provided at each stage of the process. To provide an insight into the process undertaken at each of the key appraisal stages, examples are provided in the Appendices as outlined below. The examples include the recommendations by the Sustainable Appraisal Working Group, as well as the response from the Structure Plan team, where appropriate.

Appraisal Stage	Example	Annex
Chapter Appraisal	Minerals	1.1 and 1.2
Internal Appraisal		
<ul style="list-style-type: none"> <li>• Cross Referencing Appraisal</li> <li>• Sustainability Assessment</li> </ul>	Spatial	2.1
	Rural Communities	2.3
External Challenge	Interrelationships Assessment	3

A synopsis of the key findings of the Internal and External Challenges respectively are provided in Tables 5 and 6 below.

**Table 5: Internal Sustainability Appraisal – Key Findings**

Potentially Positive Influences	Potentially Adverse Influences
<ul style="list-style-type: none"> <li>• Inclusion of an overarching policy on sustainable development</li> <li>• Emphasis on mixed use development and reducing the need to travel</li> <li>• Promotes quality of life in rural and urban areas e.g. Improving air quality and access to services</li> <li>• Promotes accessibility to jobs and homes</li> <li>• Focus on reuse and effective use of land</li> <li>• Focus of development in existing urban areas</li> <li>• Promotes public transport, cycling and walking infrastructure</li> <li>• Policies which respond to climate change by avoiding development in areas at flood risk</li> <li>• Protection and enhancement of the environment</li> <li>• Policies which seek to use resources effectively such as promoting water conservation</li> <li>• Encourages the provision of choice of houses and affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>• There are gaps in the information available to assess the impacts of some proposals. This will need to be addressed in background technical documents or in Local Development Documents as appropriate</li> <li>• The consideration given to the full cumulative impact of housing, development and transport infrastructure proposals on the environment and resources needs to be demonstrated</li> <li>• The Plan's focus on economic growth will have environmental implications</li> <li>• The identification of some remote locations for economic and residential development may encourage unsustainable travel</li> <li>• The strategy assumes that investors can be persuaded to develop in previously weak areas of the market</li> <li>• The strategy assumes that commuting can be curtailed. If this is not achievable there may be an oversupply of employment land</li> </ul>

Potentially Positive Influences	Potentially Adverse Influences
<ul style="list-style-type: none"> <li>• Seeks to provide range of employment choices and promotes economic development within growth sectors to encourage access to higher paid jobs</li> <li>• Protects town centres which will benefit social inclusion and local town centre economies</li> <li>• Supports provision of community infrastructure and leisure provision which will support social inclusion</li> <li>• Includes policies that support the development of and participation in culture, sport and the arts</li> <li>• Focus on physical accessibility</li> <li>• Focuses economic development in areas of social need</li> <li>• Support for sustainable construction and high quality design</li> <li>• Farm and rural diversification to assist the creation of new jobs</li> <li>• Promotes effective use of resources including promoting energy conservation and renewable energy</li> <li>• Seeks to address the needs of both rural and urban areas</li> <li>• Makes provision for resources development e.g. water and minerals supply to meet future demand.</li> </ul>	<ul style="list-style-type: none"> <li>• There is a heavy reliance on new road building as a means of improving accessibility. This will have significant implications for the environment and may undermine a shift to more sustainable modes of transport.</li> <li>• Support for mixed-use development is not consistent throughout the plan and may lead to development taking place in an unbalanced way</li> <li>• There is insufficient emphasis on the need to ensure that people can access new jobs e.g. through education and training</li> <li>• Health and social inclusion issues could be strengthened</li> <li>• There is a lack of emphasis on the suburbs and housing estate renewal</li> <li>• Some development proposals, particularly in North Kent, may conflict with flood risk policies</li> <li>• The proposed expansion of Manston will have significant environmental impacts</li> <li>• There are risks that the pace of development may be constrained by the ability to deliver key infrastructure</li> <li>• Tension between restraint policies and development e.g. renewable energy on undeveloped coast – where will the balance lie?</li> </ul>

**Table 6: External Sustainability Appraisal – Key Findings**

<p><b>Vision/Sustainability Policy</b></p> <ul style="list-style-type: none"> <li>• The role of the Region (incl. Regional drivers), Local Strategic Partnerships/Local Development should set the scene in the Vision/Guiding Principles section.</li> <li>• Need clarity on how tensions between policies will be addressed and how policies should be applied.</li> <li>• Need an increase in emphasis on making good past mistakes, identifying where we have come from since 1996 plan and promoting first class, sustainable development in Kent.</li> <li>• Policies are potentially too open to interpretation by individual Districts, not enough 'Must' too much 'may, could'.</li> <li>• Sustainability policy is too neutral. More robust objectives need to be introduced and a statement on its role as an overarching policy should be included.</li> </ul>
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**Transport**

- An overall assessment of the cumulative impact/effectiveness of the proposed transport strategy is required.
- Need to demonstrate sustainability criteria are at heart of the plan, that alternatives have been considered, and that the strategy will contribute to a modal shift.
- Will the infrastructure recommended satisfy the demands of the housing and spatial strategies?

**Spatial Strategy**

- Overall need to ensure that growth areas are drivers for change.
- While vision emphasises the reliance on previously developed land other policies may require greenfield development and should be justified. Plan is relatively silent on the environmental impact of the proposed development strategy and the scale/source of the resources needed to implement and maintain the strategy.
- Suburban issues are not adequately addressed.

**Quality of Living**

- Sustainable Design/Construction policy defers to Kent Design rather than embracing the principles of Kent Design specifically. It therefore fails to give direct policy emphasis to key issues, such as the use of resources, crime, amenity and disabled access.
- Health, social, arts and cultural and environmental enhancement issues not sufficiently addressed.

**Environmental/Natural Resources/Waste and Minerals**

- Need to strengthen waste and energy policy. Waste policy needs to be brought up to speed with inclusion of integrated resource management at its heart. Energy section needs to embrace the scale of provision needed to meet renewable targets.

**Implementation**

- Are the policies strong enough to stand up when it comes to implementation?
- The implementation section of the plan does not identify the resources required to take the plan forward.

### 3.0 Key achievements

The Sustainability Appraisal has influenced and informed the plan at all stages of its preparation. The findings and achievements of this process have been documented at each stage of the Sustainability Appraisal within key reports and papers. A full summary of the amendments and changes achieved as a result of the Appraisal process is too lengthy to include in this Issues Paper. There are, however, some notable key achievements, which are outlined below.

**Key achievements include:**

- Inclusion of an overarching policy on sustainable development
- Strengthening of :
  - Environmental and sustainable design policies
  - Policies for the protection and enhancement of the environment
  - References to climate change and renewable energy
  - Policies to enable a shift in transport modes
- Promotion of mixed use development
- Increased emphasis on reducing the need to travel
- Promotion of effective use of urban land
- Fuller recognition of the needs of all sectors of the community and the provision of community infrastructure
- Reinforcement of health, social, arts and cultural issues
- Fuller attention to the needs of rural, urban and suburban areas
- Promotion of integrated resource management
- An assessment of cumulative impacts of transport, employment and housing to ensure a balanced approach

## 4.0 Further consideration of Sustainability Issues

The Deposit Plan has taken on board an extensive array of sustainability issues. Consultation on the Deposit Structure Plan provides an opportunity to consider further the overall 'pitch' of the Plan on sustainability matters. The Appraisal has identified a number of questions (listed below) to assist this.

Views on these issues are sought as part of the Deposit Plan consultation process and are actively encouraged in a Sustainability Appraisal leaflet.

### Sustainability Issues

- Is the individual and cumulative impact of greenfield 'housing, transport, and employment' development acceptable?
- Is the shift in transport policies, towards offering more sustainable choices, sufficient to effect substantial change?
- Are the policies sufficiently robust to avoid inappropriate differences in interpretation at the local level?
- Will the remoteness of some employment hubs increase the need to travel? How should this risk be reduced?
- Has the capacity of rural areas and settlements to absorb development been adequately tested?
- Will there be an oversupply of employment land if assumptions about future commuting reductions do not occur?
- Is the maintenance of the Green Belt and the definition of Strategic Gaps compatible with the pursuit of sustainable settlements? Are there any locations where a more flexible approach would be appropriate?
- Is greater clarity needed on where the balance between policies should be placed? For example, between renewable energy and environmental conservation policies?
- Is the use of some greenfield land for development at employment hubs/clusters justified? Should greater clarity be given on the appropriate scale?
- What is the appropriate role for the Bluewater regional shopping centre given its relationship with other centres and major new residential development taking place in Kent Thameside?
- Can greater clarity be given to the relationship between the development of housing and the provision and timing of key infrastructure?
- Are the needs of all sections of the community met?

## **5.0 Conclusions**

The Sustainability Appraisal has provided a robust framework that has accompanied and informed the plan making process from its outset. The analysis of all key stages of plan preparation has ensured that sustainability issues have been brought to the fore and have been used to guide the Structure Plan team and the individual Chapter Authors throughout. Undertaking the comprehensive Internal Challenge ensured that the Plan was assessed in the round, whilst the External Challenge ensured that the plan was tested and informed by leading and independent professionals.

The result is a Plan that is rounded from a sustainability perspective, placing sustainable development at the heart of the document, and ensuring a balanced and integrated approach.

Whilst there are achievements that result from the Sustainability Appraisal process, some sustainability issues remain. The authorities recognise these, and are explicit about them, to enable them to be tested as part of the consultation and public examination of the Deposit Plan.

### **Next Steps**

As the sustainability appraisal is an iterative process, it does not stop here. Kent County Council and Medway Council will consider whether representations received on the Deposit Plan warrant further changes to the plan and the appraisal of its sustainability.

Kent and Medway Council would also welcome comments on the appraisal process followed to date and seek views on what further work might be required before the EIP. It is proposed to submit a review/assessment of the sustainability appraisal process itself to the EIP. It is also proposed to prepare a schedule for the EIP setting out the key differences in sustainability terms between the 1996 Plan and this Deposit Plan.

Any proposed changes to the plan itself arising from representations made during the consultation or EIP process will need to be subjected to an equally rigorous appraisal as the current proposals have been.

The real test of whether the Sustainability Appraisal has helped to deliver a truly sustainable plan will not be known until the Plan is adopted and put into practice. A robust approach to implementation will be critical and monitoring will have an important role to play in making that assessment.

## Annex 1.1: Chapter Appraisal Example using Sustainability Criteria (November 2002)

### Minerals Chapter

<b>How Does the Proposed Policy Impact on.....(See following criteria→)</b>  <b>M3 Safeguarding Marine wharves and rail depots</b>	Appropriate scale to local environment and local needs	Climate change	Physical environment (landscape and nature) conservation	Built environment quality	Noise environment	Local air quality	Reducing the need to travel	Social inclusion	Wealth creation	Employment choice	Impact on urban areas	Impact on suburban areas	Impact on rural areas	Water (quality and resources)	Impact on flood risk	Energy resources and consumption	Minerals	Land use efficiency
Short term 0-10 yrs	N/A	N	+/-	N	+/-	+/-	-	N	-	+	?	?	?	N	N	N	+	+
Long term 10 yrs+	N/A	N	+/-	N	+/-	+/-	-	N	-	+	?	?	?	N	N	N	+	+
<b>Comments</b> Eg justification for / acceptability of negative impacts	<ul style="list-style-type: none"> <li>Physical environment: wharves and depots may have adverse impacts locally but they reduce impact on road transport within the UK</li> <li>Impact on urban, suburban and rural areas: depends where facilities are located</li> <li>Minerals - helps maintain mineral supply</li> <li>Land efficiency – avoids the need to develop new sites/facilities</li> </ul>																	

+ Positive , - Negative N No impact, ? Unknown  
 NB If both positive and negative insert + and - .

## Annex 1.2: Chapter Appraisal Feedback Example (November 2002)

### Minerals Chapter

Mineral policies tended to score positively against economic criteria particularly over the longer term. They tended to score negatively against environmental and social criteria, particularly in the short term, that is, during mineral extraction.

EMERGING STRENGTHS	POSSIBLE WEAKNESSES
<b>Environment</b>	
<ul style="list-style-type: none"> <li>▪ The policies seek to reduce environmental impacts to acceptable levels.</li> <li>▪ Restoration conditions should ensure that in the long term mineral extraction sites would not cause adverse environmental impacts.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Minerals extraction will have negative environmental impacts (e.g. chalk within Areas of Outstanding Natural Beauty and Special Landscape Areas) particularly in the short to medium term while working and restoration takes place.</li> <li>▪ Land bank policies may require significant areas of countryside to be identified for extraction.</li> </ul>
<b>Social</b>	
<ul style="list-style-type: none"> <li>▪ Policies state that minerals proposals will be “subject to environment, transport and other considerations” which should provide safeguards against unacceptable impacts.</li> <li>▪ Mineral workings tend to take place in sites away from main centres of population.</li> <li>▪ Minerals are essential to meet basic constructions needs associated with homes and jobs</li> </ul>	<ul style="list-style-type: none"> <li>▪ Mineral workings can impact on the amenity of local residents who live near to sites e.g. noise, dust, traffic. Policies do not <u>specifically</u> refer to the need to protect local residents.</li> </ul>
<b>Economic</b>	
<ul style="list-style-type: none"> <li>▪ Policies will achieve a supply of minerals to underpin economic growth.</li> <li>▪ Maintaining wharves and depots for importing materials should help to safeguard supplies.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Wharves and rail depots may be under pressure from other development projects particularly in regeneration areas such as Thames Gateway.</li> </ul>
<b>Resources</b>	
<ul style="list-style-type: none"> <li>▪ Policies promote the use of recycled minerals and secondary materials and this should reduce the need for land won reserves</li> </ul>	<ul style="list-style-type: none"> <li>▪ Only a small proportion of minerals can be recycled.</li> <li>▪ Secondary materials are only likely to contribute a small proportion of total requirements.</li> <li>▪ Land bank policies may undermine the objective of reducing the use of minerals</li> </ul>

### Gaps in Appraisal

Environmental implications of land bank policies will need to be appraised when specific sites are considered through Minerals Local Plans.

### Recommendations

- 1 Need to ensure other chapters complement objectives of this chapter e.g. Transport/Prosperity -safeguarding wharves, in the Transport chapter (which gives consideration to ports); Quality of Life – minimising the use of resources and Environment – protecting sensitive landscapes.
- 2 Refer in policy to the need to protect the interests of local residents.
- 3 Landbank policies should be linked to policies that seek to reduce demand for new reserves

## Annex 2.1: Internal Appraisal – Cross Referencing Appraisal Example (January 2003)

### Spatial Chapter

EMERGING STRENGTHS	POSSIBLE WEAKNESSES	SUGGESTED CHANGES	AUTHORS RESPONSE POST APPRAISAL)	KMSP Sustainability Appraisal Working Group Comment on Response
<b>Cross cutting</b>				
<ul style="list-style-type: none"> <li>Chapter has considered opportunities and constraints applying to different parts of the County and considers the role of Kent in the wider South East/UK Economy.</li> </ul>	<ul style="list-style-type: none"> <li>The scale of some developments may not be appropriate to local needs e.g. Kingshill.</li> <li>Some major developments likely to give rise to a range of impacts including loss of greenfield land, additional traffic, noise and pollution, sterilising mineral reserves (need more detailed assessment).</li> <li>Some policies are difficult to appraise as it is not clear what is being proposed e.g. at Bluewater, Westwood, Iwade.</li> <li>Not information to assess impacts of specific proposals or the specific infrastructure needed to support it. The success of spatial strategy is dependent on the timely implementation of key infrastructure e.g. water resources East Kent, <i>Fastrack</i> in North Kent and flood defences for Ashford.</li> </ul>	<ul style="list-style-type: none"> <li>Text, and where appropriate policies, should be amended to emphasise the need to use major development opportunities as drivers for sustainability (consider scope to be specific about opportunities to integrate sustainable energy production and waste management).</li> <li>Clarify what is being proposed and ensure safeguards are in place. In the case of Bluewater this means ensuring development does not adversely impact on any other centres (not just the few mentioned).</li> <li>The timing and implementation plans for key infrastructure needs to be clarified. (Cross refers to implementation section).</li> </ul>	<ul style="list-style-type: none"> <li>The policies providing sustainable development e.g. energy will apply to all types of development including major proposals.</li> <li>Policy for Bluewater will state that development should not impact on the viability of nearby centres.</li> <li>More detailed work will be required to determine the timing of key infrastructure.</li> </ul>	<p>It is still considered appropriate to identify specific opportunities.</p> <p>Proposals for Bluewater are still unclear so that it is difficult to assess acceptability</p>

<b>Environment</b>				
<ul style="list-style-type: none"> <li>Chapters seek to maximise the use of brownfield land and avoid land subject to important environmental constraints.</li> </ul>	<ul style="list-style-type: none"> <li>Insufficient emphasis given to environmental components of spatial strategy e.g. loss of greenfield land north of A2 and around Ashford.</li> <li>Possible environmental harm if development goes ahead without appropriate environmental mitigation in place.</li> </ul>	<p>Refer explicitly to greengrid and similar environmental initiatives as part of specific district based policies.</p>	<ul style="list-style-type: none"> <li>Green grids in Thameside and conservation parks in East Kent will be referred to in locational chapter together with other references dealing with environmental enhancement. Conservation parks for North and East Kent are also referred to Quality of Life section.</li> </ul>	
<b>Social</b>				
<ul style="list-style-type: none"> <li>Chapter seeks to address inequalities within Kent.</li> </ul>	<ul style="list-style-type: none"> <li>The scale of some proposed developments may have an adverse impact on existing community facilities (at least in the short term if the delivery of new services does not keep pace with development).</li> <li>The additional traffic associated with major development proposals may impact on local amenity and air quality e.g. Dover Port.</li> <li>Tension between focusing on existing transport corridors and exacerbating the problems experienced by communities in the vicinity of these e.g. A256, M2, M20.</li> <li>There is an overemphasis on some sectors/skills which may reduce employment choice.</li> </ul>	<ul style="list-style-type: none"> <li>Cross refer to Quality of Life re infrastructure provision.</li> <li>Cross-refer to Quality of Life and Transport section (safeguards and reducing the need to travel).</li> <li>Cross-refer to Quality of Life and Transport re – amenity safeguards and reducing the need to travel.</li> <li>See comment below on economy.</li> </ul>	<ul style="list-style-type: none"> <li>Introduction will make it clear that the policies of the plan should be read as a whole so that caveats do not need to be repeated.</li> <li>Introduction will make it clear that the policies of the plan should be read as a whole so that caveats do not need to be repeated.</li> <li>Introduction will make it clear that the policies of the plan should be read as a whole so that caveats do not need to be repeated.</li> <li>Introduction will make it clear that the policies of the plan should be read as a whole so that caveats do not need to be repeated.</li> </ul>	<p>There are still outstanding tensions between specific proposals and air quality</p>

<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Promoting economic development in areas with fewer environmental constraints should help to deliver sites more readily</li> </ul>	<ul style="list-style-type: none"> <li>The emphasis on brownfield and mixed use development may restrict the delivery of serviced sites.</li> <li>There is an overemphasis on some sectors, which may make the County vulnerable to adverse economic forces.</li> <li>Down playing role of West Kent in the Kent economy may leave the County vulnerable if development in regeneration areas takes time to come to fruition.</li> </ul>	<ul style="list-style-type: none"> <li>Amend text to highlight the need for appropriate support from Government to bring forward these sites.</li> <li>Amend relevant policies to focus on a wider range of employment opportunities e.g. EK2 – avoid over emphasis on pharmaceutical sector.</li> <li>Amend West Kent Policies to ensure that economic opportunities are maximised within mixed use developments and in the redevelopment of existing employment sites.</li> </ul>	<ul style="list-style-type: none"> <li>This will be referred to in the implementation section.</li> <li>Policy seeks to strengthen and diversify economy – pharmaceuticals are only one example.</li> <li>The prosperity chapter addresses the need to husband employment land in West Kent.</li> </ul>	
<p><b>Resources</b></p> <p>The chapter seeks to reduce out commuting which should reduce the amount of energy consumed in transportation.</p>	<ul style="list-style-type: none"> <li>Discouraging economic development in West Kent could increase out-commuting particularly to London.</li> <li>Development at relatively remote locations e.g. Fort Halstead, Pfizer and Sittingbourne Research centre will rely on car access.</li> <li>Development focus on east and North Kent may conflict with flood risk policies.</li> </ul>	<ul style="list-style-type: none"> <li>See recommendation above on economy.</li> <li>Cross refer to Transport section and the need to promote sustainable alternatives.</li> <li>Cross refer to resources section (flood risk).</li> </ul>	<ul style="list-style-type: none"> <li>Policies in prosperity section make provision to husband employment land in West Kent.</li> <li>Introduction will make it clear that the document should be read as a whole.</li> <li>Introduction will make it clear that the document should be read as a whole</li> </ul>	<p>Outstanding tension that some developments will be dependent on the car e.g. Clusters</p>

**Annex 2.2: Regional Sustainable Development Framework and Criteria  
Used for Draft Deposit Structure Plan Internal Appraisal**

<b>A. SOCIAL PROGRESS WHICH RECOGNISES THE NEEDS OF EVERYONE</b>	
Objectives taken from 'Regional Sustainable Development Framework'	Decision-making criteria
1. To ensure that everyone has the opportunity of a decent and affordable home	<ul style="list-style-type: none"> <li>Will it promote the case for affordable housing and recognise the relationship between this and its other activities?</li> <li>In situations in which SEEDA controls land, is the provision of affordable housing regarded as a priority?</li> </ul>
2. To improve the health and wellbeing of the population and reduce inequalities in health	<ul style="list-style-type: none"> <li>Will it improve access to consistently high quality local services?</li> <li>Will it embrace the principles contained within the Health White Paper (1999) (i.e. integrated approach to health and not just sickness treatment?)</li> </ul>
3. To reduce poverty and social exclusion and close the gap between the most disadvantaged communities and the rest	<ul style="list-style-type: none"> <li>Will it create opportunities such that the gap in standard of living and expectation between different social groups may be closed?</li> <li>Will it reduce poverty?</li> <li>Will it help more people to engage in "everyday life", especially those that are socially excluded?</li> <li>Will it reduce long-term unemployment?</li> </ul>
4. To stimulate economic revival in priority regeneration areas	<ul style="list-style-type: none"> <li>Will it target regeneration in areas of greatest need?</li> <li>Will it reduce deprivation by delivering economic development that is appropriate to communities in greatest need?</li> </ul>
5. To raise educational achievement levels across the County and develop opportunities for everyone to acquire the skills needed to find, remain and progress at work	<ul style="list-style-type: none"> <li>Will it reduce unemployment and underemployment?</li> <li>Will it increase and diversify the employment base and widen access to it?</li> <li>Will it achieve and retain a highly skilled, diverse and flexible workforce?</li> <li>Will it promote equal opportunity in the labour market?</li> <li>Will it enhance levels of education?</li> </ul>
6. Reduce crime and the fear of crime	<ul style="list-style-type: none"> <li>Will it make the area a safer one in which to live and work?</li> <li>Will it respond to concerns about levels of crime in particular areas?</li> </ul>
7. To encourage development and participation in culture, sport and the arts	<ul style="list-style-type: none"> <li>Will it support the provision of relevant facilities and amenities?</li> <li>Will it encourage the use of these amenities/facilities by all groups of people?</li> </ul>
8. To sustain vibrant rural communities	<ul style="list-style-type: none"> <li>Will it provide sustainable employment in rural areas?</li> <li>Will it improve access to services in rural area?</li> <li>Will it respond to the issue of affordable housing in rural areas?</li> </ul>

<b>B. EFFECTIVE PROTECTION OF THE ENVIRONMENT</b>	
Objectives taken from 'Regional Sustainable Development Framework'	Decision-making criteria
9. To improve efficiency in land use including re-use previously developed land and existing buildings, and to encourage urban renaissance	<ul style="list-style-type: none"> <li>Will it encourage new development to take place on brownfield rather than greenfield sites?</li> <li>Will it support vibrant town and city centres?</li> <li>Will it enhance the quality of the built environment?</li> </ul>
10. To reduce air pollution and ensure air quality continues to improve	<ul style="list-style-type: none"> <li>Will it maintain and improve local air quality for all?</li> </ul>

11. To improve the water quality of the County's rivers and coast	<ul style="list-style-type: none"> <li>• Will it improve and maintain the quality of ground and surface waters?</li> </ul>
12. To address the causes of climate change through reducing emissions of greenhouse gases	<ul style="list-style-type: none"> <li>• Will it encourage a reduction in emissions of greenhouse gases?</li> </ul>
13. To conserve and enhance the County's biodiversity	<ul style="list-style-type: none"> <li>• Will it lead to the maintenance and improvement of the size and diversity of indigenous wildlife species and populations (e.g. achievement of Biodiversity Action Plan (BAP) targets)?</li> <li>• Will it avoid damage to international, national and locally designated sites of nature conservation or geological interest?</li> <li>• Will it conserve and enhance existing rural and urban habitats and provide new habitats appropriate to the area, such as wetland and water bodies, trees and woodland, hedgerows, and species rich grassland?</li> </ul>
14. To protect, enhance and encourage enjoyment of the countryside	<ul style="list-style-type: none"> <li>• Will it improve public access to the countryside?</li> <li>• Will it support more sustainable agriculture?</li> <li>• Will it support more sustainable land management?</li> <li>• Will it protect the quality of the landscape and promote appropriate forms of rural development?</li> </ul>
15. To reduce road traffic and congestion through reducing the need to travel by car and improving travel choice	<ul style="list-style-type: none"> <li>• Will it minimise use of the private car and motorised commercial vehicles?</li> <li>• Will it promote the use of Green Travel Plans?</li> <li>• Will walking, cycling and the use of public transport be encouraged?</li> <li>• Will it lead to the exploitation and efficient use of waterways and rail for transport of goods?</li> </ul>
16. To maintain enhance and make accessible the historic environment and the assets of the County including the quality and distinctiveness of the County's landscapes, townscapes and settlement settings	<ul style="list-style-type: none"> <li>• Will it halt the loss or fragmentation of landscape valued for its intrinsic quality?</li> <li>• Will it conserve and enhance countryside character?</li> <li>• Will it enhance the attractiveness and local distinctiveness of both urban and rural areas?</li> <li>• Will it protect sites, features and areas of historical, archaeological and cultural value in both towns and the countryside?</li> <li>• Will it encourage the productive use and re-use of historical buildings?</li> <li>• Will it maintain and improve quality and distribution of urban and rural open space with an amenity value</li> <li>• Will it ensure that new development is of high design quality and maintains or enhances the historic character?</li> <li>• Will it promote the use of sustainable materials and construction practices?</li> <li>• Will it replace worn out/poor quality built environment with high quality, resource efficient buildings?</li> <li>• Will it use heritage as a key tool for regeneration?</li> </ul>

### C. PRUDENT USE OF NATURAL RESOURCES

Objectives taken from 'Regional Sustainable Development Framework'	Decision-making criteria
17. To achieve sustainable water resources management	<ul style="list-style-type: none"> <li>• Will it ensure that economic development across the South East is consistent with the sustainable use of water, in terms of location, infrastructure and design?</li> <li>• Will it maintain and improve surface water and ground water quality?</li> </ul>

18. To reduce the risk of flooding that would be detrimental to public wellbeing, the economy and the environment	<ul style="list-style-type: none"> <li>Will it avoid areas at risk of flooding, and not lead to increased flood risk elsewhere?</li> </ul>
19. To reduce generation and disposal of waste, and achieve sustainable management of waste	<ul style="list-style-type: none"> <li>Will it promote re-use and recycling of waste, and reduce overall volume of waste produced (waste hierarchy)?</li> <li>Will it encourage waste management close to source (proximity principle)?</li> </ul>
20. To increase energy efficiency	<ul style="list-style-type: none"> <li>Will it encourage efficient use of energy?</li> <li>Will it encourage the use of least environmentally harmful fuel sources and technologies?</li> </ul>
21. To increase the proportion of energy produced and consumed in the County from renewable sources	<ul style="list-style-type: none"> <li>Will it support development of renewable forms of power in suitable locations?</li> </ul>

<b>D. MAINTENANCE OF HIGH AND STABLE LEVELS OF ECONOMIC GROWTH AND EMPLOYMENT</b>	
Objectives taken from 'Regional Sustainable Development Framework'	Decision-making criteria
22. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the County	<ul style="list-style-type: none"> <li>Will it promote job creation and reduce unemployment in areas in which it is an issue?</li> <li>Will it provide opportunities for high quality skills training and development?</li> <li>Will adequate employment land be protected and released for development?</li> <li>Will it promote flexible working practices?</li> <li>Will it improve the quality and added value of jobs?</li> <li>Will it promote employment opportunities for those that have been excluded from the workforce?</li> </ul>
23. To sustain economic growth and competitiveness, and ensure a better distribution of economic activity around the County	<ul style="list-style-type: none"> <li>Will it encourage wealth creation through enhanced productivity?</li> <li>Will it promote the growth of key economic sectors and clusters that are consistent with sustainable development?</li> <li>Will it support business development and strengthen competitiveness?</li> <li>Will it assist economic development in relatively disadvantaged areas (e.g. coastal towns)?</li> <li>Will it encourage rural and farm diversification?</li> <li>Will it encourage sustainable tourism?</li> <li>Will it encourage economic links between market towns and their surrounding rural areas?</li> </ul>
24. To invest to secure our future prosperity and quality of life	<ul style="list-style-type: none"> <li>Will it encourage new business start-up and survival?</li> <li>Will it encourage local firms to stay in the area and expand?</li> <li>Will it encourage employers to invest in workforce development?</li> <li>Will it enhance the image of the County as a whole and promote it to inward investors?</li> </ul>
25. To develop the knowledge economy by focusing on higher value, lower impact activities	<ul style="list-style-type: none"> <li>Will it facilitate processes of technology transfer between the County's universities/research institutions and its firms?</li> <li>Will it support the development of new/embryonic clusters and sectors?</li> <li>Will it increase the relative importance of employment within the knowledge economy?</li> <li>Will it encourage the development of economic activities that are eco-efficient and allow for a decoupling of economic growth and waste production?</li> </ul>

## Annex 2.3: Internal Appraisal – Sustainability Assessment Example (January 2003)

### A. SOCIAL PROGRESS WHICH RECOGNISES THE NEEDS OF EVERYONE

**Objective:** To sustain vibrant rural communities.

Potentially Negative Influences	Potentially Positive Influences
<ul style="list-style-type: none"> <li>• Housing in rural communities near Ashford may come under pressure as a result of the CTRL commuter service;</li> <li>• Rural policies may not be strong enough to prevent villages becoming commuter settlements.</li> <li>• No policies to support existing rural services.</li> </ul>	<ul style="list-style-type: none"> <li>• Good balance between protecting quality of life in rural settlements and attracting services and affordable housing provision.</li> <li>• Encourages the integration of public services in a single location.</li> <li>• Encourages recreational use of the countryside.</li> <li>• Allocation of land for the provision of affordable housing.</li> </ul>

#### Recommendations:

- **Spatial** – The hierarchy of settlements should be clarified.
- **Quality of Life** – Promote settlement capacity studies to identify the infrastructure needs of all sections of the community.
- **Our Natural and Built Environment** – Ensure policies do not act as a restraint for rural diversification and affordable housing.

#### Response:

- **Spatial** - Spatial Strategy policies draw a clear distinction between major/ principal urban areas, rural service centres and other rural settlements.
- **Quality of Living** - Capacity studies and infrastructure assessments are part of the remit of local planning and there is little added value in identifying this as a distinct process within a strategic policy.
- **Our Natural and Built Environment** - Policies specifically provide for exceptions to restraint subject to specific justification criteria e.g. HP9 (rural affordable housing) FP6 (farm based diversification).

### Annex 3: External Challenge Appraisal – Interrelationships Appraisal Example (April 2003)

Issues	Comments	Recommendations	Response			
<p>Is the transport strategy sufficiently balanced in terms of meeting economic, social and environmental needs e.g. will it reduce the need to travel/promote sustainable transport? (8)</p>	<ul style="list-style-type: none"> <li>There is no detailed assessment of the cumulative impact/effectiveness of the proposed transport strategy</li> <li>There is a question mark over whether the transport policies are sufficiently rigorous to effect significant shifts in behaviour especially given the continuing reliance on road building</li> </ul>	<ul style="list-style-type: none"> <li>Strategic Environmental Assessment required urgently of the Transport Plan. If more detailed appraisal justified at this stage should include overall landuse and transport strategy and the impact of individual schemes.</li> <li>Add criteria to TP1 – should contribute to reducing dependence on the private car.</li> </ul>	<p>To be addressed in working papers.</p> <p>Criteria added.</p>	<p>Adopted</p> <p>Change adopted.</p>	<p>Page 46, policy TP1.</p>	<p>Page 119, policy TP1.</p>
<p>Has the interrelationship between the development strategies of different sub areas been adequately considered e.g. relationship between North and West Kent? (2, 3, 4,5 )</p>	<ul style="list-style-type: none"> <li>Generally, yes.</li> </ul>					
<p>Has an adequate balance been struck between rural, suburban and urban developments? Has the respective needs of these areas in economic environmental and social been adequately addressed? (2,3,4,5 and 6)</p>	<p>Rural issues and the role of rural settlements do not appear to have the same focus as urban issues. Acknowledge that this may be result of integrating rural issues into individual topic chapters</p>	<p>Include rural section in the spatial chapter.</p>	<p>Agreed.</p>	<p>Change adopted</p>	<p>Pages 17-22</p>	<p>Pages 17 – 22</p>

#### **ANNEX 4: LIST OF BACKGROUND DOCUMENTS**

External stakeholder workshop (Pre-consultation) September 2001

Internal appraisal workshop (Pre consultation) November 2001

Kent and Medway Structure Plan Future Policy Directions “mapping out the future”  
Internal Sustainability Appraisal 2002

Sustainability Appraisal External Workshop on “mapping out the future” 9 May 2003

Sustainability Appraisal Internal Workshop on “mapping out the future” 16 May 2003

Guidance Notes for Authors 27 May 2002 and January 2003

Schedule of emerging Chapter Appraisals November/December 2003

Internal Appraisal of emerging Draft Deposit Plan 23 and 24 January 2003

External Appraisal of emerging Draft Deposit Plan 17 April 2003

Kent and Medway Joint Advisory Board Reports 27 June 2003 and 13 February 2003