

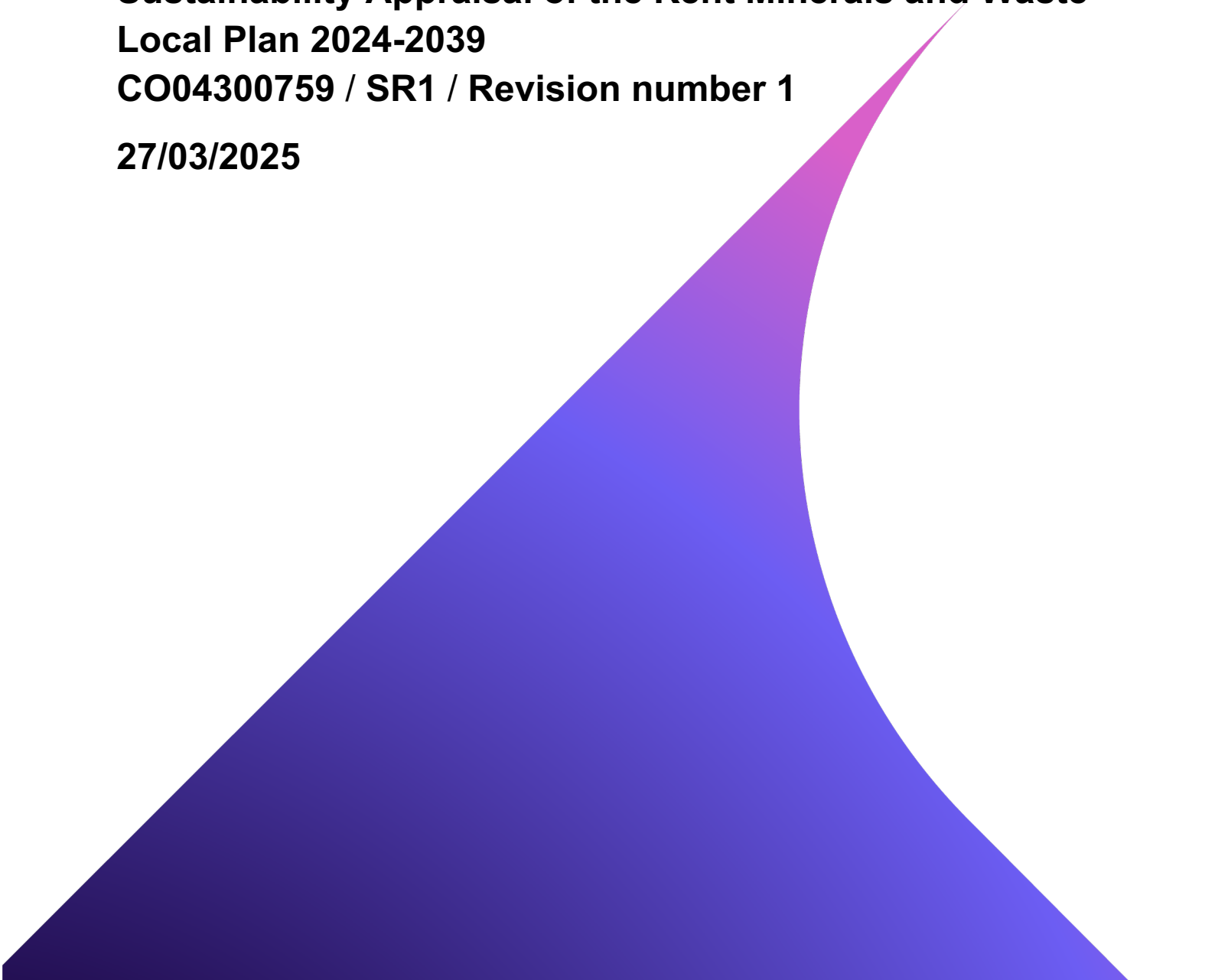
Amey

Sustainability Appraisal Post- Adoption Statement – March 2025

**Sustainability Appraisal of the Kent Minerals and Waste
Local Plan 2024-2039**




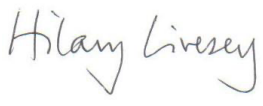


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Rev 0 Report for Kent County Council to support the adoption of the Plan – draft for client comment	Name: Hilary Livesey Signature:  Date: 19/03/2025	Name: Jenefer Taylor Signature:  Date: 19/03/2025	Name: Jenefer Taylor Signature:  Date: 19/03/2025
Rev 1 Report for Kent County Council to support the adoption of the Plan – updated to include client comments	Name: Hilary Livesey Signature:  Date: 27/03/2025	Name: Jenefer Taylor Signature:  Date: 27/03/2025	Name: Jenefer Taylor Signature:  Date: 27/03/2025

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. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives. This report is the Post-Adoption Statement for the KMWLP, which is the final step of the SA of the KMWLP and accompanies the publication of the KMWLP following its adoption in March 2025.

The original KMWLP was adopted in July 2016 and set 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. Now, as a result of a statutory Five Year Review, the KMWLP has been updated again, to ensure consistency with national policies and effectiveness of the policies within the KMWLP. The KMWLP now covers the period 2024 to 2039.

The purpose of the Post-Adoption Statement is to show how the SA process has informed the development of the KMWLP. It explains how the SA Reports at earlier stages in the process were taken into account by KCC, how environmental and sustainability considerations informed the process and how consultation comments were taken into account. It explains the reasons why the KMWLP has been adopted as it is, in the light of alternatives considered. The reasonable alternatives that were 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 consultations:

- allocate land for waste facilities as envisaged in the KMWLP adopted in 2016;
- do not strengthen groundwater protection in policy DM 10; and
- retain policy CSW 5.

The Post-Adoption Statement also describes how the environmental and sustainability impacts of implementing the KMWLP will be monitored.

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1. Introduction

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. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives. This report is the Post-Adoption Statement for the KMWLP, which is the final step of the SA of the KMWLP.

At previous stages of the SA process, SA Reports have been published which set out the likely sustainability impacts of the KMWLP, to inform the development of the KWMLP and to provide information on its impacts to inform the public consultations.

1.2. Requirements

The Post-Adoption Statement is required to provide information under the following headings:

- how environmental considerations have been integrated into the EPR;
- how the SA Report has been taken into account;
- how opinions have been taken into account, expressed in response to public consultations on the emerging KMWLP and accompanying SA Report;
- action taken by Kent County Council (KCC) to provide public access to consultation documents;
- how the results of any consultations with EU Member States have been taken into account;
- the reasons for choosing the KMWLP as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the KWMLP.

The required information is set out under these headings in the remainder of this report.

2. How Environmental Considerations Have Been Integrated into the KMWLP

As an integral part of the SA process, 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. This framework has been used to appraise the emerging KMWLP and the reasonable alternatives to its proposals. In this way, environmental, social and economic considerations have underpinned the appraisal of the KMWLP and helped to ensure that these are integrated into the KMWLP.

Table 1 sets out the detailed considerations which have been used to inform the appraisal of the KMWLP, which shows how environmental, social and economic issues have been integrated into the assessment.

Table 1 SA Framework

Sustainability Objectives		Detailed considerations
1	Biodiversity	<p>Ensure that development will not impact on important elements of the biodiversity resource and where possible contributes to the achievement of the Kent Biodiversity Action Plan (BAP) and other strategies.</p> <ul style="list-style-type: none"> – Add to the biodiversity baseline by creating opportunities for targeted habitat creation (which, ideally, contributes to local or landscape scale habitat networks). – Avoid hindering plans for biodiversity conservation or enhancement. – Support increased access to biodiversity. – Provide a net gain in biodiversity value.
2	Climate change	<p>Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources.</p> <ul style="list-style-type: none"> – Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals and waste operations. – Promote climate change adaptation

3	Community and well-being	<p>Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being; and support the delivery of housing targets.</p> <ul style="list-style-type: none"> – Help to redress spatial inequalities highlighted by the Index of Multiple deprivation. – Help to tackle more hidden forms of deprivation and exclusion, such as that which is experienced in urban and coastal areas and particular socio-economic groups within communities. – Ensure that the necessary aggregates are available for building, and that the necessary waste infrastructure is in place to support housing and economic growth – Ensure that minerals and waste development does not contribute to poor air quality with particular reference to PM2.5 and NOx – Protect and enhance public rights of way and access – Protect local green space – Avoid loss of tranquillity
4	Sustainable economic growth	<p>Support economic growth and diversification.</p> <ul style="list-style-type: none"> – Support the development of a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities – Stimulate economic revival and targeted employment generation in deprived areas
5	Flood risk	<p>Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment.</p> <ul style="list-style-type: none"> – Ensure that development does not lead to increased flood risk on or off site – Seek to mitigate or reduce flood risk through developments that are able to slow water flow and promote groundwater recharge
6	Land	<p>Make efficient use of land and avoid sensitive locations.</p> <ul style="list-style-type: none"> – Make best use of previously developed land – Avoid locations with sensitive geomorphology – Seek to safeguard the best and most versatile agricultural land and recognise its economic and other benefits - Prevent inappropriate development in the Green Belt

7	Landscape and the historic environment	<p>Protect and enhance Kent's countryside and historic environment.</p> <ul style="list-style-type: none"> – Protect the integrity of the National Landscapes and their setting and other particularly valued or sensitive landscapes – Take account of the constraints, opportunities and priorities demonstrated through landscape characterisation assessments and other studies at the landscape scale. – Avoid light pollution – Protect important heritage assets and their settings, as well as take account of the value of the character of the wider historic environment
8	Transport	<p>Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible</p> <ul style="list-style-type: none"> – Minimise minerals and waste transport movements and journey lengths; and encourage transport by rail and water. – Ensure that minerals and waste transport does not impact on sensitive locations, including locations already experiencing congestion and locations where planned growth or regeneration is reliant on good transport networks.
9	Water	<p>Maintain and improve the water quality of Kent's rivers, ground waters and coasts, and achieve sustainable water resources management</p> <ul style="list-style-type: none"> – Ensure that minerals and waste development seeks to promote the conservation of water resources wherever possible with particular reference to abstraction. – Avoid pollution of ground or surface waters, particularly in areas identified as being at risk or sensitive
10	Waste	<p>Ensure the sustainable management of waste</p> <ul style="list-style-type: none"> – Manage waste in accordance with the waste hierarchy – Prevent adverse effects from waste on human health and the environment – Ensure waste is managed as near as possible to its place of production

3. How the SA Report Has Been Taken into Account

The SA Reports that were produced have been considered by planning officers within KCC at each stage of the process, namely at:

- first Regulation 18 stage in December 2021
- second Regulation 18 Stage in December 2022
- third Regulation 18 Stage ('Further Proposed Changes') in June 2023
- Regulation 19 Stage ('Pre-Submission Draft') in November 2023
- Main Modifications Draft in October 2024; and
- Growth, Economic Development and Communities Cabinet Committee and Cabinet in March 2025.

The SA Reports set out the likely significant impacts of implementing the KMWLP. The SA considered whether there was scope for making recommendations for measures to prevent, reduce and, as fully as possible, offset any significant adverse effects of the KMWLP. A number of recommendations were made in the SA Reports for amendments to the strategic objectives, policies and supporting text to mitigate adverse effects.

Telephone, email and online meeting exchanges took place at various times throughout the SA process between KCC officers, their consultants and the authors of the SA to ensure the SA was an integral part of the KMWLP development process and that findings and recommendations could feed through from the SA to the officers responsible for developing the KMWLP. Documents were exchanged on a timely basis to ensure integration between the KMWLP development and the SA.

All the SA Reports have been published for consultation at each stage of the development of the KMWLP, with the purpose of informing consultees of the likely significant impacts of the KMWLP, so that they would be better able to comment on the KMWLP in the consultation.

4. How Consultation Responses Have Been Taken into Account

The following table summarises consultation comments received on the KMWLP in relation to the SA and shows how these have been taken into account in the SA process. Comments were received on the Scoping Report and on SA Reports themselves.

Table 2 SA Consultation Comments and Responses

Consultee	Comment	Response
SA Scoping Report		
Member of the public	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.	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

Consultee	Comment	Response
	<p>5. The SA Framework:</p> <p>Landscape and the historic environment should also include light pollution and dark skies.</p> <p>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?</p> <p>Water: this should include the implications of nutrient neutrality</p> <p>5.2 The SA Framework</p> <p>6 Land should seek to safeguard Best and Most Versatile Agricultural land</p> <p>7 Landscape and the historic environment should include protecting tranquil areas and areas of intrinsically dark skies.</p> <p>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.</p>	<p>If and where the detail is relevant for the SA Report, the information will be edited to provide information to be clearer about what the transport plans are and where they apply.</p> <p>Tranquil areas has been added to the SA framework.</p>
Tonbridge and Malling Borough Council	<p>Objective 1 - Recommended that there is a stronger emphasis on biodiversity net gain within the Framework objectives to link with the Plan objectives.</p> <p>Objective 7 - Recommended that the framework objectives include the setting of AONB landscapes.</p>	<p>The requirement for biodiversity net gain has been added to the SA framework.</p> <p>Consideration of impacts on the setting of AONBs has been added to SA framework.</p>
SA Reports		
Tunbridge Wells Borough Council	<p>TWBC welcomes the changes made to the Scoping Report including reference to the Environment Act 2021 and inclusion of the waste hierarchy, and only has the following comment to make on this report: Section 3.3 – it is suggested that references should be made to the AONB Management Plan, South East Water Resource Management Plan and the Kent Biodiversity Strategy in this section.</p>	<p>Section 3.3 contains overarching strategy documents, whereas the three identified in the comment are at a more specific, sectoral level. Nevertheless they have been reviewed to check whether any additional criteria should be added to the SA framework but none have been identified that are not already covered.</p>
Tonbridge and Malling Borough Council	<p>Consideration of "Do nothing options" for policies as proposed.</p> <p>With regard to policy CSM3, this site is the subject of a call-for sites submission and is therefore a consideration in the emerging Local Plan. TMBC considers a rationale should be given for the deletion of this policy within the column and it is also considered that the reasons given for 'Is a do-nothing option reasonable?' should be more explicit.</p>	<p>Text has been added to the table in Appendix C to clarify the rationale for deleting the policy and explaining why a 'do nothing' option is not reasonable.</p>
Gravesham Borough Council	<p>The accompanying May 2023 draft sustainability appraisal report on page 86 advises for CSM 2 for transport "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" and then gives a positive score for the SA objective of transport for CSM 2. This does not feel consistent with the proposed increased reliance on importation of sharp sand and gravel over the plan period.</p>	<p>The assessment has been amended to distinguish the case of sharp sand and gravel, for which it is expected that imports of land-won and marine aggregates will increasingly replace sharp sand and gravel from Kent.</p>

Consultee	Comment	Response
Tunbridge Wells Borough Council	Welcomes that most of the changes suggested by TWBC in the previous KMWLP consultations have now been addressed in both the Sustainability Appraisal and the non-technical summary. TWBC has no further comments to make in respect of these documents.	Noted
Environment Agency	The concept of 'sustainable remediation', which relates to the management of contaminated land and is considered by the 'Sustainable Remediation Forum', could perhaps be referenced in the Sustainability Appraisal.	Remediation of contaminated land is outside the scope of the KMWLP and therefore reference within the SA is likely to have little or no impact.
Natural England	Having reviewed the submitted Sustainability Appraisal, Natural England can confirm that we have no comments to make on it.	Noted.

5. Action Taken by Kent County Council to Provide Public Access to Documentation

KCC made the draft KMWLP and its accompanying SA Report available to the public at each stage of consultation on the emerging KMWLP.

A paper copy of both documents was held at the main reception at the principal office of KCC, which is at County Hall, Maidstone ME14 1XQ. Members of the public were able to inspect the documents at the main reception at any time during office hours.

Paper copies of the documents were also sent to all main KCC libraries and gateways and to other main KCC offices so that members of the public could inspect the documents at any time during office hours. The documents were also made available for consultation on the KCC website.

The same arrangements will apply for the adopted KMWLP and this Post-Adoption Statement.

6. Results of Transboundary Consultations with EU Member States

No comments have been received from EU Member States on the KMWLP. EU Member States were not specifically consulted as no transboundary effects were anticipated.

7. The Reasons for Choosing the KMWLP as Adopted, in Light of Alternatives

7.1. The Five Year Review and Changes to the KMWLP

The KMWLP was originally adopted in July 2016 and set 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.

As a result of a Five Year Review, the KMWLP has again been updated, now covering the period 2024 to 2039 and adopted in March 2025.

The KMWLP is a high-level planning document 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 specific locations where key strategic development should take place.

The National Planning Policy Framework (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 was reviewed to assess whether updates to the Plan are required.

The review needed to consider whether the Vision, Strategic Objectives and policies of the Plan were 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 was undertaken. This revealed that, amongst other things, there had been changes to the NPPF which required updates to policies in the KMWLP to ensure they remain consistent with national planning policy. Locally, since adoption of the previous KMWLP, 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 was also undertaken to assist the review of the policies. Other observations regarding the wording of the policies and supporting text were made and some of these indicated that policies, and supporting text, should be updated to ensure the ongoing effectiveness of the KMWLP.

The review considered each of the Vision, the Strategic Objectives and the 52 policies within the KMWLP in turn. It 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 was proposed to be deleted (SO 10). The majority of policies within the KMWLP were also proposed for amendments of different kinds and for various reasons, as well as various amendments to the supporting text and contextual chapters.

7.2. Alternatives to the MWLP as Adopted

The SA is required to appraise reasonable alternatives to the 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 consultations. The following were 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 was appraised as a reasonable alternative.

In respect of a 'do nothing' option, each proposed amendment to the policies was considered in turn to identify whether a 'do nothing' option was reasonable. In the case where an amendment is required to make the KMWLP consistent with policy elsewhere, a 'do nothing' option was not considered reasonable. Where there were other reasons for making the amendment, each was considered on its merits. Two policies were identified as having a reasonable 'do nothing' alternative to the policy amendment proposed. These were 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;

7.3. Reasoning on Alternatives

Each of the alternatives identified above were appraised against the SA framework and an assessment made of the likely impacts on sustainability objectives.

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.

Overall, option A is not considered a more sustainable option than the KMWLP as adopted, as there is a high degree of uncertainty over the impacts, both positive and negative.

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.

Overall, option B is not considered a more sustainable alternative to the KMWLP as adopted, as adverse impacts on water quality, biodiversity and treatment costs are possible or likely to occur.

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.

Overall, option C is not considered a more sustainable alternative than the KMWLP as adopted, as adverse effects on the waste hierarchy and waste transport may occur.

8. Measures to Monitor Significant Environmental Effects

KCC produces an Annual Monitoring Report (AMR) that monitors the implementation of the KMWLP. The AMR for 2022/23 reports on the following indicators relevant to minerals and waste:

- production of primary land-won aggregates;
- production of secondary and recycled aggregates;
- permitted reserves and landbanks for soft sand, sharp sand and gravel, crushed rock, clay and brickearth, silica sand and chalk;
- number of wharves and rail depots and sales of aggregates at these;
- capacity of new waste management facilities by type;
- municipal waste arisings by management type;
- waste growth rate;
- exports and imports of waste; and
- capacity for managing waste materials in Kent.

No indicators are reported in AMR 2022/23 for the environmental impacts of activities in relation to waste and minerals developments.

The KMWLP contains development management policies that seek to control the impacts of development and ensure no unacceptable adverse impacts. These policies have indicators associated with them, although they are not reported in AMR 2022/23. The KMWLP states that the Plan's development management policies will be monitored using the relevant planning applications data as an indicator. It states that the performance of each policy will be monitored on an annual basis and recorded in the AMR in accordance with the following strategy:

- target: 100% of applications meeting all applicable policy criteria granted planning permission, to include the submission of the required information where relevant;
- trigger: one application permitted that does not meet all relevant policy criteria and requirements, unless clearly justified.

The development management policies to which this applies are:

- DM 2: Environmental and Landscape Sites of International, National and Local Importance;
- DM 3: Ecological Impact Assessment;
- DM 4: Green Belt;
- DM 5: Heritage Assets;
- DM 6: Historic Environment Assessment
- DM 10 Water Environment;

- DM 11 Health and Amenity;
- DM 12: Cumulative Impact;
- DM 13; Transportation of Minerals and Waste;
- DM 14: Public Rights of Way;
- DM 15: Safeguarding of Transport Infrastructure;
- DM 16: Information Required in Support of an Application;
- DM 18: Land Stability;
- DM 19: Restoration, Aftercare and After-use; and
- DM 20: Ancillary Development.

KCC intends to reference these indicators in the AMR for 2023/24, in parallel with the adoption of the KMWLP. When developing indicators for AMR after adoption of the KMWLP, KCC officers will consider the recommendations on monitoring provided by the SA and incorporate recommendations into the AMR where practicable and appropriate.