

Maidstone Green Party response to the Local Plan Review Sustainability Appraisal

The Sustainability Appraisal (SA) provided in conjunction with the Local Plan Review (LPR) focuses on the ability of the local plan to meet MBC's aims rather than providing an objective view of the impact of the plans on environment in the long term. We believe this focus is flawed.

There are a number of issues raised in the SA that we wish to draw attention to:

1. The SA states: "Water resources are under stress and there is a risk of harm to water quality from demands from development placed on waste water treatment plants. Both of these issues could get worse as a result of climate change" and "Flood risk within Maidstone is concentrated in the southern and south western part of the borough. The risk of flooding could be intensified due to climate change".

While the SA mentions that water resources and flood risk "could" get worse due to climate change, the scientific evidence is quite clear that they "will". It is only the extent of this which is unknown. The current, BAU scenario suggests a 57% reduction in summer rainfall and a 33% increase in winter. This would seem to suggest a more significant impact than was implied by the SA.

2. The SA states: "Without the Local Plan Review it is likely that house prices will continue to rise across the borough. The Local Plan Review offers the opportunity to facilitate and expedite the delivery of affordable housing."

The SA provides no evidence for this assertion and neither does it consider the whether the impact of the low level of affordable housing in the plan (30-40%) provides the correct level of housing based on need.

The SA also does not examine whether the overall housing target is based on need or is simply driven by the desire for economic growth.

3. The SA states: "As such, the amounts of development set out in SS1 will lead to an increase in greenhouse gas emissions" and "There is little doubt that the amount of development proposed by the Local Plan Review will increase carbon emissions, both through the construction process and use of materials, and also when operational (e.g. for heating and lighting) as well as through traffic generation."

The SA does not consider this in the light of the legally binding Paris Agreement or the scientifically agreed levels of CO₂ reduction required. Specifically, the SA makes no mention of the proportion of the carbon budget available to the borough in order for the UK to comply with the Paris Agreement (5.4m tCO₂e) or that the carbon emissions of construction alone will result in 1.8m tCO₂e.

The failure to comment on the lack of carbon budgeting fundamentally undermines the credibility of the SA to assess the impact of the LPR on climate change.

4. The SA states: “uncertain negative effects are anticipated” in relation to air pollution.

Given that Maidstone has one of the worst air pollution records in the country and is facing a 20% increase in population with no clear strong plans to mitigate this, we believe that the SA’s view is significantly understated.

5. The SA does not consider the impact of the loss of farm land on the long term viability of local food supplies or the impact of the loss of carbon sinks. Biodiversity targets continue to be missed and while biodiversity is mentioned throughout the SA there is no sense of the real impact of the loss greenfield land.
6. Finally, the SA does not assess MBC’s objectives in relation to the environment, i.e. whether the objectives meet the needs of future generations without compromising the needs of the present.

In particular, economic growth is not critiqued, yet as is often quoted, “Anyone who believes that exponential growth can go on forever in a finite world is either a madman or an economist.”

The SA therefore fails to consider the continued desire for economic growth in the long term.

Maidstone Green Party,
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