



**Medway Core Strategy:
Sustainability Appraisal (SA)
incorporating Strategic Environmental
Assessment (SEA)**

Addendum to SA/SEA Report

January 2013

enfusion 

Medway Council Core Strategy: SA/SEA

Addendum to SA/SEA Report

<i>date:</i>	<i>January 2013</i>	
<i>prepared for:</i>	<i>Medway Council</i>	
<i>prepared by:</i>	<i>Alastair Peattie Toney Hallahan Barbara Carroll</i>	<i>Enfusion</i>
<i>quality assurance:</i>	<i>Barbara Carroll</i>	<i>Enfusion</i>



Treenwood House
Rowden Lane
Bradford on Avon
BA15 2AU
t: 01225 867112
www.enfusion.co.uk

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1.0 Introduction

Context

- 1.1 Medway Council is preparing a Local Development Plan (LDP) to guide future development in the Local Authority area. In accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework 2012, the Council must carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its LDP documents. The SA/SEA of the LDP Core Strategy has been ongoing since 2008 and is being undertaken alongside the preparation of the plan. This report constitutes an addendum to the most recent SA/SEA report produced in December 2011 and it has been prepared following a request for further information from the Inspector undertaking the independent examination of the Medway Core Strategy throughout 2012. The plan-making and SA/SEA processes to date are summarised below:

Table 1.1: LDF and SA/SEA stages and documents

LDP Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Evidence gathering	SA Scoping Report December 2008 Public consultation 5 weeks ending 23 rd January 2009 Final Scoping Report April 2009
Issues & Options Report July 2009 Public consultation 6 weeks ending 18 th September 2009 Responses to representations Published on Council's website	Initial SA Report July 2009 Public consultation 6 weeks ending 18 th September 2009
Pre-Publication Draft Core Strategy November 2010 Public consultation 6 weeks ending 10 th December 2010	Interim SA Report November 2010 Public consultation 6 weeks ending 10 th December 2010
Publication Draft Core Strategy August 2011 Public consultation 6 weeks ending 14 th October 2011	Update to Sustainability Appraisal (incorporating SEA) August 2011 Public consultation 6 weeks ending 14 th October 2011
Submission Draft Core Strategy January 2012	Sustainability Appraisal (incorporating SEA) Report Final December 2011
Submission of Core Strategy to Secretary of State and Independent Examination June 2012	Sustainability Appraisal (incorporating SEA) Report (Dec 2011) available as Evidence to inform Examination.
Further information gathering regarding the strategic site Lodge Hill	SA/SEA Addendum Report (January 2013) including revision and updating of SA of strategic options as a result of

Examination reopened 14 January 2013	further information available
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Nightingale Populations at Lodge Hill - New Information

- 1.2 As illustrated in Table 1.1, the Medway Core Strategy has reached independent examination stage and the hearings were held in June 2012. In light of new information regarding nightingale populations at the Core Strategy's key development site, Lodge Hill, the Examination has been suspended to allow time to complete additional work requested by the Inspector. The new information constitutes the partial findings of the National Nightingale Survey 2012 (produced by the British Trust for Ornithology), which suggests that the importance of the population of Nightingales at the site is greater than previously understood.
- 1.3 The Inspector requested additional information to establish whether there is a reasonable prospect that adequate compensatory habitat could be established, thus reducing the residual impact of the Lodge Hill development. The Inspector has also noted that additional Sustainability Appraisal work will be required to ensure that the evidence on the nature conservation importance of the site is fully recognised, and to appraise whether the conclusion that development at Lodge Hill is the most sustainable option is still valid.
- 1.4 Enfusion was commissioned in November 2012 to update the SA/SEA in consideration of this new information and its implications for the sustainability of the Core Strategy. The purpose of the work is:
- To ensure that the current SA work is updated to account for the new information now available regarding nightingale populations at the Lodge Hill development site and neighbouring SSSI (British Trust for Ornithology Survey); and
 - To review the existing treatment of SEA alternatives, as provided in the SA of the Medway Core Strategy Submission Document and to revise these alternatives in light of the current uncertainty surrounding the Lodge Hill site and the new information. The review of alternatives will include a more detailed assessment than previously undertaken and will appraise whether the previous conclusion that Lodge Hill is the most sustainable strategic option is still valid in light of the new information.
- 1.5 This work has been undertaken in consideration of recent SEA case law¹²³, good practice, and the requirements for SA/SEA of LDPs as set out in the following legislation and guidance:
- European Directive 2001/42/EC (the *Strategic Environmental Assessment Directive*)

¹ Save Historic Newmarket v Forest Heath District Council (2011) EWHC 606

² Cogent Land LLP v Rochford District Council (2012) EWHC 2542

³ Heard v Broadland DC, S Norfolk DC, Norwich City Council (2012)

- HMSO (2004) *The Environmental Assessment of Plans and Programmes Regulations* (the SEA Regulations)
- ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*
- DCLG (2008) *Plan Making Manual*⁴
- DCLG (2012) *National Planning Policy Framework*

This SA/SEA Addendum Report

- 1.6 This report details the findings of the review of alternatives and updates the Sustainability Appraisal (incorporating SEA) report for the Medway Core Strategy Submission Draft (December 2011) in light of the new information which is now available. Thus the Environmental Report required by the EU SEA Directive comprises the SA/SEA Report (December 2011) and this SA/SEA Addendum Report (January 2013).

⁴ <http://www.pas.gov.uk/pas/core/page.do?pageld=109798>

2.0 Review of SA/SEA of Alternatives

Spatial alternatives considered: work undertaken to Submission February 2012

- 2.1 The development of plan-making options and the SA/SEA of alternatives have been ongoing throughout the production of the Medway Core Strategy and its accompanying Sustainability Appraisal. Alternatives have been considered from the early stages- from the initial SA of Issues and Options in 2009 through to the production of the Submission Core Strategy published in February 2012.
- 2.2 Throughout the plan's production, the LDF Core Strategy was required to be consistent with the Regional Spatial Strategy for the South East of England (the South East Plan). Key development locations were set at the higher, regional level of decision making and this influenced the alternative spatial options available to the Council in preparing the Core Strategy.
- 2.3 The consideration of options was also limited due to the number of decisions on the location of development that had already been made, including planning permissions granted and where the way forward had been set in other plans. This included recognition of a number of constraints, such as Green Belt and European sites, and the imperative for development on previously developed land, as set by Central Government policy. The focus on regeneration of existing areas (outside of the development of one new major growth area, which had been identified for its strategic potential since regional planning guidance in 1995) also reflects the Medway area's location within the Thames Gateway and its associated regeneration strategy.
- 2.4 The SA of spatial options therefore focused on the strategic spatial options for the location of new development outside of the existing urban boundaries. This appraisal considered the potential for 5 broad locations to accommodate growth (primarily housing) outside of the existing urban boundaries. A 'Call for sites' was carried out from December 2008 till January 2009, as part of the Medway Strategic Land Availability Assessment (SLAA) and as a result of this a number of sites were put forward. These tended to fall within a number of broad locations and were considered accordingly. This also allowed an objective assessment to be made by comparison with the proposed settlement at Lodge Hill, Chattenden, to see whether another location may be more suitable and also to test whether the same scale of development could be achieved elsewhere.

Other Alternatives Considered

- 2.5 It was identified that there were other alternatives available to the Council in the consideration of plan options that relate to other non-residential development types, including the location of waste and minerals development, retail and community facilities. The

consideration of alternatives for these development types was detailed in Appendix 4 of the SA/SEA Report December 2011.

- 2.6 The level of growth proposed in the plan was set at a higher level of plan-making, namely the SE Plan, to which the Core Strategy is required to conform. An annual target of 815 completions (net) over the whole plan period (2006 - 2028) equates to 17,930 over the period, which ensures conformity to the SE Plan. With the impending abolition of the South East Plan, Medway Council has considered other levels of growth. However a higher or lower target was not considered to be reasonable or realistic options. A higher target could not be achieved based on historic building rates and the current economic conditions; whereas a lower building rate would require the removal of the Lodge Hill proposed development, resulting in a reduction of homes by one third. This would be contrary to regeneration objectives for the Thames Gateway and would result in the delivery of less affordable and social homes. Detailed reasons for this are explained in the SA/SEA Report December 2011.
- 2.7 The Council considered that not proceeding with the development of a new settlement (or sizeable urban extension) outside of the identified regeneration sites was not a realistic or reasonable option. This is because the development of the new settlement is considered vital to the economic and social development of Medway through helping to meet affordable and market housing needs, providing housing choice, improving its 5 year land supply, and providing opportunities for employment and economic development in the Borough.

Summary Findings of Spatial Options Appraisal

- 2.8 The following table provides a summary of the key alternatives considered up to Submission in February 2012. Detailed results are included in Appendix 4 of the SA/SEA Report December 2011.

Table 2.1: Summary of key alternatives considered and reasons for selection/rejection (to Submission February 2012)

Options Considered and Appraised; Published Reports and Public Consultation	Summary of reasons for Progressing or Rejecting the Option in Plan Making
<p>Option 1: New settlement at Lodge Hill, Chattenden The new settlement at Lodge Hill would be freestanding and use mainly previously developed land with circa 5,000 homes and a full range of associated services being provided. This option would not require any extension to existing urban boundaries.</p>	<p>The new settlement at Lodge Hill, Chattenden was progressed as it was considered to be the most sustainable of the 5 options as it would make the greatest contribution overall to sustainability. Reasons given by the Council for selecting this site are that it has been identified previously as an area with the potential for development (The Medway Local Plan, South East Plan), that it is located on Previously Developed Land, that it can improve sustainability on the Hoo Peninsula</p>

	and contribute most effectively to economic growth in accordance with the local economic development strategy.
<p>Option 2: Expanded Hoo This option reflects the fact that a number of landowners/developers have proposed sites for development on the edge of each of the settlements referred to below. This option would effectively substitute Lodge Hill with further expansion at Hoo St. Werburgh and at the nearby villages of High Halstow and Cliffe Woods.</p>	<p>Whilst this Option could make a good contribution towards achieving the sustainability objectives, it would have impacts through encroachment on greenfield land and on biodiversity. It would involve development over a number of sites and so would make it more difficult to sustain improved local services and attract jobs. This Option was rejected as Lodge Hill was considered to make a greater contribution to sustainability in the long-term.</p>
<p>Option 3: Capstone Urban Extension This option involves a major urban extension into the Capstone Valley between Hempstead and Lordswood. For this options appraisal an area wholly within the Medway boundary was considered, bridging the valley in a 'U' shaped configuration. This would generally be to the south of the Capstone Country Park. However, were it to proceed, development would be likely to extend further southwards into Maidstone, resulting in development on a scale that would be substantially larger than that proposed at Lodge Hill.</p>	<p>This Option was rejected as it performed the least well of all the options with regard to sustainability. Likely impacts included encroachment on greenfield land and impacts on air quality through traffic congestion. It would also isolate sites of nature conservation value.</p>
<p>Option 4: East of Rainham Urban Extension This option would involve development between the existing urban boundary and the administrative boundary with Swale Borough. It envisages the majority of any development area being to the south of the A2 but with some development, around Moor Street, to the north.</p>	<p>Option 4 could make a reasonable contribution towards achieving the sustainability objectives compared to some other options. However; this Option was rejected given the potential detrimental impacts on the immediate and wider context through the loss of greenfield land and rural settlements. Impacts on the local traffic network are also considered likely. Lodge Hill was considered to provide a greater contribution to sustainability in the long-term.</p>
<p>Option 5: North of Rainham Urban Extension This option envisages the release of land between the current urban boundary and the B2004 Lower Rainham Road. It would potentially extend from the Gillingham Link Road (A289) in the west to the administrative boundary with Swale in the east.</p>	<p>Similar to Option 4, this Option could make a reasonable contribution towards achieving the sustainability objectives. However detrimental impacts on the immediate and wider context are likely, namely through loss of greenfield land and habitat. It is in close proximity to an SPA. This Option was rejected as Lodge Hill</p>

	was considered to make the greatest contribution to sustainability in the long-term.
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- 2.9 A concurrent exercise considered the potential for the above sites to include employment land-uses, alongside existing assumed employment land designations at Kingsnorth; Grain and Rochester Airfield (which have been set under existing policy direction). The most sustainable of the solutions outlined were Lodge Hill or Extended Hoo and therefore focused to the north. These are closer to existing infrastructure and provide a mix of employment opportunities. The solutions around Rainham would also provide benefits if properly integrated with the existing town centre. However these would not be as well located for transport links or other existing infrastructure. Capstone would have the most detrimental impacts and was considered to be the least sustainable location.
- 2.10 Kingsnorth; Grain and Rochester Airfield with further development at Lodge Hill was considered to be the most sustainable as it would be located on previously developed land and may help reduce out-commuting from the new Lodge Hill development. Further detail is available in Appendix 4 of the SA/SEA Report December 2011.

Consultation on SA/SEA Alternatives

- 2.11 Consultation has formed a key part of the plan-making process for the Medway Core Strategy, and each of the SA/SEA reports has been placed on consultation alongside the plan. With regard to the SA/SEA alternatives assessment specifically, a comment was received about the level of detail in the original SA of Issues and Options. This was addressed in the SA/SEA Report December 2011, which included further detail about the reasons for progressing and rejecting alternatives. Additionally Section 3 and Appendix 1 of this report further address this concern through providing more detail in the assessment of spatial options.
- 2.12 A small number of respondents to the Publication Draft Core Strategy and its SA/SEA also queried why the Council has not sought to undertake an appraisal of options relating to the level of growth proposed in the Core Strategy; this was also further addressed in the Submission SA/SEA Report December 2011.

Requirement for Revision to Consideration of Alternatives

- 2.13 The new information available relating to nightingale populations (as discussed at Section 1) has implications for this SA/SEA alternatives appraisal, in particular the assessment of the preferred spatial option for major development at Lodge Hill. The forthcoming abolition of the South East Plan also means that the previous regional policy focus on Lodge Hill will no longer apply in the future; hence making other spatial

options more viable from a policy perspective. Enfusion has reviewed and updated the alternatives assessment to account for this new information and to provide a more detailed assessment. This assessment is provided in Appendix 1 and summary findings are discussed in the following section 3 of this Addendum SA Report.

3.0 Revised SA/SEA of Alternatives (December 2012)

Approach and Method

- 3.1 In light of the new information available for Lodge Hill, it was considered necessary to revisit the SA of spatial options proposed in the Core Strategy Issues and Options Report (2009). The revised appraisal will assist the Council to determine if the proposed development at Lodge Hill still represents the preferred spatial option in terms of sustainability.
- 3.2 Detailed appraisals of the spatial options proposed in the Core Strategy Issues and Options Report (2009) were carried out against the SA Framework and the findings are summarised below, with the detailed appraisals provided in Appendix 1. The appraisal was undertaken using professional judgment, supported by the baseline information (SA Scoping Report 2009), together with any relevant additional information sources available including the new information on nightingales.
- 3.3 For consistency, the significance key used for the initial SA⁵ of Spatial Options by Medway Council in 2009 was used for the detailed appraisal undertaken by Enfusion in December 2012. An additional category was added to allow for the appraisal to reflect any potential uncertainties in the findings. The SA key is as follows:

xx	Very negative
x	Slightly negative
-	Neutral
?	Uncertain
✓	Slightly positive
✓✓	Very positive

- 3.4 In order to inform the appraisal, workshops were held with Council Officers and key external stakeholders on 11 and 12 December 2012. The purpose of the workshops was to discuss available sources of information and provide local up-to-date knowledge regarding the alternative strategic sites. Attendees at the workshops included Council Officers from planning policy, development management, projects, urban design, greenspaces and transport. Key external stakeholders included the Highways Agency and Natural England; English Heritage and the Environment Agency were unable to attend but officers provided general comments to help inform the alternatives appraisal.

⁵ Medway Council (July 2009) Initial SA Report accompanying the Issues & Options Report

Summary Findings of the Revised SA/SEA of Spatial Options

- 3.5 A summary of the detailed comparative appraisal of spatial options is provided below, with the detailed working matrix provided in Appendix 1.

Table 3.1: Summary of detailed SA of Spatial Options

SA Objectives	Spatial Options				
	Option 1 (Lodge Hill)	Option 2 (Expanded Hoo)	Option 3 (Capstone)	Option 4 (East of Rainham)	Option 5 (North of Rainham)
1. Biodiversity	xx	x	x	x	x
2. Air	x	x	xx	xx	xx
3. Water	x ?	x	x	x	x
4. Flooding	-	-	-	-	-
5. Reduce Ecological Footprint	✓	x	✓	✓	✓
6. Housing	✓✓	✓✓	✓✓	✓✓	✓✓
7. Previously Developed Land	✓✓	xx	xx	xx	xx
8. Health	✓✓	✓	✓	✓	✓
9. Poverty/ Social Exclusion	✓✓	✓	✓	✓	✓
10. Crime	-	-	-	-	-
11. Accessibility	✓✓	✓	✓	✓	✓
12. Material Assets, heritage and culture	?	?	?	?	?
13. Renewable Energy	✓✓	✓	✓	✓	✓
14. Transport	x ✓	x ?	xx	xx	xx
15. Education and Workforce	✓✓	✓	✓	✓	✓
16. Employment	✓✓	✓	✓ ?	✓ ?	✓ ?

- 3.6 On the whole, the detailed appraisal found that Option 1 has the potential for a greater positive effect on economic and social SA objectives. The concentrated provision of housing, employment, services and facilities on the Hoo Peninsula along with associated improvements to public transport will have significant long-term positive effects on accessibility for rural communities. Lodge Hill's 'status' as a new freestanding settlement provides opportunities to attract employers/industry who might not otherwise invest in Medway and has the potential to broaden the skill base of Medway by promoting environmental technologies, capitalising on the large energy and utilities presence on the Peninsula. The dispersed nature of Option 2 means that it is unlikely to have the same level of benefits as identified for Option 1.
- 3.7 Options 3, 4 & 5 have the potential for positive effects on economic and social SA objectives; however, there are significant issues around the integration of new development with the existing road network. The large scale of proposed development and location of the sites have the potential to divert investment away from the existing town centres and urban regeneration sites. Options 2, 3, 4 & 5 would also

lead to the loss of best and most versatile agricultural land, with potential negative effects on the rural economy and food security.

- 3.8 As large scale developments all of the Options have the potential for negative effects on transport. Options 3, 4 & 5 would put increased pressure on a surrounding road network that is already experiencing capacity issues. There is likely to be significant issues integrating development with the existing road network and mitigating potential impacts for these Options (3, 4 & 5) is likely to be extremely costly, which could have an influence on the deliverability of development. Given the potential difficulties integrating into the existing road network there is also the potential for these Options to exacerbate existing air quality issues in the town centres.
- 3.9 Options 1 & 2 both have the potential for negative effects on transport but suitable mitigation is considered possible. Option 1 has the potential to improve access to public transport across the Hoo Peninsula through the concentrated provision of housing, employment, services and facilities. This will help to reduce the need to travel for rural communities and improve access to important services and facilities. Option 2 is unlikely to deliver the same benefits in terms of access to public transport, housing, employment, services and facilities as Option 1, given the dispersed nature of development.
- 3.10 Option 1 is predominantly previously developed and therefore has the potential for significant long-term positive effects on the efficient use of land, whereas Options 2, 3, 4 & 5 are predominantly greenfield land and therefore have the potential for significant negative effects. All of the Options have the potential for negative effects on the environment, including biodiversity. Option 1 has the potential to result in the loss of a significant area of land that could potentially be designated as a SSSI, with significant short to long-term negative effects on biodiversity. A number of studies have shown that there is a reasonable prospect of compensating for the loss of nightingale habitats at the site; however, it should be noted that there are still a number of uncertainties to be addressed. Options 2, 3, 4 & 5 are in close proximity to European sites and SSSIs therefore any potential adverse effects would need to be mitigated.

Other Alternatives Considered

- 3.11 During the workshops with Council Officers in December 2012 consideration was also given to the potential for any other spatial alternatives that had not been proposed in the Issues and Options Report (2009). The potential for developing an amalgam of sites was considered, which would in essence divide the proposed development at Lodge Hill between a number of smaller sites. This option was not considered reasonable as no party had proposed any such option and compared to one large development the smaller sites would not be able to provide the economy of scale and associated

community, economic and infrastructure benefits that would be associated with the five spatial options considered.

- 3.12 Consideration was also given to the potential for reducing the overall level of proposed growth, essentially removing the proposed development at Lodge Hill from the Plan. This was also considered to not be a reasonable alternative as it would be contrary to regeneration objectives for the Thames Gateway and would result in the delivery of less affordable and social homes. The latter factor is particularly important given the most recent long-term population projections for Medway provided by the Office for National Statistics. The projections show a revised population of 299,000 by 2028, which is 7% higher than the previous estimated projection in 2008 at around 280,000.⁶ A reduction in the overall level of growth means that the Core Strategy would not meet the needs of an increasing population.

Reasons for Progressing/ Rejecting Options

- 3.13 Table 3.1 below provides an updated summary of the options/alternatives considered for the Plan, with an outline of the reasons for progression/rejection where relevant. It should be noted that whilst the SA/SEA findings are considered by the Council in its selection of options and form part of the evidence supporting the Core Strategy, the SA findings are not the sole basis for a decision; planning and feasibility factors play a key role in the decision-making process.

Table 3.2: Updated Summary of key alternatives considered and reasons for selection/rejection

Options Considered and Appraised; Published Reports and Public Consultation	Summary of reasons for Progressing or Rejecting the Option in Plan Making
Option 1: New settlement at Lodge Hill, Chattenden	This Option has been progressed as it has the potential to provide extended services for the wider Hoo Peninsula, and consequently reduce the need to travel from the rural area. There is the opportunity to create new centre - more sustainable development with provision of services and facilities within walking/cycling distance. Employment offer - higher quality, more accessible. Readily available and relatively straightforward transport solutions available compared to other Options. Avoids loss of best and most versatile agricultural land. Acknowledged nature conservation impacts but significantly outweighed by social and economic benefits.
Option 2: Expanded Hoo	Dispersed development pattern would generate higher car based travel and not offer as great opportunities for public transport improvements. Impact on agricultural land. Inability to support same range of services as Lodge Hill and limited

⁶ Office for National Statistics. Sub national population projection (2010).

	ability to act as an economic catalyst. As a result this Option was rejected.
Option 3: Capstone Urban Extension	Impact on agricultural land. Poor links to rail services, significant impacts on motorway junctions and on the local road network, with knock on effect on AQMA. Major and negative impacts on adjoining communities through loss of greenspace and congestion. Deliverability doubtful due to transport constraints. As a result this Option was rejected.
Option 4: East of Rainham Urban Extension	Impact on agricultural land. Impact on existing settlements and communities (including total loss). Poses significant transport challenges with associated risk of congestion. Remoteness from primary road network would make it difficult to realise its economic potential. As a result this Option was rejected.
Option 5: North of Rainham Urban Extension	Impacts on European sites (SPA & Ramsar) and agricultural land. Transport pressure significant on local road network and AQMA. Constrained site - opportunities for dedicated PT corridors limited, and physical barriers provide poor links with existing communities. Remoteness from primary road network would make it difficult to realise its economic potential. As a result this Option was rejected.

4.0 Update of SA/SEA

Requirement and Approach

- 4.1 The SA/SEA of the Medway Core Strategy has been an iterative and ongoing process since 2008. In keeping with this, it is necessary to consider the new information regarding nightingale populations at Lodge Hill and how this affects the findings of the SA/SEA for the Core Strategy. This Section sets out a summary of the new information and considers how this affects the findings of the SA Report (December 2011) for the Medway Core Strategy Submission (February 2012), in particular for the appraisals of Policy CS33 Lodge Hill and Policy CS13 Housing Provision & Distribution.

New information on nightingales and other relevant studies

- 4.2 During the hearing sessions for the Core Strategy Examination in June 2012 the RSPB submitted new information about nightingales in the Lodge Hill area. The new information constituted the partial findings of the National Nightingale Survey (Produced by the British Trust for Ornithology), which suggest that the importance of the population of Nightingales at the site is greater than previously understood.^{7, 8} The preliminary survey data showed that the area broadly occupied by the proposed development site and the Chattenden Woods SSSI together now holds 84 pairs of nightingales and is therefore likely to hold over 1% of the UK population. It also showed that nightingales are distributed across most of the development area.
- 4.3 Based on this new information NE decided to review its advice to Council on the Lodge Hill site and consider notification of the proposed development area as an extension to Chattenden Woods SSSI.⁹ NE advised that it would be appropriate to give the development area outside of the SSSI the same weight as would normally be given to a SSSI. In response to NE's revised advice, the Inspector suspended the Examination to enable further work to be undertaken to establish whether there is a reasonable prospect that adequate compensatory habitat could be established.¹⁰
- 4.4 Since the suspension of the Examination the Council has been working with a number of organisations to determine the scale of potential loss of nightingale habitat at Lodge Hill, the opportunity for provision of mitigating negative effects through compensatory habitats, and the feasibility of providing alternative sites. The Council commissioned The Ecology Consultancy in July 2012, to undertake an independent and

⁷ Provisional 2012 BTO nightingale survey information for Lodge Hill. Available online: <http://www.medway.gov.uk/PDF/RSPB%20note%20on%20SSSI%20and%20breeding%20birds.%2014%20June%202012.pdf>

⁸ British Trust for Ornithology website. Nightingale Survey 2012. Available online: <http://www.bto.org/volunteer-surveys/nightingale-survey>

⁹ Letter (by email 09/07/12) from Rob Cameron (NE) to Alison Rock (Medway Council).

¹⁰ Letter (27/07/12) Laura Graham (Inspector) to Brian McCutcheon (Medway Council).

objective desk-based assessment of the importance of the population of nightingales at Lodge Hill. The assessment found that Lodge Hill is an important, if not major, site for nightingales in Kent, and from the population size could well be one of Kent's premier locations for nightingales¹¹. The report concluded that all necessary measures should be taken to ensure that the population of nightingales at Chattenden is conserved, either in situ or through compensation, at nothing less than its current level.

- 4.5 In July 2012 a study was carried out by Greening the Gateway Kent and Medway on behalf of Land Securities to develop a robust methodology and identify opportunities for the creation of suitable alternative sites for breeding Nightingales.¹² The study identified a number of potential strategic and deliverable opportunities to enhance nightingale populations on the Hoo Peninsula and an indication of the likely costs of providing the compensatory habitats.
- 4.6 During this time the Council also commissioned the Environmental Bank Ltd to undertake an analysis of the potential for offsetting to compensate for any environmental impact on the nightingale habitat, and in particular to provide an answer to the question "Is there a reasonable prospect that adequate compensatory habitat can be established for Lodge Hill?"
- 4.7 An initial report¹³ was published in July 2012 that provided an independent assessment of the potential for biodiversity offsetting to compensate for nightingale habitat loss at Lodge Hill. The report concluded that offsetting is both appropriate and feasible to use to ensure no net loss of nightingale habitat at Lodge Hill. The findings and conclusion of the report were then discussed at a workshop of technical experts on 25 September 2012.
- 4.8 Based on the findings of the initial report and technical workshop further work was carried out on the level of offsetting that might be required, which was then presented in a consultation draft report (November 2012). This draft report was submitted to and considered by a meeting of stakeholders on 9 November 2012. To help inform the workshop the BTO published a report that considered the factors potentially affecting the viability and success of biodiversity offsetting to compensate for nightingale habitat loss at Lodge Hill.¹⁴ The report concluded that it is theoretically feasible to create habitat that will be occupied by Nightingales in lowland England and that if the right

¹¹ The Ecology Consultancy (July 2012) Lodge Hill, Chattenden, Kent. Nightingale Assessment, Medway Council.

¹² Greening the Gateway Kent and Medway (July 2012) A study to identify mitigation opportunities for breeding Nightingales in Medway. Part One: Identifying suitable and deliverable sites locally on the Hoo Peninsula, Medway.

¹³ The Environment Bank Ltd (July 2012) Independent assessment of the potential for biodiversity offsetting to compensate for nightingale habitat loss at Lodge Hill, Kent.

¹⁴ British Trust for Ornithology (October 2012) Factors Potentially Affecting the Viability and Success of Biodiversity Offsetting to Compensate for Nightingale Habitat Loss.

conditions are satisfied, there is a greater probability of achieving success in Kent than in most parts of the country.

- 4.9 The workshop held on 9th November 2012 informed a second and final draft report produced by the Environmental Bank Ltd, which was then circulated on 14 November 2012 for further consideration by stakeholders.¹⁵ The stakeholder responses informed the production of a final report, which was published on 07 December 2012.¹⁶ The final report concluded that, *"restoring and creating c.650 ha of nightingale habitat would compensate for the loss of Lodge Hill nightingale habitat and that there is a reasonable prospect that this can be achieved within Kent"*.¹⁷
- 4.10 In October 2012 the Executive Board of Natural England convened to formally consider the proposal to extend Chattenden Woods SSSI to include the Lodge Hill land. The Executive Board concluded that the evidence presented that the site was of special interest was good but incomplete; therefore they could not notify the site as an SSSI at this stage. NE will reconsider this matter as soon as it can be confident that the comparison between the national survey data and the site data are sufficiently robust to determine that the site carried over 1% of the national population. NE concluded that until this matter is reconsidered their previous advice still stands, which is to attribute the same weight to this site as would normally be given to an SSSI. The findings of the National Nightingale Survey undertaken by the BTO are scheduled to be available in February 2013.

How do this new information affect the findings of the SA for the Core Strategy Submission Draft (Dec 2011)?

- 4.11 From the information set out above, it is clear that the importance of the population of Nightingales at Lodge Hill is greater than previously understood. This along with NE advice that the Lodge Hill site be given the same weight as would normally be given to a SSSI is clearly a significant change in evidence and it was identified that the SA for the Core Strategy should be updated accordingly.
- 4.12 The SA Report (Dec 2011) for the Submission Core Strategy (February 2012) provided the appraisal of individual policies proposed within the Core Strategy. In light of the new information it is appropriate to update the appraisal of the two individual policies for which the Lodge Hill development is a key component ie Policies CS13 Housing Provision and Distribution, and CS33 Lodge Hill. The findings of the two relevant policy appraisals are summarised below with any changes as a result

¹⁵ The Environment Bank Ltd (July 2012) Draft Biodiversity Offsetting to compensate for nightingale habitat loss at Lodge Hill, Kent.

¹⁶ The Environment Bank Ltd (July 2012) Biodiversity Offsetting to compensate for nightingale habitat loss at Lodge Hill, Kent. Available online: <http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase/lodgehill.aspx>

¹⁷ Ibid.

of the new information highlighted in **RED**. The following symbols were used within the matrices:

Table 4.1: SA Key

✓	Significant benefits
+	Potentially some benefits
0	No effect; benefits/harm will be balanced
-	Potentially some harm
x	Not compatible

Table 4.2: Updated Sustainability Appraisal of Policies CS13 and CS33 (December 2012)

Policy	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Economy
CS13: Housing Provision and Distribution	X	-	-	0	-	✓	✓	+	✓	+	✓	0	+	-	+	+
CS33: Lodge Hill	X	-	-	+	+	✓	✓	0	✓	0	+	✓	✓	+	✓	✓

- 4.13 The appraisal of policies CS13 and CS33 presented in the SA Report for the Core Strategy Submission in December 2011 identified that there is the potential for negative effects (-) on biodiversity as a result of proposed development. The biodiversity value of the Lodge Hill site was recognised within the summary of SA findings as set out in Section 6 of the SA Report.
- 4.14 The preliminary findings of the National Nightingale Survey (produced by the British Trust for Ornithology) suggest that the importance of the population of Nightingales at Lodge Hill is greater than previously understood. The statutory consultee, NE has advised that until a final decision has been made with regard to the expansion of the Chattenden Woods SSSI, the Lodge Hill site should be given the same weight as would normally be given to a SSSI.
- 4.15 The BTO estimate that there is the potential for development at Lodge Hill to result in the loss of between 66 and 71 nightingale territories.¹⁸ Developments proposed through Policies CS13 and CS33 therefore have the potential to result in the loss of a significant area of land that

¹⁸ British Trust for Ornithology (October 2012) Factors Potentially Affecting the Viability and Success of Biodiversity Offsetting to Compensate for Nightingale Habitat Loss.

could potentially be designated as a SSSI, with significant short to long-term negative effects on biodiversity.

- 4.16 However, as set out earlier in this Section, it should be noted that there has been a significant amount of work undertaken to consider the potential for providing compensatory habitat to mitigate the negative impacts of proposed development on the nightingale population. The findings of the studies undertaken by the BTO, GGKM and The Environmental Bank Ltd have indicated that there is a reasonable chance that a sufficient level of compensatory habitat for nightingales can be provided in Kent. The findings of the compensatory habitat studies are based on a number of assumptions and, therefore, may be subject to change. The evidence indicates that there is the potential to deliver sufficient levels of compensatory habitat within Kent to address the potential negative effects of proposed development at Lodge Hill on nightingales. If successfully implemented, the compensatory habitat would address the negative effects of proposed development resulting in potentially insignificant negative residual effects.
- 4.17 It is recommended that the Council ensures implementation of mitigation proposals at the project level stage of planning through requirements for sustainability and environmental management plans and that these are regularly monitored.

5.0 Summary of Findings

- 5.1 The SA/SEA of the Medway Core Strategy has been progressed in an iterative and ongoing way with the plan-making process since 2008. As a result of a request by the Inspector at the Examination of the Core Strategy in June 2012, further information and studies have been compiled on nightingale populations in Kent and at Lodge Hill. In consideration of this further information and taking into account other recent policy changes, most notably the anticipated abolition of the SE Plan; the SA/SEA of the strategic options for the Core Strategy has been reviewed and revised. Similarly, the SA/SEA of the two specific policies relevant to Lodge Hill and the new information on nightingales have been updated.
- 5.2 The consideration of alternatives including their SA/SEA and consultation has been reviewed. This demonstrates that the ongoing and iterative processes since 2008 with consultation at SA Scoping, Issues & Options, Pre and Publication Draft Core Strategy stages have given the public early and effective opportunities to be involved (as required by the EU SEA Directive). The review sets out the consideration of alternatives appraisal and the way in which the findings of the SA/SEA have informed the decision-making for the development of the Core Strategy. This demonstrates that the SA/SEA process is in compliance with the requirements of the EU SEA Directive (as implemented by UK legislation and guidance).
- 5.3 A revision of the SA/SEA of strategic alternatives was undertaken - to take into account the new information on nightingales in Kent and the key changes to planning policy, most notably the intended revocation of the SE Plan. This revision was carried out with the statutory SEA consultees and other key stakeholders.
- 5.4 The revision to the SA/SEA of the five strategic spatial options found that the Lodge Hill site (Option 1) had the potential for a greater positive effect than the other Options against SA objectives relating to the economy and communities. The Lodge Hill site was also considered to have the least impact on the majority of environmental SA objectives given the potential for the incorporation of mitigation measures as a comprehensive freestanding settlement promoted by a single developer. The Lodge Hill site was assessed as having the greatest impact on biodiversity considering the potential loss of land that could be designated as a SSSI; however, substantial work has been carried out on the potential to provide suitable compensatory habitat to offset the loss of habitat as a result of development. The studies indicate that there is a reasonable chance that a sufficient level of compensatory habitat for nightingales can be provided in Kent.
- 5.5 The revisions to the SA/SEA of Policies CS13 and CS33 to take into account the new information on nightingales found that, compared to the SA/SEA reported in December 2011, the appraisal remains the same except for the potential negative effects on biodiversity, which

have now become significant. There is considerable evidence indicating that compensatory habitats can be provided to address the negative effect of proposed development at Lodge Hill. If successfully implemented, the compensatory habitat would address the negative effects of proposed development resulting in potentially insignificant negative residual effects.

- 5.6 Since the information on compensatory habitats is based on a number of assumptions, the revised SA/SEA recommends that the Council ensures implementation of mitigation proposals at the project level stage of planning through requirements for sustainability and environmental management plans that these are regularly monitored

APPENDIX 1: Revised SA/SEA of Alternatives

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension					
1. Conserve and enhance the diversity and abundance of habitats and species	This Option is within 2km of European sites and encompasses a portion of the Chattenden Woods SSSI. An outline planning application ¹⁹ (OPA) has been submitted for the site, which includes supporting evidence that indicates that potential impacts on European sites can be resolved. ²⁰ Chattenden Woods SSSI is designated for its woodland and neutral grassland which support a number of breeding birds, including the nightingale. Provisional findings of the National Nightingale Survey (Produced by the British Trust for Ornithology) suggest that the importance of the population of	xx	The southern parcel of land near Lower Upnor is within 1km of the Medway Estuary and Marshes SPA and Ramsar. There are also a number of SSSIs in close proximity to the proposed sites. There is the potential for negative effects on biodiversity in the short to medium term through construction and in the long-term through increased recreational activity as a result of an increased population. Given the close proximity of the sites to Chattenden Woods SSSI (within 500m), there is also the potential that this Option could have negative effects on the nightingale population.	x	This Option has the potential to increase traffic along the M2, which could have negative effects on the Queendown Warren SAC as a result of reduced air quality. There is also the potential for this Option to have negative effects on local nature conservation sites, which surround the boundary of the site. The Capstone Valley acts as a vital green corridor and open space that reaches into the urban area. This Option would result in the loss and fragmentation of habitats within the Capstone Valley with the potential for medium to long-term negative effects on biodiversity.	x	This Option is within 1km of the Medway Estuary and Marshes SPA/ Ramsar and Queendown Warren SAC. There is the potential for negative effects on the SPA/Ramsar through increased recreational activity and the SAC through increased traffic along the M2, which could have impacts on air quality at the SAC. The land within the Option is agricultural and has limited local biodiversity value.	x	The site is within 200m of the Medway Estuary and Marshes SPA, Ramsar and SSSI. There is the potential for short to long-term significant negative effects on these designated sites through increased disturbance, during construction and as a result of increased recreational activity and traffic along Lower Rainham Road. The majority of land within this Option is agricultural and has limited local biodiversity value.	x

¹⁹ Land Securities - Lodge Hill. Available online: <http://www.lodgehill.info/outline-planning-application/>

²⁰ Further detail can be found on the Lodge Hill page of the Medway Council website:

<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase/lodgehill.aspx>

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension
	<p>Nightingales at the site is greater than previously understood. The Executive Board of NE have considered if the Chattenden Woods SSSI needs to be extended to include the Lodge Hill area and have concluded that more evidence is needed in the form of the final results for the National Nightingale Survey in early 2013. In the meantime, NE has recommended that the Lodge Hill site be given the same weight as would normally be given to a SSSI. There is therefore the potential for significant short to long-term negative effects on biodiversity as a result of the loss of large areas of land that could potentially be designated as a SSSI. In discussion with NE and the RSPB, work has been undertaken to consider the potential for providing compensatory habitat if the Chattenden</p>				

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension					
	Woods SSSI is extended into the Lodge Hill Site. A report ²¹ was commissioned by the Council to consider the potential to compensate for nightingale habitat loss as a result of development at Lodge Hill. The report was provided to stakeholders (including NE and the RSPB) for comment and concluded that there is a reasonable prospect of offsetting providing adequate compensation for nightingales at Lodge Hill.									
2. Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions	The transport impacts of this Option are likely to be largely limited to the A228 and A289. Sections of the A228 near the Strood railway station are designated as part of the Central Medway Air Quality Management Area ²² (AQMA). There is the	x	Similar to Option 1, this Option is likely to have impacts on the A228 and A289. However, given that the sites are dispersed and on the edge of existing settlements, this Option is likely to have a long-term negative effect on traffic and	x	This Option would be difficult to integrate into the surrounding road network, which comprise of predominantly minor roads and narrow lanes. Large scale development in this area will put increased pressure on	xx	As for Option 3, this Option would be difficult to integrate into the surrounding road network. The site is bisected by the A2 but this is already experiencing issues with capacity and increased traffic would contribute to existing	xx	As for Option 3 and 4, there would be significant difficulties integrating development with the existing road network. The Medway Estuary is to the North of the site and a railway line follows the length of the southern	xx

²¹ Environmental Bank Limited (Dec 2012) Biodiversity Offsetting to compensate for nightingale habitat loss at Lodge Hill, Kent.

²² Medway Council Website - Air Quality Management Areas. Available online:

<http://www.medway.gov.uk/environmentandplanning/environmentalhealth/airquality/airqualitymanagementareas.aspx>

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension
	<p>potential for short-term negative effects on local air quality during construction; however, this can be mitigated through appropriate phasing and construction management plans. There is the potential for negative effects on localised air quality in the long-term but this is unlikely to be significant, given the potential mitigation available and the potential for this Option to assist in reducing the need to travel for the existing population of the Hoo Peninsula through the provision of employment opportunities, services and improved public transport.</p>	<p>therefore air quality within existing settlements. As for Option 1, there is the potential for short-term negative effects on local air quality during construction; however, this can be mitigated through appropriate phasing and construction management plans. Given the dispersed nature of the Option, it is unlikely to deliver the same level of public transport improvements, employment opportunities and services as Option 1.</p>	<p>a road network that is already experiencing capacity issues.²³ The M2 is to the south of the site but there are existing issues with capacity at Junctions 3 and 4. This Option is also likely to increase traffic in the Central Medway AQMA. Given the potential difficulties integrating into the existing road network and existing air quality issues in the centres of Chatham and Rochester, this Option has the potential for significant long-term negative effects on air quality. As for Option 1 and 2, there is the potential for short-term negative effects on local air quality during construction; however, this can be mitigated through appropriate phasing and construction management plans.</p>	<p>air quality issues along Rainham High Street, which is an AQMA. The M2 is in close proximity to the south of the site; however, Junction 4 is already experiencing capacity issues. Given the potential difficulties integrating into the existing road network and existing air quality issues in Rainham, this Option has the potential for significant long-term negative effects on air quality. As for the other Options, there is the potential for short-term negative effects on local air quality during construction; however, this can be mitigated through appropriate phasing and construction management plans.</p>	<p>boundary. Large scale development in this area will put increased pressure on a road network that is already experiencing issues with capacity. This Option has the potential to increase traffic along the A2 and A289 (Pier Road), therefore contributing to existing air quality issues in the centres of Gillingham, Rainham, Chatham and Rochester, which are designated as AQMAs. Given the potential difficulties integrating into the existing road network and existing air quality issues in the centres of Gillingham, Rainham, Chatham and Rochester, this Option has the potential for significant long-term negative effects on air quality. As for the other Options, there is the potential for short-term negative effects on local air quality</p>

²³ Medway Third Local Transport Plan SA Report (Aug 2010). Available online: http://www.medway.gov.uk/PDF/medway_ltp3_sea_report.pdf

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension					
					during construction; however, this can be mitigated through appropriate phasing and construction management plans.					
3. Maintain and improve quality of ground and surface waters and security of supply	All of the Option have the potential for negative effects on the water environment through increased abstraction for water supply, increased surface water run-off (transfer of contaminants) and increased pressure on sewerage capacity (consented discharge). However, this Option has greater opportunities than the others for comprehensive sustainable water management as it is under single ownership.	x ?	All of the Option have the potential for negative effects on the water environment through increased abstraction for water supply, increased surface water run-off (transfer of contaminants) and increased pressure on sewerage capacity (consented discharge). This Option does not provide the same opportunities for sustainable water management as Option 1 as it would involve multiple land owners.	x	The appraisal for this Option is the same as Option 2.	x	The appraisal for this Option is the same as Option 2.	x	The appraisal for this Option is the same as Option 2.	x
4. Reduce risk of flooding and ensure flood resilience of buildings and minimise the effect on public	No significant effects identified.	-	No significant effects identified.	-	No significant effects identified.	-	No significant effects identified.	-	No significant effects identified.	-

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension					
services and infrastructure										
5. Reduce ecological footprint through prudent use of natural resources, reduction in waste and use of sustainable waste management practices	There is the potential for all the Options to reduce their ecological footprint through the prudent use of natural resources. As a large scale development there are opportunities to incorporate renewable energy generation and sustainable waste management. This Option has the potential for a greater positive effect than the others as the site has the benefit of being in single ownership. Development would also be primarily on PDL. This Option has the potential for long-term positive effects against this SA objective.	✓	There is the potential for all the Options to reduce their ecological footprint through the prudent use of natural resources. Given the dispersed nature of this Option, it is less likely to deliver the positive effects identified for Options 1, 3, 4 & 5. This Option would also result in the loss of greenfield land. Potential for a negative effect against this SA objective.	x	There is the potential for all the Options to reduce their ecological footprint through the prudent use of natural resources. There is the potential for a large scale urban extension to deliver renewable energy generation and sustainable waste management, with long-term positive effects on this SA objective. However, this Option does not perform as well as Option 1 as it would involve multiple land owners, which means it is less likely to deliver the same level of renewable energy generation and sustainable waste management measures. This Option will also lead to the loss of greenfield land.	✓	Please refer to the appraisal for Option 3.	✓	Please refer to the appraisal for Option 3.	✓
6. Provide opportunity for everyone	All of the Options would have a significant long-term	✓✓	All of the Options would have a significant long-term	✓✓	All of the Options would have a significant long-term	✓✓	All of the Options would have a significant long-term	✓✓	All of the Options would have a significant long-term	✓✓

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden		Option 2: Expanded Hoo		Option 3: Capstone Urban Extension		Option 4: East of Rainham Urban Extension		Option 5: North of Rainham Urban Extension	
to live in a decent, sustainably constructed, affordable home suitable to their needs	positive effect on the provision of housing within Medway. This Option will have a greater positive effect as it will be required (Core Strategy Policy CS14) to deliver a higher percentage of affordable housing (30%) compared to Options 3, 4 and 5.		positive effect on the provision of housing within Medway. As for Option 1, this Option will have a greater positive effect as it will be required (Core Strategy Policy CS14) to deliver a higher percentage of affordable housing (30%) compared to Options 3, 4 and 5.		positive effect on the provision of housing within Medway. This Option sits within the existing defined boundary of the main urban area so would therefore deliver a lower percentage of affordable housing (25%) than Options 1 and 2. Given the potential problems with integrating development into the surrounding road network (SA Objective 14) there could be issues with the potential deliverability/viability of development at this site.		positive effect on the provision of housing within Medway. This Option sits within the existing defined boundary of the main urban area so would therefore deliver a lower percentage of affordable housing (25%) than Options 1 and 2. Given the potential problems with integrating development into the surrounding road network (SA Objective 14) there could be issues with the potential deliverability/viability of development at this site.		positive effect on the provision of housing within Medway. This Option sits within the existing defined boundary of the main urban area so would therefore deliver a lower percentage of affordable housing (25%) than Options 1 and 2. Given the potential problems with integrating development into the surrounding road network (SA Objective 14) there could be issues with the potential deliverability/viability of development at this site.	
7. Maximise land use efficiency through appropriate use of previously developed land and existing buildings	This Option would have a positive effect against this SA objective as the majority of the site is previously developed land. Development at this site has the potential for negative effects on landscape, however much of the site is previously developed land (a military training area)	✓✓	The majority of this Option is Greenfield land with potential for significant negative effects against this SA objective. This Option consists of village expansions on five separate sites: a cluster of three sites around Hoo and Chattenden; a site to the south of Cliffe Woods; and a site to	XX	The majority of this Option is Greenfield land with potential for significant negative effects against this SA objective. Capstone consists of steeply sloping valleys to the north and along the sides of the area with a large central plateau to the south which continues and	XX	The majority of this Option is Greenfield land with potential for significant negative effects against this SA objective. This Option encompasses the entire Character Areas of Moor Street Farmland (Area 22) and Meresborough Farmland (Area 23) as well as a small proportion of Lower	XX	The majority of this Option is Greenfield land with potential for significant negative effects against this SA objective. This Option falls entirely within Landscape Character Area 21 (Lower Rainham Farmland), which consists of a mixture of predominantly small-scale framing activity,	XX

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension	
	and the site is largely hidden within the landscape of the Hoo Peninsula.		the East of High Halstow. The Hoo and Chattenden are the most prominent and are situated within Landscape Character Area 16 (Hoo Farmland) and 15 (Deangate Ridge). ²⁴ There is a general rise in land levels across the three sites from the south and east to the north and west. As a result, there is the potential for long-term negative effects on landscape.	rises further into the Maidstone Borough Council area before reaching the M2. The Landscape Character Assessment (2010) divides it into several small areas. Large scale development at this site has the potential for long-term negative effects on landscape, particularly for the existing communities that surround the site.	Rainham Farmland (Area 21). Large scale development at this site has the potential for long-term negative effects on landscape.	small pockets of woodland and scattered built development. The Landscape Character Assessment found that the areas condition and sensitivity is both moderate. Large scale development at this site has the potential for long-term negative effects on landscape.
8. Improve the health and well-being of the population and reduce health inequalities	This Option will be of a scale that would deliver new health facilities and as a new freestanding settlement provides opportunities to improve access for rural communities to them. This would have significant long-term positive effects for the rural communities of the Hoo Peninsula through improved access to health facilities as well as	✓✓	✓	✓	✓	✓
		This Option would have a positive effect on this SA objective. However, due to the dispersed nature of this Option, it is unlikely to deliver the same level of health facilities as Option 1, so would therefore have less of a positive effect against this SA objective. All options have the potential for creating a walking and cycling-friendly environment that		This Option is of a scale that would deliver new health facilities; however, there are significant issues around the integration of new development with the existing road network (SA Objective 14) and therefore accessibility issues for existing development. Given this along with the need for improved access and	The appraisal for this Option is the same as Option 3.	The appraisal for this Option is the same as Option 3.

²⁴ Medway Council (2010) Landscape Character Assessment.

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension					
	other services. All options have the potential for creating a walking and cycling-friendly environment that would be positive for public health.	would be positive for public health.	enhancements to health facilities on the Hoo Peninsula ²⁵ , this Option will not have as great a positive effect as Option 1. All options have the potential for creating a walking and cycling-friendly environment that would be positive for public health.							
9. Reduce inequalities in poverty and social exclusion	This Option has the potential to improve access to housing, employment, services and public transport for rural communities on the Hoo Peninsula. This has the potential for a significant medium to long-term positive effect on this SA objective.	✓✓	As per Option 1, there is the potential to improve access to housing, employment, services and public transport for rural communities on the Hoo Peninsula. However, given the dispersed nature of this Option, it is unlikely to deliver the same level/scale of benefits as Option 1.	✓	This Option has the potential to improve access to housing, employment and services for the surrounding communities. There is the potential for long-term positive effects; however, it is unlikely to provide the same benefits as Options 1 and 2 as there is a need for improved access to housing, employment and services on the Hoo Peninsula. ²⁶	✓	The appraisal for this Option is the same as Option 3.	✓	The appraisal for this Option is the same as Option 3.	✓
10. Reduce crime and	No significant effects identified.	-	No significant effects identified.	-	No significant effects identified. There are	-	No significant effects identified. There are	-	No significant effects identified. There are	-

²⁵ Lodge Hill Outline Planning Application - Evidence Base Report: Social Infrastructure (Nov 2009) and Addendum (Aug 2011). Available online: <http://www.medway.gov.uk/pdf/Social%20Infrastructure%20Final%20Evidence%20Base%20Report%20August%202011.pdf>

²⁶ Medway Rural Housing Needs surveys – See Core Strategy Evidence base.

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden		Option 2: Expanded Hoo		Option 3: Capstone Urban Extension		Option 4: East of Rainham Urban Extension		Option 5: North of Rainham Urban Extension	
the perception of crime	Development at all locations is capable of incorporating design that minimises crime.				some instances of fly tipping in the Capstone Valley and development in this area might help to address this; however, this is not considered a significant issue.		some instances of fly tipping at the site and development in this area might help to address this; however, this is not considered a significant issue.		some instances of fly tipping at the site and development in this area might help to address this; however, this is not considered a significant issue.	
11. Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic environment)	This Option will have significant medium to long-term positive effects on accessibility to services and facilities for rural communities on the Hoo Peninsula. There is also the potential for this Option to improve access to public transport on the peninsula, which will in turn improve accessibility to the services and facilities being delivered as well as improve access to the urban areas of Medway. The site currently contains military heritage which is not accessible to the general public. The development of Lodge Hill would allow the public to access them, therefore improving	✓✓	As per Option 1, there is the potential to improve access to facilities and services for rural communities on the Hoo Peninsula. However, given the dispersed nature of this Option, it is unlikely to deliver the same level of accessibility to facilities and services or improvements to public transport as Option 1.	✓	This Option is of a scale that would deliver new services and facilities; however, there are significant issues around the integration of new development with the existing road network (SA Objective 14) and therefore the provision of effective improvements to public transport. There is the potential for long-term positive effects. There is also the potential for this Option to have a negative effect on the ability for existing communities to access areas of open/ green space, as development would result in the	✓	The appraisal for this Option is the same as Option 3.	✓	The appraisal for this Option is the same as Option 3.	✓

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden	Option 2: Expanded Hoo	Option 3: Capstone Urban Extension	Option 4: East of Rainham Urban Extension	Option 5: North of Rainham Urban Extension					
	access to heritage, which would have a long-term positive effect on this SA objective.		loss of greenfield land.							
12. Conserve and enhance historic buildings, archaeological site and culturally important features and increase engagement by all sections of community	The Lodge Hill Site contains 65 built heritage assets. ²⁷ The impact of development will be dependent on implementation; however, there are suitable planning policies and controls at the project level to ensure that there will be no adverse effects on important heritage. The military heritage within the site has been closed off to the general public for many years. The progression of this Option would open up these historical assets to the general public, having medium to long-term positive effects on this objective through improved access to heritage.	?	There are a number of Listed Buildings in close proximity to the proposed sites. ²⁸ The impact of development will be dependent on implementation; however, there is unlikely to be any significant effects.	?	There is one Grade II Listed Building adjacent to one of the parcels of land. The impact of development will be dependent on implementation; however, there is unlikely to be any significant effects.	?	There are a number of Listed Buildings within and adjacent to the site. The impact of development will be dependent on implementation; however, suitable planning controls exist to ensure that there will be no adverse effects on important heritage.	?	There are a number of listed buildings on the site. The impact of development will be dependent on implementation; however, suitable planning controls exist to ensure that there will be no adverse effects on important heritage.	?

²⁷ Lodge Hill Outline Planning Application - Environmental Statement, October 2011.

²⁸ English Heritage - The National Heritage List for England. Available online: <http://www.english-heritage.org.uk/professional/protection/process/national-heritage-list-for-england/>

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden		Option 2: Expanded Hoo		Option 3: Capstone Urban Extension		Option 4: East of Rainham Urban Extension		Option 5: North of Rainham Urban Extension	
<p>13. Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies</p>	<p>As a new freestanding settlement, this Option provides excellent opportunities to effectively integrate renewable energy technologies. An outline planning application (OPA) has already been submitted for the site which proposes the delivery of a district heating network that incorporates new low carbon and renewable energy systems or connects to appropriate existing waste heat sources, such as the nearby Damhead Creek and Kingsnorth power stations. There is the potential for significant long-term positive effects on this SA objective. The types of proposals outlined above would be harder to achieve with the other Options as they could connect into existing energy infrastructure and would involve multiple landowners/</p>	<p>✓✓</p>	<p>There is the potential for this Option to incorporate renewable energy technologies. However, given that development would occur on five dispersed sites there is less of an opportunity to provide a comprehensive approach to renewable energy generation as for Option 1 and therefore less likely to have a significant positive effect.</p>	<p>✓</p>	<p>This Option is of a scale that has the potential to incorporate renewable energy technologies. However, given that there are multiple land owners there is less opportunity to provide a comprehensive approach to renewable energy generation as for Option 1.</p>	<p>✓</p>	<p>The appraisal for this Option is the same as Option 3.</p>	<p>✓</p>	<p>The appraisal for this Option is the same as Option 3.</p>	<p>✓</p>

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	developers.					
14. Reduce traffic and congestion by reducing need to travel and improving travel choice	The transport impacts of this Option are likely to put increased pressures on the A228 and A289. Mitigation measures to address potential transport impacts are contained in the supporting evidence for the OPA for Lodge Hill. ²⁹ This Option also has the potential to improve access to public transport across the Hoo Peninsula. The concentrated provision of housing, employment, services and facilities will help to reduce the need to travel for rural communities. This will have a significant long-term positive effect on this SA objective.	X ✓	X ?	XX	XX XX	
		The expansion of existing settlements on the Hoo Peninsula will put increased pressure on the rural road network around existing settlements which have a limited capacity. Compared to Option 1, this Option is likely to have a greater negative effect on existing settlements and will not deliver the same benefits in terms of access to public transport, housing, employment, services and facilities given the dispersed nature of development.		There would be significant issues integrating this Option with the existing road network, which predominantly consists of minor roads and narrow lanes. Large scale development in this area would put increased pressure on a road network that is already experiencing capacity issues. ³⁰ The M2 is situated to the south of the Option but there are existing capacity issues at Junctions 3 and 4. Given the potential difficulties integrating with the existing road network, it will be difficult for this Option to provide effective public transport improvements. For example, the size of the surrounding roads means that there could be no	As for Option 3 there would be significant issues integrating this Option with the existing road network. The site is bisected by the A2 which already experiences severe congestion. ³¹ There are local roads to connect to in the east but these do not have the capacity to accommodate the traffic increase resulting from a large scale development. The M2 is situated to the south of the Option as well as motor services; however, there are existing issues with capacity at Junctions 3 and 4. As for Option 3, given the potential difficulties integrating with the existing road network, it will be difficult for this Option to provide effective public transport	As for Options 3 and 4, there would be significant issues integrating this Option with the existing road network. The B2004 Lower Rainham Road runs along the northern boundary of the site and is heavily traffic calmed. There are a number of narrow rural roads that run north south through the site but these have limited capacity and are restricted under bridges to the railway line that follows the southern boundary of the site. A large development at this site would contribute to existing congestion along the A2 and A289 (Pier Road). As for Options 3 and 4, given the potential difficulties with integrating into the existing road network,

²⁹ Land Securities - Lodge Hill. Available online: <http://www.lodgehill.info/outline-planning-application/>

³⁰ The Highways Agency indicated that there are capacity issues with these junctions at the workshop on 12 December 2012.

³¹ Medway Local Transport Plan 3. Available online: <http://www.medway.gov.uk/pdf/ltp%20FINAL.pdf>

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			dedicated bus lanes. Connecting to the existing road network and mitigating potential impacts are likely to be extremely costly, which could have an influence on the viability of development at this site.	improvements. Connecting to the existing road network and mitigating potential impacts are likely to be extremely costly, which could have an influence on the viability of development at this site.	it will be difficult for this Option to provide effective public transport improvements. Connecting to the existing road network and mitigating potential impacts are likely to be extremely costly, which could have an influence on the viability of development at this site.					
15. Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce	This Option is of a scale that will deliver a new secondary school as well as primary schools. There is the potential to improve access to education for the existing rural communities on the peninsula with significant long-term positive effects against this SA objective. Lodge Hills 'status' as a new freestanding settlement provides opportunities to attract employers/industry who might not	✓✓	Given the dispersed nature of this Option it is unlikely to deliver the same benefits to the peninsula as Option 1. However, there is still the potential for the Option to improve access to education for the existing rural communities on the peninsula with long-term positive effects against this SA objective.	✓	This Option is of a scale that would deliver new school facilities; therefore there is the potential for a long-term positive effect. An urban extension is less likely to have as great a positive effect as Option 1, given the identified need for improved access and enhancements to schools on the Hoo Peninsula. ³⁴	✓	The appraisal for this Option is the same as Option 3.	✓	The appraisal for this Option is the same as Option 3.	✓

³⁴ Lodge Hill Outline Planning Application - Evidence Base Report: Social Infrastructure (Nov 2009) and Addendum (Aug 2011). Available online: <http://www.medway.gov.uk/pdf/Social%20Infrastructure%20Final%20Evidence%20Base%20Report%20August%202011.pdf>

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	otherwise invest in Medway. The Council indicated that Land Securities have held preliminary discussions with the University of Kent and University of Greenwich to discuss the potential for the Lodge Hill site to accommodate 'satellite' activities, including commercial operations if the site is developed. ³² This provides opportunities to broaden the skill base of Medway. ³³												
16. Support and improve employment and economic competitiveness in town centres and deprived areas	This Option will improve accessibility to employment for rural communities on the Hoo Peninsula with significant long-term positive effects on this SA objective. Lodge Hills 'status' as a new freestanding settlement provides opportunities to attract industry that isn't available elsewhere in Medway. As a	✓✓	As per Option 1, this Option will improve accessibility to employment for rural communities on the Hoo Peninsula. Given the dispersed nature of this Option it may not have the same benefits as Option 1 but could potentially be better for rural regeneration. This Option would lead to the loss of best and	✓	This Option will provide employment opportunities and therefore has the potential for positive effects on the economy. However, there are significant issues around the integration of new development with the existing road network (SA Objective 14) and therefore issues	✓	?	The appraisal for this Option is the same as Option 3.	✓	?	The effects of this Option would be similar to Option 3 and 4. The site isn't close to the M2 but there is still the potential to divert investment away from the town centres and urban regeneration areas.	✓	?

³² Workshop held at the Innovation Centre Medway 11 December 2012.

³³ Medway Core Strategy Public Examination. Matter 5: Lodge Hill Strategic Allocation. Statement by Medway Council. Available online: <http://www.medway.gov.uk/pdf/M5-MC%20Medway%20Council.pdf>

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	<p>freestanding settlement in the rural area this Option is unlikely to divert potential investment for the town centres and urban regeneration areas.</p>	<p>most versatile agricultural land, with potential negative effects on the rural economy and food security. Similar to Option 1, this Option is unlikely to divert potential investment for the town centres and urban regeneration areas.</p>	<p>relating to accessibility for existing communities. There is the potential for positive effects; however, this would be dependent on the significant transport issues being resolved. The large scale of proposed development, greenfield nature of the site and proximity of the M2 has the potential to divert investment away from the existing town centres and urban regeneration sites. This Option would also lead to the loss of best and most versatile agricultural land, with potential negative effects on the rural economy and food security. Given the potential problems with integrating development into the surrounding road network (SA Objective 14) there could be issues with the viability of</p>		

SA Objectives	Option 1: New settlement at Lodge Hill, Chattenden		Option 2: Expanded Hoo		Option 3: Capstone Urban Extension		Option 4: East of Rainham Urban Extension		Option 5: North of Rainham Urban Extension	
					development at this site.					