SUPPLEMENTARY ASSESSMENT OF REASONABLE ALTERNATIVES

Alternative/ Receptor	1. Policy MU3 of the Local Plan	2. Policy MU3 without spine road, with access via existing roads	3. Policy MU3 with additional 80 dwellings provided within footprint, plus additional land for spine road and	4. Policy MU3 with an increase of 80 dwellings provided within footprint	5. The non- inclusion of additional land to the south	6. Policy MU3 with additional land and additional 80 dwellings and spine road (the planning application)	7. Avoidance of encroachment onto Local Green Space Designation
Population	There would be an increase to the existing population in this area of the town. As a result, there would be impacts across lifestyles, community, the local economy, activities (work, travel, shopping, leisure, education etc.) and in terms of the appreciation of the built and natural environment perceived by communities. Impacts would be mixed, interrelated and cumulative, affecting both existing and new communities. New housing would be provided, alongside community infrastructure that would give opportunities for community interaction. Many of these impacts would be positive. However, adverse impacts would be most	Similar to alternative 1, although negative impacts associated with transport may be more widespread due to use of local roads and rural lanes. However, the nature of these impacts is uncertain as they have not been modelled at the application stage Overall, it is not possible to conclude significant effects, although there are uncertainties.	Similar to alternatives 1, 4 and 6. It is not possible to conclude significant effects overall; however, there would be significant positive effects on the population as a result of providing transport benefits.	Similar to alternative 1. However, an increase in the number of dwellings within the existing footprint, whilst providing a positive benefit in terms of an increase in the number of homes being provided, would lead to stresses being placed on the standards of development for new residents (e.g. density, garden size, open space and landscaping). These could have negative effects. Whilst it is reasonable to conclude similar, but slightly increased transport effects as alternative 1, there are uncertainties as this particular alternative has not been modelled. Overall, it is not possible to conclude significant effects, although there are uncertainties.	Exclusion would bring with it fewer opportunities for sport or landscaping (inc. management of part of the Local Green Space designation). For the former, there is a wider need, the absence of which would produce poorer outcomes for some existing and new residents. Overall, it is not possible to conclude significant effects.	Similar to alternative 1. However, an additional number of dwellings, together with the additional land required, would bring increased benefits in terms of housing (inc. affordable homes) community, sports and landscape provision. There may be some severance issues for the new community as a result of the spine road, although detailed design could address some of the harm arising. Community perceptions of access to the countryside and the separation of settlements would also be additionally and adversely affected. In terms of transport, some impacts would be shared as per alternative 1, but there would be	No encroachment would be beneficial in terms of a lesser visual impact for residents in local streets and upon mature trees. To achieve this would require the access to be made closer to an existing junction and other houses which would have safety and noise impacts. Encroachment into LGS is relatively minimal and thus impacts are minor. Overall, it is not possible to conclude significant effects.

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	experienced by the existing community as their perceptions of the countryside/settlement separation and access to it would change. In some places, these negative impacts would also manifest themselves as a result of transport changes (congestion and air quality), notably at					betterment in terms of a reduction in existing traffic congestion, including capacity at Key Street, together with some improvements to air quality on the A2. There would also though be some harm notably to residents in Borden Lane from increases in traffic, albeit from a lower base than the A2.	
	Wises Lane, the A2 and Key Street where the County Council have noted concerns that could impact on the acceptability of the scheme from their perspective. However, this latter conclusion is untested.					There would be benefits to the population arising from the sports provision, which might be of greater than local significance. It is not possible to conclude significant effects overall; however,	
	Overall, it is not possible to conclude significant effects, although there are uncertainties.					there would be significant positive effects on the population as a result of providing transport and some air quality benefits.	
Human health	In terms of health protection, impacts from noise and vibration,	Similar to alternative 1, although negative impacts associated with	Similar to alternatives 1 and 4, although additional impacts	Similar to alternatives 1 and 3 (although no spine road proposed under	Exclusion would bring with it fewer opportunities for sport,	Similar to alternative 1. An additional number of dwellings, together with	No encroachment would be beneficial in terms of a lesser visual impact for

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poorer air quality and contamination, there would be some harm within existing residential streets and on the A2. However, the severity of some of these impacts is uncertain as they have not been modelled at the application stage. There are some positive opportunities for health improvement, with access to better lifestyles (sport and open space), education, housing and community interaction opportunities. The loss of countryside may adversely impacts upon the existing communities' immediate access to its physical and mental health benefits. However, these will still be available in the locality in a different form and location. There will also be additional available opportunities to improve health and wellbeing	transport may permeate additional local streets due to the reliance of local roads and rural lanes for access. However, the severity of these impacts is uncertain as they have not been modelled at the application stage. Overall, it is not possible to conclude significant effects, although there are uncertainties.	associated with the spine road and its transport implications would be similar to alternative 6. There may be some new community severance issues as a result of the spine road, although detailed design is able to address some of the harm arising. It is not possible to conclude significant effects.	alternative 4). Additionally, an increase in the number of dwellings within the existing footprint could provide a positive benefit in terms of an increase in the number of homes being provided (inc. affordable), whilst limiting land and soil loss. However, it would lead to stresses being placed on the standards of development for new residents (e.g. density, garden size, open space and landscaping), which could have negative health effects. A change in the type of dwellings proposed could also impact upon viability which might impact upon a schemes ability to make community and affordable housing provision. However, as these design solutions have not been explored at the application stage, there are uncertainties around these	which would have poor outcomes for some existing and new residents. Overall, it is not possible to conclude significant effects.	the additional land would bring with it further benefits in terms of increased housing provision (inc. affordable homes) community, sports and landscape provision. In terms of transport, some impacts would be shared as per alternative 1, but there would be betterment in terms of a reduction in existing traffic congestion on the A2, including capacity at Key Street, together with some improvements to air quality on the A2. There would also though be some harm to residents in surrounding roads, notably Borden Lane from increases in traffic, albeit from a lower base than the A2. There may be some new community severance issues as a result of the spine road, although detailed design is able to address some of the	residents in local streets and upon mature trees. To achieve this would require the access to be made closer to an existing junction and other houses which would have safety and noise impacts. Encroachment into LGS is relatively minimal and thus impacts are minor. Overall, it is not possible to conclude significant effects.

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	within the new development, e.g. open space and cycle routes. There would be improvements to existing health services in order that the increase in population relative to local services can be accommodated. Overall, it is not possible to conclude significant effects, although there are uncertainties.			conclusions. Overall, it is not possible to conclude significant effects, although there are uncertainties.		harm arising. It is not possible to conclude significant effects overall.	
Biodiversity	The area is intensively farmed, with overall limited conservation interest, although there would be adverse impacts on farmland birds. No direct negative impacts on nearby (non-designated) Borden Nature Reserve, but increased provision/better management potentially secured on part of Local Green Space designation. Some mature tree loss at	As per alternative 1. Overall, it is not possible to conclude significant effects, although there are minor uncertainties.	Similar to alternative 1 and 4. There would be further land take across land of similar character, over and above alternative 1, where there would be additional loss of mature trees and hedgerows. It would be unclear as to how these impacts would be offset as it would require additional land next to the spine road to provide mitigation that would not be necessarily available	Similar to alternative 1. However, an increase of dwellings within the existing MU3 footprint could potentially add pressure to the open space and landscape provision available and this in turn would reduce the potential for biodiversity gains. However, as these design solutions have not been explored at the application stage, there are uncertainties around these conclusions.	Whilst this would avoid additional land take and as such would have the same impacts as alternative 1, the land in question is intensively farmed and not likely to have significant biodiversity interest (other than potentially offering additional habitat for farmland birds). Thus the opportunity to create further biodiversity enhancements would be missed.	Similar to alternatives 1 and 3. Additionally there would be adverse impacts arising from the further dwellings on the 'extra' land. There would also be impacts arising from the adjusted alignment for the access at Borden Lane, although impacts on biodiversity are similar to that under alternatives 1 & 3. However, within the scheme there would be additional landscaping and open space	There would be a loss of biodiversity regardless of the location of the access; however, encroachment would result in the loss of mature trees. However, due to the small size of the encroachment, it is not possible to conclude significant effects.

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Borden Lane and some loss of former orchard habitat as a result of access road. There is an uncertain potential loss (albeit limited) of trees at the junction of Wises Lane with the A2. It will be possible to mitigate impacts of increased pressures on European sites using the mechanisms provided by the Local Plan. It is assumed that the delivery of farmland bird mitigation, as proposed within alternative 6, would also be necessary and capable of being delivered. Despite this, the low overall ecological value of the site should mean that it would be possible to secure net gains in biodiversity overall due to open space and landscaping proposals within the development. Overall, it is not possible to conclude significant		under this alternative. As a result, whilst open space and landscaping proposals within development have prospects for securing net gains in biodiversity overall, the above uncertainties mean that they may not be at the level of alternative 1 or 6. Overall, it is not possible to conclude significant effects, although there are uncertainties.	It is assumed that the delivery of farmland bird mitigation, as proposed within alternative 6, would also be necessary and capable of being delivered. Overall, it is not possible to conclude significant effects, although there are uncertainties.	It is assumed that the delivery of farmland bird mitigation, as proposed within alternative 6, would also be necessary and capable of being delivered. Management of the Local Green Space designation could be achieved under this alternative. However, overall, it is not possible to conclude significant effects.	opportunities from the additional land, over and above alternatives 3 and 4. This will provide additional biodiversity interest from the current intensive land use (not inc. need for farmland bird mitigation). Overall, open space and landscaping proposals within the development should be able to secure net gains in biodiversity. It will be possible to mitigate impacts of increased pressures on European sites using the mechanisms provided by the Local Plan. The mitigation of impacts on farmland birds can also be secured off site. Overall, it is not possible to conclude significant effects.	

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	effects, although there are uncertainties.						
Land	Development would result in the loss of a greenfield site (the likely loss of which has been considered necessary to meet the development needs of the area). It is not possible to mitigate this loss. Development would not re-use previously developed land or remediate contamination. It would also result in the loss of soils (see below) and would change natural drainage processes. However, this latter issue could be mitigated and would not be an adverse outcome. The loss of land is considered to be a significant negative effect overall (although it should be noted that this significance was considered as part of the	As per alternative 1, although it might not be necessary to use undeveloped land to create new junctions at Borden Lane and Wises Lane, which would have beneficial effects. However, this is untested. The loss of land is considered to be a significant negative effect overall (although it should be noted that this significance was considered as part of the Local Plan process).	Similar to alternative 1, but would require additional greenfield land to create spine road to Chestnut Street and thus there is a further adverse impact arising. In terms of the additional housing, there would be better use of land as a scarce resource as per alternative 6. The loss of land is considered to be a significant negative effect overall (although it should be noted that for most of the site, this significance was considered as part of the Local Plan process).	Similar to alternative 1. There would be lesser land take impacts than alternatives 5 and 6. This would be a better management of land as a scarce resource. Nevertheless, the loss of land is considered to be a significant negative effect overall (although it should be noted that this significance was considered as part of the Local Plan process).	There would be lesser impacts than alternative 6 and thus a better management of land as a scarce resource. Overall, not possible to conclude significant effects.	Similar to alternatives 1 and 3. However, there would be additional land loss as a result of the extra greenfield land needed to accommodate the further 80 dwellings, together with the additional land taken to the south to accommodate the sporting facilities/landscaping and the Local Green Space designation. The loss of land is considered to be a significant negative effect overall (although, for a significant proportion of the site, this significance was considered as part of the Local Plan process).	Would potentially create additional impact from alternative 2, however, would not involve additional land take when compared with other alternatives as the land take is unaffected by the position of the new road at Borden Lane. Encroachment into LGS is relatively minimal and thus impacts are minor. Overall, not possible to conclude significant effects.

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	Local Plan process).						
Soil	Development would result in the loss of agricultural land likely to be best and most versatile. This would result in the loss of land suitable for a wide range of crops (the likely loss of which has already been considered necessary to meet the development needs of the area). It is not possible to mitigate this loss. Surveys indicate no potential contamination concentrations on the site, although protection from ground gas concentrations will be required. The loss of soil is considered to be a significant effect overall (although it should be noted that this significance was considered as part of the Local Plan process).	As per alternative 1. Although it might not be necessary to use land (and thus soil) at the junction of Borden Lane and Auckland Drive to create an access. This has not been tested. The loss of soil is considered to be a significant negative effect overall (although it should be noted that this significance was considered as part of the Local Plan process).	Similar to alternative 1, but would require additional agricultural land to create spine road. In terms of the additional housing, there would be better use of soil as a scarce resource. The loss of soil is considered to be a significant negative effect overall (although it should be noted that for most of the site, this significance was considered as part of the Local Plan process).	Similar to alternative 1. There would be lesser losses of soils than alternatives 3 and 6. This would be a better management of a scarce resource. The loss of soil is considered to be a significant negative effect overall (although it should be noted that this significance was considered as part of the Local Plan process).	There would be lesser impacts than alternative 6 and thus a better management of a scarce resource. Overall, not possible to conclude significant effects.	Similar to alternatives 1 and 3. However, there would be additional soil losses as a result of the land needed to accommodate the additional 80 dwellings, together with the additional land taken to the south to accommodate the sporting facilities/landscaping and the Local Green Space designation. The loss of soil is considered to be a significant negative effect overall (although, for a significant proportion of the site, this significance was considered as part of the Local Plan process).	The land has not been in agricultural use for many years, although it is likely to be of high quality. Would potentially create additional impact from alternative 2, however, would not involve additional land take when compared with other alternatives as the land take is unaffected by the position of the new road at Borden Lane. Encroachment into LGS is relatively minimal and thus impacts are minor. Overall, not possible to conclude significant effects.

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Water	None of the site is subject to fluvial flood risk. In terms of water contamination, this can be addressed during the construction phase of development and with a site SuDS system to address both pollution and surface water flooding. Overall, not possible to conclude significant effects.	As per alternative 1. Overall, not possible to conclude significant effects.	Similar to alternatives 1 and 4, although mitigation measures would be required for the additional length of spine road. Part of the area is subject to fluvial flooding, but alternative 6 has demonstrated that the Environment Agency is satisfied. There is no residential development within the area at risk from flooding. Overall, not possible to conclude significant effects.	Similar to alternative 1. However, there could be further adverse effects were the additional dwellings to place pressure of the space available to create an adequate site SuDS arrangement. However, as these design solutions have not been explored at the application stage, there are uncertainties around these conclusions. Overall, it is not possible to conclude significant effects, although there are uncertainties.	Exclusion would potentially limit land available for mitigation. However, this has not been tested. Overall, it is not possible to conclude significant effects, although there are uncertainties.	Similar to alternatives 1 and 3.	No issues identified.
Air	There would likely to be some deterioration in air quality on the A2, but there are uncertainties as this has not been modelled. Overall, it is not possible to conclude significant effects, although there are uncertainties.	Similar to alternative 1. There may be some deterioration in air quality through use of more minor roads, but there are uncertainties as this has not been modelled. Overall, it is not possible to conclude significant effects, although there	As per alternative 6. This would be a change in air quality effects from alternative 1. Overall, it is not possible to conclude significant effects.	Similar to alternative 1. Although there would be a worsening of air quality over and above it, it does not seem likely that this relatively modest number of additional dwellings would significantly worsen conditions. However, there are uncertainties given that this has not	There would be a reduced potential to plant additional trees which might have otherwise benefited air quality, although this may have been achieved in any event under alternatives 1 and 2. Overall, not possible to conclude significant	There would be some improved effects on alternative 1, due to changes in traffic distribution away from the A2, but with some adverse effects on other local roads. Overall, it is not possible to conclude significant effects.	The location of the access road has no implications under this subject.

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		are uncertainties.		been modelled. Overall, it is not possible to conclude significant effects, although there are uncertainties.	effects.		
Climate	Emissions from transport would increase from the additional dwellings, whilst the distance of the site to the town centre is likely to increase car dependency, although the availability of services such as local schools should limit car use for some activities. Cycle routes would support non-car use to a limited degree. The specific effects on this issue have, however, not been modelled, therefore there are some uncertainties. Overall, not possible to conclude significant effects, although there are uncertainties.	Similar to alternative 1. Although given the use of narrower roads, there may also be a reduced opportunity to encourage public transport onto the site to reduce car dependency. The specific effects on this issue have, however, not been modelled, therefore there are some uncertainties. Overall, not possible to conclude significant effects, although there are uncertainties.	Similar to alternative 1 and 6. However, the provision of a link road may increase car dependency over and above alternative 1 by virtue of the ease of access to the A249; however, many journeys would be displaced from other congested routes. Some of these impacts would be offset to a limited degree by better public transport access into the site via the 'spine' road. The specific effects on this issue have not been modelled, therefore there are some uncertainties. Overall, not possible to conclude significant effects, although there	Similar to alternative 1. The addition of a modest increase in dwellings, although adverse, is not likely to have a significant effect overall. The specific effects on this issue have, however, not been modelled, therefore there are some uncertainties. Overall, not possible to conclude significant effects, although there are uncertainties.	There could be a reduced opportunity for tree planting which would otherwise have beneficial effects on climate change mitigation, although it is unclear as to whether the same benefit could have been achieved by alternative 1. The specific effects on this issue have, however, not been modelled, therefore there are some uncertainties. Overall, not possible to conclude significant effects, although there are uncertainties.	Similar to alternatives 1 and 3. Would deliver a greater level of community facilities which has ability to reduce local journeys by car to a greater extent than alternatives 1 and 2. This would be assisted to some degree by the possibility of better public transport access. The specific effects on this issue have not been modelled, therefore there are some uncertainties. Overall, not possible to conclude significant effects, although there are uncertainties.	The location of the access road has no implications under this subject.

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Material assets	Development will require utilities and increase demand for community facilities (schools, health services etc.). These possible adverse effects will be offset by new provision made possible from developer contributions so as to increase capacity. Specifically, there would also be an on-site primary school provided. Overall, not possible to conclude significant effects.	Similar to alternative 1, although a road between Borden Lane and the A2 might not be achieved.	Similar to alternatives 1, 4 and 6. The increase in dwellings could further improve viability for the development that in turn could provide additional funding for new material assets. However, this would not be certain as it would depend upon the overall dwelling mix. If smaller units were required to achieve the numbers in the same footprint as alternative 1, this could impact upon viability. However, although the viability of dwelling mix has been tested to some degree, the specifics of what might be required are uncertain. Likewise the design effects are untested. Additionally, the spine road, if delivered, will create a new material asset to the benefit of this part of the town, although other assets	Similar to alternatives 1 and 3. However, the provision of material assets would be lesser than these alternatives, as they would not include the 'spine road', whilst there may also be less space for other assets to be provided. The other impacts of alternative 4 have not been tested through the design process and are thus uncertain. Overall, it is not possible to conclude significant effects, although there are uncertainties.	The non-inclusion of this land would reduce the potential to provide material assets, such as sports provision, although there is no requirement to make such provision. Nevertheless, it would provide a reduced betterment upon alternative 6. Overall, not possible to conclude significant effects.	Similar to alternatives 1 and 3. However, the impacts (negative and positive) would be greater due to the increased level of development. However, these are addressed with the additional developer contributions that would arise and the improved viability that is able to support it. Delivery of new material assets is more certain. New material assets, in particular the new 'spine' road for this part of the town, school and sports facilities would be positive benefits both for existing and new communities. Overall, the material benefits are considered to produce significant positive effects.	The location of the access road has no implications under this subject.

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			might be diluted due to the reduced space on the site available to provide them due to the extra housing.				
			Some positive effects could be significant due to the new 'spine' road, sports and other facilities; however, some may be uncertain due to the additional land required for the extra housing.				
			Overall, not possible to conclude significant effects, although there are uncertainties.				
Cultural heritage	There is less than substantial harm to designated assets. There is the potential for non-designated assets to be present, although analysis indicates that past agricultural activities may have had an adverse effect on this potential. This has been confirmed in respect of the first phase of	Similar to alternative 1. There would be some lesser negative effect in Borden Lane as no access road would be required from here. Overall, not possible to conclude significant effects.	Similar to alternative 1. There would though be additional impacts on built and buried heritage. For example, additional listed properties and a further conservation area (with a Grade I property). These would be influenced both by the adverse visual impacts of the new road access at Chestnut	Similar to alternative 1. However, the additional dwellings could limit the ability of the scheme to mitigate impacts on setting and archaeology due to the reduced space that would be available from within the existing footprint. However, this has not been tested as part of the design process and	There is the possibility that exclusion of this land might safeguard any existing archaeology. However, this has yet to be tested and as such there is uncertainty. Overall, it is not possible to conclude significant effects, although there are uncertainties.	Similar to alternatives 1 and 3. Even though there would be an additional number of dwellings on the additional land over and above alternative 3, the impacts on heritage, would not be significantly greater. However, in the case of archaeology there is uncertainty as per	There would be some additional negative impact upon the setting of a designated heritage asset due to the location of the road. However, there would be a marginal lesser effect upon a second heritage asset in Borden Lane as the proposed access would be located slightly further away.

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	development, but not so the remainder, as further assessment will be undertaken as part of the mitigation proposals for subsequent phases. Although Kent County Council is happy with this approach, it is not possible to definitely confirm the significance of development impacts on non-designated assets in subsequent phases of the scheme. The impacts on heritage assets adjacent the site and in the surrounding area are judged as less than significant. Overall, it is not possible to conclude significant effects, although there are uncertainties.		Street and Borden Lane, together with traffic that would be able to use Maidstone Road as an alternative to the A249, especially if there were difficulties on the trunk road. These impacts are less than substantial. Overall, not possible to conclude significant effects.	as such results here, although potentially negative, are nevertheless uncertain. Overall, it is not possible to conclude significant effects, although there are uncertainties.		alternative 1. The impacts on heritage assets are less than substantial. Overall, it is not possible to conclude significant effects, although there are uncertainties.	Encroachment into LGS is relatively minimal and thus impacts are minor. Overall, not possible to conclude significant effects.
Landscape	Given the greenfield nature of the site and the scale of development proposed, the proposed scheme would result in harm to the rural open landscape character and	As per alternative 1. Overall, not possible to conclude significant effects, although there are some minor uncertainties.	Similar to alternatives 1 and 4. Additional adverse landscape impacts would arise from the further land-take required to secure the spine road to Chestnut	Similar to alternative 1. However, the additional dwellings could increase the density/dwelling height of development within the existing footprint and/or could	The issue is uncertain. The additional land is required (in part) to provide additional sports provision that would not be possible under alternative 1. Thus	Similar to alternatives 1 and 3 due to the further land-take required to secure the spine road to Chestnut Street. There would also be some additional impact over	The land is currently open at Borden Lane and would be less impacted upon than that proposed by alternatives 6 and 3. Encroachment would have the result of

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	the visual amenity of users of the public roads and public rights of way that pass through and around the site. Locally, some of this harm would be significant (e.g. from public footpaths). There would also be a site-wide loss of open arable land and pasture. There is an uncertain potential loss (limited) of trees at the junction of Wises Lane with the A2. There would be a range of adverse landscape and visual effects. However, landscape structure and advanced planting is proposed and if managed for the long term, they would provide mitigation and reduce the level of landscape and visual harm to moderate levels. There would also be a more considered response to the settlement/countryside edge than much of the		Street, although some impacts would be 'saved' as a result of the more efficient use of land for housing than as per alternative 6. Due to the land available for mitigation at for the proposed new junction and access road at Chestnut Street, the likely impacts upon landscape and visual amenity will be less than significant. Overall, not possible to conclude significant effects, although there are some minor uncertainties.	limit the amount of land available for landscape and visual mitigation and increase landscape/visual impacts overall. Overall, it is not possible to conclude significant effects, although there are uncertainties.	whilst the additional land is able to provide additional potential landscape benefits, it is not clear as to whether these would be in addition to alternative 1 because that alternative would have also been able to provide landscape mitigation on its southern boundary in its own right without the need to extend the site southward. Proposals would be able to additionally provided positive landscape management to the Local Green Space designation. Overall, it is not possible to conclude significant effects, although there are uncertainties.	and above alternative 3 arising from the development of land for the additional 80 units. Due to the land available for mitigation at for the proposed new junction and access road at Chestnut Street, the likely impacts upon landscape and visual amenity will be less than significant. Proposals would be able to additionally provided positive landscape management to the Local Green Space designation. Overall, not possible to conclude significant effects, although there are some minor uncertainties.	needing to remove mature trees. However, the visual and landscape impacts are not significant overall. Encroachment into LGS is relatively minimal and thus impacts are minor. Overall, not possible to conclude significant effects.

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	existing edge to this part of Sittingbourne. Overall, not possible to conclude significant effects, although there are some minor uncertainties.						
Conclusions and reasons for selection/ rejection	Land and soil loss are judged to give rise to significant negative effects, noting that such matters have already been considered as part of the Local Plan process. Compared with other alternatives (other than 'do nothing'), this alternative would have preferable land, soil, landscape and biodiversity impacts. Many of the positive and negative effects have already been considered by the Local Plan process. Additionally, there is no modelled evidence to suggest that MU3 is not deliverable, although Kent Highways	This alternative has the benefits of alternative 1, whilst also potentially having urban, landscape design and community benefits which could limit the effects of a more major road through the site, as proposed by other alternatives. This alternative would not present the diversionary effects of traffic offered by alternative 1 (to some degree), 3 and 6 and would create uncertain (but probably adverse) effects on local streets and rural lanes by focusing traffic on roads less able to accommodate the level of growth.	This alternative has similar impacts to alternative 1 and 6, but with additional adverse land, soil and landscape impacts due to the access across land to Chestnut Street. These would not be as significant as alternative 6 which involved additional development on land outside of the MU3 footprint. Despite the significant adverse effects on land and soil, this alternative performs well as it minimises the land take required and potentially achieves the same transport and air quality betterments as alternative 6. However,	Conclusions are as per alternative 1. Although the urban and landscape design implications of this alternative have not been formally tested, it seems probably that as a potentially denser scheme, with fewer opportunities for landscaping/open space and implications for viability, such a scheme would have less desirable outcomes, despite the provision of extra housing and the more efficient use of land.	Inclusion of the land to the south for sports provision is not necessary in its own right. The proposed use of the land for sports provision, whilst responding to a local need, is nevertheless an opportunistic benefit rather than a necessity; albeit one which would have positive impacts in terms of population, health and material assets at a wider than local level. As such, the additional adverse land take, soil, landscape and visual impacts need to be viewed in the light of whether there is an overriding need or benefit, particularly when being judged against	With the possible exception of alternative 3, there is no indication that other alternatives (i.e. alternatives 1 and 2), with lesser harm (e.g. land-take, soils, visual, landscape and heritage), would not be deliverable. Therefore, this alternative can be viewed in terms of the more favourable betterment arising. It seems likely that alternative 3 would not be deliverable. In the case of alternative 6, there is betterment arising from impacts upon population and human health (e.g. extra housing (inc. affordable)), transport	Avoidance of the designation is beneficial in many respects, although alternative 2 is able to remove the issue of concern altogether. Encroachment into LGS is relatively minimal and despite the loss of mature trees (which can be replaced), impacts are minor. However, there are also safety questions, due to the proximity of an existing junction at Auckland Drive. Encroachment onto the designation reduces these issues, whilst potentially giving the opportunity to better 'advertise' its gateway role to a new alternative

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consider that key junctions may be subject to unacceptable impacts. However, the site does not perform as well as alternatives 3 and 6 in terms of impacts under population, human health and material assets. Specifically, it would be bettered by these alternatives on such matters as transport. In conclusion, whilst the site remains deliverable and many of the positive and adverse impacts have already been considered by the Local Plan process, alternatives 3 and 6 potentially provide other approaches able to provide improved solutions to adverse impacts and offers improved.		there are potential adverse effects arising from increasing development within the existing footprint in terms of material assets, biodiversity, layout and landscape (although this is uncertain). However, there is uncertainty as to the delivery of this alternative as it is assumed that the additional 80 dwellings (see alternative 6) is required by the adjacent landowner to be located on their land rather than in the MU3 footprint. Without these houses, the land would presumably not be offered and the scheme promoter would not be able to deliver the scheme without incurring the costs of land acquisition (had it been agreed) and the costs of the additional road infrastructure. This would have challenged		alternatives with lesser adverse impacts. This alternative does provide benefits in terms of Local Green Space designation management and wider strategic landscaping, however, these benefits are available under alternative 6. In its own right, this alternative is unlikely to be pursued. However, its advantages and disadvantages might reasonably be considered as part of another alternative.	and from material assets (e.g. spine road and sports and community facilities). In considering the extent of the betterment overall, in the case of impacts on population, human health and material assets, it is significant. In terms of the additional land for the sports facilities, it is acknowledged that these benefits are of greater than local significance. The additional housing is modest, but will nevertheless potentially enable delivery of a greater number. Specifically, betterment is provided in respect of transport components. In the case of air quality, there may be some improvement over the other alternatives because of the diversionary effects of traffic arising from the spine road. However,	route. Avoidance of the designation would be the preferred alternative, however, given the minimal encroachment and safety issues, this is not a significant issue overall.

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			the viability of the scheme and would not be financially viable as demonstrated by the alternative 6 application.			the levels are relatively modest, but nevertheless beneficial. Elsewhere however, there may be reductions in air quality.	
			In the absence of this, the only way this alternative could be delivered is by the Council using its CPO powers. Whilst this potential has not been explored, given that the additional 80 units is not judged to give rise to significant additional adverse effects (see alternative 6), this would not be a beneficial alternative for the Council to consider as it			However, the diversion of traffic away from the A2 and its improvements to congestion and the functioning of the Key Street junction are more material. Evidence shows there would be a material reduction in traffic on the A2 London Road. However, for Borden Lane, Wises Lane and Chestnut Street, the diversionary effects are	
			would simply be using public monies to achieve the same ends as could be achieved in alternative 6. Alternatively, the Council could have tried to reach agreement with the scheme promoter that would have enabled the CPO process to have			negative, although not significantly so. There are significant negative effects arising from this alternative from impacts on land-take and soils. However, much is already committed from alternative 1, whilst the other additional adverse	

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			been funded by them; however, these additional costs for developer would have also adversely affected the viability of the scheme (although again this has not been tested). Whilst the specific scenario has not been formally tested, in the absence of a CPO option, it nevertheless seems probable, on the basis of viability evidence concerning the planning application, that this alternative would not be deliverable.				and not As a popphea ass con sign effer The post unid and by cresp are con alter ultir be contact.	pacts identified (singly a cumulatively) are significant overall. The significant overall are sult of the pulation, human alth and material sets, these are asidered to give inficantly positive ects. The extents of these sitive effects are que to this alternative a dance at levels over a day over that offered others. In these pects, these benefits clearly at least inmensurate to other emately more likely to deliverable under this emative.		

Source documentation

Applicant's EIA Main Statement received 02/11/17, together with addendums/additional information received 25/05/18, 07/06/18, 18/10/18, 13/12/18.

Kent Highways Correspondence received 04/01/18, 29/06/18, 07/09/18, 10/10/18, 3/01/19, 18/01/19.

Applicant's viability assessments and Pathfinder viability assessment.