
F5A Topic paper on the SA process August 2020

1. Introduction

- 1.1 The Sustainability Appraisal (SA) process has run in parallel with Local Plan-making, with an Interim SA Report published as part of all five Regulation 18 consultations, ahead of the formally required SA Report being prepared and published at the Regulation 19 stage. Subsequently, in October 2019, an SA Report Addendum was published as part of the Focused Changes consultation, as was an updated version of the SA Report.
- 1.2 This topic paper presents an overview of each stage in the SA process in turn, before a conclusion draws matters together. The aim is to demonstrate that the SA process has fed into and influenced plan-making.

Opening remark on the SA process

- 1.3 The formally submitted SA Report (October 2019) is the first port of call, when seeking to build an understanding of the SA process. The report is presented in three Parts, in order to explain a chronology of events:
- Part 1 – explains that preparation of the Pre-submission Plan was informed by appraisal of spatial strategy reasonable alternatives, which themselves were identified following a preceding step-wise process, with a key input to the step-wise process being evidence gathered at the earlier Regulation 18 stages;
 - Part 2 – presents an appraisal of the Pre-submission Plan (incorporating Focused Changes); and
 - Part 3 – discusses next steps in the plan-making/SA process.
- 1.4 Part 1 of the SA Report is therefore key to understanding how SA has informed preparation of the Local Plan. Part 1 of the report aims to meet the legal requirements in respect of

reasonable alternatives, by presenting an appraisal of the reasonable alternatives as well as “an outline of the reasons for selecting the alternatives dealt with”.¹

2. Issues and Options consultation 2009

- 2.1 The primary focus of the first Interim SA (ISA) Report was an appraisal of the following spatial strategy alternatives: 1) Centralised growth; 2) Transport corridor-led growth; 3) Semi-dispersed growth; 4) Dispersed growth.
- 2.2 It is important to emphasise that the alternatives at this stage were in the form of alternative conceptual spatial approaches (or ‘development philosophies’), and were not defined in site-specific terms. The spatial definition underpinning the alternatives can be seen from the maps presented across pages 17 to 20 of the report.
- 2.3 The appraisal conclusion (pages 23 and 24) served to highlight numerous arguments in support of Option 2 (it was found to perform relatively well, or on a par with other options, in respect of all SA objectives bar one) and very limited arguments in support of Option 4 (it was found to perform relatively well in terms of only one SA objective).

3. Preferred Options consultation 2013

- 3.1 The second ISA Report presented an appraisal of:
 - Spatial strategy alternatives – the Council’s preferred option at the time (Option 1) was appraised alongside the same four options previously appraised at the Issues and Options stage (Options 2 to 5). The appraisal (Section 16) found there to be limited arguments in support of the two ‘dispersal’ options (Options 4 and 5), but highlighted a more nuanced picture in respect of Options 1 to 3, with all options associated with pros and cons.
 - Housing quanta alternatives – the preferred option at the time, which involved providing for 170 dpa, was appraised against two higher growth options (see Section 12). The alternatives were not spatially defined, which limited the potential to draw meaningful conclusions; however, the appraisal served to highlight higher growth options as preferable in socio-economic terms, but more problematic in environmental terms.
 - Site options – the report presented an appraisal of 48 site options, with the aim being to highlight options standing-out as performing notably well, or notably poorly, in respect of each of the SA objectives in turn.

¹ Article 12 of the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004 requires an assessment of the “the plan and reasonable alternatives”, whilst Schedule 1 requires “an outline of the reasons for selecting...”

4. Strategic Growth Options consultation 2015

- 4.1 The primary focus of the ISA Report was an appraisal of five competing spatial strategy RAs: 1) focus at DHGV; 2) focus at West Horndon; 3) focus at South-east of Brentwood/Shenfield; 4) focus at Pilgrims Hatch; and 5) dispersal of growth between smaller urban extensions at Brentwood, Hutton, Pilgrims Hatch, Shenfield and Warley. These alternatives were explained in Section 11 and Appendix III of the report.
- 4.2 The appraisal served to highlight a nuanced picture, with all options being associated with pros and cons. For example, the appraisal found 'Dunton' to perform relatively well in terms of five objectives, but relatively poorly in terms of four objectives (heritage, flood risk, landscape and soils).

Dunton Hills Garden Suburb consultation

- 4.3 This consultation was run concurrently with the Strategic Growth Options consultation. It was a joint consultation with Basildon Borough Council, with the ISA Report prepared by Basildon's SA consultants (LUC).
- 4.4 The ISA Report focused on appraising the emerging proposals only, and did not present an appraisal of alternatives. The appraisal concluded the likelihood of: significant positive effects in terms of 'Prosperity, economic growth and regeneration' (given location and the potential to deliver employment land), 'Town centres' (given proximity to local centres at Laindon and Great Berry) and 'Housing' (given the potential for a good mix of housing, including affordable housing); and significant negative effects in terms of 'Landscape' (given the low capacity of the landscape to accommodate change), 'Cultural heritage' (given that the eastern part of the area sits within an area of sensitivity), 'Biodiversity' (given onsite and nearby habitats), 'Efficiency of land use' (given the greenfield nature of the site) and 'Flood risk' (given onsite issues).

5. Draft Plan consultation 2016

- 5.1 The ISA Report aimed to present all of the information legally required of the SA Report, and was presented in three Parts accordingly (as per the SA Report, 2019).

Part 1 of the report

- 5.2 The aim was to explain the process of exploring spatial strategy reasonable alternatives (RAs). Specifically:
- Section 6 explained the process of arriving at spatial strategy RAs;
 - Section 7 presented an appraisal of the spatial strategy RAs; and

- Section 8 presented the Council’s response to the appraisal.
- 5.3 Sub-section 6.2 notably explained the ‘context and background’ to the establishment of spatial strategy RAs in 2016, with reference to preceding stages of plan-making / SA. It is also important to note that the spatial strategy RAs ultimately arrived at, at the end of Section 6, were defined with reference to specific sites.
- 5.4 The appraisal (Section 7) served to highlight the Council’s preferred option at the time (Option 1) as performing relatively well in a number of respects, but also being associated with drawbacks, perhaps most notably in respect of biodiversity, landscape and soils.
- 5.5 The Council responded (Section 8), acknowledging “the complexity and challenges raised by the Sustainability Appraisal, and anticipates further investigation of these matters including through the on-going commissioning and publication of evidence. The Draft Local Plan consultation will enable further comments on the development of the Plan and the identified sites, which will be used to inform the next iteration of the Plan.”

Part 2 of the report

- 5.6 The appraisal was presented as a series of narrative discussions under the SA objectives (the ‘SA framework’), with a final section drawing conclusions and also presenting a series of recommendations.

6. Preferred Allocations consultation 2018

- 6.1 The ISA Report again aimed to present all of the information legally required of the SA Report.

Part 1 of the report

- 6.2 Section 6 presented the findings of a step-wise process to arrive at spatial strategy RAs, which was summarised in a flow diagram (Figure 6.1). Section 6.4 notably explained work completed to appraise all site options in isolation, using a GIS-based methodology (N.B. similar analysis was also reported in Appendix II of the 2016 ISA Report); and Section 6.5 notably examined competing site options at Brentwood/Shenfield. With regards to the spatial strategy RAs arrived at, it is important to note that they were defined with reference to specific sites.
- 6.3 The appraisal (Section 7) found the Council’s preferred option at the time (Option 3) to perform well, or relatively well, in terms of a number of objectives, but highlighted drawbacks in terms of biodiversity, landscape and housing. Option 1 (low growth) was found to perform best from a landscape perspective, but with drawbacks from a housing perspective. The high growth options (Options 9 and 10) performed very well from a housing perspective, but with drawbacks in respect of a number of environmental issues/objectives, most notably air quality.

- 6.4 The Council responded in detail (Section 8) explaining the potential to put in place measures to address (i.e. avoid or mitigate) the drawbacks associated with the preferred spatial strategy.

Part 2 of the report

- 6.5 The appraisal was again presented as a series of narrative discussions under the SA framework, with a final section (Section 10.14) drawing conclusions. The appraisal concluded significant positive effects in respect of Housing and the Economy; significant negative effects in respect of Landscape and Soils; uncertain effects in respect of Community and wellbeing and Water; and more minor concerns in respect of several other objectives.

7. Publication 2019

- 7.1 The SA Report was published alongside the Pre-submission Local Plan in February 2019, presenting all of the required information (Article 12 and Schedule 2 of the SEA Regulations, 2004).

Part 1 of the report

- 7.2 Section 5 presented the findings of a step-wise process to arrive at spatial strategy RAs, which was summarised in a flow diagram (Figure 5.1). **Appendix I** of this topic paper considers the process in detail, but in summary:
- High level issues/options – Section 5.2 presented a discussion of alternative housing **growth quanta** options and **broad distribution** options, drawing upon evidence from Regulation 18.
 - Strategic site options – Section 5.3 introduced the **strategic site options** previously considered over the course of the Regulation 18 stage, highlighted two further potential strategic site options (para 5.3.5) and also presented a brief discussion of areas of search for other strategic site options (para 5.3.7).
 - Site options – Section 5.4 explained work completed to examine **site options** in isolation (regardless of whether ‘strategic’ or ‘non-strategic’). Paragraph 5.4.2 explained a focus on those site options found to be ‘deliverable or developable’ through the Council’s Housing and Economic Land Availability Assessment (HELAA).
 - Sub-area alternatives – Section 5.5 drew upon the preceding ‘top down’ and ‘bottom up’ analysis to identify and informally examine alternative approaches to growth at **four sub-areas** in turn, with a view to identifying options to progress to the final stage of the process, namely the establishment of spatial strategy RAs.
 - Spatial strategy RAs – Section 6.6 collated the sub-area options (see Table 5.4) and then explored means of packaging these up into spatial strategy RAs for **the Borough**

as a whole, leading to the spatial strategy RAs presented in Table 5.5 and across subsequent maps.

- 7.3 Section 6 presented the appraisal of spatial strategy RAs, finding the Council's preferred option (Option 3) to perform relatively well in respect of a number of objectives, but with notable drawbacks in respect of landscape (lower growth options were appraised as preferable) and 'soils' (all RAs performed poorly, and broadly on a par).
- 7.4 The Council responded in detail (Section 7) explaining their reasons for supporting Dunton Hills Garden Village, which is a central component of the preferred strategy, and also providing clear reasons for not supporting each of the non-preferred options (para 7.2.4). The Council's reasons from para 7.2.4 are reproduced here – Box 1.

Box 1: The Council's reasons for supporting the preferred option and rejecting the reasonable alternatives

Lower growth (Options 1 and 2): There is a need to provide for a land supply significantly in excess of the '2016-based' LHN figure of 350 dpa for the reasons discussed above, including the need to be mindful of the higher '2014-based' LHN figure.

Additional strategic growth at Brentwood (Options 2, 4, 5 and 7): A primary concern is in respect of traffic congestion (also noting the two air quality management areas), with a secondary concern relating to the capacity of existing community infrastructure to absorb additional growth. All of the sites available and deliverable at the current time are subject to constraints, and are of an insufficient scale to deliver strategic infrastructure upgrades.

West Horndon (Options 1, 4, 5, 6, 7): The Council would favour a strategic scheme involving growth both to the East and West, but equally considers the opportunity associated with growth at West Horndon to be less than the opportunity that presents itself at Dunton Hills Garden Village, where there is the opportunity for a larger and more comprehensive scheme. The Council notes that Thurrock Council is exploring the option of developing West Horndon as a large new settlement, but concludes that this proposal is at such an early stage of formulation that it cannot be considered to be a potential issue or constraint in respect of delivering DHGV.

Part 2 of the report

- 7.5 The appraisal was again presented as a series of narrative discussions under the SA framework, with a final section (Section 9.14) drawing conclusions. The appraisal concluded significant positive effects in respect of Housing and positive effects in respect of Climate change mitigation, Community and wellbeing and Economy/employment; however, the appraisal concluded significant negative effects in respect of Landscape and Soils and 'notable tensions' between the Local Plan and objectives for Air quality, Water quality and Traffic congestion.

8. Focused Changes consultation 2019

8.1 Two SA documents were published as part of the Focused Changes consultation in October 2019:

- **SA Report Addendum** - the SA Report Addendum presented an appraisal of A) the Focused Changes; and B) the Pre-submission plan plus focused changes. This was a concise document presenting tailored information.
- **Updated SA Report** - the SA Report, as previously published alongside the Pre-submission Plan in February 2019, was updated simply to A) incorporate the implications of the Focused Changes; and B) account for a notable change in the evidence-base, namely a new higher Local Housing Need (LHN) figure for Brentwood Borough (454 dpa). The scope of the updates was explained within a box on page “i” of the report, and all updates were presented within stand-alone highlighted sections (all within Section 9 of the Report).

9. Conclusion

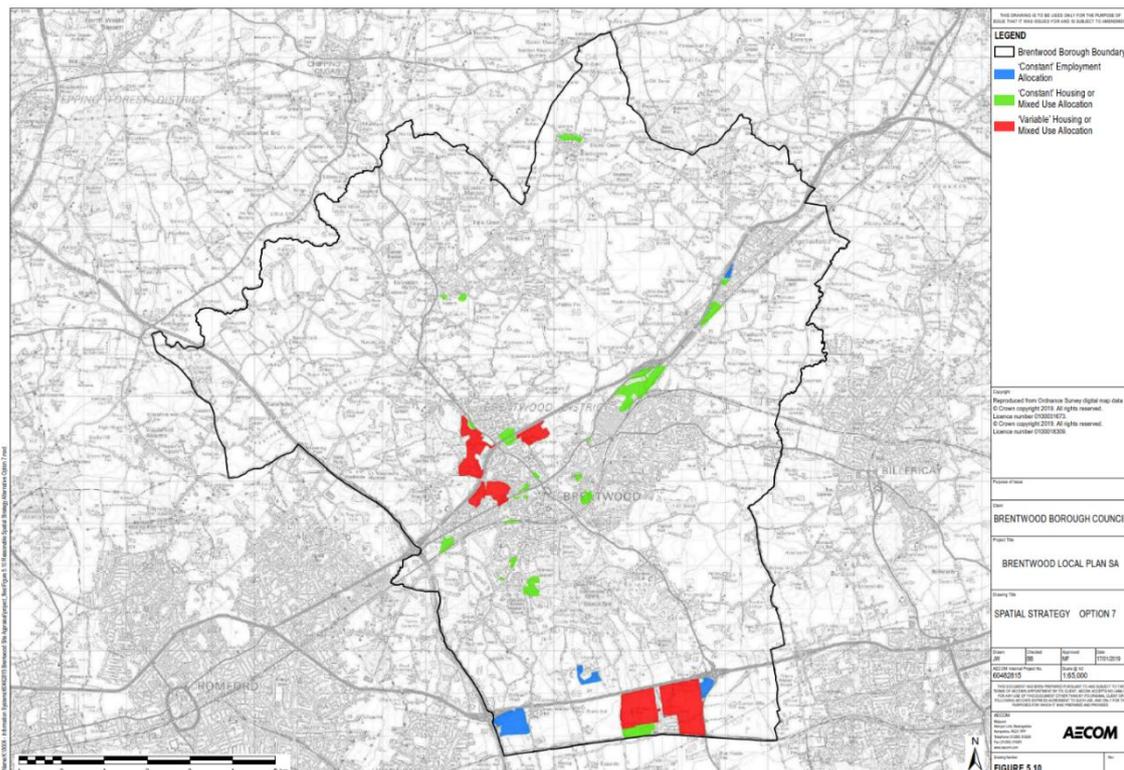
- 9.1 This topic paper has sought to demonstrate how SA fed-into and influenced plan-making over the period 2009 to 2019, particularly in respect of **the scale and distribution of growth**. In summary, appraisal of spatial strategy RAs influenced plan-making and consultation in 2019, and appraisal of earlier iterations of the spatial strategy RAs in 2009, 2013, 2015, 2016 and 2018 also served to inform plan-making and consultation at the time. Furthermore, discrete work-streams to explore options for the scale and distribution of growth were completed in order to feed-into the establishment of spatial strategy RAs, in particular in 2018/19 (as reported in Section 5 of the SA Report).
- 9.2 All work completed over the course of the Regulation 18 stages fed-into work in 2018/19 to establish spatial strategy RAs, namely the step-wise process reported in Section 5 of the SA Report (e.g. see para 5.2.12). Section 5 of the SA Report explains a lengthy and involved process of **selecting and rejecting options** for the scale and distribution of growth, but stops short of presenting an audit trail of all options considered over the years. **Appendix II** of this topic paper presents supplementary information regarding selecting and rejecting options.
- 9.3 The spatial strategy RAs ultimately arrived at are sufficiently **distinct** such that meaningful comparisons can be made, in respect of sustainability implications. This is evidenced by the maps of spatial strategy alternatives presented across pages 34 to 40 of the SA Report and from Table 6.1 (also Appendix VI), which reports the **comparative appraisal** of the spatial strategy RAs. The alternatives are necessarily site specific and, as such, it is necessary to hold some elements of supply **constant** (as otherwise the number spatial strategy RAs, would be vast). The decision on those elements of supply to hold constant was made on the basis of the analysis presented in Section 5, with the aim being to hold constant those elements of supply that are most strongly justified and least associated with a strategic choice. For example, supply from urban sites is held constant at the maximum reasonable level across the spatial strategy RAs because there are very strong arguments to suggest

that this is necessary in order to minimise pressure on the **Green Belt**. It was also deemed necessary and appropriate to hold constant supply from certain smaller, better performing Green Belt sites, with this decision again being based on the basis of the analysis presented in Section 5, and within Section 5.5 in particular.

9.4 Finally, there is a need to give stand-alone consideration to the decision made to include **Dunton Hills Garden Village** (DHGV) within the spatial strategy RAs, and ultimately the preferred option. Key points are as follows:

- The scheme emerged as an option in **2015**, which prompted the concurrent Strategic Growth Options / Dunton Garden Suburb consultations, with the published ISA Report serving to highlight the pros and cons of spatial strategy options involving the scheme, both in absolute terms and relative to alternatives.
- Subsequently, in **2016** and **2018**, two rounds of work were completed to establish, appraise and consult on spatial strategy RAs that included DHGV as a variable, with both appraisals serving to highlight the pros and cons of a spatial strategy involving allocation of DHGV.
- Work from the Regulation 18 stages then fed into work to establish final spatial strategy RAs in **2018/19**, and ultimately led to the conclusion that allocation of DHGV should once again be included as a variable across the spatial strategy RAs. The appraisal of RAs (Section 6 of the SA Report) served to highlight that a spatial strategy involving DHGV performs well in a number of respects, relative to the alternatives, whilst also flagging certain issues and challenges. These appraisal findings were taken into account by the Council when finalising the Pre-submission Plan, and will also have served to inform representations on the Pre-submission Plan.

Figure 1: An example of one of the seven spatial strategy alternatives (2019)



Appendix I: Explanation of the RAs

- 9.5 As discussed above, the information presented in Section 5 of the SA Report (2019) is central to understanding how the SA process has met with legal requirements and served to appropriately inform the spatial strategy. Specifically, Section 5 of the SA Report explains the process of arriving at spatial strategy RAs.
- 9.6 Section 5 extends over 30 pages of the report, plus there are three associated appendices that extend to almost another 30 pages. As such, the aim here is to aid navigation and understanding. The approach taken is to work backwards from Table 5.5 at the end of Section 5, namely the table presenting the spatial strategy RAs.
- 9.7 Each row of the Table 5.5 is examined in turn, below.

Table 5.5: The reasonable spatial strategy alternatives (following 8th November 2018 Extraordinary Council meeting)

			Option 1 WH East WH West	Option 2 Brentwood	Option 3 DHGV	Option 4 Brentwood WH East	Option 5 Brentwood WH West	Option 6 DHGV WH West	Option 7 Brentwood WH East WH West
Completions			363	363	363	363	363	363	363
Commitments			926	926	926	926	926	926	926
Windfall			410	410	410	410	410	410	410
Allocations	Constants	Brentwood / Shenfield	Urban brownfield	1,152	1,152	1,152	1,152	1,152	1,152
			Urban greenfield	75	75	75	75	75	75
			Green Belt	1240	1240	1240	1240	1240	1240
		West Horndon	Urban brownfield	580	580	580	580	580	580
			Villages	218	218	218	218	218	218
		Variables	Brentwood	Northern Village GB	123	123	123	123	123
	Honeypot Lane				200		200		200
	Sawyers Hall Farm				450		450		450
	St. Faiths				750		750		750
	A127		West of Ongar Road		800		800		800
			West Horndon East	600			600		600
			West Horndon West	900				900	900
			Dunton Hills GV			2700			2700
	Total dwellings			6587	7287	7787	7887	8187	8687
Total per annum			387	429	458	464	482	511	517
% over 350 dpa			11%	22%	31%	33%	38%	46%	48%
% over 454 dpa			-15%	-6%	1%	2%	6%	13%	14%

Completions

- 9.8 The number of homes completed since the start of the plan period, as understood at the time. This figure must therefore be included as a **constant** element of supply across the spatial strategy RAs.

Commitments

- 9.9 The number of homes set to be delivered at sites with planning permission, as understood at the time. This figure must therefore be included as a **constant** element of supply across the spatial strategy RAs.

Windfall

- 9.10 There can be the potential to vary the windfall figure, which is the number of homes expected to be delivered sites not allocated in the Local Plan (typically infill sites and redevelopments within settlement boundaries that are in accordance with planning policy) and, indeed, this approach was taken when establishing spatial strategy RAs in 2016. However, it is more common practice to establish a windfall figure through a technical exercise that simply aims to understand past rates and project this rate forward to the end of the plan period. This was approach taken in 2018/19, when establishing spatial strategy RAs, hence the windfall figure is a **constant** across the RAs.

Urban brownfield

- 9.11 Throughout the course of the Local Plan-making / SA process it has been taken as something of a 'given' that there is a need to maximise supply from urban brownfield sites, with identification of preferred sites and site yields a technical exercise for Council officers more so than a policy exercise that might benefit from work to formally explore options/alternatives through the SA process.
- 9.12 This being the case, the discussion of high-level distribution options in Section 5.2 does not dwell on the matter of distributing development to/between urban brownfield sites. This approach is explained at the top of page 16.
- 9.13 With regards to the discussion of sub-area alternatives (Section 5.5), each discussion begins by explaining the supply from brownfield sites that was supported by the Draft Plan (2016) and then any changes that were subsequently made at the Preferred Allocations stage (2018), before finally going on to consider whether there is any justification for varying the approach, i.e. exploring a higher or lower growth approach. The discussion within each sub-area section is appropriately brief, although it is worth noting that additional detail was presented within the earlier 2016 and 2018 ISA Reports (paras 6.3.5 and 6.5.4) respectively. For each sub-area, the conclusion reached is that growth at urban brownfield sites can reasonably be held **constant** across the spatial strategy RAs.

Urban greenfield

- 9.14 There is only one urban greenfield site known to be available and potentially suitable for allocation, namely Land at Priests Lane, Shenfield. This site has been closely scrutinised throughout the Local Plan-making / SA process;² however, it has never been deemed necessary or appropriate to vary the approach to growth at this site across the spatial strategy RAs. This is because the site's allocation is strongly justified, in order to minimise pressure on the Green Belt, and the matter of housing yield at the site is not a strategic matter that warrants formal appraisal of alternatives through the SA process. On this basis,

² The site was a focus of appraisal within the 2016 and 2018 ISA Reports and the 2019 SA Report, and following each iteration of appraisal and consultation the decision was taken to reduce the yield of homes from the site. The site was then further examined within the SA Report Addendum published as part of the Focused Changes consultation in October 2019.

the decision was made that the approach to growth at the one urban greenfield site options in contention could reasonably be held **constant** across the spatial strategy RAs.

Brentwood/Shenfield Green Belt

- 9.15 The approach to growth at Green Belt sites around the Brentwood/Shenfield urban area is a key decision for the Local Plan, and hence has been closely scrutinised throughout the course of the Local Plan / SA process.
- 9.16 Beginning with the Draft Plan consultation stage (**2016**), the approach to growth was a variable across the spatial strategy RAs with two options reflected: 1) allocation of a package of strongly performing smaller sites only (see justification at para 6.3.7); and 2) additional allocation of the 'North of Brentwood' strategic site. The appraisal of spatial strategy RAs then served to highlight a particular concern associated with air quality impacts resulting from the North of Brentwood Strategic site, whilst the Draft Plan appraisal highlighted a wide range of issues/impacts.
- 9.17 At the Preferred Allocations stage (**2018**), the approach to growth at Green Belt sites at Brentwood/Shenfield was subjected to further detailed scrutiny as part of the process of arriving at spatial strategy RAs, as reported in Section 6.5, and particularly within Box 6.2 (a 'points of the compass' discussion). The conclusion reached, once again, was that the approach to growth should be a variable across the spatial strategy RAs with two options reflected: 1) allocation of a package of strongly performing smaller sites only; and 2) additional allocation of the 'North of Brentwood' strategic site. Options were then scrutinised through appraisal in Section 7 and Section 10.
- 9.18 By the time of establishing spatial strategy RAs in **2018/19** things had moved on in several respects:
- Firstly, it was understood that LHN might stem from the 2014-based household growth projects, which lead to a need to explore a higher housing growth target of 454 dpa (see para 5.2.7);
 - Secondly, there was understood to be a need to explore higher growth options involving allocations with a total capacity significantly in excess of 454 dpa (see para 5.2.8);
 - Thirdly, strategic arguments for a focus of growth along the A12 corridor were crystallising (paras 5.2.9 - 5.2.13);
 - Fourthly, the option of a 'North of Brentwood' strategic site was understood to be unreasonable (para 5.3.4).
- 9.19 All of these considerations fed into the discussion of alternatives presented in Section 5.5 (with Appendix IV), with the conclusion reached that growth here should be a **variable** across the spatial strategy RAs, with **two options**: 1) low growth involving allocation of the package of sites supported by Elected Members at the 8th November Council meeting; and 2) high growth involving allocation of four additional sites.

A127 corridor Green Belt (inc. West Horndon and DHGV)

- 9.20 The approach to growth at Green Belt sites along the A127 corridor is a key decision for the Local Plan, and hence has been closely scrutinised throughout the course of the Local Plan / SA process.
- 9.21 Beginning with the Draft Plan consultation stage (**2016**), the approach to growth was a variable across the spatial strategy RAs with three options reflected: 1) nil Green Belt allocations; 2) allocation of a strategic site at West Horndon; and 3) allocation of DHGV. Options were then scrutinised through appraisal in Section 7.
- 9.22 At the Preferred Allocations stage (**2018**), the approach to growth at Green Belt sites along the A127 corridor was subjected to further detailed scrutiny as part of the process of arriving at spatial strategy RAs, as reported in Sections 6.5 and 6.6, with the conclusion reached that nine options should be reflected across the spatial strategy RAs, namely (in ascending scale order): 1) nil allocation; 2) West Horndon West (low growth); 3) West Horndon West; 4) West Horndon West and East (low growth); 5) West Horndon West (low growth) and East; 5) West Horndon West and East; 7) DHGV; 8) DHGV plus West Horndon West (low growth) and 9) DHGV plus West Horndon West. Options were then scrutinised through appraisal in Section 7 and Section 10.
- 9.23 By the time of establishing spatial strategy RAs in **2018/19** things had moved on in several respects. In addition to latest understanding of housing needs / the housing target (discussed above), understanding of strategic issues and opportunities associated with growth along the A127 corridor had crystallised (paras 5.2.9 - 5.2.13), as had understanding of the merits of DHGV and West Horndon as strategic growth locations (para 5.3.2). All of these considerations fed into a discussion of alternatives in Section 5.5, with the conclusion reached that growth here should be a **variable** across the spatial strategy RAs, with **six options**: 1) nil allocation; 2) West Horndon East; 3) West Horndon West; 4) West Horndon East and West; 5) DHGV; 6) DHGV plus West Horndon West.

Northern villages Green Belt

- 9.24 The approach to growth at Green Belt sites surrounding the villages was held **constant** across the spatial strategy RAs for the reasons given in Section 5.5, in the context of preceding Sections 5.2 to 5.4 and work completed at the Regulation 18 stage. It is important to note that the decision not to explore a higher growth option was informed by a review of all deliverable and developable omission sites – see Appendix V of the SA Report.

Ingatestone Green Belt

- 9.25 The approach to growth at Green Belt sites surrounding Ingatestone was held **constant** across the spatial strategy RAs for the reasons given in Section 5.5, in the context of preceding Sections 5.2 to 5.4 and work completed at the Regulation 18 stage.

Final rows of Table 5.5

- 9.26 The final rows of Table 5.5 present the housing quanta figure supported by each of the spatial strategy RAs, and compares this quanta figure to Local Housing Need (LHN). At the time of publication (January 2019) there was uncertainty in respect of the LHN figure, and so Table 5.5 presented two alternative LHN figures. By the time of the Focused Changes consultation there was certainty regarding the LHN figure (454 dpa); however, it was felt better to leave Table 5.5 unchanged (also discussion of LHN earlier in Section 5) in order to minimise the number of changes made to the SA Report. This approach was explained at page “i” of the SA Report (October 2019).
- 9.27 It is recognised that the question “what is a reasonable high growth option” will come under scrutiny. The decision taken, when establishing the spatial strategy RAs, was that spatial strategy options involving sites with a total yield exceeding the higher LHN figure by more than c.15% could be ruled-out as unreasonable. As explained under the ‘housing’ heading within the appraisal (see pg. 133), the assumption was that under this option *“additional supply would (likely) go towards meeting the unmet needs likely to arise from elsewhere in South Essex, or (less likely) go towards meeting affordable housing needs arising from within Brentwood more fully.”*

Conclusion

- 9.28 Arriving at a single set of site-specific spatial strategy RAs for the Local Plan was a challenging task, and there is a need to read Section 5 as a whole in order to understand the full justification of the RAs ultimately arrived at. It is considered that Section 5, when read as a whole, comfortably meets the legal requirement, which is to present *“an **outline** of the reasons for selecting the alternatives...”* [emphasis added].

Appendix II: Selecting / rejecting options

- 9.29 Focusing on the reports published in 2016, 2018 and 2019, the aim of Part 1 was to explain a process of selecting and rejecting reasonable alternatives. In each case the aim was to explain the following process:
- (1) Select reasonable alternatives on the basis of latest evidence, including as gathered from previous stages;
 - (2) Appraise reasonable alternatives;
 - (3) Inform the Council's selection of a preferred option for consultation.
- 9.30 The aim of this appendix is to present supplementary information in respect of **three specific matters**:
- Selecting / rejecting quanta options
 - Selecting / rejecting strategic site options
 - Selecting / rejecting dispersal options

Quanta options

- 9.31 The question of 'how many homes' to support through the Local Plan was a specific focus of alternatives appraisal in 2013; however, work from that stage is superseded at the current time, with evidence of housing needs having moved on to a considerable extent.
- 9.32 More importantly, the spatial strategy RAs appraised/published in 2006, 2018 and 2019 were site specific, and hence naturally varied in respect of total quantum of homes supported. In short:
- 2016 Interim SA Report – the RAs varied in total quanta terms only to a limited extent, but the appraisal was still able to meaningfully conclude, for example: *“Planning for a degree of headroom would mean that there is a useful contingency in place, should it transpire that any allocated sites are not built, or do not deliver at the scale/rate anticipated. In other words, this headroom could be useful in the future, as the Council looks to demonstrate that there is a sufficient five year land supply to meet OAN arising from within the Borough. It is, however, not the case that this level of headroom would be of any more strategic importance, i.e. lead to a situation whereby Brentwood Borough is in a position to deliver housing to meet unmet needs arising from neighbouring HMAs (and thereby ensure that housing needs are met within the wider sub-region).”* Despite this, the Council chose to support a lower growth option, for the reasons set out in Section 8 of the report.
 - 2018 Interim SA Report – the RAs varied in total quanta terms to a considerable extent, with the appraisal able to conclude, for example: *“Higher growth options perform best as the effect could well be to deliver ‘above OAHN’ in practice (even once account is taken of the*

possibility of one or more sites not delivering the anticipated number of homes in the plan period). This would mean that affordable housing needs are met more fully, and the effect could also be to reduce the risk of unmet needs arising at the sub-regional scale (recognising that whilst Brentwood is a self-contained housing market area, there are functional links to surrounding housing market areas)." Despite this, the Council chose not to support one of the higher growth options, but rather to support an option that would involve providing for OAHN plus a 'buffer' of around 9%, for the reasons set out in Section 8 of the report.

- 2019 SA Report – the RAs varied in total quanta terms to a considerable extent, with the appraisal able to conclude, for example: *"Higher growth options are judged to be preferable given: A) uncertainty in respect of the LHN figure (350 dpa or 454 dpa); B) the need to provide for a 'buffer' over-and-above LHN in order to ensure a robust housing supply trajectory (recognising the risk of unanticipated delays to deliver at one or more sites); and C) the risk (less likely) of the Brentwood Local Plan having to provide for unmet needs arising from elsewhere in South Essex. All options are judged to result in significant positive effects on balance; however, this conclusion is uncertain in respect of the lower growth options, recognising the LHN uncertainty in particular."* Despite this, the Council chose not to support one of the higher growth options, but rather to support an option that would involve providing for OAHN plus a 'buffer' of around 31% (assuming 350 dpa as the LHN figure) or 1% (assuming 454 dpa as the LHN figure), for the reasons set out in Section 7 of the report.

Strategic site options

- 9.33 There has been a degree of focus on exploring the merits of competing strategic site options throughout the Brentwood Local Plan SA process. This has not been by design, but rather reflects the fact that key decisions, at each stage of the Local Plan-making process, have centred on selection of one or more strategic sites for allocation.
- 9.34 The following bullet points consider each stage in turn, whilst Table A provides an overview.
- Issues and Options consultation (**2009**) - no assumptions were made regarding strategic site options as part of the appraisal of high-level spatial strategy RAs.
 - Preferred Options consultation (**2013**) - Spatial strategy options 1 and 3 were assumed to include a strategic focus of growth at West Horndon.
 - Strategic Growth Options consultation (**2015**) – Dunton Hills Garden Suburb was available by this time, and indeed a stand-alone consultation on the scheme was run concurrently. In addition to Dunton Hills Garden Suburb and the established option of strategic growth at West Horndon, the opportunity was taken to also appraise two comparator strategic growth options, namely South-east Brentwood/Shenfield and Pilgrim's Hatch. Section 11 of the report (also Appendix I) explained selection of these RAs.

- Draft Plan consultation (**2016**) - the spatial strategy RAs varied in respect three of the four strategic site options considered at the preceding Strategic Growth Options stage,³ with Pilgrims Hatch ruled-out at this stage. Additionally, the option of a strategic scheme to the north of Brentwood was brought into contention.
- Preferred allocations consultation (**2018**) - the spatial strategy RAs varied in respect three of the four strategic site options considered at the Draft Plan stage, with South-east of Brentwood/ Shenfield ruled-out at this stage.
- Publication stage (**2019**) - the spatial strategy RAs varied in respect two of the three strategic site options considered at the preceding stage, with North of Brentwood ruled-out at this stage; however, a package of significant urban extensions to Brentwood (including a focus north of Brentwood) was included as a variable.

Table A: Strategic growth options examined over the course of the Local Plan / SA process

Strategic site option	Preferred Options (2013)	Strategic Growth Options (2015)	Draft Plan (2016)	Preferred Allocations (2018)	Publication (2019)
Dunton Hills GV		Yes	Yes	Yes	Yes
West Horndon	Yes	Yes	Yes	Yes	Yes
South-east of Brentwood/Shenfield		Yes	Yes		
Pilgrims Hatch		Yes			
North of Brentwood			Yes	Yes	Partial

Dispersal options

- 9.35 Dispersal of housing growth across widely across the Borough was seen as a reasonable option to explore, through the appraisal of reasonable alternatives, in both **2009 and 2013**. The dispersal options appraised were high-level / conceptual, rather than site-specific; however, appraisal findings (alongside consultation responses received nonetheless helpfully served to inform the establishment of reasonable alternatives in 2014/2015.
- 9.36 The process of establishing spatial strategy RAs in **2014/2015** was explained in Sections 10 and 11 of the ISA Report published as part of the Strategic Growth Options consultation. The decision was ultimately taken that a spatial strategy involving wide-spread dispersal could be ruled-out as unreasonable, but that there was a reasonable need to appraise an

³ The strategic site option referred to as Land to the East of Running Waters, Hutton was previously referred to as South-east of Brentwood/ Shenfield at the Strategic Growth Options stage.

option involving a degree of dispersal. Specifically, Option 5 (“Numerous smaller extensions”) would involve 30 smaller urban extensions to the main urban area.

- 9.37 The process of establishing spatial strategy RAs in **2016** was explained in Sections 6 and 7 of the ISA Report published as part of the Draft Plan consultation. The evidence at the time served to indicate that all reasonable alternatives should involve both a package of small urban extensions and a strategic site allocation. As explained within the Draft Plan consultation document (para 7.2.9), when considering Green Belt sites for allocation there was preference given to *“larger scale strategic sites which provide opportunities for new self-sustaining communities with new services, facilities and infrastructure”*. The package of smaller urban extensions was held constant across the RAs, with the choice of strategic site allocation a variable.
- 9.38 The process of establishing spatial strategy RAs in **2017/2018** was explained in Section 6 of the ISA Report, with consideration given to the approach to growth at five sub-areas within Section 6.5. As part of these discussions certain smaller sites were identified as better performing; however, the decision was reached (as per 2016) that smaller sites could held constant across the RAs, with the choice of strategic site allocation a variable.
- 9.39 The process of establishing spatial strategy RAs in **2018/19** was explained in Section 5 of the SA Report, with consideration given to the approach to growth at five sub-areas within Section 5.5. As part of these discussions certain smaller sites were identified as better performing, and the decision was ultimately reached that the approach to growth at smaller sites at Brentwood/Shenfield should be a variable across the RAs (e.g. see Option 2, which would involve a package of smaller sites at Brentwood/Shenfield in place of a strategic site allocation). The merits of this option, which involved a reasonable degree of dispersal, were explored through the appraisal of RAs presented in Section 6, and the Council responded in Section 7, stating: *“Additional strategic growth at Brentwood (Options 2, 4, 5 and 7) - a primary concern is in respect of traffic congestion (also noting the two air quality management areas), with a secondary concern relating to the capacity of existing community infrastructure to absorb additional growth. All of the sites available and deliverable at the current time are subject to constraints, and are of an insufficient scale to deliver strategic infrastructure upgrades.”*