

Sustainability Appraisal (SA) of the Brentwood Local Plan

SA Adoption Statement

March 2022

REVISION SCHEDULE					
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Limitations

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1 INTRODUCTION

Background

- 1.1.1 Brentwood Borough Council submitted the Brentwood Local Plan to the Secretary of State for Housing, Communities and Local Government (now Levelling Up, Homes and Communities) on 14th February 2020 for examination by the Planning Inspectorate.
- 1.1.2 The appointed Planning Inspectors issued their final report to the Council on 23rd February 2022, finding the Plan 'sound' subject to main modifications. The next stage will be for the Council to formally adopt the Local Plan.
- 1.1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view minimising negative impacts and maximising positives.

SA explained

- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the SA process involves preparing a 'statement' at the time of plan adoption. This SA Statement presents:
- 1) The 'story' of plan-making / SA up to the point of adoption.
Specifically, there is requirement¹ to: *"summaris[e] how environmental considerations have been integrated into the plan....and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of...reasonable alternatives..."*
 - 2) Measures decided concerning the monitoring of plan implementation.
Specifically, there is a requirement to explain *"the measures... to be taken to monitor the significant environmental effects of the implementation of the plan or programme."*

This SA Statement

- 1.1.5 This is the Local Plan SA Statement. It considers **(1)** and **(2)** in turn, and then concludes by presenting a checklist aimed at demonstrating a legally compliant SA process.

2 THE PLAN-MAKING / SA 'STORY'

2.1 Introduction

- 2.1.1 Key stages in the plan-making / SA process were as follows:
- 1) Issues and Options consultation **2009**
 - 2) Preferred Options consultation **2013**
 - 3) Strategic Growth Options consultation **2015**
 - 4) Draft Plan consultation **2016**
 - 5) Preferred Allocations consultation **2018**
 - 6) Publication **2019**
 - 7) Focused Changes consultation **2019**
 - 8) Potential Main Modifications consultation **2021**
 - 9) Inspectors' report **2022**

¹ Regulation 16 of the Environmental Assessment of Plans and Programmes (SEA) Regulations.

2.2 Issues and Options consultation 2009

- 2.2.1 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; and 4) Dispersed growth.
- 2.2.2 The alternatives that were a focus of appraisal and consultation at this stage were in the form of conceptual spatial approaches, which contrasts to later stages of the plan-making / SA process. The alternatives were mapped across pages 17 to 20 of the ISA Report.
- 2.2.3 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).

2.3 Preferred Options consultation 2013

- 2.3.1 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 new dwellings per annum (dpa), was appraised against two higher growth options. 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.

2.4 Strategic Growth Options consultation 2015

- 2.4.1 The primary focus of the ISA Report at this stage was to provide an appraisal of five competing spatial strategy alternatives: 1) focus new development at Dunton Hills; 2) focus at West Horndon; 3) focus at south-east of Brentwood/Shenfield; 4) focus at Pilgrims Hatch; and 5) dispersal across smaller urban extensions at Brentwood, Hutton, Pilgrims Hatch, Shenfield and Warley. These alternatives were explained in Section 11 and Appendix III of the ISA Report.
- 2.4.2 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 (heritage, flood risk, landscape and soils).

Dunton Hills Garden Suburb consultation 2015

- 2.4.3 This consultation was run concurrently with the Strategic Growth Options consultation above. It was a joint consultation with Basildon Borough Council.
- 2.4.4 The ISA Report, prepared by Basildon's SA consultants (LUC), 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). The appraisal concluded the likelihood of 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).

2.5 Draft Plan consultation 2016

2.5.1 The ISA Report prepared at this stage aimed to present all of the information legally required of the SA Report, and was presented in a series of 'parts' accordingly.

Part 1 of the report

2.5.2 The aim was to explain the process of exploring spatial strategy reasonable alternatives (RAs). Specifically:

- Section 6 explained the process of arriving at RAs;
- Section 7 presented an appraisal of the RAs; and
- Section 8 presented the Council's response to the appraisal.

2.5.3 Sub-section 6.2 notably explained the 'context and background' to the establishment of RAs in 2016, with reference to preceding stages of plan-making / SA, including consultation responses received. Importantly, the RAs ultimately arrived-at were *site-specific*.

2.5.4 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.

2.5.5 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

2.5.6 The appraisal was presented as a series of narrative discussions under the SA objectives (the 'SA framework'), with a final section drawing conclusions and presenting recommendations.

2.6 Preferred Allocations consultation 2018

2.6.1 The ISA Report prepared at this stage was structured as per the previous report.

Part 1 of the report

2.6.2 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.

2.6.3 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.

2.6.4 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

2.6.5 The appraisal was again presented as a series of narrative discussions under the SA framework. 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 minor concerns in respect of several other objectives.

2.7 Publication 2019

2.7.1 The SA Report was published alongside the Pre-submission Local Plan in February 2019, presenting the information required by Regulation 12 and Schedule 2 of the SEA Regulation).

Part 1 of the report

2.7.2 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). 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.
- 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.

2.7.3 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).

2.7.4 The Council responded in detail (Section 7) explaining their reasons for supporting Dunton Hills Garden Village (DHGV), 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 alternatives (February 2019)

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, 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 DHGV, 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 a constraint to delivering DHGV.

Part 2 of the report

2.7.5 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’ with objectives for Air quality, Water quality and Traffic.

2.8 Focused Changes consultation 2019

- 2.8.1 Two SA documents were published as part of the consultation in October 2019:
- **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, i.e. it did not aim to present the information required of the SA Report.
 - **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).

2.9 SA Report Addendum 2021

- 2.9.1 Following submission of Local Plan and supporting documentation (including the SA Report of February 2018 and its October 2018 update) a series of examination hearings were held, which led to agreement on a series of potential main modifications (henceforth ‘potential modifications’), which were then published for consultation in September 2021.
- 2.9.2 An SA Report Addendum was published, as part of the consultation, that simply presented an appraisal of the potential modifications (also ‘the submitted plan plus potential modifications’). It should be noted that the report did not present an appraisal of reasonable alternatives, for the reasons set out in Section 1.4 of the report.
- 2.9.3 The appraisal conclusions, in respect of the potential modifications, were as follows:
- **Climate change mitigation** - the proposed changes to site allocations / the housing supply trajectory do not give rise to any significant concerns, from a climate change mitigation perspective. With regards to site-specific and thematic policy, there are invariably opportunities to ‘go further’; however, it is recognised that there is a need to balance decarbonisation aspirations with development viability and a range of other considerations. A recommendation is made regarding the policy approach to planning for decentralised energy (which primarily equates to heat networks). **Neutral effects** are predicted on balance, including as there should be the potential to adjust policy through the immediate Local Plan review, if necessary.
 - **Community and wellbeing** - the proposed changes to site allocations, specifically increased densities, do give rise to tensions with ‘community and well-being’ objectives, but it is difficult to conclude that concerns are ‘significant’, when viewed from a strategic perspective. As for the proposed changes to site-specific and borough-wide thematic policies, these are strongly supported. Overall, it is appropriate to ‘flag’ **a risk of negative effects**.
 - **Economy and employment** – proposed modifications relating to transport infrastructure lead to notably **positive effects**.
 - **Flood risk** - the proposal to increase development density at Blackmore potentially gives rise to a degree of risk. However, in practice there is little reason to question the potential to appropriately address surface water flood risk through masterplanning, Sustainable Drainage Systems (SuDS) and design. At this stage it is appropriate to ‘flag’ **a risk of negative effects**.
 - **Housing** - the proposal is to plan for fewer homes, in comparison to the submission plan, but to require an immediate review of the Local Plan to boost the planned supply of housing. It is appropriate to conclude **strongly negative effects**, mindful of the representations made on this proposed approach by a number of examination participants in June 2021 (see F132 in the examination library), including the Home Builders Federation, who concluded: “Given that affordability in Brentwood is worsening with the work placed based affordability ratio increasing from 12.24 to 13.22 from 2019 to 2020 there is clearly a need for more supply earlier in the plan period to try and limit a further worsening of affordability in this area.” However, the only alternative approach would be to significantly prolong the Local Plan examination to identify sites to deliver additional supply, giving rise to a host of issues.

- **Landscape** - the proposed changes to site allocations / the housing supply trajectory give rise to mixed but overall **positive effects**, and changes to site-specific policy are supported.

2.10 The Inspectors' Report 2022

- 2.10.1 The Inspectors' Report was published on 25th February 2022, setting out conclusions on the main modifications necessary to enable the plan to be adopted, and reasons for finding the plan, as modified, to be 'sound', having regard to the tests of soundness set out in the NPPF.
- 2.10.2 The Inspectors' Report discusses many of the same issues that have been a focus of the SA process, over the years. For example:
- The housing requirement – *“Policy SP02 of the Plan identifies the housing requirement as 7,752 net new homes to be provided during the Plan period. This reflects the identified housing need and is therefore justified.”*
 - Housing supply trajectory – *“Overall, [there is] an updated housing land supply figure for the Plan period of 7,146 new dwellings. Accordingly, the Plan is not able to meet the identified housing requirement of 7,752 new dwellings, resulting in a shortfall of 606 dwellings over the Plan period... It is imperative that there is a Plan in place to enable housing to come forward now, including the removal of land from the Green Belt to facilitate this, otherwise there would be a significant shortage of housing land supply in the Borough, due to limited opportunities outside the Green Belt... Furthermore... an immediate review of the Plan needs to be carried out, with the objective of meeting in full the identified housing needs...”*
 - Broad spatial strategy – *“Overall, we are satisfied that the spatial strategy makes effective use of the Borough’s assets and opportunities, aligns with the overarching strategic aims and objectives and provides a suitable framework to achieve sustainable development.”*
 - Site selection – *“[Sites] in the HELAA have been assessed against a number of reasonable criteria to establish site suitability, availability and achievability... Following this the findings of the Green Belt Study 2018 and SA assisted the selection of sequentially preferable sites.”*
 - Dunton Hills Garden Village –
 - *“We acknowledge that the amount of housing development planned for this location is substantial and that concerns about the loss of Green Belt and other impacts on the locality, including the effect on the local and strategic road networks have been raised. However, the proposal seeks to deliver a development using sustainable Garden Community principles. We consider that this and the elements highlighted above will assist in the proposal contributing towards mitigating, as far as possible, its moderate to high impact on the purposes of the Green Belt.”*
 - *We have carefully considered the anticipated timescale for the delivery of Dunton Hills Garden Village within the Plan period. The trajectory in the Plan shows housing being delivered from 2022/23, which is clearly not achievable...”*
 - *“The deletion of the policy and replacement with succinct design requirements to be delivered through a masterplanning process, provides necessary clarity, justification and effectiveness and ensures the policy is consistent with national policy.”*
 - Land at Priests Lane, Shenfield – *“In order to make effective use of land and accord with national policy, the density of the site should be increased to that set out in the Pre-Submission version of the Plan.”*
 - Adjacent sites at Blackmore – *“Development of the sites would encroach into the countryside, but this would be limited in extent. The sites would appear as modest extensions to the village. They are relatively well contained with defensible boundaries. Furthermore, the policies require the provision of good pedestrian and cycling connections and public open space. The development of the two sites would contribute to meeting local housing need and support the existing local services...”*
 - Affordable housing – *“Policy HP05 seeks 35% of dwellings to be provided as affordable... This is a higher percentage than the 30.6% requirement set out in the SHMA, in recognition that not all sites will deliver affordable housing... This is an appropriate response, which will assist in meeting the identified needs... The required tenure mixes in the policy are based on the SHMA evidence...”*

- Gypsy and traveller pitches within DHGV – *“The siting of 5 pitches within the Garden Village is being considered through the ongoing site masterplanning process. This approach will ensure that the pitches are integrated... to support inclusive communities...”*
- Gypsy and traveller pitches elsewhere – *“MM41... merges Policies HP07 and HP08 to form one cohesive policy (Policy HP07) that allocates the three gypsy and traveller sites within the Plan and removes them from the Green Belt.”*
- Development management policy – including in respect of biodiversity net gain, built environment decarbonisation and air quality.

3 MEASURES DECIDED CONCERNING MONITORING

3.1.1 Section 12 of the SA Report (2019) stated broad support for the Council’s proposed Local Plan monitoring framework, on the basis that proposed indicators cover the great majority of issues/impacts highlighted through appraisal, but also made a number of [recommendations](#) in respect of potential adjustments to the monitoring framework.

3.1.2 Subsequently, at the potential main modifications stage, MM117 dealt with changes to the monitoring framework. The SA Report Addendum (2021) explained:

“There is a notable increased focus on site allocation-specific monitoring indicators, with a particular aim of ensuring close monitoring of affordable housing and infrastructure delivery (in-line with the Infrastructure Delivery Plan, IDP). There is also a new focus on monitoring the production of heritage statements for certain sites, and certain key site specific environmental factors and, in certain cases, a specific commitment to monitor impacts to specified listed buildings. These changes to the monitoring framework are broadly supported.”

3.1.3 MM17 was then taken forward, with the Inspectors’ Report explaining:

“The Plan is to be monitored through the key indicators and targets set out in the monitoring framework within Appendix 3 of the Plan. Whilst the monitoring tables provide key indicators and targets against each relevant policy, these do not provide sufficient detail and clarity to be effective. They also do not include actions and contingencies to be taken by the Council, should the policies not deliver the required outcomes.

We therefore consider it necessary for the Plan’s monitoring framework to be amended to ensure that the indicators are appropriate and consistent with other MMs for the Plan and set appropriate triggers and actions. MM117 rectifies this...”

4 CONCLUSIONS ON THE SA PROCESS

4.1.1 This SA Statement demonstrates a robust SA process progressed alongside plan-making, with appraisal findings and consultation responses feeding in to decision-making at key junctures.

4.1.2 Most importantly, in terms of compliance with both the SEA Regulations² and Local Planning Regulations,³ the SA Report was published alongside the proposed submission version of the Local Plan in 2018/19, presenting an appraisal of “the plan and reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with”. The report served to inform representations on the plan, and then served to inform plan finalisation.

4.1.3 This SA Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

² Environmental Assessment of Plans and Programmes Regulations 2004

³ Town and Country Planning (Local Planning) (England) Regulations 2012

Regulatory checklist

The SA Statement must...	How has this Statement presented the required information?
<p>Summarise how environmental (and wider sustainability) considerations have been integrated into the plan</p>	<p>This Statement has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation and, in turn, integrated into the plan.</p> <p>First and foremost, the relative merits of reasonable alternatives were appraised in terms of a range of sustainability issues/objectives, with a view to informing decision-making.</p>
<p>Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.</p>	<p>This statement seeks to explain a step-wise process over time. It was naturally the case, at each step in the process, that account was taken of earlier consultation responses, alongside wider evidence.</p> <p>In particular, the reports published in 2016, 2018 and 2019 all included clear reference to consultation responses received: as part of the ‘outline reasons for selecting alternatives’; as part of the appraisal of reasonable alternatives; and as part of the draft plan appraisal. For example, Section 5 of the SA Report (2019) presents a detailed discussion of issues raised by key stakeholder organisations, including neighbouring local authorities. Most recently, the SA Report Addendum (2021) notably reached its conclusion on effects in terms of ‘housing’ objectives in light of consultation responses received from the development industry including from the National Home Builders Federation.</p> <p>Further information on consultation responses received, including in respect of spatial strategy / site selection (which was a particular focus of the SA process), is presented within the Consultation Statement submitted alongside the Local Plan in 2020.</p>
<p>Summarise the reasons for choosing the plan as adopted, in the light of reasonable alternatives.</p>	<p>Reasonable alternatives were defined and appraised at several points in the plan-making / SA process in order to inform decision-making ahead of consultation, with officers providing a response to the appraisal, equating to the Council’s reasons for supporting the preferred option.</p>
<p>Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan</p>	<p>See Section 3</p>