
F6A Topic paper on the spatial strategy

1. Introduction

- 1.1 The Local Plan spatial strategy is set out in the following sections of the plan document:
- Section 3 (Spatial Strategy - Vision and Strategic Objectives) – Figure 3.1 presents the Key Diagram, whilst Figure 3.2 highlights two primary driving factors, namely: A) the settlement hierarchy; and B) transport corridors;
 - Section 4 (Managing Growth) - Table 4.2 presents a sequential approach to distributing development across a hierarchy of locations in the Borough, with development in urban areas sequentially preferable;
 - Section 9 (Site allocations) - presents the allocations that underpin the broad distribution / sequential approach.
- 1.2 This topic paper considers each of the seven tiers of the spatial hierarchy, as set out in Table 4.2, in turn. The aim is to demonstrate that the spatial strategy is evidence-based and justified.
- 1.3 A concluding section then presents an expanded version of Table 4.2, specifically a version expanded to include summary justification for each of the elements of supply that taken together comprise the spatial strategy.

2. Brownfield sites within the main urban area

- 2.1 There is a clear need to maximise growth at brownfield sites within the Brentwood/Shenfield urban area (henceforth 'main urban area') in order to minimise pressure for development elsewhere. This is achieved by allocating all sites that are available, achievable and suitable, and by allocating each site an optimum yield.
- 2.2 The primary technical piece of evidence that has informed site selection and yield calculations is the Housing and Economic Land Availability Assessment (**HELAA**). In addition, careful account has been taken of consultation response received, and the SA process has also fed-in an informed the emerging preferred approach.
- 2.3 The HELAA was first published in support of the proposed spatial strategy in 2018, at the time of the Regulation 18 'Preferred Allocations' consultation; however, detailed technical work to examine the merits of sites did also feed-in at earlier Regulation 18 stages. For example, the 2016 Draft Plan discussed the approach to site selection under the 'Housing allocations' heading (paragraphs 7.28 to 7.31).
- 2.4 The preferred approach was fine-tuned over time. For example, between the 2016 Draft Plan stage and the 2018 Preferred Allocations stage, four brownfield allocations were removed from the plan due to the sites being undeliverable,¹ but the yield of five other sites was increased as a result of reviewing the appropriate densities that could be achieved. There were also three additional brownfield sites identified

¹ The sites removed were: Land north of Highwood Close including St Georges Court, Brentwood; Ingleton House, Stock Lane, Ingatestone; Victoria Court, Victoria Road, Brentwood; and Baytree Centre, Brentwood. These were identified as no longer being available for development (all but Baytree Centre were Council owned Sheltered Housing which had no advanced plans for redevelopment. Baytree Centre had a change of ownership with the new owners having no plans to develop additional residential provision as part of the shopping centre. In addition, three sites were removed on account of having received planning permission.

in the 2018 Preferred Allocations stage which were not previously promoted or considered available in the 2016 Draft Local Plan.²

- 2.5 In **conclusion**, the approach to growth at brownfield sites within the main urban area has evolved over the course of the plan-making process, in response to both technical evidence and consultation. In 2018, when finalising the Local Plan and SA Report, the Council determined that there were no reasonable alternatives to the preferred strategy, and that view holds true at the current time. All proposed allocations are justified, given the importance of making best use of brownfield land, and all omission sites are unavailable, as explained within Appendix VI of the HELAA (2018; see pages 40-42). The omission sites were nonetheless appraised within the Appendix III of the SA Report, and are amongst those shown in **Figure 1** as “Omission sites 1”.

² The sites added were Ford Offices, Eagle Way, Warley; Land at Crescent Drive, Shenfield; Eagle and Child Pub, Shenfield.

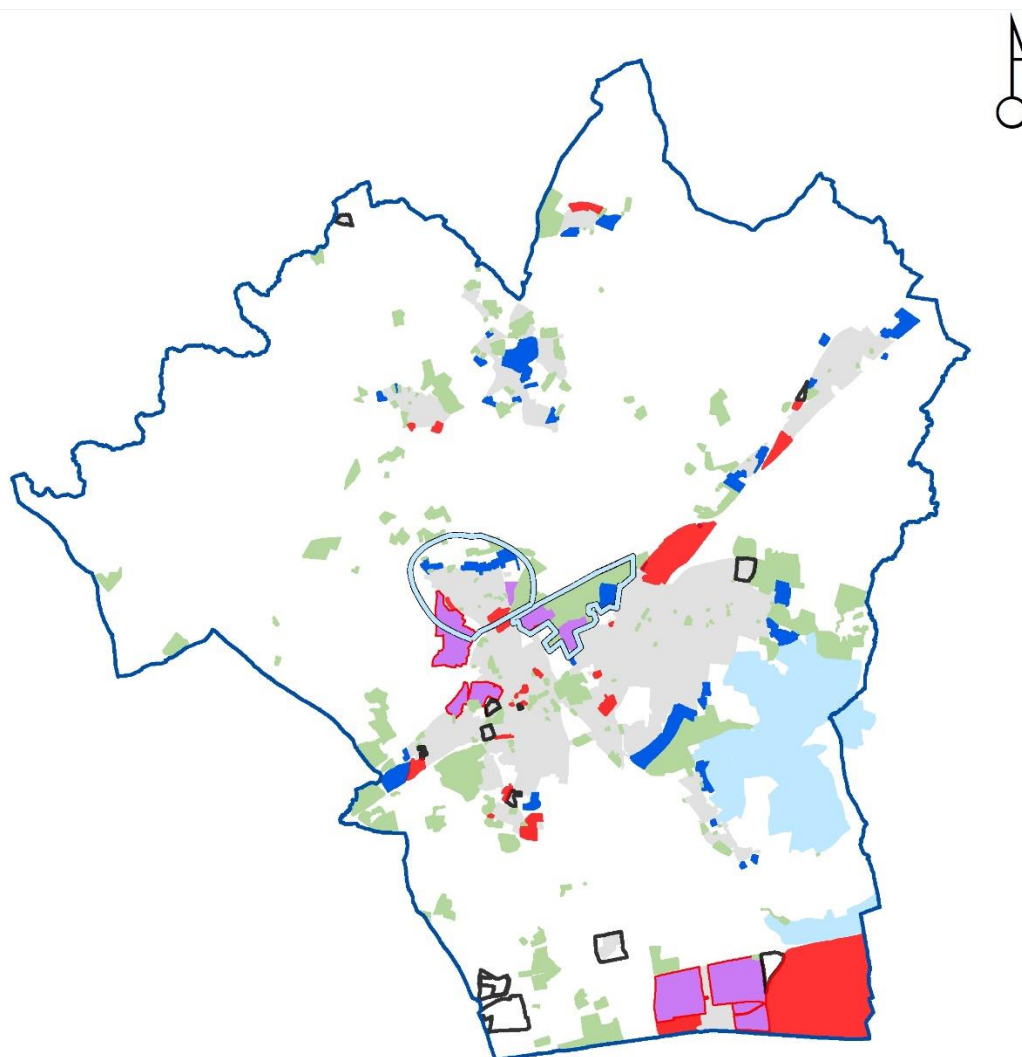
Figure 1: Proposed allocations and omission sites

Explanation

This figure shows proposed **allocations** alongside five tiers of **omission sites**:

- Omission sites 1 – sites that were not a focus of the SA process beyond the GIS appraisal of site options presented in Appendix III of the SA Report; all are non-deliverable HELAA sites.
- Omission sites 2 – sites discussed in Section 5.3 of the SA Report, but not progressed any further; one is a non-developable HELAA site, two are ruled-out within Appendix V of the HELAA; two are not in the HELAA.
- Omission sites 3 – sites discussed in Section 5.5 of the SA Report (including associated appendices), but not progressed any further; all are deliverable or developable HELAA sites.
- Omission sites 4 – sites progressed to Table 5.2 of the SA Report, but not progressed to the spatial strategy reasonable alternatives; one is a deliverable HELAA sites whilst the other is not in the HELAA.
- Omission sites 5 – sites included in the spatial strategy reasonable alternatives (Table 5.5 of the SA Report); all are deliverable HELAA sites.

The figure also shows **settlement boundaries** so as to indicate those sites that fall outside of the Green Belt.



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Legend

	Settlement Boundaries		Housing Omission Sites 1		Housing Omission Sites 3
	Housing Allocations		Housing Omission Sites 2		Housing Omission Sites 4
	Employment Allocations		Housing Omission Sites 2 (Concept Options)		Housing Omission Sites 5

3. Greenfield sites within main urban area

- 3.1 As reported in the HELAA (Appendices VI and VII) **six** greenfield sites within the main urban area were considered for allocation, with the conclusion reached that **two** adjacent sites are suitable for allocation.
- 3.2 These two adjacent sites form a single allocation, known as Land at Priests Lane, Shenfield, and the approach to development at this site has been a key matter for the Local Plan. Specifically, at both the 2016 and 2018 consultation stages, issues/impacts were highlighted that informed a decision to reduce the yield of homes, and a decision to further reduce the yield from the site was made in 2019 ahead of the Focused Changes consultation.
- 3.3 In **conclusion**, the approach to growth at greenfield sites within the main urban area has evolved over the course of the plan-making process, in response to both technical evidence and consultation. In 2018, when finalising the Local Plan and SA Report, the Council determined that there were no reasonable alternatives to the preferred strategy, and that view holds true at the current time. The proposed allocation is justified, given the importance of minimising pressure on the Green Belt, and in light of detailed analysis of site-specific issues/impacts, and all omission sites are unavailable (HELAA Appendix VI; see page 42). The omission sites were nonetheless appraised within the Appendix III of the SA Report, and are amongst those shown in **Figure 1** as “Omission sites 1”.

4. Brownfield sites within urban areas elsewhere

- 4.1 As reported in the HELAA (Appendices VI and VII) **six** brownfield sites within urban areas elsewhere were considered for allocation across the course of the plan-making process, with the conclusion reached that **three** adjacent sites are suitable for allocation.
- 4.2 These three adjacent sites form a single allocation known as Land at West Horndon Industrial Estate, West Horndon, and the approach to development at this site has been an important matter for the Local Plan, with the yield of the site increased by 80 homes between the 2016 Draft Plan and 2018 Preferred Allocations stages.
- 4.3 In **conclusion**, the approach to growth at brownfield sites within urban areas elsewhere has evolved over the course of the plan-making process, in response to both technical evidence and consultation. In 2018, when finalising the Local Plan and SA Report, the Council determined that there were no reasonable alternatives to the preferred strategy, and that view holds true at the current time. The proposed allocation is justified, given the importance of making optimal use of brownfield land, and all omission sites are unavailable, as explained within Appendix VI of the HELAA (see pages 42 and 43). The omission sites were nonetheless appraised within the Appendix III of the SA Report, and are amongst those shown in **Figure 1** as “Omission sites 1”.

5. Green Belt 1: Edge of the main urban area

- 5.1 As reported in the HELAA (Appendices VI and VII), **56** Green Belt sites around the edge of the main urban area were considered for allocation across the course of the plan-making process, with the conclusion reached that **41** sites are ‘deliverable or developable’. Of these 41 sites, the decision was made to ultimately allocate **11**. Several of the allocated HELAA sites are adjacent to one another, such that the Local Plan presents six allocations.
- 5.2 Section 5.5 of the SA Report is a first port-of-call for understanding the site selection process. The discussion under the ‘Brentwood urban area’ sub-heading begins by explaining the process of refining the preferred approach over the course of the Regulation 18 stages, before explaining that a key milestone was hit on 8th November 2018, when a preferred strategy was agreed by Full Council. The discussion goes on to explain work undertaken to explore **alternatives** involving deletion of one or more allocations and/or allocation of one or more omission sites.
- 5.3 With regards to alternatives involving **deletion of one or more allocations**, all were ruled-out as unreasonable for the reasons explained at paragraph 5.5.8, including:

“... it was recognised that there is a lack of alternative brownfield capacity to fill the gap in supply that would result from removal of any of these sites, meaning that there would be pressure to A) allocate an alternative Green Belt site, which, in all likelihood, would perform worse in Green Belt and/or sustainability terms; and/or B) increase reliance on delivery of housing at one or more strategic schemes, which would increase the delivery risk associated with the plan, and also give rise to additional Green Belt and/or sustainability issues.”

- 5.4 With regards to alternatives involving **addition of one or more omission sites**, paragraphs 5.5.10 and 5.5.11 of the SA Report explain that attention focused on those listed as ‘deliverable or developable’ within Appendix VII of the HELAA, as well as three additional sites.³ In turn, these sites were examined in detail, as reported in Appendices III and IV of the SA Report. This analysis led to a further shortlist of six omission sites, which were then subjected to further examination in Table 5.2 of the SA Report, before the conclusion was reached that four should feature within the spatial strategy reasonable alternatives (RAs). On the basis of the appraisal of spatial strategy RAs (Section 6 of the SA Report), the Council was able to confirm support for the allocations supported by the 8th November 2018 Full Council, with reasons set out at paragraph 7.2.4. **Box 1** presents further information.
- 5.5 In **conclusion**, the approach to growth at Green Belt sites around the edge of the main urban area has evolved over the course of plan-making process, in response to both technical evidence and consultation. In 2018, when finalising the Local Plan and SA Report, the Council determined there to be one ‘reasonable alternative’ approach, involving additional allocation of the four sites labelled in **Figure 1** as “Omission sites 5”; however, the preferred approach was judged to be preferable. Four further levels of decreasingly suitable omission sites can also be identified (see **Figure 1**); however, spatial strategy options involving additional allocation of one or more of these sites were judged to be unreasonable in 2018, and that view holds true at the current time.

Box 1: Discussion of drawbacks to higher growth at the main urban area

As discussed, the spatial strategy RAs subjected to appraisal in 2018/19 (with appraisal findings then published in the SA Report) explored the merits of both the submission approach to growth at the main urban area, and an alternative higher growth strategy involving additional allocation of four urban extension Green Belt sites.

Notable findings from the appraisal included:

- *Air quality* - the spatial strategy options involving higher growth at the main urban area were found to perform **significantly worse** than the preferred option, given designated AQMAs, a constrained road network and limited potential for infrastructure upgrades.
- *Biodiversity* - the spatial strategy options involving higher growth at the main urban area were found to perform **significantly worse** than the preferred option.
- *Climate change* - the spatial strategy options involving higher growth at the main urban area were found to perform **notably worse** than the preferred option.
- *Community and wellbeing* - the spatial strategy options involving higher growth at the main urban area were found to perform **notably worse** than the preferred option.
- *Cultural heritage* - the spatial strategy options involving higher growth at the main urban area were found to perform **somewhat worse** than the preferred option.
- *Economy and employment* - the spatial strategy options involving higher growth at the main urban area were found to perform **somewhat worse** than the preferred option.
- *Housing* – the appraisal conclusions focused on the matter of total quantum of homes provided for, more so than spatial distribution, but did note “*the need to focus housing on the Brentwood/Shenfield area, as the sub-area with highest need*”.
- *Landscape* - the appraisal conclusions focused on the matter of total quantum of homes provided for, more so than spatial distribution, but noted a range of sensitivities associated with the additional urban sites that would deliver the ‘higher growth at the main urban area’ options, in particular “*West of Ongar Road*”.
- *Water* – the appraisal conclusions focused on the matter of total quantum of homes provided for, more so than spatial distribution, but noted: “*There is some reason to suggest that growth at Brentwood... is preferable to growth along the A127 corridor... however, on balance the evidence is not sufficiently clear.*”

³ 287 East of Mascalls Lane (listed in the HELAA as non-developable), 088 Bishops Hall Community Centre (listed in the HELAA as non-developable); and 089 the Brentwood Centre (not listed in HELAA); N.B. 088 and 089 are adjacent.

- *Traffic and transport connectivity* – the headline finding of the appraisal, as reported under the ‘Climate change mitigation’ heading, was that:
“... it is difficult to differentiate the alternatives. Within the A127 corridor there is the potential to achieve new homes and jobs in close proximity, deliver a new bus route linking the A127 corridor to Brentwood, enhance walking/cycling infrastructure (including to train stations) and also increase the offer at West Horndon and Laindon local centres. However, on the other hand, growth within walking/cycling distance of Brentwood town centre and, in particular, Brentwood Crossrail station is to be supported (albeit two of the four sites assumed to deliver higher growth are beyond 1km of Brentwood town centre).”

6. Green Belt 2: Edge of Ingatestone

- 6.1 As reported in the HELAA (Appendices VI and VII) **12** Green Belt sites around the edge of Ingatestone and Mountnessing were considered for allocation across the course of the plan-making process, with the conclusion reached that **10** sites are ‘deliverable or developable’. Of these 10 sites, the decision was made to ultimately allocate **four**. Two of the allocated HELAA sites are adjacent to one another, such that the Local Plan presents three Green Belt allocations around the edge of Ingatestone (two for housing and one for employment).
- 6.2 Section 5.5 of the SA Report is a first port-of-call for understanding the site selection process. The discussion under the ‘Ingatestone’ sub-heading begins by explaining the process of refining the preferred approach over the course of the Regulation 18 stages, before explaining that a key milestone was hit on 8th November 2018, when a preferred strategy was agreed by Full Council. The discussion goes on to explain work undertaken to explore **alternatives** involving deletion of one or more allocations and/or allocation of one or more omission sites.
- 6.3 With regards to alternatives involving **deletion of one or more allocations**, all were ruled out as unreasonable for the reasons explained at paragraph 5.5.29, namely: *“All three are very well contained in Green Belt terms, albeit the corollary is that much of the land is bounded by the A12 or the railway, which gives rise to some noise and air pollution concern.”*
- 6.4 With regards to alternatives involving **addition of one or more omission sites**, paragraphs 5.5.31 and 5.5.32 of the SA Report explained that attention focused on those listed as ‘deliverable or developable’ within Appendix VII of the HELAA. Two sites were identified as better performing, on the basis that the Green Belt review finds these sites to contribute to Green Belt purposes only to a ‘moderate’ extent; however, neither site is fully contained in the landscape, with the larger site having a weak boundary. The conclusion ultimately reached (paragraph 5.5.32) was that there are no reasonable alternatives involving one or more omission sites.
- 6.5 In **conclusion**, the approach to growth at Green Belt sites around Ingatestone has evolved over the course of plan-making process, in response to both technical evidence and consultation. In 2018, when finalising the Local Plan and SA Report, the Council determined that there were no reasonable alternatives to the preferred strategy, and that view holds true at the current time. The proposed allocations are justified, as the effect of non-allocation would be to increase pressure on other sites that are more sensitive in Green Belt terms and/or increase reliance on housing delivery from a strategic site (i.e. DHGV). There are omission sites that are deliverable and developable in HELAA terms, and these are shown in **Figure 1** as “Omission sites 3”; however, additional allocation of one or more of these sites would lead to increased harm to the Green Belt, and might (arguably) lead to an over-allocation at Ingatestone, given its size and function.

7. Green Belt 3: Larger villages

- 7.1 As reported in the HELAA (Appendices VI and VII), **45** Green Belt sites around the edge of Larger villages were considered for allocation across the course of the plan-making process, with the conclusion reached that **34** sites are ‘deliverable or developable’. Of these 34 sites, the decision was made to ultimately allocate **four**. Two of the allocated HELAA sites are adjacent to one another, such that the Local Plan presents three allocations.
- 7.2 Section 5.5 of the SA Report is a first port-of-call for understanding the site selection process. The discussion under the ‘Villages’ sub-heading begins by explaining the process of refining the preferred

approach over the course of the Regulation 18 stages, before explaining that a key milestone was hit on 8th November 2018, when a preferred strategy was agreed by Full Council. The discussion goes on to explain work undertaken to explore **alternatives** involving deletion of one or more allocations and/or allocation of one or more omission sites.

- 7.3 With regards to alternatives involving **deletion of one or more allocations**, all were ruled out as unreasonable for the reasons explained at paragraph 5.5.39, namely: “... *all were determined to be suitably justified, on the balance of evidence. The January 2018 Interim SA Report (see Chapter 10) highlighted limited issues/impacts; however, on reflection the issue/impacts raised were considered to be minor, or with the potential for suitable avoidance/mitigation.*” More generally, there is an acknowledgement that limited growth is needed to allow village communities to thrive. The four sites supported by Full Council were considered to represent opportunities to provide beneficial growth around larger villages in the Borough.
- 7.4 With regards to alternatives involving **addition of one or more omission sites**, paragraphs 5.5.41 and 5.5.42 explained that attention focused on those listed as ‘deliverable or developable’ within Appendix VII of the HELAA. In turn, these sites were examined in detail within Appendices III and V of the SA Report. In turn, paragraph 5.5.43 concluded that there were no reasonable higher growth alternatives, given that no omission sites stand-out as better performing, particularly mindful of evidence provided by the Green Belt Review, and also “*mindful of the strategic context, namely limited arguments for higher growth at the villages.*”
- 7.5 In **conclusion**, the approach to growth at Green Belt sites around larger villages has evolved over the course of plan-making process, in response to both technical evidence and consultation. In 2018, when finalising the Local Plan and SA Report, the Council determined that there were no reasonable alternatives to the preferred strategy, and that view holds true at the current time. The proposed allocations are justified, as the effect of non-allocation would be to increase pressure on other sites that are more sensitive in Green Belt and/or increase reliance on housing delivery from a strategic site (i.e. DHGV). There are omission sites that are ‘deliverable and developable’ in HELAA terms, and these are shown in **Figure 1** as “Omission sites 3”; however, additional allocation of one or more of these sites would lead to increased harm to the Green Belt, and might (arguably) lead to an over-allocation at the villages, contrary to the position of villages in the settlement hierarchy.

8. Green Belt 3: Strategic allocation

- 8.1 A strategic allocation in the Green Belt has featured as part of the emerging Local Plan since the time of the Draft Plan consultation. Taking each stage of the plan-making process in turn:
- *Draft Plan 2013* - the preferred option was a 1,500 home strategic allocation at West Horndon, with the Interim SA Report at the time also examining the merits of alternatives involving a greater focus at the Brentwood/Shenfield urban area and alternatives involving a greater degree of dispersal.
 - *Strategic Growth Options 2015* – the emergence of Dunton Hills as a strategic option, combined with an increase to the housing need figure for the Local Plan, led to two parallel consultations: one on Strategic Growth Options and a second, run in conjunction with Basildon District Council, solely on the option of a Garden Suburb at Dunton Hills. The Interim SA Report at the time appraised five spatial strategy alternatives: 1) focus at DHGV; 2) focus at West Horndon; 3) focus south-east of Brentwood/Shenfield; 4) focus at Pilgrims Hatch; and 5) dispersal of growth across Brentwood, Hutton, Pilgrims Hatch, Shenfield and Warley.
 - *Draft Plan 2016, Preferred Allocations, 2018, Publication 2019* – at each of these stages the preferred spatial strategy involved Dunton Hills Garden Village (DHGV), with reasonable spatial strategy alternatives appraised through the SA process. In particular, the SA Report published alongside the Pre-submission Plan in 2019 presented an appraisal of seven spatial strategy alternatives, including certain options that would see an increased focus of growth through smaller urban extensions at Brentwood/Shenfield, in place of DHGV.
 - *2019 Focused Changes* – having taken account of consultation responses and other updated evidence the Council determined it necessary to fine-tune the spatial strategy, as part of which an additional 50 homes was directed to DHGV. The merits of this approach were explored through an SA Report Addendum.

- 8.2 In short, the Council has consistently supported a strategic allocation, on balance, for two related reasons:
1. A strategic allocation is **necessary** if the Local Plan is to provide for Local Housing Needs (LHN) (and there is a need to provide for LHN, as discussed at paragraph 5.2.8 of the SA Report) in a sustainable manner. As discussed above, whilst a reasonable alternative *not* involving a strategic allocation was tested in 2018, it was found to have significant drawbacks in a number of respects, and was judged to perform relatively poorly.
 2. A strategic allocation is an **opportunity** to deliver a mix of uses and new/upgraded infrastructure alongside housing; the alternative of increased reliance on piecemeal urban extensions would not achieve this.
- 8.3 Whilst the preferred option has involved DHGV since 2016, the Council has remained very open to alternative locations for a strategic allocation. Section 5 of the SA Report explains that, by 2019, whilst a range of alternative strategic allocations could be envisaged, West Horndon was determined to be the only reasonable alternative to DHGV (other 'unreasonable' strategic site options are presented in **Figure 1** as "Omission sites 2"). Section 6 then presents an appraisal of the preferred spatial strategy alongside alternatives involving a strategic allocation at West Horndon, as well as one alternative *not* involving strategic allocation (Option 2). Section 7 of the SA Report then presents the Council's response to the appraisal. **Box 2** presents further information.

Box 2: Discussion of SA findings in respect of support for a strategic allocation and DHGV in particular

As discussed, the spatial strategy RAs subjected to appraisal in 2018/19 (with appraisal findings then published in the SA Report) explored the merits of the preferred option relative to alternatives involving an alternative strategic allocation (namely West Horndon) as well as one alternative option involving no strategic allocation.

Notable findings from the appraisal included:

- *Agricultural land* - the appraisal found that allocation of DHGV will lead to significant loss of 'best and most versatile' agricultural land, but found that the reasonable alternatives would do likewise.
- *Air quality* - the appraisal found that a strategy involving DHGV to be significantly preferable to one involving an increased focus at the main urban area; however, **West Horndon** is (more marginally) a preferable location to DHGV.
- *Biodiversity* - the appraisal found a focus of growth at **DHGV** to be the preferable approach, for the reasons explained in Appendix VI of the SA Report, including "*DHGV is considered to be relatively unconstrained in biodiversity terms, with work having been completed to establish how to deliver biodiversity net gain through delivery of onsite green infrastructure.*"
- *Climate change* - the appraisal found a focus of growth at a large scale **strategic allocation** to be preferable to the alternative of dispersing growth around the main urban area, given the potential to achieve economies of scale and a good mix of uses that, in turn, supports low carbon infrastructure including district heating.
- *Community and wellbeing* - the appraisal found a focus of growth at **DHGV** to be the preferable approach, for the reasons explained in Appendix VI of the SA Report.
- *Cultural heritage* - the appraisal found a focus of growth at **DHGV** to be the preferable approach, for the reasons explained in Appendix VI of the SA Report.
- *Economy and employment* - the appraisal found a focus of growth at **DHGV** to be the preferable approach, for the reasons explained in Appendix VI of the SA Report, in particular given the potential for DHGV to deliver significant new employment land along a strategic road corridor.
- *Housing* – the appraisal conclusions focused on the matter of total quantum of homes provided for, more so than spatial distribution, but did note several points in respect of DHGV:
 - DHGV would deliver significant additional housing beyond the plan period, thereby giving confidence regarding housing supply in the long term;
 - Some sites [including DHGV] may be better suited to delivering specialist accommodation (e.g. supported housing) and/or the full quota of affordable housing;
 - Reliance on a strategic allocation naturally gives rise to challenges in respect of ensuring a robust housing delivery trajectory, as complicated schemes are inherently at some risk of unforeseen delays.

- *Landscape* - the appraisal reaches the conclusion that **West Horndon** is a preferable location to DHGV; however, this is a finely balanced conclusion, and there is a need to recall that capacity at West Horndon is significantly below capacity at DHGV, such that that a strategy involving West Horndon would likely also necessitate one or more additional Green Belt allocations, with associated landscape impacts.
- *Traffic and transport connectivity* – this matter was a focus of work undertaken to arrive at spatial strategy RAs, as reported across paragraphs 5.2.9 to 5.2.12 of the SA Report, and then was a focus of discussion under the 'Climate change' and 'Economy' headings within the appraisal presented in Section 6. Conclusions are finely balanced, although it is important to note (at the current time, given the recent experience of Covid 19 and lockdown) that DHGV does give rise to a considerable opportunity in respect of supporting walking and cycling, potentially more so than an alternative strategy with DHGV replaced by growth elsewhere.

9. Conclusion

9.1 Broadly speaking, the Local Plan spatial strategy involves:

- making optimal use of land falling outside of the Green Belt;
- allocating land in the Green Belt sufficient to meet LHN, recognising that providing for 'below LHN' (and thereby relying on neighbouring authorities to provide for the unmet needs) is not a realistic possibility; and
- selecting Green Belt sites in order to minimise harm to the Green Belt as a foremost consideration, whilst also giving weight to "the need to promote sustainable patterns of development" (NPPF paragraph 138).

9.2 Working within this framework, seven spatial strategy reasonable alternatives were established, appraised and published for consultation in 2019. The detailed appraisal findings, alongside the consultation responses received, allowed the Council to reach the conclusion that the Local Plan spatial strategy does represent sustainable development on balance, and is sound. Whilst the reasonable alternatives involving a strategic allocation at West Horndon, in place of DHGV, are arguably preferable in Green Belt and potentially wider landscape terms, DHGV is the preferred location on balance, including because there is the potential to deliver a larger, more comprehensive scheme. As for the reasonable alternative involving higher growth at Brentwood/Shenfield, in place of DHGV, Green Belt and wider landscape impacts would be similar to the preferred option, whilst negative impacts in respect of traffic and air quality would be greater, and the positive impacts of growth would be lower.

9.3 Having made these overarching points, Table A presents summary justification for each element of the spatial strategy in turn.

Table A: Summary justification for each element of the spatial strategy⁴

Spatial strategy element	Net homes	%	Summary justification
Completions	363	5%	N/a
Permissions	926	12%	N/a
Windfall	410	5%	This figure is a projection of past trends.
Brownfield in the main urban area	1,152	15%	All available sites are allocated.
Greenfield in the main urban area	75	1%	The only available site is allocated.
Brownfield within urban areas elsewhere	580	7%	All available sites are allocated.
Green Belt around the main urban area	1,240	16%	There is a need for Green Belt allocations given: LHN; a need to provide for LHN; and limited supply from non-Green Belt sites. The sites allocated are those found to be 'deliverable or developable' through the HELAA and suitable for allocation on the basis of evidence provided through the Green Belt Study, the SA Report and other technical studies, as well as evidence gathered through consultation.
Green Belt around Ingatestone	218	3%	
Green Belt around the villages	123	1%	
Strategic allocation	2,700	35%	There is a need for a strategic allocation in the Green Belt given: LHN; a need to provide for LHN; limited supply from non-Green Belt sites; and limited supply from Green Belt sites that are found to be 'deliverable or developable' through the HELAA and suitable for allocation (see discussion above). Furthermore, a strategic allocation is an opportunity to deliver a mix of uses and new/upgraded infrastructure alongside housing; the alternative of increased reliance on piecemeal urban extensions would not achieve this.

⁴ At the current time the proposal is to update Table 4.2 of the plan to reflect latest monitoring data (April 2020). Also, the proposal is to adjust the windfall figure. See further discussion in the Housing Supply Paper (document F5D).