

Principle 8: Create and refine realistic spatial policy options

Guide Questions

- What is the scope and content of the plan objectives and how locally distinctive are they?
- Is there sufficient background knowledge to inform option development?
- What is the approach to generating and testing options?
- What are the arrangements for community engagement?
- How will sustainability appraisal inform the refinement of options?

8.1 The development of options involves thinking spatially about how the plan area and specific places within it will contribute to achieving the plan objectives and deliver the spatial vision. As well as underpinning local plan objectives, evidence should also inform the development of options for the plan.

Creating options

- 8.2 Realistic spatial options need to be based on a strong understanding of your area – the starting point for which is your evidence base. Evidence should not be produced to justify a position already developed, but will help to:
- identify what policies you need to help deliver the plan and comply with the expectations of the National Planning Policy Framework (NPPF).
 - find the solutions by underpinning the generation and testing of options.
 - identify who is going to help you solve the problems and deliver the plan, including internal and external partners (the development industry, statutory agencies and other bodies, as well as neighbouring authorities) many of whom will have useful evidence.
 - plan for infrastructure and investment, whether at sub-regional, local or neighbourhood level.
 - set targets, which can be justified through evidence.
- 8.3 Your evidence may be collected on a thematic basis but should be analysed on a spatial basis. This could begin with a basic mapping exercise to identify constraints (green belt, landscape or heritage coast, wildlife sites, flood risk areas) and opportunities for development. Opportunities for development could be identified through, for example, mapping public transport routes and accessibility as well as aspects of deprivation or site availability. The information derived from this analysis will also help with the sustainability

appraisal. You should also think about any changes taking place in neighbouring authority areas which may have a bearing on the options developed.

- 8.4 Many authorities use area profiles to bring together the conclusions from the topic-based studies and develop a detailed understanding of areas. Area profiles involve breaking down the area into spatial units. These will vary in size depending on the nature of the area and of the plan being prepared. For example, you might identify a series of areas based on key settlements and their hinterlands. For a town centre plan, the areas identified might be much smaller, for example, different quarters: retail, business, culture and leisure.
- 8.5 For each identified area, you could prepare a profile that identifies its problems and issues, opportunities and constraints. The information collected should range from basics such as the population structure and dwelling densities to the relationship between homes and jobs and commuting patterns. Area profiles are a useful means to synthesise the messages coming out of the various evidence base studies (for example housing and employment studies, strategic floor risk assessment etc), including cross-boundary issues. Evidence from early community engagement could be used to help build local profiles, which in turn may usefully demonstrate how the plan reflects local perceptions and aspirations.
- 8.6 Area profiles can provide the basis for intervention or 'place shaping'. By analysing the characteristics of the area and its constituent parts and the key issues and challenges facing them you should be able to develop a distinctive vision for the area. This should help to provide the platform for identifying options, particularly in relation to the scale and distribution of new development. By using the information in the area profiles you will be in a strong position to differentiate between and identify areas that:
- can accommodate new development
 - can accommodate new development provided certain infrastructure was put in place
 - might benefit from regeneration
 - might gain from a reconfigured town centre, a stronger retail offering or an increased amount of green infrastructure to address deficiency and
 - those where new development might be best kept to a minimum.
- 8.7 The area profiles will also assist in fulfilling the requirements of the Sustainability Appraisal process if they include descriptions of the environmental characteristics of areas likely to be significantly affected by the plan.
- 8.8 For the high level strategy part of your plan key tasks could involve:
- identifying alternative growth scenarios to explore the implications of different levels of development based upon different levels of demand.

- directing growth to different settlements/areas according to what criteria are to be used, and reflecting matters such as economic and retail roles, strategic balance, the desire to bring about shorter trips and more appropriate use of transport modes, housing need, the maintenance of services and facilities, and infrastructure required to facilitate development.

8.9 Where there is a need to consider site location options, the following considerations apply:

- using studies to identify the scale of growth required from strategic sites indicate available sites and narrow down options using constraints mapping. Transport assessment, traffic modelling, infrastructure investigation and landscape sensitivity work should be involved in identifying options.
- working with landowners and site promoters to develop a list of reasonable sites. Start with the results of the Strategic Housing Land Availability Assessment and filter these sites using three broad criteria:
 - Exclusionary criteria – such as Areas of Outstanding Natural Beauty, flood risk areas or areas outside those marked for development in the local plan area.
 - Discretionary criteria – such as high quality agricultural land or local nature conservation designations. Whilst not necessarily ‘show stoppers’, these are important considerations and should be measured against the objectives in the Sustainability Appraisal and the Sustainable Community Strategy.
 - Deliverability criteria – such as land ownership, site access, planning history, infrastructure requirements, and possibly viability. If there is evidence that any issues here cannot be easily mitigated, they could be filtered out of the list of reasonable sites.

8.10 It is important to be creative. When developing options these are some of the questions you should think about.

- What is this option trying to achieve and how will it deliver the objective(s) of the local plan?
- Is this the best or only way of achieving it?
- Does the option generally conform with the NPPF (and the London Plan in London)?
- How would this translate into a policy?
- Is the option sufficiently, and proportionately, detailed to enable meaningful community involvement, Sustainability Appraisal and Habitats Regulation Assessment?
- Is it a genuine option or has it been included only to make other options look better or worse or for the sake of having an alternative option to test in the sustainability appraisal.

- 8.11 It is also vital that councillors are involved. Ask councillors to think about each of the options contribute to achieving our vision and what are stakeholders and the community likely to think of them.
- 8.12 Avoid the 'status quo' trap and a bias towards alternatives that perpetuate the current situation. Decision-makers should ask themselves whether they would choose the status quo if it weren't the status quo. You should also work with councillors to avoid pursuing alternatives that validate past choices just because it was a past choice and there is reluctance, consciously or otherwise, to admit a past 'mistake'. Often in practice there will be ideas which sometimes go back many years. You need to re-evaluate your choices against the vision and objectives you are looking to deliver. This is where involving scrutiny at key stages will really add value.

Testing options

- 8.13 There are three main ways to test the options. The first is 'deliverability test': is capable of being delivered? You should make a judgement on these points before you consult on an option. To help you think about this, consider the following questions.
- How deliverable is the option?
 - Is there the commitment of the delivery partners needed to make it happen?
 - Is there time within the plan period to implement the option?
 - Is it likely that the option will not be fully implemented for one reason or another? Ask 'what might go wrong with this option'?
 - Is the option flexible enough to accommodate changing circumstances such as revisions to housing needs and site viability?
 - Does the option give rise to any cross-boundary issues that will need to be considered early on?
- 8.14 It is important to explore how options and policies will be effectively delivered on the ground to help avoid an unrealistic policy approaches – the deliverability test. For example, if the evidence base suggests that policies to ensure a certain level of affordable housing in new development have not been fully implemented in the past, there is a need to be cautious and you may need to refine the option.
- 8.15 Options must be tested through the sustainability appraisal. The sustainability appraisal should evaluate the different options (particularly in respect of the levels of growth proposed), and this work used in turn to help refine them as the plan process proceeds.
- 8.16 Options should also be developed and tested with stakeholders through a process of continual engagement. The extent of this engagement will depend on the nature of the plan document in question. The minimum requirements for consultation as set out in the Local Planning Regulations (see also Principle 5 on community engagement). To help consultees to

understand the different options and their relative impacts, publish your sustainability appraisal of them, including the pros and cons of each option. Use maps and other visuals to help explain the impacts. This will all help people to understand the different scenarios and the consequences of them.

Refining the options

- 8.17 This stage follows on from the appraisal and engagement work that you have done on the different spatial options for your area. It's about taking the findings from these exercises and getting to one or more preferred spatial options. You need to still bear in mind the deliverability of the preferred options (so on-going work with service providers is essential) and their compatibility with national and corporate objectives and other plans and strategies.
- 8.18 When deciding on the final options make sure that you give clear reasons for not proceeding with certain alternatives as part of the ongoing engagement and participation processes. It is important that councillors are engaged in this decision. If options are discounted because they aren't deliverable, or for any other reason, record the reasons why.

Further Information

[PAS Soundness Self-Assessment Checklist](#)

Frequently Asked Questions



Q: We don't intend that our overall development strategy would change therefore can we do a partial review and keep some policies? But what would be the implications of current policies running to 2026 but the new policies running to 2031? Would electing to not change some policies have to be considered as a 'do nothing' option?

A: Partial reviews are possible. You really need to consider the impact of your proposed changes. Are you looking at new areas for development? What will the Sustainability Appraisal of the alternatives come up with? How will you communicate this to the community? Can anyone genuinely say that they have not had the opportunity to engage with you on the new proposals/options? Make it very clear what you are not proposing to change, as well as what you are.

You will assess existing policies against the new evidence, where relevant. If the policies are unaffected, they will not need to change.

Q: Issues and options stage will raise certain issues, but new evidence may show some of the issues are different from the ones consulted on. Can you go to a preferred option without going back and saying there are new issues?

A: In general, the answer is 'yes' provided that the Sustainability Appraisal explains the reasons and why the preferred option was chosen. If it is site specific it needs to be tested against the other sites that were options.