

**Committee:** Local Plan Leadership Group

**Date:**

**Title:** Areas of Search and the Local Plan  
Development Strategy

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**Report  
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## Summary

1. The purpose of this paper is to seek views on the use of Areas of Search and their role in relation to the development strategy for the new Local Plan.

## Recommendations

2. Should the Group support the use of Areas of Search, it is recommended that officers prepare an Areas of Search map. The map and any supporting material will be brought to a subsequent meeting of the Group for approval, enabling it to be finalised in time for publication alongside the Call for Sites.

## Financial Implications

3. None.

## Background Papers

4. The following papers were referred to by the author in the preparation of this report and are available for inspection from the author of the report.

Appendix A – Indicative Areas of Search map

## Impact

- 5.

Communication/Consultation	An Areas of Search map would be an important form of communication with site promoters and the community.
Community Safety	N/A
Equalities	N/A
Health and Safety	N/A
Human Rights/Legal Implications	N/A

Sustainability	The map would encourage the submission of sites in areas with greater potential for sustainable transport.
Ward-specific impacts	N/A. Location-specific impacts will only arise after sites have been assessed, alternative spatial strategies compared and preferred options selected.
Workforce/Workplace	N/A

## Situation

### Background

6. A Local Plan's development strategy must make every effort to address the area's objectively assessed needs<sup>1</sup>. It is therefore important that the options are not narrowed down too early, so that all are properly considered and the strategy may evolve gradually with the benefit of consultation and evidence-gathering exercises.
7. There are set to be two main consultation stages, as follows:
  - i) **Issues and Options:** The purpose of this initial consultation is to seek a wide range of views on the issues facing the area, and the options for the new Local Plan. This is not a compulsory stage and there is considerable variation among planning authorities as to the format. It is currently proposed that the Issues and Options consultation will comprise a series of bite-sized thematic consultations over an extended period.
  - ii) **Preferred Options:** The purpose of this statutory consultation is to seek a wide range of views on the Council's preferred options (or draft Local Plan) before it prepares a final version for submission to the Planning Inspectorate.
8. Areas of Search were used to inform the development strategy of the 2019 Submission Local Plan. However, it is worth noting that they are neither compulsory nor universally adopted among planning authorities.
9. The advantage of using Areas of Search is that they allow the Council to be more proactive in identifying potential sites for development. While it is important to keep an open mind regarding sites elsewhere, Areas of Search based on a clear rationale give confidence to landowners within them and make those outside think carefully about how locational issues could be addressed.

<sup>1</sup> In accordance with the soundness tests at paragraph 35 of the National Planning Policy Framework, and taking into account the approach demonstrated by Planning Inspectors applying those tests.

10. The disadvantage of using Areas of Search is that their appearance on a map can be seen as a predetermined decision on where development will be located. Clear communication is therefore important to build the understanding that no such decision has been made.
11. Examination of the 2019 Submission Local Plan did not raise any issues with the principle of Areas of Search. However, the Inspectors did raise concerns regarding the way reasonable alternatives to the chosen spatial strategy were considered. In particular, the assessment of reasonable alternatives in the Sustainability Appraisal did not consider a smaller number of garden communities, in combination with more housing in existing sustainable settlements.

### **Proposed use of Areas of Search**

12. It is recommended that Areas of Search (applicable to larger scale developments) are mapped according to their proximity to existing and committed attractors. This approach supports a rationale that utilises known facts to encourage site promoters to put land forward in better-connected areas, and to think carefully about whether and how locational issues could be overcome in more remote areas.
13. Their role as a tool for generating sites for further consideration means the Areas of Search would accompany the Call for Sites. Clear communication would confirm that no decisions have yet been made on development locations, and that detailed consideration of a site's opportunities and constraints would be reserved for the subsequent site assessment process.
14. This specific role would be reinforced by omitting the Areas of Search from the Issues and Options consultation, thus ensuring unconstrained engagement on the full range of spatial options – the first step in evolving a development strategy.
15. The initial separation of site-generation and development strategy activities, and their subsequent convergence, is illustrated in the below diagram.



16. **Appendix A** includes an indicative example of how the areas could be visually represented. In accordance with the Duty to Cooperate, the administrative boundary of the District does not act as a barrier to consideration of attractors.

## Risk Analysis

17.

Risk	Likelihood	Impact	Mitigating actions
An Areas of Search map is not agreed in time to influence the Call for Sites	1 – A map can be prepared relatively quickly using internal resources	2 – A map is not essential for plan preparation, although could play a useful role in generating appropriate sites for consideration	Map preparation work can be prioritised and completed relatively quickly, to fit in with the project plan
The Areas of Search map harms community engagement on the development strategy	3 – The map could be seen as a predetermined decision on development locations	4 – A loss of trust could undermine efforts to prepare a Local Plan with effective	Defining a clear role for the Areas of Search as a site-generating tool. Communicating this role clearly when issuing the Call for

		and inclusive community engagement	Sites and in conversations with the community throughout the Issues and Options consultation.
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1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.