

Lancaster City Council | Report Cover Sheet

Meeting	Cabinet	Date	27 October 2020
Title	Preparation of Lancaster South Area Action Plan Development Plan Document		
Report of	Director for Economic Growth and Regeneration		
Purpose of Report			
To seek endorsement for the formal commencement of the Lancaster South Area Action Plan (AAP) Development Plan Document (DPD) Plan.			
Key Decision (Y/N)	Y	Date of Notice	28/09/2020
		Exempt (Y/N)	N

Report Summary

The Council has just adopted a new Local Plan for Lancaster District. The plan establishes the amount of development that is required in the district and it allocates sites for development to contribute to meeting these needs. In addition to allocating land it also identifies a Broad Location for Growth to the south of Lancaster. The Broad Location for Growth will include the site of the Bailrigg Garden Village. Policy SG1 of the plan sets out a series of principles with which development at south Lancaster will need to conform. The Policy also commits the Council to preparing a further local development plan document that can formally allocate land for development and introduce detailed policies, building on the principles established by Policy SG1, that will create the robust policy framework needed to determine the planning proposals that will come forward in south Lancaster.

The development plan document will be an AAP. The AAP will enable the achievement of a new settlement to a holistic Masterplan supported by a locally specific Design Code. The Masterplan, prepared by external consultants, will establish the location, shape, and layout of development; this area will then be formally allocated by the AAP. The AAP will also contain policies on matters such as managing water and securing development benefits such as affordable housing.

As Cabinet has a role to plan in the drafting of policy this report seeks the endorsement of Cabinet for the formal commencement of work on the statutory stages of preparing the AAP in accordance with the commitment made in the just-adopted Local Plan. There are separate costs in preparing the Masterplan and Design Code; and the AAP as a DPD. The AAP costs include ecological surveys, viability assessment, Sustainability Appraisal, Habitats Regulation Assessment, and the costs of submission and independent Examination by a Government appointed Inspector.

Unless an AAP is prepared in accordance with prior commitments then the Council would have to determine the many separate planning applications that will come forward in south Lancaster on the basis of only the policies within the adopted Local Plan, particularly policy SG1, and, very significantly, in the absence of land allocations. Members are strongly advised that this would not represent a policy framework that will be sufficiently robust to achieve the Council's ambition of developing a distinctive new Bailrigg Garden Village in South Lancaster.

Recommendations of Councillor Janice Hanson

- (1) That Cabinet formally endorses the commencement of work on the statutory stages of preparing the Lancaster South Area Action Plan in accordance with the commitment described in the adopted Local Plan for Lancaster District and the timetable provided in the Lancaster District Local Development Scheme as approved by Council on 29 July 2020.

- (2) That Cabinet authorises officers to commence with the projects set out in this report.

Relationship to Policy Framework

The Local Development Plan and Development Plan Documents are part of the Council's Policy Framework (See Section 2.3 (c) of the Council's Constitution). The Council is obliged to prepare and maintain the Development Plan for Lancaster District as described by Section 19 of the Planning and Compulsory Purchase Act 2004. A "Local Plan for Lancaster District", specifically, the Strategic Policies & Land Allocations Development Plan Document and the Review of the Development Management Development Plan Document, was adopted by Council on 29 July 2020. The Local Plan and the adopted Local Development Scheme commit the Council to preparing an AAP for Lancaster South.

Conclusion of Impact Assessment(s) where applicable

Climate Not directly within the report but the Development Plan Document to be prepared will contain planning policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change in compliance with Section 19(1A) of the Planning and Compulsory Purchase Act 2004	Wellbeing & Social Value There are no direct implications on Wellbeing & Social Value arising from the recommendations of this report, however, the intention of the implementation of the recommendations, to prepare an AAP that will enable the delivery of housing and employment opportunities in a well-planned environment that will be advantageous to the well-being of residents.
Digital n/a	Health & Safety n/a
Equality n/a	Community Safety n/a

Details of Consultation

On 29 July 2020, Council approved the publication of a new Local Development Scheme that commits the Council to preparing an AAP as a DPD. The Council will consult with the community on the preparation of the AAP document in accordance with regulatory requirements and obligations described in the Council's own Statement of Community Involvement (SCI).

Legal Implications

There are no legal implications associated with this consultation. To be found sound (properly prepared) at independent Examination the Council must demonstrate that the proposed AAP has been prepared in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and associated regulations.

Financial Implications

As part of the 2020/21 budget process Cabinet approved the use of the Invest to Save Reserve for the purpose of feasibility studies for both Bailrigg Garden Village and Morecambe Town Centre projects. It is intended to use this reserve to cover the costs in the first instance.

The amount set aside for Bailrigg Garden Village amounts to £1M included in the revenue reserve which has been profiled equally over this and the next three financial years. The costs associated with taking forward and enabling the development proposals have now been advanced and the proposed amendments with the known expenditure levels to date are set out in the table below.

Costs	2020/21 £'K	2021/22 £'K	2022/23 £'K	2023/24 £'K	Total £'K
Reserve Spend to date	36	0	0	0	36
AAP Direct Costs Evidence, legal & professional costs	10	290	100	0	400
*Masterplan & Design Code Costs	175	150	0	0	325
*Unidentified Costs	0	0	0	239	239
Total costs	221	440	100	239	1,000
Reserve start balance	250	250	250	250	1,000
Total Costs from above	(221)	(440)	(100)	239	1,000
Balance in reserve	29	(190)	150	11	0
Adjustment to reserve profile	(29)	190	(150)	(11)	0

*indicative figures tbc

The Council has commissioned external design consultants JTP to prepare a Masterplan and a Design Code. There are separate costs for undertaking the statutory stages of preparing the Lancaster South Area Action Plan. The completion of the former is a prerequisite to achieving the latter. The direct AAP costs include evidence collection including ecological surveys, and viability assessment, sustainability appraisal, habitats regulation assessment, and the costs of submission and independent examination by a Government appointed inspector.

With reference to any further costs that may be attributable to this project which are not quantifiable at this point in time, the Council is in ongoing positive dialogue with Homes England & the MHCLG about the prospect of additional funding to support the project development stages of the Bailrigg Garden Village in pursuance of achieving shared objectives on homes and growth. Should additional funding from Homes England or the MHCLG ultimately prove insufficient to cover the gap that is currently anticipated for the project development stages then further funding will be sought as a growth item in a future years budget process, as appropriate.

With regard to committing expenditure in accordance with the 'Covid-19 Pandemic Policy for decision making and spending delegations within the Budget and Policy Framework', it is recommended that Cabinet authorises officers to commence with the projects set out in this report.

Other Resource or Risk Implications

N/a

Section 151 Officer's Comments

The nature of the Invest to Save reserve is to support to services to help them become more efficient and effective in order to generate future savings, or to fund projects that will make a positive income contribution to the Council through increases in fees and charges, council tax or business rates. To maintain the reserve each investment is expected to repay the initial investment within an agreed period. The forecast balance on the reserve at the end of 2021/22 is £209K, providing the level of repayments are made on current projects.

This report seeks the acceleration of proposed expenditure in 2021/22, however should the expected levels of repayments not be attained the reserve may well be fully committed and so reprofiling of the project against other reserves may need to be considered at that juncture.

Monitoring Officer's Comments

The Monitoring Officer has no further comments to add.

Contact Officer	Maurice Brophy
Tel	Tel: 01524 582330
Email	mbrophy@lancaster.gov.uk

Links to Background Papers

Local Development Scheme, July 2020 (Local Plan project timetable)
<https://www.lancaster.gov.uk/planning/planning-policy/about-local-plan>

1.0 Introduction

- 1.1 On 29 July 2020, the City Council formally adopted the Strategic Policies & Land Allocations DPD and reviewed Development Management DPD (the Local Plan for Lancaster District).
- 1.2 The Local Plan sets out a vision for growth in the district, addressing development needs during and beyond the plan period, and establishing a framework for realising solutions to long-standing infrastructure issues, particularly in relation to transport and connectivity.
- 1.3 The Local Plan allocates strategic development sites, including at North Lancaster and at East Lancaster, and identifies a broad location for growth to the south of Lancaster. The Council's expectations for development in Lancaster south, the Key Growth Principles, are described in Policy SG1 of the Strategic Policies & Land Allocations DPD. For clarity the Broad Location for Growth does not allocate land for development, rather it establishes the intention that development needed to meet the district's requirements will be achieved in south Lancaster and commits the Council to preparing a further Development Plan Document (DPD) that will provide the detail needed to advance development at this broad location.
- 1.4 Policy SG1 includes the expectation that Lancaster South will include a new Garden Community – the Bailrigg Garden Village. The Ministry of Housing, Communities & Local Government maintains a Garden Towns and Villages Programme which, in January 2020, identifies the 34 Garden Villages and 15 Garden Towns that are currently part of the programme. In addition to Bailrigg there a further three Garden Communities are proposed in the North West of England, at; St Cuthbert's (Carlisle); Halshead (Knowsley) and Handforth (Cheshire East). The MHCLG maintains a Garden Communities prospectus, this is an open invitation for further bids.

- 1.5 Policy SG1 of the just-adopted Local Plan sets out 15 clear principles with which development in south Lancaster must conform but it also makes clear that these matters will be explored in more detail through the preparation of an area specific development plan document. That further DPD is to be an AAP for Lancaster South. The commitment to prepare this specific document, and a timetable for its key milestone preparation stages, is described within the published Lancaster District Local Development Scheme of July 2020.

2.0 The role and purpose of an Area Action Plan

- 2.1 An AAP is a Development Plan Document. This is very different from a Supplementary Planning Document (SPD). SPDs may build upon and provide more detailed advice or guidance on policies that are already in an adopted local plan, and, the content of an SPD can be a material consideration in decision-making, but, significantly, SPDs do not form part of the development plan and they cannot introduce new planning policies into the development plan. Importantly, SPDs should not add unnecessarily to the financial burdens on development; thus local charges on development to fund infrastructure, such a Community Infrastructure Levy or a similar approach to capture the uplift in development value as a consequence of the granting of a planning consent, cannot be introduced or otherwise enabled by an SPD.
- 2.2 As an SPD cannot allocate land for development or enable development charges to be introduced, it would not provide a development framework that is sufficiently robust to direct and control critical matters such as layout, design, phasing or infrastructure delivery at Lancaster south. An SPD that provided design guidance could be a *material consideration* in determining planning proposals; whereas development proposals *must be* determined in accordance with policies on design in an AAP unless material considerations indicates otherwise.
- 2.3 Though the preparation of an AAP is much more significant undertaking than an SPD in terms of time and process; it requires Strategic Environmental Assessment, submission to Government and independent Examination, it is only an AAP that can provide the necessary robustness of policy framework needed to achieve the undertaking of developing a new settlement. That is why both the adopted Local Plan and the Local Development Scheme of July 2020 commit the Council to preparing an AAP for Lancaster South.
- 2.4 Members may recall that parallel with the latter stages of the preparation of the Local Plan the Council engaged informally on development growth issues and potential options in South Lancaster to inform preparation of an AAP. Through engagement sessions in late 2017 and the Spring of 2018 officers explored potential approaches that led to illustrations of possible options for the development of a garden village on land to the south of Lancaster. This work, which included much community engagement, was useful in exploring the evidence, the issues, and the challenges in achieving a new garden village settlement and understanding its possible relationships with other development in the south Lancaster area. However, now that the Local Plan for Lancaster District has been successfully completed and adopted, and a new Local Development Scheme has been approved by Council, there is a need for a clear mandate to formally commence the preparation of an AAP that can formally allocate land for development and create policies with development plan weight that can be used in the determination of subsequent development proposals and planning applications.
- 2.5 Importantly, members are strongly advised that an AAP is needed to provide the certainty needed to support the delivery of necessary infrastructure in this area, most particularly where external funding or development contributions are required.

Relationship with the adopted Local Plan

- 2.6 As previously noted, Policy SG1 of the Strategic Policies & Land Allocations DPD already established a series of key principles that will guide development in the Lancaster south area. Policy SG1 provides the basis from which an AAP can be advanced, along with a complementary masterplan and a design code that can illustrate the Council's intentions on layout, design, and approach to integrating landscape within development. The preparation of the Lancaster South Area Action Plan DPD therefore must be complementary to the strategic position set out in the Local Plan and must ensure consistency with the growth principles set out within Policy SG1.
- 2.7 It will be important that the Lancaster South AAP is consistent and complementary with other plans, strategies and programmes which are ongoing, either being prepared by this Council or by other partner organisations such as Lancashire County Council. For example, the Lancaster South AAP will have to be consistent with the Council's wider objectives that have inspired the Climate Emergency Review of the Local Plan and it must be consistent with the County Council's adopted Lancaster District Highways and Transport Masterplan.

Proposed Scope of the Development Plan Document

- 2.8 The principles contained in Policy SG1 already establish the matters and the scope of the issues that the APP will need to explore and expand upon. It is therefore not necessary to commence the preparation of the AAP with a scoping stage exploration.
- 2.9 The key issues which now need to be addressed through the APP are: -
- The **land-use patterns** within the south Lancaster area, this includes allocating the areas which will accommodate future development and growth, including public spaces; and, allocating the areas which should be protected from development for their environmental value. It will be necessary, including through land allocations to determine the relationship between the new settlement and other development and the relationship between the new settlement, other development, and Lancaster University.
 - Ensuring new settlement planning is **holistic** and that combined with good urban design integrates key considerations to conserve and enhance landscape, achieve significant biodiversity gains, properly manages water to an overarching strategic framework and promotes and advantages sustainable and active travel and **active healthy lives**.
 - The delivery of **necessary infrastructure** to ensure that development is acceptable in planning terms and that strategic infrastructure can be delivered in a sustainable manner. This includes the delivery of wider infrastructure such as roads and transport connections but also the provision of new education, healthcare, and local facilities. It will be necessary to have policies that further associate the development allocations with the realisation and funding of the transport infrastructure proposed by Lancashire County Council in the Lancaster District Highways and Transport Masterplan.
 - The **phasing** of new development, to ensure that development growth takes place in a managed way allowing infrastructure to be delivered in the right place and at the right time.
 - Setting out in policy the Council's approach to the **design** of future development in the south Lancaster area, including the **layout**, scale, massing of development and the approach to the materials uses. Importantly this will give the Council the opportunity to explore lower carbon development and energy efficient buildings.

- The AAP will need to address in policy the approach to the **management of water** to ensure that land management contributes positively to the storage and drainage of water and that the development incorporates design features which promote sustainable drainage.
- The APP will need to describe approaches to the promotion of **community stewardship**, given that development in south Lancaster will create a new community, it is important that development actively promotes a sense of community through the development of shared facilities and the opportunities for people to assemble, play and exercise.
- Strongly associated with land-use and design, the AAP will need to describe how development will contribute to the achievement of the Council's ambitions to mitigating the contribution that development makes to **Climate Change** and adaptation to the effects of Climate Change. It is wholly anticipable that the APP will need to commit development to achieving objectives on modal shift; so demonstrably reducing the use of private cars, most particularly for local journeys. including travel into Lancaster.
- Addressing the **environmental** impacts and change arising through development, ensuring that opportunities for environmental gain are identified, landscape mitigation set out and heritage issues are well understood and addressed.

3.0 Arrangements for preparing the AAP

- 3.1 Planning law requires that applications for planning permission be determined in accordance with the **development plan** unless material considerations indicate otherwise. The AAP will therefore be a formal **development plan document** with written planning policies accompanied by a policies map on an Ordnance Survey Base Map that clearly shows where land has been formally allocated for development.
- 3.2 The formal development plan document will be accompanied by two further documents: a **Masterplan** supported by a **Design Code**.
- The **Masterplan** will, within the boundaries of the land that will subsequently be allocated by statutory development plan policy in the AAP, be grounded in good urban design. It will illustrate the layout of the proposed development, including areas of land for housing, service centres, schools, roads, landscaping, nature, recreation and water management. The Masterplan will show the sustainable transport and movement network within the development as well as show where connections will be made to the existing transport and movement network, including links to public transport, cycling and walking connections.
 - The **Design Code** will provide detailed design guidance using both written descriptions and illustrations that are intend to establish with precision both the two dimensional and the three dimensional design requirements for all new development that will be granted planning consent within the area illustrated in the overall Masterplan. Design Codes aim to provide a positive statement about the qualities of a newly created and distinctive place in which to live and work.
- 3.3 Design Codes can set out design principles aimed at delivering better quality places, by, for example, establishing:
- A requirement to achieve a human-scale streetscape rather than a car-dominated road-scape that can create a higher quality and more ecologically diverse environment to enhance well-being by encouraging residents and visitors to actively enjoy being in their surroundings.

- A requirement to create blocks or groups of visually interesting and individually designed buildings which promote the prospect of mixed-use, activity and vitality, rather concede to the conventional repeating pattern of featureless rows of car-orientated road-facing detached and semi-detached houses.
- A requirement to work to a consistent approach for landscaping, architectural aesthetic or energy efficiency in accordance with a locally appropriate consideration approach which will help provide the visual clues that can create a sense of place.
- The Design Code approach can achieve greater surety on how development will look and function. By establishing in advance of the receipt of development proposals what will be required in terms of the principles of a local aesthetic on the appearance, layout and building design.
- The Design Code approach, by establishing rules and clear expectations on design, layout and appearance, can minimise the time-consuming need arising from challenge, negotiation and amendment to proposals that might otherwise be brought forward by developers in the absence of such a code.
- The Design Code approach gives the Council the opportunity to establish approaches to design, layout and appearance that it can be content with and that it believes can create development that best responds to the local environmental context and accordingly offers the best prospect of bringing forward development that is locally distinctive.
- The Design Code, in association with the Masterplan, can provide certainty to developers and residents about how the development of a long-term project will be phased. Developers can have assurance about the order in which parts of a major development proposal will be achieved and when and where infrastructure will be delivered. Residents can have assurance about what development will take place in each phase; reducing speculation and concern about what will be developed in subsequent development areas.
- The Design Code approach permits higher expectations of design to be factored into development costs; knowing that an unequivocal expectation of quality will be a non-negotiable requirement when seeking planning consent developers will be obliged to factor the costs of providing better quality outputs into the value of land that they intend to purchase.

3.4 Members will be aware that the Council has previously appointed consultants JTP to advise on design and layout in south Lancaster including the Bailrigg Garden Village.

3.5 JTP will continue the work that they have started and prepare a Masterplan and a Design Code. Officers of the City Council's Property, Investment and Regeneration Service, which is part of the Economic Growth and Regeneration Directorate, will liaise with and support JTP in the achievement of a Masterplan and a Design Code. In full liaison with officers of the Property, Investment and Regeneration Service, officers of the Planning and Housing Strategy team, who sit in the Planning and Place Service, (also part of the same Directorate), will prepare the formal AAP document, with its policies and policies map, that will enable the delivery of the Masterplan.

4.0 Consultation

- 4.1 The timetable for preparing the AAP is provided in the July 2020 Local Development Scheme. It is anticipated that the work needed to support the production of the AAP and Masterplan & Design Code will be undertaken in the closing months of 2020 and continue into early 2021. The preparation of the Masterplan & Design Code will require consultation and engagement with the community, developers, and stakeholders. As the Masterplan & Design Code are to be prepared during the restriction on movement and social gathering imposed by the management of the Covid-19 pandemic Council officers will work with consultants JTP to seek appropriate safe approaches for satisfactory consultation and engagement.
- 4.2 As the AAP is a DPD progress, including the involvement of other elected members, will be guided by the Portfolio Holder for Planning Policy. It is further anticipated that following completion of a draft plan, Cabinet, itself informed by the Overview and Scrutiny Committee, would recommend to Council that the APP is published and submitted to Government for independent Examination.
- 4.3 For clarity, the process of preparing the APP as a regulatory planning document, will be undertaken by the Head of Planning and Place Service, and specifically by officers of the Planning and Housing Strategy Team. The Masterplan and Design Code, the critical informing elements for the preparation of the AAP will be achieved by external consultants managed by officers within the Property, Investment and Regeneration team. Officers in both internal teams sit with the Economic Growth and Regeneration Service and are greatly experienced in working together to achieve good outcomes on the realisation of shared planning and regeneration objectives.
- 4.4 Should both the Masterplanning and the Design Code be completed by early 2021, it is anticipated that a draft AAP accompanying and supporting the Masterplanning and the Design Code would be available for informal consultation (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) by late spring or early summer 2021.
- 4.5 The Council will consider the responses received at the Regulation 18 Stage and the work towards the formal publication and submission of the APP to government before the end of 2021.
- 4.6 Following the submission of the APP the timetable for completion is largely determined by the government following the Independent Planning Inspector. It is anticipated that independent Examination could commence in the spring of 2022 with the Inspector's recommendations being published by the summer of that year. Should this timescale prove accurate then it would not be unreasonable for the Council to be considering the adoption of the Lancaster South Area Action Plan before the end of 2022.

5.0 Options and Options Analysis (including risk assessment)

Option 1: To endorse the formal commencement of work on the statutory stages of preparing the Lancaster South Area Action Plan in accordance with the commitment described in the adopted Local Plan for Lancaster District and the timetable provided in the Lancaster District Local Development Scheme (LDS) as approved by Council on 29 July 2020.

Advantages: This will enable the Council to move from the current Local Plan position of an identified Broad Location for Growth in Lancaster South to one where land is formally allocated with accompanying policies with **development plan weight**, including on securing community benefits. This will enable the delivery of development needs during both the period of the current Local Plan and for many years beyond. Evidence of the intention to progress development plan policy in Lancaster South will support the case that has been made by the County Council for national funding contributions transport related infrastructure in Lancaster district.

Disadvantages: None apparent. To not progress with an AAP, that accompanies and supports the Masterplan and Design Code, means that it will remain wholly unclear how the delivery of development requirements in Lancaster south is to be realised. The absence of development plan policies would leave the Council more exposed to development proposals being brought forward on sites that are not identified by the just-adopted Local Plan.

Risks: There are challenges and costs associated with preparing the AAP that will enable the implementation of a Masterplan for Lancaster South in accordance with a Design Code, however, if the Council is to achieve development needed to meet the needs of the community and economy these challenges and costs are unavoidable. The preparation of an AAP takes time as a consequence of the regulatory obligations on consultation, submission, and independent examination. Development proposals may have to be determined whilst the AAP is still in progress. The Council can also anticipate challenge from residents, who may not be supportive of development in this area, and from developers who may not be supportive of the expectations that policy in support of a holistic new settlement Masterplan and Design Code will place upon their development proposals.

Option 2: To **not** endorse the formal commencement of work on the statutory stages of preparing the Lancaster South Area Action Plan in accordance with the commitment described in the adopted Local Plan for Lancaster District and the timetable provided in the Lancaster District Local Development Scheme (LDS) as approved by Council on 29 July 2020.

Advantages: None apparent.

Disadvantages: The community, developers and stakeholders would be left wholly unsure about how the Council intends to achieve the delivery of development in Lancaster South in accordance with an overall plan. Infrastructure funders and developers would be left unsure as to this Council's commitment and timetable for achieving development in Lancaster south. To proceed with the commitment to prepare a further Development Plan Document would mean that planning proposals in south Lancaster would have to be determined in accordance with policy within existing Development Plan Documents, notably Policy SG1 of the adopted Local Plan. Policy SG1 only identifies a Broad Location for Growth and a

series of broad development principles. It would be very challenging to determine development proposals for a new settlement on only the principles established to date.

Risks: Lack of progress in advancing the development plan position will make it difficult to determine planning proposals that come forward in Lancaster south. Lack of an overall plan for the area will mean that development proposals will come forward as individual proposals and not contribute well to the achievement of a distinctive new community or realise community benefits such as contributions to education and affordable housing. An inability to demonstrate how progress is to be made on achieving development in the Broad Location for Growth will leave the district more open to proposals coming forward on sites that are not identified in the Local Plan.

6.0 Officer Preferred Option (and comments)

- 6.1 The officer preferred option is Option 1; to formally commence the Lancaster South Area Action Plan Development Plan Document Plan in accordance with the commitments made in the Lancaster District Local Development Scheme of July 2020.
- 6.2 The implementation of Option 1 will ensure the Council's aspirations and ambitions for future growth in South Lancaster, including Bailrigg Garden Village have sufficient robustness and planning weight to manage the delivery of future development proposals in the area. This will be vital in terms of implementing the Masterplan and Design Code, and the phasing and delivery of development and infrastructure.
- 6.3 Importantly, the implementation of Option 1 is also consistent with the commitments made in the just-adopted Local Plan for Lancaster District and the July 2020 Local Development Scheme. These clearly and unequivocally present the Council's intentions to prepare a further Development Plan Document for the Lancaster South area.
- 6.4 It should be noted that the implementation of Option 1 does carry some risks. These are particularly associated with the length of time it will take to prepare and the challenge which the Council's might engender from residents and the development industry. However, challenge is a necessary component of the plan-making process and the need to address challenge can lead to the adoption of a robust Development Plan Document.