

Principle 9: Develop a usable and focused set of plan policies

Guide Questions

- Do policies reflect the scope and objectives of the plan?
- Do policies reflect local circumstances, justified by evidence?
- How does policy convey the plan's key targets such as housing supply, employment land provision and affordable housing requirements?

- 9.1 The key policies required for the plan need to be scoped, with subsequent consideration of the potential impact of differing standards, thresholds and levels and types of intervention to achieve the plan objectives. Local plans must be based upon and reflect the presumption in favour of sustainable development in the NPPF with clear policies showing how the presumption will be applied locally (NPPF paragraphs 14 and 15).
- 9.2 A specific policy which sets out the principles of sustainable development should be included in the Plan, and chapter-specific policies could be based on these aspirations. You must make be made to the presumption in favour of sustainable development in line with the NPPF. There is a model policy on the Planning Portal web site. If this model policy is in your plan, and other policies are consistent with it, this should be enough to meet this expectation. You can make up your own policy, but if you do the Examiner of your plan will need to be satisfied that it fully and accurately reflects the national presumption.
- 9.3 A core strategy is no longer the primary development document so other development plan documents don't have to be in conformity with it – any existing policy can be changed via a new development plan document. But consistency *within* the local plan remains important. Make sure that the vision set out at the beginning of the plan is clear, concise and carried forward through the strategy and policies. Similarly, the challenges identified need to be tackled through appropriate policies. These should also be reflected in your Sustainability Appraisal objectives.
- 9.4 Policies should be focussed on how development proposals will be viewed by your authority (NPPF 154). You only need a limited suite of essential development management policies. Remember the NPPF also contains policies for use in determining applications. There is no need to repeat these locally. Except for the fundamentally critical presumption in favour of sustainable development, policy matters that are adequately covered in the

NPPF should not be repeated in the local plan. Repeating national or regional policy does not make the document unsound but it can make it longer than it needs to be. Some authorities feel that having the relevant policies all in one document is convenient for the public, but this is often negated by the production of a long, unfocused and confusing plan in which the essential issues and the strategies are lost in a mass of unnecessary material.

- 9.5 It can take some time to prepare a full set of policies to which there is broad consensus. In particular, work closely with development management officers to ensure the policies are fit for purpose, in particular check their wording supports plan objectives (see NPPF paragraphs 16 and 57, for example, which require that plans and policies are positive in tone).
- 9.6 Avoid negative “thou shalt not” type development control policies and embrace a “yes, unless” approach to drafting policies. The policies should be aimed at promoting the strategy that the authority is seeking to implement. Negative policies reinforce the reactive development control mind-set rather than the positive development management approach suitable for a genuinely plan-led planning system.
- 9.7 How the plan and supporting material is presented is important. Make sure it has been rigorously edited to ensure consistency throughout the document and structure material in a logical way, using sub-headings etc. Decide what is better placed in supporting documents with clear cross references and use illustrations or graphics to improve understanding and visual appeal. Use plain English and include an executive summary.

Further Information

[Soundness Self-Assessment Checklist](#),
Planning Advisory Service, January 2013

There is a model ‘presumption in favour of sustainable development policy on the [Planning Portal](#) web site



Frequently Asked Questions

Q: What makes a good flexible policy? When does too much flexibility lead to uncertainty?

A: There is no current advice on writing flexible policies. A couple of thoughts spring to mind: Is the flexibility so great as to threaten the overall strategy? Does the policy provide clarity and certainty (for example, if there are ‘triggers’ to applying the policy in different ways are these clearly set out)? Have you ‘tested’ the policy, perhaps with colleagues or with a group of local developers/agents to see if it is

clear and understood? Monitoring of policies is hugely important. Although this is a retrospective test, it is crucial to understanding how policies are working.

Q: Can post-publication changes to policies maps be dealt with under 'minor editorial' changes, without the need for a 'focused change' consultation?

A: Boundary changes would require focused consultation if you are altering an allocation or designation. Is it 'fair' not to give people chance to respond?

Q: What are the technical requirements of the policies map? Does it have to be at a recognised (standard scale) or simply at a scale (i.e 1:13000)? Do we have to provide hard copies?

A: Regulation 9 of the Town and Country Planning (local planning) (England) Regulations 2012 requires that a policies map is prepared to illustrate the policies in the plan graphically. It should explain any symbols and notations and be reproduced from or based on an Ordnance Survey base. No specific scale is specified but it goes without saying that it should be clear and legible.

If the policies map is changed, it will be one of the proposed submission documents, so it would need to be printed for submission and made available for inspection at the council offices (and other locations determined by the council) along with local plan. It is possible to use inset maps for changes but these will need to be incorporated into the final version.