

GENERAL POINTS ON NEIGHBOURHOOD PLAN PLANNING POLICY WRITING – A BRIEFING.



Planning policy writing is technical writing! It's also an art! Which means that there is no one right way to do it, and that anyone, with a little bit of thought, can do it!

In the next couple of pages I've set out some basic guidance. Follow it and you shouldn't go far wrong.

To be useful, policies have to be in a format that Development Management Officers, Councillors, Developers, and of course the public can understand and use with some certainty.

Policies can be in three basic formats:

- Generic – giving general requirements which apply across the Plan area to all developments.
- Criteria based – more targeted on particular types of developments or themes clearly identifying the requirements that need to be met with indicators.
- Site specific – applying to particular areas of land, and individual or groups of sites, often referred to as 'allocations'. Sometimes referred to as Proposals rather than policies.

Policies should be set into context, i.e. clearly linked back to the evidence-based strategy of which they are a part and the objectives they are seeking to deliver. The justification should be clear about the change that the policy intends to achieve in relation to the strategy, i.e. showing how the policy will serve the objective. But be careful about repetition.

The phrasing of policies is critical. They must be:

- Precise in application and effect
- Concise
- Unambiguous

- Able to be applied consistently in a variety of circumstances
- Positive
- Relevant to the development and area involved
- Deliverable in the plan period
- Targeted
- Provide indicators by which development can be judged

Weasel words can creep into policies. Such as 'should', which leaves room for exceptions, 'normally', which implies to vagueness in application, 'where possible' which implies that the policy criteria isn't a serious requirement, and 'character', which refers to the distinctiveness of an area that needs to be protected, but doesn't say what it is, leaving the judgement to be made outside of the Plan policy. Avoid such words, be as specific as you can.

When using criteria based policy, be careful with 'and' and 'or'. The absence of 'and' at the end of criteria means they can apply individually: i.e. meet one of ten criteria and the development is OK! The use of 'or' means that criteria can be used as alternatives.

Sometimes it can useful to include indicators in policies that can be used for monitoring purposes. This would usually be in numerical targets set over a specified timescale.

Policy presentation is important. The best Plans clearly identify and separate the context for the policy, its reasoned justification, its intended effect and the policy itself. The policy should be picked out in bold, or in a shaded box. Numbering of objectives and planning policies can provide extra opportunities to show off the 'golden thread' from evidence, through strategy, objectives to policy.

What about non land-use issues? There are two cases where these can be included in a Neighbourhood Plan

1. **As a source of policy.** Planning policies can be derived from other 'projects and interventions' that are active in your area. For example, there may be a town centre regeneration initiative that involves investment, operational changes, street scene improvement and management, setting up a Community Interest Company, volunteer

action, marketing etc., all of which is outside planning control. However elements of the work may require enabling planning policies, for example allocating land for redevelopment, supporting change-of-use of premises, setting design standards for shop fronts, controlling advertisements, etc.

2. **As a focus for community action.** Many Plans involve greater community engagement and involvement than has been achieved previously, stimulating community activity and leading to new initiatives which are predominantly non land-use in nature. Some Neighbourhood Plan Groups have successfully included detailed reference to such projects in their Plans as they have become an important and on-going focus for their communities. This is also a useful way of keeping a Plan 'alive' in the public mind.

For more detailed guidance see the 'Writing Planning Policies' by Tony Burton, published by Locality and available on their website as a download.

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