



FITNESS FOR PURPOSE: QUALITY IN DEVELOPMENT PLANS

A guide to good practice
commissioned from



and written by:

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Preface

Toward the end of 1999, The Royal Town Planning Institute, conscious of both the demands by many of its members for guidance on the quality of development plans and also the external pressures for better quality in this field, decided that a guide to good practice was desirable. The Institute consequently initiated research on “what constitutes a good development plan?”. After having been put out to open competition, the research was undertaken by a team from the Department of City and Regional Planning at Cardiff University comprising Stephen Crow, Neil Harris, Huw Thomas and Chris Yewlett.

The research work was overseen by a Steering Group from the RTPI comprising: John Baker (Chair), Mike Ash, Robert Gillespie, David John, Keith Mayoh, Anne Williams and Andrew Wright. The Group was supported by Joanna Ross, the Institute’s Planning Practice Officer.

The emphasis of this research was on the plan as a *product*, rather than on the planning *process*, research on which has been earlier published by the Institute under the title “*Slimmer and Swifter*¹”. The scope of the new research was limited to Part II of unitary development plans and district wide local plans and broadly to the legislative framework as it now exists. Key elements in the brief for the research also included:

- The central position of development plans in the planning system
- The importance of the quality of development plans.

The research programme was very simply structured, being based on the holding of seven focus groups of planners and plan users throughout Great Britain as the primary means of obtaining ideas from a wide spectrum of plan users in order to develop conclusions and recommendations. Those interested in the research methods and findings may wish to note that the full text of the team’s research report may be found on the internet, and is also available from Cardiff University on request:².

So far as plan making is concerned its present statutory basis dates essentially from over 30 years ago. In many other respects the planning system is over 50 years old. Whether this means that the time is ripe for a radical review of the legislation or whether a system that has proved its worth in action for so long must be considered a sound one was not, as will have been noted, part of the research remit. Rather, this document examines how quality could be best obtained using the present system as it stands.

Introduction

What is Quality?

1. Quality in development plans does not solely relate to matters of presentation and the quality of writing, but more importantly involves the very content and substance of the plans themselves. The quality of a good tool is less a matter of its appearance than whether it will do the job it is meant to do. This concept can be expressed as “fitness for purpose”, and may be usefully applied to development plans.
2. The history of development planning illustrates that the purpose of plans has changed radically from one generation to another, and, just as the purpose of plans has changed radically in the past, it may reasonably be expected to change again in the future. There can be no set pattern, valid for all time. What may have been seen as best practice a decade ago will not necessarily continue to be regarded as best practice.
3. Neither should what is right for one place necessarily be right for another. Just as no two places are quite alike, so no two plans are likely to be wholly similar as to their purpose, and therefore their content. In areas of declining fortune, or where a high rate of sustainable growth is being sought, then clearly plans will be promotional in character. Equally, where stability is desired in the face of development pressures, plans will necessarily express restriction. In some authorities, the urge for “joined-up thinking” will demand a corporate approach, whilst in others there will be more emphasis on planning as a regulatory activity seeking to mitigate or compensate for environmental damage. Each of these approaches to plan making will imply its own approach to quality, expressed as “fitness for purpose”.
4. Some of the qualities of a good plan are likely to be generally agreed, such as the importance of clarity of expression, yet it has to be remembered also that plans are used by a variety of people for a number of different purposes. Perceptions of “quality” may well differ accordingly. Plan users in different walks of life are bound to differ over such matters as the weight to place on each element of the plan, or what additional things they look for in a plan. Each will view a plan in terms of fitness for *their* purpose. So a good quality plan must satisfy a wide variety of purposes.
5. The revised Planning Policy Guidance Note 12 “*Development Plans*” contains much useful advice as to quality and on the form of plans. Some of it is repeated here, but only by way of introducing some suggested detail to the PPG advice. Some aspects of quality are also required by virtue of the Development Plan Regulations³, including in England a full environmental appraisal of each development plan.

The vision

6. A good plan is one which is fit for a clearly defined range of purposes. It will meet the needs of a changing style of planning in the next decade and the demands of changes in local government.
7. It is hoped that planning will emerge in the near future from an excessive emphasis on the plan as a guide for development control. The policy and institutional context for plan-making of the 1990s has sometimes encouraged the preparation of narrowly focused plans. Plans must now adopt a more positive role and make their own contribution to the community planning process, and a new context in which innovations such as Best Value are central to the delivery of good

quality planning. These changes will demand an evolution in the culture of plan making if plans are to be fit for their purpose in this new context.

8. In this vision of the future, statutory local plans and UDPs will be central to an increased range of activities, but they ought not to dominate them, and certainly not aim to be all-inclusive. In this future, a good development plan will be a short, succinct, easy to read and well argued document, accompanied by easy to read maps and plans.

In particular, it will:

- be clear as to its aims and objectives, and explain itself, being based on sound reasoning from good survey and analysis;
- based on that survey and analysis, set out its basic policy, which will include a clear spatial expression of its strategic vision, (which in UDPs, will be in Part I);
- clearly tie into the community strategy, visibly taking forward particular key policy themes;
- be up-to-date and capable of ongoing monitoring;
- continue to adequately fulfil the role of providing a basic guide not only for development control, but also for a range of other functions;
- underpin and legitimise action for economic, social and environmental ends (without spelling this out in unnecessary detail);
- not be a document that attempts to do too much; but rather, be a document which does those things which it does attempt well;
- overall, be a document that people will find easy to read and perhaps even enjoy reading.

Institutional change in Local Government

9. Local government in Great Britain is currently experiencing considerable institutional change. These changes are both internal and external, and their importance to planning and the preparation of plans should not be minimised. Externally, reorganisation has created new and amended patterns of local government, not least in Scotland and Wales. In the regional field in England, the creation of Regional Development Agencies, the prospect of new Regional Chambers and the re-vamping of Regional Planning Guidance will inevitably impact on the content of all development plans, as will the review and revision of policy guidance by DETR and the Welsh Assembly.
10. Internally, the Government's modernisation of local government continues to result in significant change, including: the introduction of new democratic structures; the challenge of interactive and responsive service provision; e-government; and, fundamental to planning, the institutional separation of plan-making from routine development control. The new duty on local authorities to prepare a community strategy, when taken with the promotion of Best Value, presents challenging, but exciting opportunities for planners to demonstrate the relevance of the development plan to corporate approaches to policy and service delivery. Local planning authorities must rapidly understand and respond to the need to practice new and challenging forms of development planning.
11. At the heart of Best Value is a concern that public services should address the needs of users in a cost-effective way. To do this they must be based on sound information, continuing dialogue,

clearly defined purposes and efficient management of scarce resources. These are principles that must infuse development planning if the quality of plans is to improve.

12. These exciting changes in local government coincide with reviews of development plans in many areas. A tranche of post 1991 plans is now being reviewed. This guide aims to build on the lessons learnt in producing them, as well as drawing on user-views of current development plans.

The characteristics of a good plan

13. The present generation of plans derives from the “plan-led system” of the 1990s. The “system” that was to be “plan-led” was the development control system. But the desired new approach to planning needs statutory planning to fulfil a much wider remit of purpose compatible with the broader, more corporate, approach of “Best Value” and community planning. This is in fact quite a long list of purposes. So a *good development plan is one which:*

- *Is well related to other plans, both hierarchically and horizontally;*
- *Expresses a spatial interpretation of a commonly held vision;*
- *Adequately guides (but, as we shall later argue, does not attempt to anticipate) development control decision making;*
- *Gives long term guidance to the plan making and investment of other public sector organisations;*
- *Acts as a source of information about development intentions, guiding investment decisions by the private and the voluntary sectors;*
- *May (if required as such) act as marketing or boosting tool, attracting investment, visitors or general interest in an area; and*
- *By setting out the locations in which community and other action may take place and the essential parameters of policy which relate to that action, both legitimates and guides that action.*

14. Following this introduction, the guide continues with some suggestions as to the shape of a good plan. Further guidance is then provided, first on quality of substance, then on quality of presentation. This advice is offered in the hope that it will be of use in a number of roles: in the training of plan-makers, in the process of drafting and reviewing plans, and, in particular in the essential process of *critical audit* and peer review of plans. *A good plan is one that has been subjected to, and improved by, critical audit.* Critical audit of plans will result in refinement and improvement of draft and review plans by encouraging the assessment of individual or groups of policies. Outdated, irrelevant and ill-conceived policies should be deleted, and central policies should be subjected to a rigorous process of critique.

The shape of a good plan

Brevity

15. A good plan is one that does not attempt to be a “one stop shop”, does not needlessly repeat policy material already in PPGs or other Government guidance, and does not attempt to have a policy to cover every possible development control exigency. New style plans, prepared in accordance with this advice, will be much slimmer and briefer than their predecessors.

Form

16. The Regulations require that the written statement of a local plan or UDP Part II must contain two main elements: the authority’s policies and proposals for the development and use of land, and the reasoned justification of those policies and proposals. There are also formal requirements for plans to have a title comprising the name of the area of the authority and the type of plan, and also the keeping of records of the status of the document and its date of adoption and any alteration.⁴
17. A plan should, broadly following PPG12, begin with an introduction which makes clear what is its role and purpose and briefly explains the planning framework within which it is prepared, that is the background of national and regional policies and, where appropriate, of structure plans. This will be accompanied by a brief explanation of the plan’s relationship with the authority’s other policies, programmes and management strategies, and with the planning policies of neighbouring authorities. Each plan should also include in its introduction a clear and concise statement of its main aims, objectives and targets, and the strategy for achieving them having regard to the likely level of resources available in both the private and the public sectors. It is in this context that the basic strategy and vision of the authority should be found, if it is not already clear from the national and regional background, etc. The authority’s priorities forming the background to all of its plans and decision making should also be clear in this introduction⁵.
18. This introductory material needs to be brief, yet it needs to fulfil the criterion that *a good plan is one that explains itself*. Brief reference may be made to the survey material gathered by the authority and its availability, to the dialogue and consultations undertaken, to the sustainability and environmental appraisals undertaken and to the alternative plans and policies considered. Most of this material will be published alongside the plan, but nevertheless, in the interests of comprehensiveness, as well as openness, it may well be useful for lists of this material to be published as an annex to the plan.
19. The introductory material may perhaps contain a very brief reference to the statutory relationship of the plan to development control and to the fact that the other material considerations to which regard is had cover a very wide span. This could also be the opportunity to introduce the “check list” of the most common considerations, neighbourliness, good design, etc. which, if the advice of this guide has been followed, will have been excised from development control policies. The check list itself could form an annex to the plan, with an explanation of its status, and appropriate cross-referencing to areas or sites allocated in the plan.
20. The introduction will be followed by topic chapters in which policies and proposals will be introduced by, or supported by, their reasoned justification, and any necessary explanation.

Policies, proposals and their reasoned justification should be capable of being read as one continuous narrative, although it is often useful for policies and proposals to be readily distinguishable from the supporting material.

21. Policies and proposals of all development plans should be expressed in a form that will facilitate monitoring and review. The reasoned justification should include an indication of how monitoring and review are to be carried out, emphasising the critical features upon which the plan is based⁶. It is useful for each topic chapter to contain relevant targets and indicators, which may then be brought together in a chapter on monitoring if it is necessary. This chapter may also briefly set out the processes involved.
22. If the chosen layout is a conventional one containing chapters on such topics as economic development, housing, sustainable transport patterns and so on, it may be found useful to add sections on *selected* areas of the plan which bring together the policies and proposals of the topic chapters as they affect these areas. Such sections will be essential where proposals are made for urban regeneration, whether by way of proposing action areas or otherwise.

Quality of Substance

The classical virtues

23. PPG12 states that “Plans need to be clear, succinct and easily understood by all who need to know about the planning policies and proposals in the area”⁷. Few would dispute that the “classical virtues” of clarity of objectives, of expression and of proposals should be found in every good plan. Clarity is to a large extent a matter of presentation but clarity of expression cannot be dissociated from clarity of thought, which underlies all that this guide has to say about quality of substance. There may be occasions where ambiguity is politically expedient and so introduced deliberately, but there can be no excuse for the inadvertent introduction of ambiguity. Also among the “classical virtues” must be soundness of reasoning and of the factual base, and also being up to date.
24. If it should be necessary to use technical terms, then these should be explained in a glossary, as PPG12 advises⁸.

Survey and dialogue

25. Effective plan-making is based on proper and adequate survey. In the anticipated conditions in which planning will attempt a positive role, yet be primarily dependent for the execution of that role on the actions of others, it will be even more important that there is a proper understanding of the economic, environmental and social considerations that necessarily underlie plan making. In times of scarce resources it is vital that planners are clear about their priorities for surveys and information gathering. These will derive in large measures from an evaluation of how the current plan is operating, demonstrating the value of critical appraisal.
26. Of course, not all of this can be expected from the internal resources of even the most intellectually well-furnished local planning authority. Proper understanding of the economic, social and environmental considerations can only come through the establishment of dialogue with all those concerned. This means dialogue with those in the private sector, others in government and the public. The dialogue, if carried on effectively, will include the exchange of views and information and also be the occasion of mutual persuasion. Local planning authorities may also consider allocating small, yet sufficient, budgets for the buying-in of expert research and advice.
27. *A good plan is one which is firmly based on proper dialogue between all concerned with the economic, social and environmental considerations that necessarily underlie plan making. A good plan is also one that is based on proper and adequate survey.*
28. A good plan will make it clear that dialogue has been undertaken and surveys completed, and that the proposals and policies of the plan are based on sound analysis. *A good plan is therefore one that is founded on sound analysis of the relevant economic, social and environmental considerations. Above all, a good plan is one that explains itself.*

Monitoring

29. The present emphasis on “plan, monitor and manage” necessarily embraces continuous monitoring, and so, to paraphrase PPG12⁹ — *a good plan therefore is one that facilitates continuous monitoring by expressing its policies and proposals in a form that will facilitate*

monitoring and review. This may take the form of setting out of policy related targets and comparable indicators which will provide an early warning of any further action that is required.

Consistency

30. Given the broader, more corporate, approach of “Best Value” it is self-evident that *a good development plan is one which is well related to other plans, both hierarchically and horizontally.* Consistency between plans is possibly one of the most difficult elements to achieve in practice. Plans have to be prepared in the changing context of regional and sub-regional guidance and often despite the continuous evolution of government policy and EU initiatives such as the ESDP¹⁰. There is less excuse, however, for inconsistency between a development plan and other plans (including the community strategy) being prepared by the same local authority. Additional guidance on the relationship between development plans and community strategies is provided below.

RPG and Structure Plan Policy

31. Local plans and UDPs have a responsibility in carrying forward the policy of RPG and, in the case of local plans, their structure plans. This means that *a good plan is one that interprets RPG and structure plan policy (where appropriate) on the ground, having regard to local conditions.*
32. In this function of expressing spatial vision it is insufficient for plans simply to repeat the policy of RPG and structure plans. Plans need to illustrate how that policy is to be worked out on the ground. For example, a structure plan policy that states “provision will be made for the expansion of existing firms within or adjacent to the built-up area of settlements” requires suitable areas to be identified within a local plan and allocated on a proposals map. It is this process of identification and allocation of suitable sites within a locality that is the essential function of local plans and unitary development plans.

Spatial interpretation of vision

33. A good plan is not just the local expansion of the spatial content of RPG and the structure plan and the local interpretation of their policies. *A good plan is one that also expresses a spatial interpretation of a commonly held vision (governmental or otherwise) for the future of a place.* This will become increasingly important in the era of community plans. The unique contribution of land use planning is that it integrates *where* things ought to happen and says *where* they should not. A plan must be more than a compendium of policies, indexed on a proposals map. It should be clear as to its spatial strategy, indicating, for example, the directions of desired growth and its locations. It may also point to the areas in which regeneration of one sort or another is both needed and is practical in the plan period. Beyond this, it needs to make adequate allocations of sites for all of the commonplace land using developments, not forgetting that mixed uses may often be more desirable than single use zones. Well founded strategy can then act as the foundation for detailed consideration.

A guide for Development Control

34. We come now to the principal function of most existing development plans. *A good plan is one that adequately guides development control decision-making.* This does not mean attempting to anticipate or pre-empt every development control decision, as can be seen from the two principal statutory provisions which relate development control to the development plan, taken from the 1990 Act:

S.70 (2) In dealing with (an application for planning permission) the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations;

S.54A Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

35. It is clear that the Act does not expect the development plan to be the be-all and end-all of development control. Indeed, recognition of “other material considerations” is one of the main contributions to the planning system of the 1947 Act, from which the first of the above is derived. It is not necessary to have policies for everything. It is sound argument that justifies challenged decisions, and a policy not based on sound argument may not get far in its application. It certainly ought not to. Development control as practised in Britain is a professional skill and an administrative art and cannot be done in advance.
36. There is more than a presentational point in the number and coverage of policies. The fewer there are, the more likely each is to be known widely and held in respect. *Another test of a good plan is that the presence of every policy can be justified by the test of necessity, and policies have not been added for political or other convenience.* As PPG 12 states, the written statement of a plan should be “clear and concise and limited to those policies and proposals which genuinely provide a strategic framework”. The strict application of this test of necessity will prove challenging and it must command respect from all involved in plan preparation.

“Planning gain”

37. It is hoped that the Government’s “modernising planning” agenda will soon include the modernising of advice in respect of the contentious field of “planning gain”. The Institute is playing a leading consultative role in this respect. Whatever the outcome of the current consultative process, it is desirable that development plans should provide the “ground rules” for the conclusion of s.106 agreements. Further consideration of the way development plans address the matter of planning gain will be needed.

Guidance and Information for others

38. *A good plan is one that provides long term guidance to the plan making and investment of other public sector organisations. A good plan also acts as a source of information about development intentions, guiding investment decisions by the private and the voluntary sectors. This information should not only be about location, but give clear statements about priorities.* It may be expected that a local authority should respect its own development plan but it also ought to be possible for others without such a commitment of loyalty to find a development plan helpful. Private sector infrastructure providers will wish to know of future commitments, for example of area regeneration, where the renewal of infrastructure is a necessary part of the package. Similarly, voluntary bodies may look to the plan for guidance as to the planning of their own activities. Clearly this cannot be simply a top-down activity if the plan is to be held in respect by such providers and effective dialogue is essential.

Setting Priorities

39. The strategy of plans should always make clear their approach to the resolution of conflicts by setting out priorities and objectives that, in particular circumstances, will carry more weight than others. Clear statements of priorities can often be valuable in maintaining the relevance of the development plan despite the changes of circumstance which are inevitable with the passage of time.
40. The priorities that a good plan expresses will be informed by the vision that underlies the plan. No allocation of land for development, and no expression of policy can expect to provide for all future exigencies. It may be, for example, that the vision or general strategy of an older industrial

town will be one of economic regeneration, in which proposals for investment will always be given a favourable hearing.

Marketing the area and boosting the economy

41. Not every local planning authority has an interest in marketing its areas in order to attract investment, visitors or general interest. Nevertheless, many do, and they should be able to find something in their plans that is attractive, from information on the location of sites for development to proposals for a central area regeneration which would make the most of historic features. Or it could be that the vision, expressed in the background to the plan, establishes, in a broad brush way, the opportunity for a market response. *So a good plan may (in appropriate circumstances) be one that acts as marketing or boosting tool, attracting investment, visitors or general interest in an area.*

Legitimising plans for action

42. By setting out the locations in which community and other action may take place and the essential parameters of policy which relate to that action, a good plan will both legitimate and guide that action. Nevertheless, it is a mistake to expect a statutory plan to provide all the guidance that is needed for action for change of any sort.
43. Authorities may designate action areas under the 1990 Act. Even if they do not, a *good plan should seldom if ever attempt to provide all the detail that is needed for positive action in an area.* This detail may be generated in a variety of ways: through the preparation of development briefs as supplementary planning guidance, or through the initiative of developers or community groups presenting indicative plans for public consultation and approval. *The role of the statutory plan is to identify the areas for priority action and provide for them a statutory platform for action, legitimating it and guiding it by setting out essential parameters of policy.* This means that plans should contain such *minimum* of policy as is necessary to ensure that the action complements the general strategy of the plan and to secure essential neighbourliness. The statutory development plan therefore provides a spatial foundation that is related well to other strategies and plans for action.
44. The duty upon local authorities to prepare a community strategy will require local planning authorities to dedicate special attention to the relationship between the community strategy and the development plan. There is a danger that the nature of community strategies will deflect public and local authority attention away from the essential functions of the statutory development plan, which despite all positive efforts will require lengthier preparation and appear less responsive to community demands. Yet the development plan can make a positive contribution to corporate activity and can serve as a vehicle for the delivery of the community strategy. To do this, the development plan must tie in with the community strategy and will also provide useful input into its formulation and review, particularly in ensuring a strong geographical and spatial component to the strategy. *A good plan is one which is clearly founded in the community strategy for the area, and is visibly one of the key vehicles for its delivery.*

Degree of precision

45. The extent to which plans are able to provide certainty is the subject of debate. The planning system as a whole has flexibility built into it as a result of the statutory necessity to have regard to material considerations other than the development plan. Each planning application has to be considered on its own merits, and, moreover, the legislative system makes ample provision for departures to the plan to be approved, as well as permission to be denied to proposals that accord with the plan. Therefore, development plans should never give the impression of a certainty that they cannot deliver.

46. There is, however, scope for variation in the degree of certainty offered. In every plan there will be a place for certainty, and also a place for a more relaxed approach. For example, in an area of countryside conservation of national or international importance, strict control should be implied, whereas in other countryside areas a more relaxed approach to rural economic diversification might be thought in order. A plan, whether flexible or otherwise, should be robust, in the sense that its integrity and underlying strategy will not be undermined by a degree of flexibility in decision making.

“Density of policy expression”

47. A corollary of this argument relates to what may be called “the density of policy expression”. If there is an implied assumption that plans should express the same level of control throughout their area, then it needs little thought to appreciate that such an assumption is wholly unjustified and in fact not carried through to practice. The extent of control should vary according to the circumstances - there will be areas for action in which special considerations will apply which contrast with much larger areas where not a lot needs to be said. *A good plan therefore is one that tailors density of policy expression to the varied circumstances of every part of its area.*

Quality of presentation

Clarity of expression

48. Clarity of written and visual expression is one of the classical virtues of a plan. Good command of the English language (or, where appropriate, the Welsh language) is an obvious starting point. The formatting of text and the graphical presentation of policies in plans may be equally important to clarity of expression. The Regulations¹¹ require that “the reasoned justification shall be set out so as to be readily distinguishable from the other contents of the plan”. This can be done both by the proper use of language and the use of a different typeface for the expression of policies. Planning Policy Guidance Notes make no use of such typographical devices, yet remain potent sources of policy material. However, the use of development plans in practice makes the distinct formatting of policies and proposals both convenient and useful. It may also assist in concentrating plan-makers' attention on the essence of individual policies. Where changes in typeface are used, they should be used to give emphasis to expressions of policy, but should not disrupt the flow of argument. *A good plan is one written in ordinary plain language that is capable of being read with interest and understanding. Through sound reasoning its policies and proposals will command respect, even if they are not agreed by all.*

Maps and illustrations

49. *Clarity should also extend to the maps that illustrate and form part of development plans, particularly the proposals map required by the Regulations. This does not mean a return to the rigidity of the standard notations that were required of plans submitted for approval under the 1947 Act regime¹². Nevertheless, it ought to be possible for any competent map reader to gain useful information from a proposals map without constant reference to the key or to the written policies themselves. The use of schematic diagrams may assist in the understanding of plan strategy, though it should be made clear that these do not have the formal status of the proposals map itself*
50. There is no reason why a map should not also look good in itself. Map drawing is an art, but thought should be given not only to the quality of maps in artistic terms, but also to ease of use by people whose eyesight is poor or who are colour blind. Therefore, tiny and indistinct print, complex patterns of hatching and the use of commonly confused colours are best avoided. *A good plan is one that contains maps which both look good and are easily readable.* Moreover, to aid planners in this aim, *the development of a common language for map presentation is, in our opinion, very desirable*, and this is therefore one of our recommendations.

Section 54A and “criteria based policies”

51. In the light of s.54A of the 1990 Act¹³ an aspect of clarity is that any normally well-informed person making or considering a development proposal ought to be able to tell from it what its status is “in accordance with the development plan”. However, much time is spent at appeal inquiries arguing this very point. The matter would become of particular concern if initiatives to limit the currently discussed right of third party appeal to decisions which depart from development plans were to come to fruition¹⁴.

52. Difficulty in ascertaining whether a development proposal accords with the plan or not cannot ever be totally expunged from the system. Nevertheless its incidence ought to be severely reduced; *a good plan is one which enables development proposals which accord with it to be readily distinguished from those which do not*. One cause, internal inconsistency within plans, is inexcusable. Another more complex cause lies in the common use of “criteria based policies” as, for example, is advocated in PPG12 at paragraph 3.12. A select number of carefully crafted, criteria-based policies can assist in producing slimmer plans and ensuring the relevance of plan policies for extended periods. Useful examples are presented in the Planning Officers Society guide to the writing of effective criteria for policies¹⁵.

53. The word *criterion* means “principle or standard that a thing is judged by”¹⁶ and “fitness for purpose” should be construed accordingly. Criteria, based on the definition provided, should be capable of being applied without the need for additional appraisal. Effective criteria should also be capable of being interpreted without significant disagreement as to their being satisfied. This is, unfortunately, common and many criteria-based policies suffer from being too vague, too specific, or requiring further appraisal. For example, a policy may state that planning permission will be granted for extensions to residential properties in the countryside, subject to a number of criteria including that they:

- (a) are sympathetic to the character of the original building and do not substantially increase its size;

This example would require further appraisal of whether the proposed extension is sympathetic to the character of the original building and whether it amounted to a substantial increase in size, which to a large degree are bound to be subjective and on which one professional opinion may well legitimately disagree with another.

54. *Therefore, for criteria based policies to be “properly framed” in order “to judge planning applications in a broad range of circumstances” they must be capable of being used without a need for further appraisal*. The following are examples of criteria that are capable of being used in such a manner:

- (a) the development will not involve the loss of the best and most versatile agricultural land;
- (b) the site enjoys ready access to the primary road system;
- (c) areas of nature conservation value or geological interest are not affected by the proposals;

These criteria are clear, precise and may be commonly agreed upon as being satisfied or not for any particular development proposal. This is not to say that “check-list material” has no place in planning control. It is only right that such material should be publicly available, and it needs to be somewhere in the plan, perhaps as introductory or explanatory material indicating the general nature of some of the “other material considerations” that always temper the sharpness of formal policy.

A “one-stop shop”?

55. A development plan should not attempt to be a “one-stop shop”. Inevitably a local plan or a UDP is one document among many: statutory instruments, circulars, RPGs, PPGs, structure plans (where appropriate) local transport plans, community plans and supplementary guidance of every kind. For this reason an educational role cannot have a place in the list of functions of a plan. That, along with explanation to individual groups of users of the plan system, can only sensibly be filled by explanatory material produced outside the statutory system. Advice on “popular” versions of a plan is to be found in PPG12¹⁷.

56. PPG12 makes it abundantly clear that plans should not repeat large sections of national policies such as those in the PPGs. It is not impossible for a local planning authority to propose a policy which departs from national guidance if they have a good reason so to do, yet there is no good reason for wasting time and space in producing homespun versions of national policies. *A good plan is one that, in the words of PPG12 at paragraph 3.1, is clear, succinct and is easily understood by all who need to know about the planning policies and proposals in an area.*

The internet

57. The Development Plan Regulations require that “printed copies” of adopted plans should be available for inspection and purchase¹⁸. It may be many years before the authoritative plan instrument ceases to be a paper document, but this must not exclude rapid progress by all local planning authorities to use the internet to bring their plans before professional audiences and an increasing number of suitably equipped private citizens. This facility will first have importance in web sites that explain local plan material and in facilitating dialogue, consultation and public deposit. Advice on the optional use of Geographic Information Systems (GIS) technology that allows local planning authorities to make plans available in computerised form is to be found in PPG12¹⁹.

References

- ¹ Stephen Crow, Alison Brown, Sue Essex, Huw Thomas and Chris Yewlett, 1997. *Slimmer and swifter: a critical examination of district wide local plans & UDPs*. London: the Royal Town Planning Institute.
- ² Stephen Crow, Neil Harris, Huw Thomas and Chris Yewlett, 2000, “*Fitness for Purpose*”: *Report of Research Commissioned by RTPI on the Quality of Development Plans*, Cardiff: Department of City and Regional Planning, Cardiff University.
On internet at:
<http://www.rtpi.org.uk>
- ³ Town and Country Planning (Development Plan) Regulations, 1991 (S.I.2794)
- ⁴ *Ibid*, at paragraphs 4(1) and 28(1) respectively.
- ⁵ PPG12: Development Plans 18 January 2000, at paragraphs 13 and 14.
- ⁶ *Ibid*, paragraph 2.17.
- ⁷ *Ibid*, paragraph 3.1
- ⁸ *Ibid*. Annex A at paragraph 16
- ⁹ PPG12 at paragraph 2.17.
- ¹⁰ Committee on Spatial Development. *European Spatial Development Perspective. Towards Balanced and Sustainable Development of the Territory of the European Union*. Luxembourg: European Commission 1999.
- ¹¹ Regulation 7 of both sets of Development Plan Regulations (*ibid.*).
- ¹² Ministry of Town and Country Planning 1948.
- ¹³ S.54A. “*Status of Development Plans*
“Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”.
- ¹⁴ Baker, L. 2000. “Call to restrict third party appeal rights”. *Planning* No.1363, 7 April 2000.
- ¹⁵ Planning Officers Society (POS).. *Better Local Plans. A Guide to Writing Effective Policies*. London; POS, 1997; p.17.
- ¹⁶ *Concise Oxford Dictionary*.
- ¹⁷ PPG12, Annex A at paragraph 31.
- ¹⁸ *The Development Plan Regulations (ibid.)*, Regulation 27.
- ¹⁹ PPG12 Annex A at paragraph 30.