



**NOTE TO INSPECTORS ON THE MATTER OF STRATEGIC POLICIES**  
**9 March 2018**

*This note provides some further explanation of the JLP's use of strategic policies, but also sets out some alternative approaches, given reservations the inspectors have expressed about how some of these being presented as 'policies'.*

## **I. Explaining our preferred approach**

- I.1 The plan includes three main types of policy:
- Strategic Policies – which are designed to set the key principles for the Plan Area and for each of the Policy Areas, and also identify the needs that the plan seeks to meet.
  - Site Specific Policies – which include site allocation policies as well as policies for the management of change, for environmental purposes, and for safeguarding.
  - Development Policies – which are general policies for development management purposes, usually covering the entire Plan Area.
- I.2 The plan is designed to be read as a whole, with the more detailed policies fleshing out the strategic policies to aid decision-making on future planning applications and other planning decisions.
- I.3 We believe this approach helps achieve a genuinely strategic spatial plan, something that is supported by the Framework which identifies the place shaping role of local plans and says that they should set 'a positive vision for the future of the area' (para 17, first bullet point).
- I.4 We think that there is a clear logic in the approach we have taken, and we are able to explain this logic through a relatively simple diagram which shows how our 12 Strategic Objectives (each of which has an associated Strategic Outcome and Measure of Success) relates to the suite of policies. See Appendix.
- I.5 In putting forward our approach, we are aware of potential difficulties arising from Framework para 154, depending on how this is interpreted. However, we think it is appropriate to interpret para 154 within the context of other provisions of the Framework. Indeed, the Framework itself suggests that its provisions need to be 'taken as a whole' (para 6).

- I.6 We also note that the Framework (*our emphasis* highlighted below) sets out that:
- Plans should provide a *practical framework* within which decisions on planning applications can be made (para 17, first bullet point)
  - Plans should set out a *clear strategy* for allocating sufficient land (para 17, third bullet point).
  - Local Plans are key to delivering sustainable development that reflects the *vision and aspiration of local communities* (para 150)
  - Local Plans *should include strategic policies for the area* in relation to meeting needs and delivering sustainable development (para 156).
- I.7 Furthermore, the NPPG (again, *our emphasis* highlighted) provides further guidance, setting out that ‘Local Plans should be *tailored to the needs of each area* in terms of their strategy and the policies required. They should focus on the key issues that need to be addressed and be aspirational but realistic in what they propose’ (paragraph: 002 Reference ID: 12-002-20140306). The NPPG goes on to say that ‘They should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them ....’ (paragraph: 010 Reference ID: 12-010-20140306).
- I.8 When all of this is taken as a whole, we believe that national policy suggests that there is a degree of local determination as to what a policy can include, and that there is an expectation that plans will provide different types of policies, including strategic policies and setting frameworks for development. We therefore think that it is a fair interpretation of para 154 to suggest that it is referring to the policies of a plan taken as a whole as well as individually. Otherwise it will be difficult to put in place policies to do the more strategic things the Framework is anticipating, and which genuinely deliver a vision and shape place.
- I.9 We note too that the Framework review consultation draft (published on 5 March 2018) is proposing some changes that seem positive in relation to the approach we have taken. It makes an even clearer distinction between ‘strategic policies’ and what it calls ‘local policies’. Significantly it says that strategic policies ‘provide a clear starting point for any local policies that may be needed’ (para 21), which is precisely how we have designed out strategic policies to work. Para 20 suggests that these policies, amongst other things, provide an ‘overall strategy for the pattern and scale of development’, which is what we intend our strategic policies to do. The wording of the last sentence of Framework para 154 is also proposed to be modified by para 16d). This significantly changes the emphasis of the original text and perhaps adds some clarity to its original intention.
- I.10 In our Matter Statements we have tried to demonstrate how our strategic policies, in combination with other policies of the plan, provide a clear indication of how a decision maker should react to a development proposal. For example see:
- Para 2.21 of our Matter 2 Statement
  - Para 4.71 of our Matter 4 Statement

- Para 7.4 of our Matter 7 Statement

1.11 Additionally, we feel our strategic approach is compatible with the three key tests of para 182, in that:

- The combination of different policy types sets a positive strategy for place shaping and delivering our vision, setting this within a framework for sustainable development ('positively prepared').
- The strategic policies help establish the plan as being to deliver the most appropriate strategy as justified by our proportionate evidence base ('justified').
- The strategic policies are deliverable because they define the overall direction of travel and work in combination with the wider policy framework of the plan to bring about the preferred strategy. Additionally, they create some inherent flexibility in the plan, setting the more detailed site allocation and development policies in the context of a 'bigger picture', which is helpful in the event of changed circumstances ('effective').
- As explained above, we feel that the approach we have taken to these policies is justified in the context of the Framework and NPPG ('consistent with national policy').

1.12 In summary, we are hoping that you will find that our approach is permitted by national policy and that it is not unsound. However, in the event that you do find our approach unsound we are keen to maintain integrity in how the plan is structured, based around 12 Strategic Objectives (with their associated Strategic Outcomes and Measures of Success) and delivering a genuinely spatial approach. Our three alternative options set out below are presented with this in mind.

## 2. **Alternative One – Restructure the ‘Spatial Strategy’ chapter**

2.1 This alternative involves restructuring Chapter 3 in the following way:

### 3. Spatial Strategy

What we are trying to achieve - The Spatial Strategy for Plymouth and South West Devon.

*No change*

What we are going to do - our principles to deliver the spatial strategy

*New section taking some of content from original ‘our policies to deliver the spatial strategy’ section – see below*

What we are going to do - our policies to deliver the spatial strategy

*Revised based on original ‘our policies to deliver the spatial strategy’ section – see below*

How we will know we have been successful - our measures of success for the spatial strategy

*No change*

2.2 The new section (*‘What we are going to do - our principles to deliver the spatial strategy’*) would bring together in one place the ‘policies’ that identify the key principles and objectives of sustainable development that the plan is seeking to deliver. However, we suggest calling them ‘Spatial Principles’ rather than policies. See below.

<b>As in Submitted JLP</b>	<b>Alternative One</b>
Policy SPT1 – Delivering sustainable development	Spatial Principle 1– Delivering sustainable development
Policy SPT2 – Sustainable linked communities and sustainable rural communities	Spatial Principle 2 – Sustainable linked communities and sustainable rural communities
Policy SPT9 – Strategic principles for transport planning and strategy	Spatial Principle 3 – Strategic principles for transport planning and strategy

2.3 The revised section (*‘What we are going to do - our policies to deliver the spatial strategy’*) would retain the strategic policies relating to identifying and meeting development needs, the distribution of those needs, together with other key strategic policies about connectivity, transport, the environment and infrastructure. See below.

<b>As in Submitted JLP</b>	<b>Alternative One</b>
Policy SPT3 - Provision for new homes	Policy SPT1 - Provision for new homes
Policy SPT4 - Provision for employment floorspace	Policy SPT2 - Provision for employment floorspace
Policy SPT5 - Provision for retail development	Policy SPT3 - Provision for retail development
Policy SPT6 - Spatial provision of retail and main town centre uses	Policy SPT4 - Spatial provision of retail and main town centre uses
Policy SPT7 - Working with neighbouring areas	Policy SPT5 - Working with neighbouring areas
Policy SPT8 - Strategic connectivity	Policy SPT6 - Strategic connectivity
Policy SPT10 - Balanced transport strategy for growth and healthy and sustainable communities	Policy SPT7 - Balanced transport strategy for growth and healthy and sustainable communities
Policy SPT11 - Strategic approach to the natural environment	Policy SPT8- Strategic approach to the natural environment
Policy DEV21 - Conserving the historic environment	Policy SPT9 - Strategic approach to the historic environment (see EXC10Ai, ref M346)
Policy SPT12 - Strategic infrastructure measures to deliver the spatial strategy	Policy SPT10 - Strategic infrastructure measures to deliver the spatial strategy
Policy SPT13 - European Sites – mitigation of recreational impacts from development	Policy SPT11 - European Sites – mitigation of recreational impacts from development

### 3. **Alternative Two – Separate ‘strategic policies’ from ‘spatial principles’ *in situ***

3.1 This is a variation of Alternative One. Instead of splitting the current section called ‘*What we are going to do - our policies to deliver the spatial strategy*’ into two sections, the spatial principles could simply be identified in their current location. The order would therefore be as follows.

<b>As in Submitted JLP</b>	<b>Alternative Two</b>
Policy SPT1 – Delivering sustainable development	Spatial Principle 1– Delivering sustainable development
Policy SPT2 – Sustainable linked communities and sustainable rural communities	Spatial Principle 2 – Sustainable linked communities and sustainable rural communities
Policy SPT3 - Provision for new homes	Policy SPT1 - Provision for new homes
Policy SPT4 - Provision for employment floorspace	Policy SPT2 - Provision for employment floorspace
Policy SPT5 - Provision for retail development	Policy SPT3 - Provision for retail development
Policy SPT6 - Spatial provision of retail and main town centre uses	Policy SPT4 - Spatial provision of retail and main town centre uses
Policy SPT7 - Working with neighbouring areas	Policy SPT5 - Working with neighbouring areas
Policy SPT8 - Strategic connectivity	Policy SPT6 - Strategic connectivity
Policy SPT9 – Strategic principles for transport planning and strategy	Spatial Principle 3 – Strategic principles for transport planning and strategy
Policy SPT10 - Balanced transport strategy for growth and healthy and sustainable communities	Policy SPT7 - Balanced transport strategy for growth and healthy and sustainable communities
Policy SPT11 - Strategic approach to the natural environment	Policy SPT8- Strategic approach to the natural environment
Policy DEV21 - Conserving the historic environment	Policy SPT9 - Strategic approach to the historic environment (see EXC10Ai, ref M346)
Policy SPT12 - Strategic infrastructure measures to deliver the spatial strategy	Policy SPT10 - Strategic infrastructure measures to deliver the spatial strategy
Policy SPT13 - European Sites – mitigation of recreational impacts from development	Policy SPT11 - European Sites – mitigation of recreational impacts from development

### 4. **Alternative Three – Apply the language of the Framework review (consultation draft) to the ‘strategic policies’**

4.1 This alternative takes a lead from the proposed changes to the Framework and renames as ‘strategic’ the policies that meet the proposed definitions in para 16 of the consultation draft review (i.e. Strategic Policy SPT1; Strategic Policy SPT2; Strategic Policy SPT3 etc).

- 4.2 The policies that we think would be affected by this change are set out below. Please note that we are no longer proposing that the spatial priority policies for the Main Towns in the TTV Policy Area (TTV4, 7, 12, 16, 20, 25) are referred to as policies, including as strategic policies. However, we are proposing to retain the information within the plan, with the spatial priorities for each town set within a box to highlight them. See EXD5v, reference HM25.

<b>Strategic policies</b>	<b>Relevant ref from draft Framework</b>
SPT1 – Delivering sustainable development	20 a)
Strategic Policy SPT2 – Sustainable linked communities and sustainable rural communities	20 a)
SPT3 - Provision for new homes	20 a) b)
SPT4 - Provision for employment floorspace	20 a) b)
SPT5 - Provision for retail development	20 a) c)
SPT6 - Spatial provision of retail and main town centre uses	20 a) c)
SPT7 - Working with neighbouring areas	20 a)
SPT8 - Strategic connectivity	20 d)
SPT9 – Strategic principles for transport planning and strategy	20 a) d)
SPT10 - Balanced transport strategy for growth and healthy and sustainable communities	20 d) e)
SPT11 - Strategic approach to the natural environment	20 a) f)
DEV21 - Conserving the historic environment (see EXC10Ai, ref M346 which proposes moving this and renaming as ‘strategic approach to the historic environment’)	20 a) f)
SPT12 - Strategic infrastructure measures to deliver the spatial strategy	20 d)
SPT13 - European Sites – mitigation of recreational impacts from development	20 f)
PLY1 – Enhancing Plymouth’s strategic role	20 a) b) c) d) e)
PLY2 – Unlocking Plymouth’s growth potential	20 a) b) c)
PLY3 – Utilising Plymouth’s economic assets	20 b)
PLY4 – Protecting and strengthening Devonport Naval Base and Dockyard’s strategic role	20 b) d)
PLY5 – Safeguarding Plymouth’s mineral resources	20 d)
PLY6 – Improving Plymouth’s city centre	20 a) b) c) d) e) f)
PLY20 – Managing Plymouth’s waterfront	20 a) b) c) d) e) f)
PLY21 – Supporting the visitor economy	20 a) b) e)
PLY22 – Cultural quarters	20 e) f)
PLY37 – Strategic infrastructure for the City Centre and Waterfront Growth Area	20 d)
PLY37 – Strategic infrastructure for the Derriford and Northern Corridor Growth Area	20 d)
PLY57 – Strategic infrastructure for the Eastern Corridor Growth Area	20 d)
PLY57 – Strategic infrastructure measures	20 d)
TTV1 – Prioritising growth through a hierarchy of sustainable settlements	20 a)

Strategic policies	Relevant ref from draft Framework
TTV2 – Delivering sustainable development in the TTV Policy Area	20 a)
TTV3 – Strategic infrastructure for the Main Towns	20 d)

- 4.3 A variation on this alternative would be to group all the strategic policies in the same part of the plan, with the local policies for Plymouth Policy Area, TTV Policy Area and the Development policies kept separate.

## 5. Conclusions

- 5.1 We are very happy to flesh out any of these alternatives in more detail should this be helpful to your considerations.
- 5.2 Of the alternatives that we have identified, we are most supportive of Alternative Three given that it is the one that reflects most closely the way we had intended the plan to operate.
- 5.3 If it was a choice between Alternatives One and Two, we think this is a finely balanced judgement. Alternative Two keeps the basic structure and order of the plan in place, and that structure and order does have some logic to it. However, Alternative One is perhaps a less confusing solution, by the way it separates out principles from policies. In the event that you reject Alternative Three as a sound solution, we would therefore marginally favour Alternative One.

**APPENDIX 1: PLAN STRUCTURE IN SUBMISSION PLAN**

