### Report No. 01/12 National Park Authority

#### **REPORT OF Director of Park Direction and Planning**

#### SUBJECT: The Call for Evidence 'Towards a Welsh Planning Act: Ensuring the Planning System Delivers'

#### Purpose of Report

To request Members authorise a response to the Welsh Government's Questionnaire on the above subject. [Appendix One is the Questionnaire, Appendix Two – Background Information].

#### Introduction

This is a consultation request with a deadline for a response of 3 February 2011.

In October 2011, the Welsh Government commissioned an Independent Review of the Planning System in Wales and set up a Group to do this. This review is to consider options on how to deliver the planning system in the future. This review work will lead to a report which will form part of the evidence base for a Welsh Planning Bill.

The Planning Bill will reconsider roles and responsibilities including that of the Welsh Government, Local Authorities and consultees eg the Environment Agency, Community Councils etc.

To be clear, this review is not about looking at the content of planning policy – but the wider context of the Planning system.

The Group has set out 23 questions it wishes to answer, and the answers will be 'evidence'. The Group is looking to find out how players in the existing planning system consider it and how it could be improved for the future.

The PCNPA is a key player in the planning system acting as a Planning Authority, setting policy through its Local Development Plan and dealing with Development Management too. It is considered by officers that as an Authority we have a worthwhile contribution to make to this review.

It is proposed that PCNPA puts forward its own response to the questionnaire – see Appendix 2 which contains a draft of possible answers, but also contributes to a 'Three Parks' response. (This work is being undertaken by Snowdonia). Your officers have also been involved in preparing a response for the Planning Officers' Society Wales (POSW).

#### Main points

Officers consider that generally the planning systems (plans and management) work in the main effectively. The Development Plans process is relatively new and therefore officers would suggest that there needs to be a period of assimilation and any major overhaul of this system would be counterproductive.

The Development Management system is perceived as being unwieldy and therefore there are suggestions for improvement to this service – namely the reduction in the need for numerous or duplicate consents (which sit alongside planning) in an attempt to speed up the process and provide clarity for users.

Question 6 regarding scoring for transparency, accessibility, timeliness and democratic accountability have been left blank for your consideration and scoring at the meeting. (1 - low, 10 - high).

#### **Recommendation**

## That the attached questionnaire responses are agreed and submitted to the Welsh Government as the PCNPA response to the 'Call for Evidence'

**Background Documents** 

Planning Policy Wales Edition Four – extract at Appendix 2 Wales Spatial Plan

(For further information, please contact Jane Gibson)

Author: Jane Gibson Consultees: Aled Sturkey (Snowdonia), Chris Morgan (Brecon Beacons), Tegryn Jones, Martina Dunne, Vicki Hirst

Appendix One – Draft Questionnaire return Appendix Two – Extract from Planning Policy Wales Edition Four – Chapter 4

#### CALL FOR EVIDENCE – RESPONSE FORM

## TOWARDS A WELSH PLANNING ACT: ENSURING THE PLANNING SYSTEM DELIVERS

The Call for Evidence invites views on how to deliver the planning system in Wales.

Please submit your comments by 3 February 2011.

#### **Data Protection**

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information. Towards a Welsh Planning Act: Ensuring the Planning System Delivers - Call for Evidence

#### RESPONSE FORM

Towards a V	Velsh Planning Act: Ensuring the Planning System Deliv Call for Evidence	ers		
11 November 2011 – 3 February 2012				
Name				
Organisation	Pembrokeshire Coast National Park Authority			
Address	Llanion Park Pembroke Dock Pembrokeshire SA72 6DY			
E-mail address	janeg@pembrokeshirecoast.org.uk			
Type (please select	Businesses / Consultants			
one from the following)	Local Planning Authority	$\boxtimes$		
	Government Agency/Other Public Sector			
	Professional Bodies/Interest Groups			
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)			
	Member(s) of the public			
	Other (other groups not listed above)			

#### SECTION A: KEY POLICY OBJECTIVES

	Do you agree that the primary purpose of the planning		No
Q1a	system in Wales is the delivery of land for sustainable development?		$\boxtimes$
Q1b	If you answered No please give your reasoning:		

Planning is more than delivering land for sustainable development. The primary purpose of the planning system is to deliver 'development opportunities' and is one of many players in the whole 'development process' (including landowners, constructors and financers) of delivering land for sustainable development.

One of its primary purposes is also to safeguard land from inappropriate development in the public interest. This is of particular importance in areas like National Parks.

The planning system has to some extent also been used to attempt to achieve non-landuse based outcomes eg welsh language, housing tenures (affordable housing) which mean that its primary function has been diluted. It is a very blunt tool with which to attempt to achieve these important non-landuse targets and is often criticised for underachieving on these objectives on which it has little direct influence. A good example of this is the actual targets for affordable housing achieved through section 106 planning obligations. The provision of such housing is only achieved when there is a prosperous residential housing market. (This relationship seems only recently to have been recognised by players in the development industry).

	If you answered YES to 1a, does PPW in paragraph 4.1.2		No
Q2a	above define sustainable development sufficiently for the purposes of legislation?		$\boxtimes$
Q2b	If you answered NO to 2a, please explain your reasoning. If p suitable alternative:	oossible, p	rovide a
achieve	able development in Wales means balancing the well being of people and commu- e a better quality of life against the limits of the earth's resources to respond to char achieving a better quality of life for our own and future generations in ways which	nge to meet th	
I. pron	note social justice and equality of opportunity		
2. cons share o	erver and enhance the nature and cultural environment and it's heritage and respec f the earth's resources within its capacity to absorb change whilst sustaining our na re generations.		

Q3	Does the current national/local structure enable environmental and economic aspects of susta the appropriate level for:		aken a
		Yes	No
	a) Development Plans	$\boxtimes$	
	b) Planning Applications	$\boxtimes$	

#### If you answered NO to 3a and/or 3b, please explain your reasoning.

#### Additional comments:

04

In general terms we consider that both Development Plans and the Planning Application processes work fairly well at present, and we would not suggest that there is need for a major overall of the systems. Development Plans is a relatively new process which certainly needs tweaking but which also needs time to bed in and be fully understood by all stakeholders.

At present, certain large planning applications (eg Wind turbines over 50MW) are either determined by the UK government or the IPC/Planning Inspectorate. It is uncertain whether decisions made by these organisations can/will take proper account of distinct Welsh planning policy.



Additional Comments: Please include below any further observations on the Key Planning Policy Objectives that should be delivered by the planning system and/or are set out in PPW, paragraph 4.4

Additional comments:

(members pls refer to Planning Policy Wales (PPW) document - Chapter 4 for full details. An extract of the relevant section is shown at Appendix 2 attached to this report)

PPW Chapter 4 has principles set out and then objectives - all of which are commendable, but which don't really give a clear and concise view of priorities when there is inevitably conflict when achieving these. The PPW document is not easily understood and with regard to the priorities for 'rural area' the priorities for National Parks are not clearly stated.

#### SECTION B: CRITERIA FOR EFFECTIVE DELIVERY

Q6	Using the criteria of 'transparency', 'accessibility' (how easy to understand or obtain information), 'timeliness' and 'democratic accountability', please score the DELIVERY OF PLANNING on a scale of 1 (LOW) to 10 (HIGH) for:
а	Development Plans
	Transparency
	Accessibility
	Timeliness
	Democratic Accountability
b	Planning Applications / Development Management
	Transparency
	Accessibility
	Timeliness
	Democratic Accountability



Please provide evidence (in appendix or below) to substantiate your scores in 6a) and 6(b) above.

#### DEVELOPMENT PLANS

With regard to the Development Plan process, as stated previously this is a relatively new process and we do not suggest that a major overhaul is required and that it will take time to bed in. Two Welsh National Parks were near the forefront of operating this new system through to adoption. The system needs to remain in place for sometime to enable the benefits and any shortcomings of the system to be recognised and duly dealt with.

We would suggest that transparency is not always evident. New evidence was not easily available or perhaps understood fully by L.A.'s or public participants and organisations. The process will however improve with subsequent monitoring and review. The process could be made more efficient to save time and costs. One example would be a more detailed approach at the Preferred Strategy Stage to give the public a better understanding of likely expected allocations. In our opinion there also remains confusion amongst L.A.'s and Inspectors as to what consitutes a "focussed change" Further clarity would avoid confusion and a possible need for additional advertisement of "minor" changes.

Active involvement by Members in the process and the participation of stakeholder groups also assisted with local accountability. However, it would be fair to say that many stakeholders and Members did not appreciate the additional work and further explanation which would be required following the adoption of the Local Plan to produce Supplementary Planning Guidance to amplify policies would be needed eg affordable housing

#### DEVELOPMENT MANAGEMENT - PLANNING APPLICATIONS

Transparency and accountability is confused with the layers of responsibility being separated in some circumstances. The clear illustration of this is decisions on 50MW Wind Turbine applications being determined outside Wales without proper local accountability.

Timeliness is almost doomed to fail, if we are measured so significantly against an '8 week target' - see over for future suggestions. The planning process has over recent years become more complex with a huge requirement for additional technical information eg Design and Access Statements, Ecological Reports etc. The 8 week target raises applicants' expectations unduly.

Consultees lack of timely response have a knock on effect for which there is limited penalty. Planning decisions are not going to be made within targets if significant consultees have not responded in time. Complexity of the planning system, the growth of information required and the depth and breadth of experience now required of planners has become an undeniably complex and hence often lengthy process. With legal agreements now almost becoming the norm on planning applications this again is having an impact on timeliness.

We take the view that accessibility is being improved with the use of website links and documents being available on line, however, we appear to be at the point in time of the 'hand-over' from the printed media to online material. Moving from one to the other will inevitably cause frustration to many players on both sides. A good example of this is the provision for applications to be submitted via the portal. The provision of plans etc to our community councils at present is an expensive and timeconsuming business of printing off hard copies and posting for their use.

## Q8 What criteria would you use to describe the effective delivery of planning decisions and development plans?

#### Additional comments:

Local Planning Authorities must be measured on the 'quality' of the built environment as well as the quantity and speed of decisions being made.

Quality is an issue which must be found a suitable criteria with which to measure it. We would support the indicators used by the Planning Officers Society Wales which are readily available and which have been developed over a number of years to emphasis "quality" of decision as well as efficiency. We appreciate that this area needs further work and will need careful monitoring.

#### Please describe how the criteria suggested in Question 8 could be measured and how information about them could be collected.

Additional comments:

Q9

As above - POSW indicators - and also planning decisions issued as 'departures' which go the the 'heart of the plan', eg are contrary to fundamental policy matters.

Could the Design Commission for Wales be charged with the task of coming up with further reasonable criteria for judging the quality of planning permissions?

#### Q10

Additional Comments: Please include below any further observations about the Criteria for assessing Effective delivery of the planning system.

The Development Plan system has unfortunately progressed to be full of jargon and is very remote from the person on the street eg what does the 'test of soundness' really mean?

The planning system is now seen as a barrier to development when in fact it provides a meaningful check and balance to development, giving consistency and continuity which is needed for development to materialise.

The planning process and professionals within it should ensure that it delivers a more customer focussed service easily understood by Members and the public.

#### SECTION C: ROLES AND RESPONSIBILITIES IN PLANNING DELIVERY

~	Is the current allocation of roles and responsibilities the		No
Q11a	best for delivering sustainable development in Wales?		$\boxtimes$
Q11b	Please give evidence for your answer to 11a above.		
areas whe	he regional working groups operate reasonably well eg Waste and Minerates. Here the momentum is not so strong eg housing. Therefore some more formal syst twould assist.		
This critic	ssue would be the abdication of responsibility within the planning system of key eism would be directed mainly at Welsh Water with regard to playing its part in ple development.	players and c providing time	consultees. ely
	ased number of legislative requirments at Euoropean and national lelvel is confu g with each other and requiring aduplication of work (ie species protection of pl		
There nee	ds to be more interaction or a simplified system to enable timely, sustainable dev	elopment to	be achieved.
	the setting up of a Single Environment Body will produce one statutory consult nich would be a good result if it works effectively.	ee on environ	imental
		5	

Q12	Do they provide the most effective delivery through the planning system of:	Yes	No
а	Development Plans	$\boxtimes$	
b	Planning Application Decisions	$\boxtimes$	
and supp format for However their resp Cross bo boundari	eds to be much more responsibility taken by consultees (eg Welsh Water) with th ort their input into the planning system (similarly to Highway Authority consulta or a response may well help. improved engagement will take time, knowledge and commitment and a desire a ponsibilitites within the planning process. undary considerations need thought - administrative boundaries have a limited re es on the ground and a more strategic approach is sometimes needed on these asp protection, creation of employment opportunities).	tion). A stand and acknowled flection of nat	dardised dgement of ural

## Q13 What realignment of roles or additional levels of responsibility, if any, could improve delivery? Please provide evidence to support your views.

Overhaul all licensing requirements/building regs/listed building consents etc so that there is not so much duplication or levels of control. This would speed up the process whilst reducing the costs in time and money (and confusion) to the development industry.

Voluntary joint working on certain aspects may also improve the situation. this is already being done on various levels e.g. Minerals and Waste Planning. At the moment collaborative working is being driven by the need to save money rather than to improve services and a wrongful assumption that bigger is better.

Regionalisation has an 'accountability' issue as democratic representation at this scale is difficult to achieve resulting in a disengaged public. Regionalisation should not be viewed as a panacea to resolve planning problems and efficiency. There is a contradiction between making organisations larger and expecting them to deliver well focussed, customer orientated sevice delivery. The Wales Spatial Plan has the potential to fulfil this regional level for planning if required, however at present it does not sit comfortably within the policy framework and further work would be required to achieve this.

# Q14 What changes do you consider could be made to local planning authority organisation/management structures, or to decision making responsibilities (for example delegation to planning officers in place of Committee when determining planning applications), which would improve delivery?

Delegation is already very high in most planning authorities. In the main, it is the complexity of the planning system which impedes decision making rather than the actual action of making the decision (but see below). Efforts should be made to simplify the whole process and its inherent costs for both the public and the private sector.

Delivering a more transparent and better understanding of the planning process could be enhanced if:

1. consultees were required to support their case to Planning committees if necessary.

2.consultation were able to require conditions on planning applications if they were required to be party to any enforcement action

3. evening meetings would improve equality/transparency

4.Case officers to present to Committee

	Does the current combined Planning Inspectorate for		No
Q15a	England and Wales deliver appeal decisions and plan examinations effectively?	$\boxtimes$	
Q15b	If you have answered YES to 15a, do you consider that the role it could play in delivery through the planning system?	ere is some	e wider
there was	hole yes. All appeal target decisions dates should be shortened. In the initial rou some inconsistency on Inspector approach with regard to advertisising and what Hopefully this will improve with the introduction of best practice.		

#### Towards a Welsh Planning Act: Ensuring the Planning System Delivers - Call for Evidence

Q16a	Do you consider that the level of policy development and intervention by the Welsh Government is appropriate for effective delivery?	Yes	No
Q16b	Please explain and give evidence for your answer to 16a:		
	hole yes, although a formalised cross-boundary working regime would enhance optentially contentious issues.	effective deliv	very and

What changes to the role of statutory consultees (if any) could improve delivery? (Your view should be confined to the role of consultee as a part of the planning system and not to the role of individual organisations as that is outside the remit of this Review.)

Several comments have already been made on the responsibilities of Statutory consultees.

Perhaps the first point is that consultees should be adequately and effectively staffed to respond, in a timely manner to policy formulation, planning applications and pre-application advice.

Lack of engagement appears to be a problem in other areas of Wales, for example, future capital programmes of Welsh Water need to be aligned with development plan allocations and in the past this has not always been the case. There has also been an inconsistency of advice from Welsh Water at the planning application stage.

Q17

## Q18 What aspects of the planning service and/or planning legislation could be reconsidered or more appropriately delivered by other agencies so as to simplify and focus planning's role on delivering sustainable development?

There is no need to change the delivery providers. The system could be simplified and careful consideration given by central govenment before introducing additional requirements on the system. For example the code for sustainable homes should be a building control function and not a planning function. All future sustainable building issues related to construction should also be channelled to Building Control.

However, a cautious approach needs to be taken to isolating 'sustainable development considerations' from other matters. It is essential that all aspects are considered under one regime. It is only a holistic approach that will produce a truly sustainable development.

Please identify what would be required to deliver any of the changes you Q19 suggest to roles and responsibilities. Changes to the consents regime to reduce bureacracy with licences, consents etc.

Q20

Additional Comments: Please include below any further observations about **Roles and Responsibilities** in delivering an effective planning system.

The Planning system at present is perceived as being a muddle of processes, neither a 'one-stop shop' or a 'clearing house' for allocating/permitting development.

Just taking the illustration of a planning decision notice (which is targetted to be delivered within a wholly unrealistic '8 week' target) - it will often include conditions which are:

- a) expensive and timeconsuming to discharge,
- b) involve further consultation with agencies and
- c) by the very nature of the way targets are driven be given a low priority and
- d) are considered by the development industry to be 'small print' and often ignored.

#### SECTION D: QUICK WINS AND SIMPLE IMPROVEMENTS

## Q21

Do you have any examples of barriers to effective delivery, examples of good practice or suggestions to improve delivery through the planning system that could be implemented quickly without legislation or organisational changes?

An amendment to the 8 week target for planning decisions.

A more workable and realistic phased target of an 8 week period calculated as an 'average time' to determine planning applications would be better.

This would be:

more realistic

curtail expectations

potentially reduce backlog because as the system works at present applications having passed the 8 week deadline are given a lower priority than fresh applications.

## Q22 Please list below any people or organisations which you consider have relevant information that would assist the Independent Advisory Group in its investigation.

Planning Aid Wales CCW EA One Voice Wales RTPI WLGA Community and Town Councils Campaign for National Parks Friends of the National Parks

Q23

If you have any further comments not covered by your responses above, please make additional observations here

#### Confidentiality

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential please indicate here:

#### How to respond

Please submit your comments by 3 February 2012, in any of the following ways:

Email	Post
Please complete the consultation form and send it to :	Please complete the consultation form and send it to:
plancallforevidence@wales.gsi.gov.uk [Please include 'Towards a Welsh Planning Act' in the subject line]	Call for Evidence Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3NQ

Additional information	
If you have any queries on this consultation, please	
Email: welshplanningreview@wales.gsi.gov.uk	

Telephone: James Morris on 029 2082 3725

#### APPENDIX 2

#### 13

#### 4.3 Principles

4.3.1 The following principles underpin the Assembly Government's approach to planning policy for sustainable development:

- putting people, and their quality of life now and in the future, at the centre of decision-making;
- ensuring that everyone has the chance to obtain information, see how decisions are made and take part in decision-making;
- taking a long term perspective to safeguard the interests of future generations, whilst at the same time meeting needs of people today;
- · respect for environmental limits, so that resources are not irrecoverably depleted or the environment irreversibly damaged. This means, for example, mitigating climate change, protecting and enhancing biodiversity, minimising harmful emissions, and promoting sustainable use of natural resources;
- tackling climate change by reducing the greenhouse gas emissions that cause climate change and ensuring that places are resilient to the consequences of climate change;
- applying the precautionary principle. Cost-effective measures to prevent possibly serious environmental damage should not be postponed just because of scientific uncertainty about how
- using scientific knowledge to aid decision-making, and trying to work out in advance serious the risk is; what knowledge will be needed so that appropriate research can be undertaken;
- while preventing pollution as far as possible, ensuring that the polluter pays for damage resulting from pollution. In general the Assembly Government will seek to ensure that costs are met by those whose actions incur them;
- applying the proximity principle, especially in managing waste and pollution. This means
- solving problems locally rather than passing them on to other places or to future generations; and taking account of the full range of costs and benefits over the lifetime of a development, including
- those which cannot be easily valued in money terms when making plans and decisions and taking account of timing, risks and uncertainties. This also includes recognition of the climate a development is likely to experience over its intended lifetime.

### 44 Key policy objectives

4.4.1 The following broad objectives, which derive from these principles and reflect both the sustainable development agenda and Assembly Government priorities<sup>1011</sup> should be taken into account in the preparation of development plans and in the control of development throughout Wales. Detailed application of some of these objectives is explored in later sections of this chapter. Chapters 5 to 13 consider in more detail the responsibilities and scope for action of local planning authorities in these policy fields and provide guidance as to how they can be met. Technical Advice Notes providing additional guidance are signposted in these chapters where relevant. The following points include in brackets an indication of where in this document further guidance is set out.

4.4.2 Planning policies and proposals should:

 Promote resource-efficient and climate change resilient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl, especially



through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites (Sections 4.6, 4.7 and 4.8).

- Locate developments so as to minimise the demand for travel, especially by private car (Section 4.6 and Chapter 8).
- Support the need to tackle the causes of climate change by moving towards a low carbon economy. This includes facilitating development that reduces emissions of greenhouse gases in a sustainable manner, provides for renewable and low carbon energy sources at all scales and facilitates low and zero carbon developments (Sections 4.6, 4.10 and Chapter 12)
- Minimise the risks posed by, or to, development on, or adjacent to, unstable or contaminated land and land liable to flooding. This includes managing and seeking to mitigate the consequences of climate change (see 4.2.4 and 4.2.5) by building resilience into the natural and built environment (Chapters 5, 12 and 13).
- Play an appropriate role to facilitate sustainable building standards (including zero carbon) that seek to minimise the sustainability and environmental impacts of buildings (Section 4.11).
- Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities (including water supplies, sewerage and associated waste water treatment facilities, waste management facilities, energy supplies and distribution networks and telecommunications), while ensuring proper assessment of their sustainability impacts (Chapter 12).
- Contribute to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems. In particular, planning should seek to ensure that development does not produce irreversible harmful effects on the natural environment and support measures that allow the natural heritage to adapt to the effects of climate change. The conservation and enhancement of statutorily designated areas and of the countryside and undeveloped coast; the conservation of biodiversity, habitats, and landscapes; the conservation of the best and most versatile agricultural land; and enhancement of the urban environment all need to be promoted (4.9, 4.10.9, Chapters 5 and 13).
- Help to ensure the conservation of the historic environment and cultural heritage, acknowledging and fostering local diversity (4.10.9 and Chapter 6).
- Maximise the use of renewable resources, including sustainable materials (recycled and renewable materials and those with a lower embodied energy). Where it is judged necessary to use non-renewable resources they should be used as efficiently as possible. The use of renewable resources and of sustainably produced materials from local sources should be encouraged and recycling and re-use levels arising from demolition and construction maximised and waste minimised (4.10.4 and 4.10.9).
- Encourage opportunities to reduce waste and all forms of pollution and promote good environmental management and best environmental practice (4.10.4, Chapters 12 and 13). Waste arising from demolition and construction should be minimised, and opportunities to recycle and re-use this waste promoted (4.10.4,).
- Ensure that all local communities both urban and rural have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate, in safe neighbourhoods (4.10.11 and Chapter 9).
- Promote access to employment, shopping, education, health, community, leisure and sports facilities and open and green space, maximising opportunities for community development and social welfare (Sections 4.5 and 4.6, Chapters 7, 10 and 11).



- Foster improvements to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity. In general, developments likely to support the achievement of an integrated transport system should be encouraged (Section 4.6 and Chapter 8).
- Foster social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that development is accessible by means other than the private car (Section 4.6 and 4.10.10).
- Promote quality, lasting, environmentally-sound and flexible employment opportunities (Chapter 7).
- Support initiative and innovation and avoid placing unnecessary burdens on enterprises
   Support initiative and innovation and avoid placing unnecessary burdens on enterprises
   (especially small and medium sized firms) so as to enhance the economic success of both urban
   (especially small and medium sized firms) so as to enhance the economic success of both urban
   (and rural areas, helping businesses to maximise their competitiveness (Chapter 7).
- Respect and encourage diversity in the local economy (Section 4.5 and Chapter 7).
- Promote a greener economy and social enterprises (Section 7.4).
- Contribute to the protection and, where possible, the improvement of people's health and wellbeing as a core component of sustainable development and responding to climate change. Consideration of the possible impacts of developments - positive and/or negative - on people's health at an early stage will help to clarify the relevance of health and the extent to which it needs to be taken into account (Sections 4.6, 8.1, 11.1 and Chapter 12).