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Consultation – summary and assessment of responses

Planning Policy Wales Chapter 7 Economic Development

Date of issue: October 2012

Overview

This document summarises the responses to the consultation on proposals for a revised PPW Chapter 7 Economic Development held 28 November 2011 – 5 March 2012.

This summary report is published in electronic form only.

Electronic copies of all consultation responses to this consultation can be found on the Welsh Government website.

<http://wales.gov.uk/consultations/planning/ppwch7consultation>

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1 BACKGROUND

- 1.1 On 28 November 2011 the Welsh Government consulted on changes to Chapter 7 Economic Development, Planning Policy Wales (Edition 4, March 2011). The consultation ended on 5th March 2012. This consultation summary report details the responses to this consultation, the Welsh Assembly Governments response and the next steps.
- 1.2 The draft policy reflects many of the recommendations contained in the research report “Planning for Sustainable Economic Renewal” produced by Roger Tym & Partners in association with Asbri Planning in 2011. We also consulted on the draft structure for a new Technical Advice Note, which will provide more detailed guidance on the implementation of the proposed policy changes to Chapter 7. Research to provide evidence to support the preparation of a Technical Advice Note will be undertaken later in 2012. This document does not consider the consultation responses on the Technical Advice Note.

Policy Background

What was the consultation about?

- 1.3 The global economic recession has affected Wales along with the rest of the UK, and it is likely that it will continue to do so for several years to come. The Welsh Government has made it clear that it will do all that it can, using all available policy levers, to help address the causes and symptoms of the recession in Wales.
- 1.4 The planning system is devolved to Welsh Ministers, and it is essential that it is fit for purpose and supports our policies for economic renewal. As a consequence we are seeking to update Chapter 7 of Planning Policy Wales (PPW) which relates to supporting the economy, to align it more closely with the Welsh Governments broader economic policies and to try to ensure that the planning system facilitates economic renewal in Wales more effectively.

- 1.5 In July 2010 the Welsh Government published a strategy for economic recovery called Economic Renewal: a new direction. This strategy sought to implement a fresh approach to policy-making and delivery, seeking a new way to lead Wales out of recession informed by wide ranging consultations and new evidence. As part of this new approach the Welsh Government identified that planning policy needed to be updated. In particular, the strategy states:

'To remain competitive, businesses in Wales must be able to invest in new development in an efficient and timely way. Government provides the framework for this new development, and needs to ensure that the planning system in Wales facilitates effective decisions and to impose costs only where these are justified by the benefits they bring to society as a whole.'

Planning Policy Framework in Wales

- 1.6 PPW sets out the land use planning policies of the Welsh Government and is supplemented by a series of TANs. PPW and TANs provide the framework for the preparation of Local Development Plans and the decision making responsibilities of Local Planning Authorities.
- 1.7 Chapter 7 of PPW has remained unchanged since 2002 and it is considered that the policy needs to be reviewed and realigned in order to facilitate economic recovery in Wales. Once finalised, it will replace the existing Chapter 7 in PPW.

What are main changes being proposed?

- 1.8 The Planning for Sustainable Economic Renewal Report identified a need to update planning policy for economic development and that the policy should be set against the Welsh Government's legal duty to

promote sustainable development. Sustainable development is comprised of three components namely, social, economic and environmental development. The research highlighted a view that the economic component of sustainable development has been overlooked in the decision making process at the expense of economic and social progress in Wales.

- 1.9 The revised policy seeks to redress this perception by stressing the importance of economic development within the context of sustainable development.
- 1.10 The revised policy requires local planning authorities to adopt a more holistic approach to economic development and recognise that most land uses have some economic impact. Local authorities should therefore consider the likely impacts of all development and adopt a “whole-economy” approach rather than focussing on the more traditional employment land uses as set out in categories B1-B8 of the Town and Country Planning Use Classes Order.
- 1.11 The policy requires local authorities to establish a robust, locally appropriate evidence base of the economic characteristics of their areas and to develop locally appropriate development plan policies based upon informed assumptions about possible changes, whilst having regard to national economic policies.
- 1.12 As part of the evidence base, the policy now requires local planning authorities to undertake and keep up to date Employment Land Reviews. These Reviews should be based on a realistic assessment of demand for employment land and should highlight instances of over and under provision within development plans.
- 1.13 The new policy seeks to promote more effective working and decision making both within and between local authorities. The policy seeks to ensure that Economic Development Officers are consulted on proposals

which have the potential to generate job creation or retention, and that the economic benefits of such proposals are more fully understood. Similarly local authorities are required to work collaboratively to ensure that Employment Land reviews are undertaken at an appropriate strategic level and that they co-operate to ensure that development take place in the most appropriate locations in Wales even if that is outside of their boundaries.

Next steps

- 1.14 This 'Consultation Summary Report' is published alongside changes to Edition 5 of Planning Policy Wales, which incorporates the changes to Chapter 7 of PPW.

2 DETAILS OF RESPONSES

- 2.1 On 16th July 2010 over 200 core and key stakeholders were targeted by email on the publication of the consultation documents. These were drawn from the core consultation list held by the Planning Division of the Welsh Assembly Government. This included all local planning authorities in Wales, public bodies, special interest groups and other groups. The consultation document was made available on the Welsh Assembly Government consultation website and a press release was issued.
- 2.2 The consultation period commenced on 28 November and responses were invited by 5 March 2012. A total of **53** responses were received. We thank all those who responded to the consultation.
- 2.3 A consultation form was provided in the consultation document and separately on the website. Respondents were assigned to one of six respondent categories. Table 1 below shows the breakdown of all respondents to the consultation process. Not all respondents used

Table 1 Breakdown of respondents		
Category	Number	% of total
Businesses	10	19
Local Authorities (including National Park Authorities)	18	34
Government Agencies/Other Public Sector	8	15
Professional Bodies/Interest Groups	13	24
Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	2	4%
Other	2	4%
Total	53	100%

the questionnaire or responded to every question. For this reason, in section 4, none of the tables showing a more detailed breakdown of statistics for each questionnaire question add up to 53. A summary of the main comments submitted via questionnaire format, or other form, are picked up in the 'overview' for each question.

- 2.4 The consultation document posed 12 questions specifically relating to draft Chapter 7; a further 2 questions concerning the draft TAN framework, and 1 additional question inviting any other comments from the respondent (see Table 2 below). Each question required the respondent to categorise their response in one of five ways, i.e. Strongly Agree, Agree, Neither Agree nor Disagree, Disagree or Strongly Disagree. Each question had a second part asking for any further comments. A statistical overview of the responses, showing the nature of the response to all 15 questions is presented in Annex B.

Table 2: Consultation questions	
Q1	Do you agree with the proposed definition of economic development for planning purposes?
Q2	Do you agree with the objectives as specified in paragraph 7.1.2?
Q3	Do you agree that an Employment Land Review is required to provide the evidence base for Local Development Plans?
Q4	Do you agree that Employment Land Reviews should be undertaken collaboratively by local planning authorities to reflect economic circumstances?
Q5	Do you think that policy on economic development will help in rural areas to promote diversification of the economy?
Q6	Do you consider that the draft policy supports the development of the green economy?
Q7	Do you agree that the guidance on the content of development plans is sufficiently flexible to allow for local circumstances and changes in the wider economy?

Q8	Do you agree that local authorities should be working together, and with other stakeholders, to plan strategically for employment land provision?
Q9	Do you agree with the view that development management decisions need to reflect economic considerations more prominently?
Q10	Do you think that draft planning policy, as proposed, will be effective in raising the profile of economic issues as part of the development management process?
Q11	Do you agree with the list of key factors to be taken into account listed in paragraph 7.6.1, when deciding planning applications?
Q12	Do you agree that local planning authorities should look favourably on applications for economic development not in accordance with development plans, if the economic benefits outweigh and adverse impacts?
Q13	Do you agree with the broad headings which the Technical Advice Notes should address?
Q14	What further guidance would you like to see contained in the draft Technical Advice Note?
Q15	We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

2.5 It should be noted that not all respondents used the questionnaire and some chose not to answer all the questions on the questionnaire. The summary tables in section C reflect this, and only answers that can be categorised are included. As a consequence the tables rarely add up to 53.

2.6 Appendix A includes a list of all respondents. Copies of the consultation responses have been published in their original form to the Assembly Government's website together with this summary document. These can be found here:

Web address

<http://wales.gov.uk/consultations/planning/ppwch7consultation>

3 KEY THEMES

3.1 Key themes arising from the consultation responses are as follows:

- The definition of economic development received general approval, although various amendments were also suggested. This included the inclusion of other sectors not currently directly mentioned, in particular tourism, energy and construction.
- Clarification was required concerning the implications of a change in definition, terms of both land use classes and what land should be allocated as.
- A number of respondents felt that greater reference to the principle of sustainability needed to be made.
- The additional emphasis on a positive approach to economic development was generally welcomed, as evidenced by all the consultation questions receiving over 50% support. However, respondents also expressed the opinion that the policy needed to articulate that any additional emphasis needed to be part of a balanced approach with social and environmental considerations.
- There was strong support for the principle of Employment Land Reviews and their use as evidence to support local development plans. There was also support for collaboration between local authorities in ELR preparation. However, in both cases there were questions about how this should be implemented in practice.
- Reference to the Green Economy generated a mixed response, ranging from general support, to querying the reason for it being specifically identified. Supporters felt that more renewable technologies could be identified and that information technology could be highlighted for its importance in encouraging home-working, particularly in rural areas.

- There was strong support for local authorities to adopt a positive approach to applications for economic development. However, this was often caveated by the need to apply a balanced approach to economic, environmental and social considerations. Those disagreeing were environmental/heritage based interests. There was also strong support for the key factors, however various amendments and additions to these were suggested.
- Question 12 proposing local authorities look favourably on applications for economic development not in accordance with development plans where economic benefits outweighed adverse impacts proved the most contentious. Whilst 55% supported the idea, many respondents felt that it undermined the planning system and the primacy of the local development plan. The largest number of responses in favour came from Businesses and Professional Bodies/Interest Groups, and Local Planning Authorities opinions were split. Environmental interests from across the groups were not supportive.

4 Statistical Breakdown and Overview of the Responses to Each Question

- 4.1 A summary of the key findings under each consultation question is set out below. Section 4 provides a detailed summary and analysis of the key themes generated for each question followed by our response.
- 4.2 The tables below show results for those respondents who ticked one of the 5 categories set out in the consultation questionnaire or whose alternative answer expressed clear support or disagreement for the question. 'All Respondents to Question' shows the total number of respondents, who replied to a question, split by category. The 'Overall Percentage' shows the proportion of all those responding to a particular question, split by category. For example, question 1 received 46 responses, and of these 27 or 58% of responses agreed (A) with the proposal.

Q1	Do you agree with the proposed definition of economic development for planning purposes?
Section 7.1.1	

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	2	6	1	1	0
B	Government Agencies/Other Public Sector	0	3	2	1	0
C	Local Planning Authorities	2	13	1	1	0
D	Professional Bodies/Interest Groups	1	5	3	1	1
E	Voluntary	0	0	0	0	2
All respondents to question		5	27	7	4	3
Percentage split		10.8	58.6	15.2	8.7	6.5

Statistical review

The majority of respondents, approximately 70%, were in favour of the proposed change to the definition of economic development. Local authorities made up the largest group, followed by businesses. Approximately 15% neither agreed nor disagreed and a further 15% did not support the proposition.

Overview

- The main issue arising from this question was what the definition did not include. The omitted sector mentioned most often was tourism. The other main sectors mentioned were energy, housing and construction, and education. These sectors were considered to provide substantial contributions to the economy in the same way that retail, leisure and public services did. It was also considered that reference to rural sector policies should also be mentioned in the second part to 7.1.1.
- A number of respondents felt that the new emphasis on economic development should not be at the expense of social and environmental considerations. Some respondents wanted the term sustainable development to feature more prominently particularly in relation to economic development, with one suggestion that 'sustainable economic development' replace economic development. There was some concern that the definition failed to mention communities and natural environment, which play an important part in creating economic prosperity.
- Clarification was requested on how the new definition affected the protection normally afforded employment land against alternative uses such as retail in development plans. Also, whether or not existing B1-B8 allocations would become redundant, or outdated, following publication of the revised policy.

Welsh Government Response

The intention of the policy is to encourage Local Planning Authorities to consider the needs of all employment creating sectors and develop a

holistic approach to planning for economic development. The examples of employment sectors in paragraph 7.1.1 are not intended to be exhaustive and are illustrative of principal employment sectors in Wales. However it is agreed that the list of land uses could be expanded and now also includes tourism, which is a major employer. The construction industry (although not a specific land use) is vital to building Wales' future infrastructure and is now mentioned in this section together with energy.

We consulted only on the proposed changes within Chapter 7 of PPW which considers economic development, Chapter 7 should be read within the context of all of PPW and we believe that there are adequate environmental safeguards contained elsewhere within PPW. The aim of the revised policy which we consulted on was to raise the profile of economic considerations within the context of sustainable development rather than to downplay the social and environmental aspects. We do not therefore accept the need to reinforce the principle of sustainable development in Chapter 7 as this is considered at length elsewhere in PPW.

Q2	Do you agree with the objectives as specified in paragraph 7.1.2?

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	4	1	5	0	0
B	Government Agencies/Other Public Sector	0	5	1	1	0
C	Local Planning Authorities	3	12	0	1	0
D	Professional Bodies/Interest Groups	0	10	0	2	0
E	Voluntary	0	0	0	0	2

All respondents	7	28	6	4	2
Percentage split	14.9	59.5	12.7	8.5	4.2

Statistical review

Approximately 74% of respondents either strongly agreed or agreed with the economic aims set out in paragraph 7.1.2. The largest group responding positively to this question was local authorities, followed by professional bodies and interest groups, and then businesses. 6 respondents disagreed and these were spread over all groups except business.

Overview

- Responses to this question refer to aspects of both the main paragraph and the listed aims.
- Some concern was expressed that para 7.1.2 could become a general statement for what the planning system should deliver and in doing so lose some of its inherent flexibility. There was also concern that section 7.1 makes no reference to agriculture.
- It was suggested that Bullet 1 be reworded as follows, 'co-ordinate development with infrastructure provision and facilitate the development of local and strategic infrastructure'. The reason given for this was because infrastructure provision may also meet the needs of wider areas if not national requirements. One respondent felt that local authorities had little influence over infrastructure provision and clarity was required. It was suggested that bullet 2 should also refer to regional policy and strategy where appropriate, and other strategies that affect economic development. Clarification was requested on what Bullet 3, 'aligning jobs and services and housing', meant in practical terms. There was also a view that the text should highlight alternative and more sustainable methods of travel. Bullet 4 should include 'under used or vacant buildings'. Also, whilst previously developed land was important it should not be overriding in every situation. Bullet 5 was considered to contradict para 7.1.2 where it says 'authorities should aim to facilitate the

provision of land the market requires'. Also it was also considered unlikely that the market will show interest in investing in disadvantaged areas.

- Concern was also expressed that the aims omitted reference to the importance of both the green economy, and historic and environmental capital.
- Concern was expressed that the term 'Provision of land that the market requires' appeared to support primacy of economic development over the other two considerations. It was proposed that 'in sustainable locations' be added after 'the market requires'.
- A number of respondents felt that reference to 'most appropriate locations' in para 7.1.3, should be replaced by 'most sustainable locations', in line with PPW's sustainability objectives.
- It was suggested that economic strategies should seek to maximise the potential of local economic advantage.
- There was also concern that the aims as written were not supportive of rural development and could inhibit it. For example, poor infrastructure was often used as a reason for not allowing development in rural areas.

Welsh Government Response

One of the reasons for updating planning policy was to bring economic considerations into sharper focus and it is considered that the aims set out in paragraph 7.1.2 offer more prescription than was previously the case. The planning system should seek to address all relevant concerns and it is still the case that local material circumstances can prevail in the decision making process, which means that there is still an element of local flexibility and discretion.

We believe the needs of the agricultural sector are adequately

addressed elsewhere in PPW and Technical Advice Notes, e.g. TAN 6.

We do not accept that there needs to be any clarification of the first bullet point as it is intended to address all infrastructure provision.

Part of the basis for the revision of PPW was that economic developments and Travel to Work Areas do not respect local authority boundaries and that strategic level considerations are required. We therefore accept that regional policies and strategies are important to effective economic planning and we will consequently amend the second bullet point in paragraph 7.1.2 to reflect this.

The re-use of redundant, vacant or under-used buildings is an important issue in many town centres in Wales and the Welsh Government has recognised this fact in its response to the Enterprise and Business Committee's Report into the Regeneration of Town Centres¹ consequently we believe that we need to reinforce this within planning policy. We therefore accept the need to include reference to under used or vacant buildings under the fourth bullet point in paragraph 7.1.2.

We do not accept that there is a contradiction between paragraph 7.1.2 where it says 'authorities should aim to facilitate the provision of land the market requires' and the fourth bullet point. Disadvantaged communities can exist in close proximity to more affluent ones, especially in the larger towns and cities, and we believe that regeneration can be delivered on

¹ National Assembly for Wales Enterprise and Business Committee Town Centre Regeneration Report January 2012

Q3

Do you agree that an Employment Land Review is required to provide the evidence base for Local Development Plans?

Section 7.2

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	3	2	4	0	0
B	Government Agencies/Other Public Sector	2	3	2	0	0
C	Local Planning Authorities	7	10	0	0	0
D	Professional Bodies/Interest Groups	3	4	4	0	0
E	Voluntary	0	0	2	0	0
All respondents		15	19	12	0	0
Percentage split		32.6	41.3	26	0	0

Statistical review

The need to provide an evidence base on which to base economic development decisions was strongly supported with almost 74% in agreement. Local planning authorities were the largest group in favour. A significant percentage, 26%, neither agreed nor disagreed; businesses and professional bodies/interest groups were the main respondents in this category. No respondents disagreed with this proposal.

Overview

- To aid the preparation of evidence bases that are consistent, it was suggested that all Wales software or data resources be made available to support methodology proposed in a new technical advice note. The Welsh Government was identified as a provider of such information.
- A number of respondents were concerned about how existing surveys or land reviews might be affected by new technical advice note

methodology, particularly in relation to Local Development Plan preparation.

- One respondent queried how use classes should be incorporated in an ELR, given that the definition of economic development had been broadened to include other sectors.
- Final sentence of 7.2.1 requires further clarification.
- It was also suggested that when local planning authorities are undertaking ELRs they should engage with utility companies.
- Other comments included whether there would be guidance on what the ELR frequency should be, and also whether vacant property should form a part of any study.
- Concern that ELRs as described could be too narrow and fail to consider transport, social, housing and environmental considerations.
- A number of respondents voiced strong opposition to the line ‘there will be occasions when economic benefits will outweigh social and environmental considerations, and refer to how this relates to the Welsh Government’s sustainability aims.

Welsh Government Response

Employment Land Reviews form an important part of the draft Technical Advice Note which was also consulted on. The new TAN will provide further technical guidance on how these studies are to be undertaken. Roger Tym Associates and Asbri Planning have been commissioned to undertake additional research work in order to assist with the delivery of the TAN and the issues of data and software will be considered as part of the ongoing development of the TAN. As a result, many of the detailed issues raised in relation to this section should be addressed by the forthcoming TAN which will be issued in 2013.

The intention of the new TAN will be to assist with the production of ELRs and not to invalidate work already undertaken by Local Planning Authorities. Providing existing ELRs have been undertaken in a rigorous, evidence-based way and are defensible then LPAs will be able to pursue existing methodologies.

It is accepted that Utility Companies and other key stakeholders will influence the availability of employment land and should be consulted as part of the process and we expect the TAN to issue advice on this matter.

Paragraph 7.2.2 states that there will be occasions where economic benefits outweigh social and environmental considerations, and this reflects that there are 3 components to sustainable development which need to be balanced and reconciled. The Welsh Government is determined that the planning system should help Wales recover from the economic recession and expects economic development benefits to be fully understood and factored into planning decisions, and this will mean that there will be occasions where economic benefits outweigh all other considerations.

Q4	Do you agree that Employment Land Reviews should be undertaken collaboratively by local planning authorities to reflect economic circumstances?
Section 7.2.1	

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	1	5	4	0	0
B	Government Agencies/Other Public Sector	1	5	1	0	0
C	Local Planning Authorities	3	12	0	1	0
D	Professional Bodies/Interest Groups	4	5	3	0	0
E	Voluntary	0	0	1	0	0
All respondents		9	27	9	1	0
Percentage split		19.5	58.6	19.5	2.1	0

Statistical review

Approximately 78% of respondents agreed that ELRs should be undertaken collaboratively. The largest sector once again was local planning authorities with other responses evenly spread between the other groups. 19% of respondents neither agreed nor disagreed. Only one respondent disagreed with this question.

Overview

- Whilst there was broad agreement that collaboration was a positive thing, there were mixed views on how it should be achieved or the extent to which collaboration should take place. Various issues were raised including, does a sub regional/regional study feed into local ELRs or vice versa, and is collaboration always appropriate. Concerns were expressed about timing in relation to Local Development Plan preparation in adjacent authorities, the potential difficulties between

authorities with different policies and priorities, competition to attract inward investment, and the lack of obvious penalties where an authority does not participate. One respondent indicated that whilst there should be no compulsion to collaborate, authorities should still demonstrate they are complimentary to the strategies of adjacent authorities. One business asked if the ELR process would be moderated in any way as the Joint Housing Land Availability Studies are. A further comment raised the issue of identifying land for onshore wind energy outside Strategic Search Areas.

- Section 7.2.3 also refers to Enterprise Zones and a number of respondents requested this be elaborated on, given their recent reintroduction, together with SPZs and LDOs.

Welsh Government Response

We expect each Local Planning Authority to have its own ELR as part of the evidence base for its LDP. We encourage collaborative and joint working in order to develop meaningful assessments of the sub-regional economic development trends and we anticipate the production of ELRs to both influence and reflect sub-regional studies. It is expected that the economic development TAN will address this issue in more detail.

As part of the LDPs preparation we acknowledge that most LPAs have undertaken some assessment of their employment land requirements. We expect that the forthcoming guidance on ELRs in the TAN will seek to rationalise and assist with the consideration of employment land requirements and allocations across Wales in a consistent and timely way. Whilst recognising that LDPs are at different stages we expect the new TAN to assist with plan production and review.

We have yet to issue the new policy in PPW and think it premature to consider issues of sanctions against authorities which do not co-operate, at this stage we prefer to encourage and facilitate collaborative working.

Further consideration to the conduct of ELRs will be contained in the TAN although it is not anticipated that it will involve the same procedures as Joint Housing Land Availability Studies.

Guidance on the use of LDOs has been issued with the regulations which enable them in Wales. We see LDOs and SPZs as useful planning tools for Local Authorities to develop in effective economic development planning in Wales.

Q5

Do you think that policy on economic development will help in rural areas to promote diversification of the economy?

Section 7.3

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	2	3	2	1	0
B	Government Agencies/Other Public Sector	1	2	3	1	0
C	Local Planning Authorities	2	8	5	1	0
D	Professional Bodies/Interest Groups	4	7	1	0	0
E	Voluntary	0	0	1	1	0
All respondents		9	20	12	4	0
Percentage split		20	44.4	26.6	8.8	0

Statistical Review

Respondents were broadly in agreement about this proposal, with 64% in favour. Groups most in favour were local planning authorities and professional

bodies/interest groups. A large group of respondents were undecided, approximately 26%, and almost 9% disagreed.

Overview

- A variety of comments were made in relation to the rural economy. A number of respondents queried what the definition of 'small scale' enterprise was, and what implications this has for 'large scale' development; clarification was requested. It was argued that development should not be limited in size as larger developments could be beneficial under certain circumstances. It was suggested 7.3.1 include reference to long term economic uses like tourism. It was also advocated that information technology be included, and how it can be of benefit to the rural economy, for example in terms of home working. One respondent asked whether renewable energy could be considered as farm diversification. The term 'unacceptable impacts' in the final sentence of 7.3.2 was questioned and alternative terms such as 'disproportionate amount of impact' or 'significant impacts', suggested instead. Also, what was the definition of 'short term economic gain'. It was argued that to allow business development on the edge of a settlement was contrary to sustainable development and suggested an amendment to text such that ' a need for a countryside location must be demonstrated'. Clearer reference to TAN 6 required.
- Chapter 7 should reflect the Welsh Government's ecosystem services approach being promoted in the Green Paper Sustaining a Living Wales on natural resource management in Wales. 7.3 should be amended to include 'Economic development in rural areas should ensure that ecosystem services are protected and enhanced'.
- One respondent suggested 7.6.8 of the existing Chapter 7 and dealing with conversion of rural buildings, should be retained.

Welsh Government Response

Revisions to Chapter 7 recognise that in most instances the economic development opportunities in rural areas will be small in size, albeit that their significance to the rural economy will probably be disproportionate to their actual size. The term small scale is used to distinguish between the different opportunities in rural and urban areas, and we do not think that it is necessary to further define what is meant by small scale as we do not want PPW to be too restrictive in terms of rural economic development. At the same time we recognise that there may occasionally be larger developments in rural areas and we believe that the policy as outlined in paragraph 7.3.2 adequately sets out the criteria by which larger developments should be evaluated.

We recognise that much of the rural economy is predicated on tourism and although the need to plan for tourism is specifically contained in chapter 11 of PPW we accept that there is a need to reinforce the reference to tourism under this section of PPW as well.

We also accept that we need to include reference to the use of information technology and its implications for rural economic development, and to draw attention to the important contribution that home based working can make in rural areas

The term “unacceptable impacts” is considered to be a well understood concept and is used extensively elsewhere throughout PPW. We believe that the alternative suggested text does not add to certainty and could undermine the discretion of the decision-maker to consider the overall impacts of proposed new development on the countryside.

The Welsh Government is seeking to promote sustainable economic development and as such we expect decision makers to consider the potential and longevity of proposed development in rural areas. We recognise that there could be environmental impacts associated with new development and would not wish any denigration of the environment if the economic benefits associated with new development

are short term. It would be for the decision makers to consider the impacts and benefits of any proposed development.

The Welsh Government's ecosystem services approach to natural resource planning is still being developed and we expect the planning system to reflect this approach once it has been established. In the meantime the evidence suggests that there is an urgent need to update the economic development aspects of PPW.

Q6	Do you consider that the draft policy supports the development of the green economy?
Section 7.4	

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	0	5	1	0	1
B	Government Agencies/Other Public Sector	1	4	2	0	0
C	Local Planning Authorities	0	9	7	0	0
D	Professional Bodies/Interest Groups	0	7	4	1	0
E	Voluntary	0	0	0	0	2
All respondents		1	25	14	1	3
Percentage split		2.2	56.8	31.8	2.2	6.8

Statistical Review

Responses to this question were more varied. Whilst approximately 59% agreed that the policy supported the green economy, almost 32% were undecided. 9%, or 4 respondents, did not agree with the proposition, but of these 3 strongly disagreed.

Overview

- There was some confusion amongst a number of respondents as to why the green economy was being referred to specifically, perhaps clarification could be provided. In this respect some form of broad definition would be welcomed. It was also suggested that PPW was promoting one form of economic development over another and a balanced approach needed to be taken.
- One respondent indicated that 7.4.1 should encourage all types of renewable energy not just those identified. Reference to TAN 8 should be included. Also, that the sector was more diverse than implied by the text and, for example, for example traditional construction methods used to maintain existing building stock. Another perspective expressed was that safeguarding the environment itself contributed to the economy. It was suggested that the final sentence of 7.4.1 be amended to include ‘..or on natural heritage’.
- Reference should be made to permitted development rights on non domestic microgen.
- Chapter 7 should reflect the Natural Environment Framework, and the Green Paper Sustaining a Living Wales.

Welsh Government Response

The green economy offers huge potential for Wales, and we have identified that low carbon electricity generation, for example could be worth up to £50billion². It is a priority of the Welsh Government that these resources are optimised and consequently PPW should also reflect this.

PPW contains substantive guidance on low carbon and renewable energy in Chapter 12 which is also supplemented by an array of further guidance such as a toolkit for planners. As such we believe that policy and guidance on planning for renewable energy is sufficiently addressed elsewhere.

Permitted Development Right on Domestic micro-generation equipment mean that for most forms of technologies, there is no requirement for planning permission, and as such the planning system should focus its attention on those development which will need planning permission. PPW will not issue policy guidance for domestic micro-generation.

Q7

Do you agree that the guidance on the content of development plans is sufficiently flexible to allow for local circumstances and changes in the wider economy?

Section 7.5.1

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	1	5	3	0	0
B	Government Agencies/Other Public Sector	0	4	2	1	0
C	Local Planning Authorities	1	10	4	1	0
D	Professional Bodies/Interest Groups	0	5	4	0	0
E	Voluntary	0	0	2	0	0
All respondents		2	24	15	2	0
Percentage split		4.6	55.8	34.8	4.6	0

Statistical Review

Approximately 60% of respondents supported this proposition, the largest group being local planning authorities and the remainder split between the other groups. A significant proportion of respondents, almost 35%, neither agreed nor disagreed, and these were spread fairly evenly between each group. 4% disagreed with this question, which equated to 2 respondents one local planning authority and another public sector organisation.

Overview

- There were considerable additional comments and changes to text in relation to this question. Some of the main points are referred to here but significant changes to text whilst being considered are not included here.
- There was concern that employment land targets could have the effect of forcing authorities to allocate land when there might not be demand for it. How often would ELRs be required? One respondent indicated that the list was presented in a way that suggested it was prescriptive, and that instead of being flexible all the criteria needed to be met.
- Second bullet should include 'environmental evidence'. Some concern that bullets 3 and 4 would require consultancy contributions. In bullet 3 what is meant by 'broad assessment'? In bullet 4 it was suggested that the text read, 'Provide targets on land provision for economic uses' instead of 'employment uses'. Consistency was required regarding use of the term 'employment' which seemed to cover B1-B8 in some instances, but could be applied to a broader group of economic sectors in other situations as set out in 7.1.1. It was suggested that reference to classes B1-B8, in bullet 4, be deleted. In Bullet 5 one respondent felt strongly that if the policy was suggesting controlling the release of employment land for housing then it should be deleted. Bullet 5 should also include reference to redundant and underused buildings as well as previously used land. Bullet 10 undermines primacy of development

plan. Should bullet refer to sequential approach as Chapter 10 does? In bullet 13 add 'appropriate' before 'farm diversification'.

- A number of new bullets including, 'Include policy and proposals that support economic development, not just of uses in Use Classes B1-B8, but also the needs of the wider economy, including infrastructure'. Also, 'Include policies which encourage renewable energy development and low carbon businesses'.
- Other comments included the following. Had the new policy been subject to a sustainability appraisal? The list should refer to development viability. Concern about the affect of the draft Chapter 7 on emerging development plans. Clarification required on criteria based policy. Further clarity was required regarding what development is appropriate or inappropriate, if development creates jobs according to 7.1.1 it is economic development. Parts of existing Chapter 7 section 7.5 should be retained.

Welsh Government Response

It is not the intention of PPW to force local planning authorities to allocate land for specific uses where there is no demand for such development. We expect all local authorities to establish a credible and defensible evidence base and to make realistic assumptions about future land requirements. As explained above, the detail relating to the production of ELRs will be contained in the forthcoming TAN.

The need to ensure that the planning system aids economic recovery means that there needs to be a greater deal of prescription in national policy and as such the list of considerations in paragraph 7.5.1 is detailed, however the evidence we have gathered suggests that policy needs more prescription. We expect the economic development TAN to provide guidance on how many of the issues raised under paragraph 7.5.1 could be addressed by local planning authorities. We consider that such requirements are necessary as part of the evidence base for LDPs.

Although we are seeking to promote all forms of employment generation, within the context of the Use Classes Order the traditional employment uses are B1-B8 and it is a relatively straightforward task to identify the requirements for these categories of development.

We have previously accepted that planning policy should also seek to facilitate the re-use of redundant and underused buildings for economic development purposes and agree that these could be usefully referenced in paragraph 7.5.1.

We do not accept that bullet point 10 undermines the primacy of the development plan, it simply promotes city, town and village centres as the most sustainable location for developments which attract large numbers of people and is in accordance with the sequential test outlined elsewhere in PPW.

Q8

Do you agree that local authorities should be working together, and with other stakeholders, to plan strategically for employment land provision?

Section 7.5.1

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	5	3	2	0	0
B	Government Agencies/Other Public Sector	4	3	0	0	0
C	Local Planning Authorities	3	14	0	0	0
D	Professional Bodies/Interest Groups	4	7	1	0	0
E	Voluntary	1	1	0	0	0
All respondents		17	28	3	0	0
Percentage split		35.4	58.3	6.2	0	0

Statistical Review

93% of respondents supported this proposition, 17% of which strongly agreed. No respondents disagreed.

Overview

- In addition to local authorities working together, it was also suggested that local authorities should engage more internally between divisions. There was some support for existing structures such as SEWSPG and SEWEF to take on this role.
- It was argued by one respondent that whilst local authorities can influence the location of economic development, the market will ultimately dictate where employment is created.
- The discord between some LDP timeframes needs to be taken in to consideration and the difficulties this might pose for working together.
- Whilst some respondents were unsure of who might be included in the stakeholders mentioned in 7.5.1 and suggested additional guidance on this, others encouraged engagement with the likes of local business, town councils, retailers, leisure operators, educational institutions and infrastructure providers. The new single body was also proposed as a stakeholder, and to ensure new development is sustainable.
- One response argued that this should only be applied where necessary specifically to avoid overprovision.
- One respondent also emphasised the importance of internal communication between local authority divisions.

Welsh Government Response

Support for this aspect of the revised PPW is welcome. The issue of internal cohesion within local authorities is beyond the scope of this consultation, however, the Welsh Government expects local authorities to be joined up in their approach to service delivery.

We do not intend to specify who the stakeholders should be as they may be different across Wales. The Welsh Government has recently updated guidance on Statutory Consultees within the Planning system and this should be borne in mind when identifying stakeholders within the context of economic development issues although this is by no means prescriptive.

Q9

Do you agree with the view that development management decisions need to reflect economic considerations more prominently?

Section 7.6

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	5	4	1	0	0
B	Government Agencies/Other Public Sector	2	1	2	0	1
C	Local Planning Authorities	4	9	2	0	0
D	Professional Bodies/Interest Groups	5	5	0	2	0
E	Voluntary	0	0	0	0	2
All respondents		16	19	5	2	3
Percentage split		35.5	42.2	11.1	4.4	6.6

Statistical Review

This question resulted in a somewhat mixed response. Of the 77% of respondents who supported this proposition, 32% strongly agreed. Approximately 11% were not supportive of which 6% strongly disagreed. However, in numerical terms this equated to 31 in favour and 5 against. Businesses, Government Agencies/Other Public Sector, Local Planning Authorities and Professional Bodies/Interest Groups were mainly in favour, whilst those disagreeing mainly included Professional Bodies/Interest Groups and Voluntary.

Overview

- This question and the text it refers to has been interpreted in different ways by respondents. Respondents have expressed both support and concern because it is believed economic development may carry more weight than social and environmental considerations in the decision making process. Others consider it will simply readdress a perceived imbalance between the three considerations. Other respondents felt that the existing system was sufficient and wanted to ensure that equality or balance was maintained between economic and environmental considerations in any decision making process. There was also a call for evidence to be provided to support the assertion that environmental considerations were in fact given more weight than economic issues. One comment considers paragraph 7.6.1 as ambiguous and that applications should be developed on their merits.
- Greater reference to the importance of sustainable development in the process was called for.
- It was requested that the 7.6 emphasise that economic development now refers to a broader range of sectors and these needed to be considered equally in the decision process.

- It was suggested that applicants should do more to set out economic benefits of development, perhaps providing economic impact reports.
- The question was raised, would job provision gain more importance in determining qualitative need in relation to retail proposals? Further clarification was requested.
- Concern was expressed that environmental bodies that were statutory consultees were strongly represented in the development management process but there were few economic development equivalents. Perhaps an economic agency was required.
- The policy review should be considered in relation to the Sustainable Development, Planning and Environment Bills. The Sustainable Development Bill may provide a full definition of sustainable development.
- The view was expressed that in rural areas environmental considerations were given higher prominence than economic development issues.

Welsh Government Response

The proposed revisions to PPW were informed by extensive research which in turn was guided by a range of stakeholders representing a many different organisations who promote sustainable development. This research indicated that there was a need to reaffirm and promote the economic aspect of sustainable development alongside the social and environmental aspects. We believe that the draft policy recognises that there is a need for a balanced approach to sustainable development and Chapter 7 should be read in the context of all of PPW which contains extensive policy for environmental protection and social advancement. There will be no further changes to section 7.6

Q10

Do you think that draft planning policy, as proposed, will be effective in raising the profile of economic issues as part of the development management process?

Section 7.6

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	1	5	2	0	0
B	Government Agencies/Other Public Sector	0	3	2	2	0
C	Local Planning Authorities	3	10	2	1	0
D	Professional Bodies/Interest Groups	0	8	3	0	0
E	Voluntary	0	1	0	0	0
All respondents		4	27	9	3	0
Percentage split		9.3	62.8	20.9	6.9	0

Statistical Review

72% of respondents supported this proposition and 7% disagreed. Almost 21% neither agreed nor disagreed. Business, Local Planning Authorities and Professional Bodies/Interest Groups were the most supportive groups.

Overview

- One respondent did not think the policy considered the major barriers to regeneration such as lack of infrastructure, TAN 15 issues and the requirement to comply with European Directives.
- One respondent expressed the opinion that 7.6 may reduce the effectiveness of sustainability led economic development policies in the LDP.

- It was suggested that a short guidance note be prepared, in support of this policy, which provided good practice advice on effective liaison with economic development officers during the decision making process.
- Section 7.6 could be strengthened to support proposals which provide substantial benefits to economic, social and environmental aspects of a development.

Welsh Government Response

We do not believe that the responses submitted in respect of this issue merit any changes to PPW. The mechanism by which Economic Development Officers are included in the decision making process is a matter for local authorities.

Q11

Do you agree with the list of key factors to be taken into account listed in paragraph 7.6.1, when deciding planning applications?

Section 7.6.1

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	1	7	0	1	0
B	Government Agencies/Other Public Sector	1	3	1	1	1
C	Local Planning Authorities	3	12	1	1	0
D	Professional Bodies/Interest Groups	1	7	1	3	0
E	Voluntary	0	0	0	0	2
All respondents		6	29	3	6	3
Percentage split		12.7	61.7	6.3	12.7	6.3

Statistical Review

74% supported the factors listed under section 7.6.1 however 19% were not supportive, of which 6% strongly disagreed. Groups most in favour of the proposition were Businesses, Local Planning Authorities, and Professional Bodies/Interest Groups. All groups contributed toward the 19% not in favour but Professional Bodies/Interest groups were the largest.

Overview

- Whilst this proposal was well supported a number of amendments and additions were suggested.
- A general comment was made that section 7.6 needed to emphasise that the factors listed are not exhaustive. Another respondent felt that the criteria were vague and open to interpretation.
- Uses such as tourism had previously been considered alternative uses on employment land, unless they were complementary. There was concern that the new guidance might erode successful employment parks unless local policy restrictions were in place. Similarly, out of centre retailing might be considered to fall under the definition of economic development, how did this relate to guidance set out in Chapter 10 Retailing and Town Centres?
- Different views were expressed about information on job creation; on the one hand evidence of permanency was sought, whilst another respondent highlighted the importance of part time and seasonal jobs which in rural and peripheral areas could be as significant as full time work. There should also be consideration given to the economic benefits of new development helping sustain local business and jobs offsite.
- A number of specific recommendations were made regarding additions to the criteria such as 'encourage diversity and economic development in rural areas', and include growth potential of business as constraints to expansion could lead to relocation. It was also suggested that the

factors reference national and regional policy, developments relationship with infrastructure, and contribution to local and regional economic position. Reference should be made to contribution towards low carbon economy.

- It was suggested that reference be made to both social and environmental benefits, and impacts particularly in sensitive locations. In a similar vein a number of respondents would have preferred bullet one of the existing Chapter 7 to remain. Another view was that the factors did not consider how economic developments might benefit communities for example in relation to Welsh language. Key factors should also include management of land and water to avoid impact on resources and the imposition of costs through increases flood risk and water scarcity.

Welsh Government Response

There is still an expectation that existing business parks and industrial estates should be protected from inappropriate development and the Welsh Government's policy in respect of out of town shopping development remains unchanged.

Local authorities need to understand fully the nature of employment that is likely to be generated and not take inappropriate decisions based upon ephemeral job creation. PPW and the new TAN seek to ensure that decisions are taken based upon sound locally sensitive evidence. It is expected that the TAN will contain guidance on understanding the local economic conditions.

Q12

Do you agree that local planning authorities should look favourably on applications for economic development not in accordance with development plans, if the economic benefits outweigh and adverse impacts?

Section 7.6.2

Statistical summary

Category		SA	A	NAD	D	SD
A	Businesses	6	2	1	1	0
B	Government Agencies/Other Public Sector	0	3	1	1	2
C	Local Planning Authorities	1	5	3	2	3
D	Professional Bodies/Interest Groups	4	4	2	2	0
E	Voluntary	0	0	0	0	2
All respondents		11	14	7	6	7
Percentage split		24.4	31.1	15.5	13.3	15.5

Statistical Review

This question elicited the widest spread of responses. Whilst 55% supported this proposition, almost 29% opposed it. 24% strongly agreed and 15% strongly disagreed. Of those strongly agreeing Businesses and Professional Bodies/Interest Groups were the largest. Of Local Planning Authorities responding 6 were supportive and 5 were not.

Overview

- A number of respondents requested more information on how this would work in practice, as it was felt it implied that economic benefit overrides other considerations. Some felt it would undermine the primacy of the development plan and reiterated that decisions should continue to be made in accordance with the plan, and that the paragraph should be

removed. The proposal was considered to contradict PPW 1.2.3 and 3.1.1 and sustainable development objectives (notwithstanding the outcome of work in to 'the presumption in favour of sustainable development'); it was further suggested that this proposal may have legal implications which could be open to challenge (for example 7.6.2 under Habitats Directive and Regulations, reg. 59). However, it was also argued that the existing statutory framework already enabled material considerations to be taken in to account under certain circumstances.

- Concern was expressed that if applications were approved because of their economic benefits it might remove local authorities need to consider individual planning applications cumulative impacts.
- One respondent believed that applications for economic development not in accordance with the plan should be referred to the Welsh Government under existing procedures.
- It was argued that such decisions should be given extra weight when development plans were out of date.
- Retail policy may conflict with economic benefits of a proposal because national policy sets out tests to examine adverse affects.
- A further suggestion highlighted the importance of robust evidence if this was to work, based on criteria lists.
- Various amendments to the text were also put forward by respondents

Welsh Government Response

Planning decisions should reflect the balance to be struck between the components of sustainable development. The Welsh Government is determined that the planning system should do all that it can to facilitate sustainable economic development, In this respect local planning authorities must fully understand the economic benefits associated with the proposal and if these outweigh any adverse impacts associated with the development then currently as with any other material consideration,

then the development can be approved. However, question 12 takes this a step further by proposing that where economic benefits outweigh any adverse impacts, even if the proposal is contrary to the development plan, local planning authorities should look favourably on such proposals. Having considered the responses to this statement, we have concluded that its implications in practice (as currently expressed), may raise issues that could become matters of contention. For this reason para 7.6.2 has now been deleted.

In terms of out of town retailing the other provisions of PPW should be applied and we have a clearly established policy containing the sequential test for site selection.

Q15

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Comments included:

- ELR methodology should enable local authorities to undertake the work without having to resort to external consultants, and in this respect the level of evidence required should reflect resource availability.
- Reference needs to be made to the educational and skills development sector, which plays an important part in the economy. The mineral industry should also be recognised.
- Concern was expressed that an approach in favour of economic development could have a harmful affect on the historic environment.
- The policy should address the burden that making minor planning applications has on small businesses.

- The Health and Safety Executive have suggested changes to 7.6.5 concerning references to separation distances, 'When considering the location of new development, authorities should ensure appropriate separation distances between major hazard sites and the public are maintained to manage the risks to people and the environment of a major accident. Consultation with statutory bodies is essential'.
- Should be recognition of the need to protect sites for specific businesses that require certain facilities and features.
- Various respondents have suggested amendments to policy text.
- It should still be a requirement to direct employment development and land allocations toward the most accessible locations; this is not defined in the revised policy.
- Should be reference to resisting alternative uses on sites allocated for traditional employment purposes i.e. B1-B8.
- Chapter should highlight importance of pre-application discussions with developers and statutory consultees.
- Section 7.1.1 needs to be consistent with other parts of PPW.
- Clarification is requested on the following terms 'appropriate location' section 7.1.3, 'a good reason to the contrary' section 7.1.2, 'realistic assumption' section 7.2.1.

Welsh Government Response

Many of the comments made under question 15 are addressed in responses to the other questions.

However, changes suggested to 7.6.5 by the Health and Safety Executive, regarding separation distances, will be included.

ANNEX A LIST OF RESPONDENTS BY CATEGORY

The table below indicates the categories to which respondents assigned themselves to in completing the consultation form. Neither respondent in the 'Other' category featured in the questionnaire statistics because they did not fill out a form. Two respondents requested their identities be withheld.

	Business
	Arqiva Services Ltd
	Concept Town Planning
	Dwr Cymru Welsh Water
	Mango Planning
	Morrison Super Markets
	National Grid
	RPS Planning Group
	RWE NPower Renewables
	Scottish Power
	WYG Planning and Design
	Gov. Agency/Other Public Sector
	CADW
	Countryside Council for Wales
	Combined North Wales Economic Development Authorities
	Identity withheld
	Environment Agency Wales
	Health and Safety Executive
	Welsh Pool Town Council
	Welsh Local Government Association
	Professional Bodies/Interest Groups
	Archaeologist Institute
	British Home Holiday Park Association
	Country Land Owners Association
	Coal Pro
	Friends of Pembrokeshire National Park
	Farmers Union Wales
	Home Builders Federation
	Institute of Historic Building Conservation
	National Farmers Union
	Renewables UK
	RTPI Cymru
	South East Wales Economic Forum

	Wales Tourism Alliance
	Local Planning Authorities
	Anglesey County Council
	Blaenau Gwent County Borough Council
	Bridgend County Borough Council
	Caerphilly County Council
	Cardiff Council
	Carmarthenshire County Council
	Cyngor Sir Ceredigion County Council
	Conwy County Borough Council
	Gwynedd Council
	Monmouthshire County Council
	Neath Port Talbot County Borough Council
	Pembrokeshire Coast National Park
	Pembrokeshire County Council
	Powys County Council
	Rhondda Cynon Taf County Borough Council
	Snowdonia National Park
	Swansea City Council
	Voluntary
	CPRW
	Wales Link
	Other
	Julia Gardiner
	Madeline Moon MP

ANNEX B - STATISTICAL OVERVIEW OF ALL RESPONSES

The table below provides an overview of all responses to the questionnaire. It is based on the tables presented in section 4 but combines the five response options into three groups namely 'Agree and Strongly Agree' (A/SA), 'Don't Know' (DK), and 'Disagree and Strongly Disagree' (D/SD). This provides a broad overview of whether in principle a proposal is supported or not.

	Question		Business	Government Agencies	Local planning authorities	Professional Bodies/Interest Groups	Voluntary	Total	%
1	Do you agree with the proposed definition of economic development for planning purposes?	A/SA	8	3	15	6	0	32	70
		DK	1	2	1	3	0	7	15
		D/SD	1	1	1	2	2	7	15
2	Do you agree with the objectives as specified in paragraph 7.1.2?	A/SA	5	5	15	10	0	35	74
		DK	5	1	0	0	0	6	13
		D/SD	0	1	1	2	2	6	13
3	Do you agree that an Employment Land Review is required to provide the evidence base for Local Development Plans?	A/SA	5	5	17	7	0	34	74
		DK	4	2	0	4	2	12	26
		D/SD	0	0	0	0	0	0	0
4	Do you agree that Employment Land Reviews should be undertaken collaboratively by local planning authorities to reflect economic circumstances?	A/SA	6	6	15	9	0	36	78
		DK	4	1	0	3	1	9	20
		D/SD	0	0	1	0	0	1	2
5	Do you think that policy on economic development will help in rural areas to promote diversification of the economy?	A/SA	5	3	10	11	0	29	64
		DK	2	3	5	1	1	12	27
		D/SD	1	1	1	0	1	4	9
6	Do you consider that the draft policy supports the development of the green economy?	A/SA	5	5	9	7	0	26	59
		DK	1	2	7	4	0	14	32
		D/SD	1	0	0	1	2	4	9
7	Do you agree that the guidance on the content of development plans is sufficiently flexible to allow for local circumstances and changes in the wider economy?	A/SA	6	4	11	5	0	26	60
		DK	3	2	4	4	2	15	35
		D/SD	0	1	1	0	0	2	5

8	Do you agree that local authorities should be working together, and with other stakeholders, to plan strategically for employment land provision?	A/SA	8	7	17	11	2	45	94
		DK	2	0	0	1	0	3	6
		D/SD	0	0	0	0	0	0	0
9	Do you agree with the view that development management decisions need to reflect economic considerations more prominently?	A/SA	9	3	13	10	0	35	78
		DK	1	2	2	0	0	5	11
		D/SD	0	1	0	2	2	5	11
10	Do you think that draft planning policy, as proposed, will be effective in raising the profile of economic issues as part of the development management process?	A/SA	6	3	13	8	1	31	72
		DK	2	2	2	3	0	9	21
		D/SD	0	2	1	0	0	3	7
11	Do you agree with the list of key factors to be taken into account listed in paragraph 7.6.1, when deciding planning applications?	A/SA	8	4	15	8	0	35	74
		DK	0	1	1	1	0	3	6
		D/SD	1	2	1	3	2	9	19
12	Do you agree that local planning authorities should look favourably on applications for economic development not in accordance with development plans, if the economic benefits outweigh and adverse impacts?	A/SA	8	3	6	8	0	25	55
		DK	1	1	3	2	0	7	15
		D/SD	1	3	5	2	2	13	29