The Localism Act 2011 – reform of the planning system

The Localism Act received Royal Assent on 15 November 2011. **Although the Act contains a number of important measures, not all of the measures are in force.**

The Act contains a number of *enabling provisions*. These give the Secretary of State power to introduce regulations and guidance that will make the measures 'live.' **It will not be clear how the measures will work in practice until the government publishes regulations and guidance. The government has not yet published regulations for a significant number of the measures.**

This detailed briefing includes:

- an overview of the main components of this section of the Localism Act
- the estimated timescales for measures to be introduced and regulations to be published - please see the 'Status' section for each measure
- the potential implications of the Localism Act for Wiltshire
- next steps for Wiltshire Council and contact details

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Abolition of regional planning strategies (s109)	Status: in force now, abolition order expected 30 April 2012
The Act abolishes responsible regional planning authorities and the regime for regional planning strategies. At present regional planning strategies remain in force. It also gives the Secretary of State power to order the abolition of all or part of any previous structure plan policies that were saved as part of the transition to core strategies. Structure plan policies provided a strategic policy framework for land use planning, development and transport. These provisions came into force when the Act received Royal Assent, but regional planning strategies are likely to continue until at least 20 January 2012 when the government's consultation on the environmental impact of abolishing regional planning strategies finishes. The government intends to issue an order revoking all existing regional spatial strategies and saved structure plan policies as soon as possible.	
Implications for Wiltshire	**Next steps** For more information please contact: Alistair Cunningham, Service Director for Economy and Enterprise at alistair.cunningham@wiltshire.gov.uk
The Adopted Regional Spatial Strategy for the South West (RPG10) has already been implemented at the local level through the Wiltshire and Swindon Structure Plan 2016. As a result of the Localism Act, the more recent draft Regional Spatial Strategy (RSS) for the South West 2006 – 2026 has been abandoned and will not be adopted. Until the draft RSS is formally abolished, the council will need to make sure that the Wiltshire Core Strategy is in general conformity with the draft RSS unless new evidence overrides policies within the RSS. The saved policies of the Wiltshire and Swindon Structure Plan form the most up to date part of the statutory development plan which contains a consistent policy for Wiltshire as a whole.	The council will: • progress locally derived employment land and housing requirements for the period 2006 to 2026, based on up to date evidence, as part of the emerging Wiltshire Core Strategy • implement the recently adopted South Wiltshire Core Strategy – this includes locally derived levels of new employment land and homes and will be used to inform decisions on planning applications in South Wiltshire • continue to prepare the Wiltshire Core Strategy – it will be submitted to the Secretary of State for independent examination by early July 2012. The Wiltshire Core Strategy will ensure consistent, up to date planning policy across the whole of Wiltshire as soon as possible. The Wiltshire Core Strategy will include the recently adopted South Wiltshire Core Strategy • use the emerging Wiltshire Core Strategy to determine planning applications as well as the council's decisions on investments relating to

	the use and disposal of land and regeneration activities

Legal duty to cooperate when planning sustainable development (s110)	Status: in force now

The Act places a legal duty on local planning authorities, county councils and other statutory bodies (to be defined in regulations) to co-operate with each other.

They will be required to:

- engage constructively, actively and on an ongoing basis when preparing development plans, marine plans and other local development documents for 'strategic' activities, such as sustainable development or infrastructure that would have a significant impact on at least two planning areas
- have regard to the activities of each other
- consider whether to consult on, prepare and publish agreements on joint approaches to 'strategic' planning activities
- consider whether to prepare joint local development documents (this only applies to local planning authorities)
- comply with all guidance issued by the Secretary of State on how to comply with the legal duty to cooperate

Implications for Wiltshire	Next steps For more information please contact: Alistair Cunningham, Service Director for Economy and Enterprise at alistair.cunningham@wiltshire.gov.uk
As a new unitary authority Wiltshire Council is already working over a large geography and taking strategic implications into account across a wide area. The council will need to: • develop the expertise of its officers in strategic planning matters • re-establish its strategic planning role • review and reinvigorate its relationships and working arrangements with neighbouring planning authorities in Gloucestershire, the West of England, Somerset, Berkshire, Dorset and Hampshire.	The council will: • respond to formal and informal consultations on planning policy documents prepared by other local planning authorities and statutory bodies defined by the Localism Act and actively engage in the preparation of strategic policy • develop appropriate Officer/Councillor working arrangements with all adjoining local authorities • monitor the activities of adjoining local authorities • exploit opportunities for joint working, building on existing efficient joint working arrangements developed with Swindon Borough Council on Minerals and Waste planning policy matters

Changes to the approval process for local development schemes and development plan documents (s111 – 113)	Status: in force from 15 January 2012

Local development schemes set out the timetable for local planning authorities to produce development plan documents which are used to make decisions on planning applications.

The Act changes the way local development schemes are approved by:

- removing the requirement for local planning authorities to submit local development schemes to the Secretary of State
- introducing a new requirement for local planning authorities to publish their local development scheme, including any changes to the scheme and up to date information on progress against the timetable
- limiting the powers of the Secretary of State to make changes to local development schemes – the Secretary of State can only order changes for the purpose of ensuring 'effective coverage' of the local authority's area

The Act also changes the process for approving and withdrawing development plan documents:

- if it is reasonable to conclude that development plan documents are sound and meet the statutory requirements, the planning inspector must recommend that they are adopted

- if the local planning authority prepared the documents correctly, but the documents are not sound or do not meet the statutory requirements, the local planning authority can ask the planning inspector to recommend changes that would make the documents suitable for adoption – the planning inspector can **only** recommend changes if he or she is requested to by the local planning authority

- local planning authorities can change development plan documents after the inspector has recommended approval as long as the changes do not 'materially affect' the policies in the development plan

- if the inspector recommends non-adoption and changes to the development plan documents that would make it suitable for adoption, local planning authorities can adopt the documents with the main changes recommended by the inspector and any other changes that do not 'materially affect' the policies in the modified development plan

- local planning authorities can withdraw a development plan document any time before its adoption without a recommendation from the planning inspector or an order from the Secretary of State

- the Secretary of State still has powers to order a local planning authority to withdraw a development plan document before it is adopted

- local planning authorities will no longer be required to submit annual reports on the implementation of local development schemes and development plan documents to the Secretary of State - instead they will need to publish this information annually.

The new process will apply to **all** development plan documents that are adopted after the provisions come into force (after 15 January 2012), including those that have been inspected

but have not been adopted.	
Implications for Wiltshire	Next steps For more information please contact: Alistair Cunningham, Service Director for Economy and Enterprise at alistair.cunningham@wiltshire.gov.uk
The Act means the council will: • no longer be required to submit Local Development Schemes to the Secretary of State for approval • need to publish its Local Development Scheme, including any changes to the scheme and up to date information on progress against the timetable • comply with the requirements of the Localism Act when preparing development plans • no longer be required to submit a single annual monitoring report to the Secretary of State each year or to provide data on national indicators • still be required to publish reports covering annual data sets	The council will: • continue to publish up-to-date information on progress against timescales within Local Development Scheme on the Wiltshire Council website and review as appropriate • continually review and improve its monitoring systems to ensure data is collected, analysed and reported on efficiently and effectively

Reform of the Community Infrastructure Levy (s114-115)	Status: in force from 6 April 2012, regulations expected 25 July 2012

The Community Infrastructure Levy (CIL) allows local planning authorities to charge a levy on new development in their area in order to raise funds to meet the associated demands placed on the area and enable growth.

The Act changes the process for setting and approving Community Infrastructure Levy charges by introducing:

- a requirement for local planning authorities to set their charging schedules based on 'appropriate available evidence' (to be determined in regulations by the Secretary of State)
- a requirement for the independent examiner to consider whether the local planning authority has complied with the CIL regulations when setting the charging schedule:
    - if the local planning authority has not complied with the regulations and no changes could be made to the charging schedule to make it compliant the examiner must recommend that the charging schedule is rejected - local planning authorities cannot adopt a charging schedule if the examiner has recommended rejection
    - if changes could be made to the charging schedule to make it compliant with the regulations, the examiner must recommend that the charging schedule is approved with these changes

- very limited discretion for local planning authorities to choose how they respond to changes suggested by the examiner:
    - a local planning authority must have regard to the reasons for the changes suggested by the examiner and can **only** introduce changes that are 'sufficient and necessary' to ensure compliance with the regulations identified by the examiner. They will also be required to publish a report explaining how the charging schedule complies with the regulations.
    - a local planning authority cannot approve a charging schedule if the examiner recommends rejection.

The Act amends the purpose of the Community Infrastructure Levy by:

- explicitly requiring the CIL regulations to make sure local planning authorities will not be able to impose levy charges that make it 'economically unviable' to develop their areas because landowners and developers will be unable to meet the costs of the levy

- widening the definition of 'infrastructure' to include the future maintenance and operating costs of infrastructure

- extending the permitted uses of levy receipts so that they can be applied to a matter that supports development by addressing the demands that it places on the area

- allowing the CIL regulations to require local planning authorities to consider the costs of, and expected sources of funding for, anything other than infrastructure that will address the demands that development places on an area.

The Act also introduces a legal duty to pass levy receipts to other bodies specified by the CIL regulations. The regulations will:

- ensure levy receipts passed to other bodies are only used to support the provision, improvement, replacement, operation or maintenance of infrastructure; or, anything else that addresses the demands development places on an area
- provide details of how levy receipts can be passed to other bodies, including the monitoring, reporting and accounting responsibilities of the local planning authority and bodies that have been given CIL receipts

A government consultation on the draft community infrastructure regulations closed on 30 December 2012.

Implications for Wiltshire	Next steps For more information please contact: : Alistair Cunningham, Service Director for Economy and Enterprise at alistair.cunningham@wiltshire.gov.uk
The council will need to develop a Community Infrastructure Levy (CIL) charging schedule and a set of administration procedures which comply with the requirements of the Localism Act. The government's consultation on draft CIL regulations focused on: • whether affordable housing should be part of CIL • how CIL should be distributed and spent locally The final regulations are expected 25 July 2012. The development of a CIL charging schedule depends on the emerging Wiltshire Core Strategy because: • the Infrastructure Delivery Plan that underpins the emerging Wiltshire Core Strategy will be a key part of the evidence base for the CIL charging schedule • the council's ability to become a charging authority for CIL depends on the development and progression of the Wiltshire Core Strategy The current process of negotiating section 106 agreements for individual planning applications is time consuming and can delay development. A uniform set of county-wide contributions will reduce debate and speed up the development process.	The council will: • introduce the Community Infrastructure Levy (CIL) within the timeframe specified by the government to make sure contributions can be collected • update its CIL project plan to incorporate the provisions of this section of the Localism Act and regulations from the government (expected 25 July 2012) • prepare a CIL charging schedule and develop arrangements to collect CIL and monitor the expenditure. The charging schedule will meet (or be ready before) the milestones set in the council's Local Development Scheme • consider publishing online, real time information on CIL receipts • work with Area Boards and town/parish councils to liaise with appropriate local stakeholders – this will help the council identify community infrastructure requirements, establish local priorities and implement mechanisms for administering CIL receipts

Neighbourhood planning (s116-122, schedules 9-12)	Status: in force from 6 April 2012, general regulations passed 6 March 2012, regulations for referendums expected 25 July 2012

The Localism Act makes a number of changes to the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 to introduce neighbourhood planning. This includes:

- *neighbourhood development plans* – these allow parish councils (or 'neighbourhood forums' if there is no parish council) to lead on the development of local policies for the development and use of land in a neighbourhood area
- *neighbourhood development orders* - orders prepared by parish councils (or 'neighbourhood forums' if there is no parish council) which grant planning permission for specific development in a particular neighbourhood area.

The Act places a legal duty on local planning authorities to:

- designate 'neighbourhood areas' when parish councils or bodies capable of being designated as 'neighbourhood forums' where there is no Parish Council (comprised of a minimum of 21 individuals who live or work in the neighbourhood area, including unitary councillors) apply to be designated as neighbourhood areas
- have regard to the 'desirability' of designating existing parish council areas as neighbourhood areas
- follow the procedure for considering neighbourhood development plans and orders outlined in the Act and regulations from the Secretary of State

Neighbourhood development plans:

Unless there are other material considerations, decisions on applications for planning permission must be made in accordance with neighbourhood development plans. According to the draft National Planning Policy Framework (NPPF) neighbourhood development plans must conform to the Local Plan, i.e. the Wiltshire Core Strategy.

The Act provides detail on the expected form and contents of neighbourhood development plans and gives the Secretary of State power to make further regulations. A neighbourhood development plan must:

- specify the period for which it has effect
- not include any references to 'excluded development' (including nationally significant infrastructure projects and minerals and waste)
- only relate to one neighbourhood area – a neighbourhood area cannot have more than one neighbourhood development plan

Neighbourhood development orders:

Neighbourhood development orders cannot apply to more than one neighbourhood area and the local planning authority cannot consider more than one neighbourhood development order for the same neighbourhood area at the same time. Planning permission under a neighbourhood development order can be granted:

- unconditionally; or,

- subject to conditions which specify that the local planning authority must give approval for some of the work permitted under the order - regulations from the Secretary of State may allow parish councils to give approval for work permitted under neighbourhood development orders.

Neighbourhood development orders can be revoked by the Secretary of State or the local planning authority (with the consent of the Secretary of State or to correct errors in the development order). Legal challenges to neighbourhood development orders can only take place if a claim for judicial review is filed within six weeks of the day when the decision was published.

Procedure for introducing neighbourhood development plans and orders:

The procedures for introducing neighbourhood development plans and making neighbourhood development orders are very similar. Proposals for neighbourhood development plans and orders will need to be submitted to the local planning authority by parish councils or 'neighbourhood forums'.

The Act gives the Secretary of State power to make regulations on:

- the expected standards for draft neighbourhood development plans or orders, including documents and information that must accompany proposals for plans or orders
- consultation which must be undertaken by the parish council or neighbourhood forum before proposals for plans or order are submitted to the local planning authority

It also requires local planning authorities to:

- give appropriate advice and non-financial assistance to parish councils or neighbourhood forums to help them make proposals for neighbourhood development plans and orders
- check whether the application meets the requirements of legislation and regulations
- submit the draft neighbourhood development plan or order for 'independent examination' by an independent person with appropriate qualifications who has no interest in the land affected by the draft plan or order (the local planning authority may be required to pay the independent person for their services). The independent examiner will consider whether the plan or order is appropriate in relation to national policy, the strategic policies of the local development plan for the area (i.e. the Wiltshire Core Strategy once adopted) and EU obligations
- hold a referendum on the neighbourhood development plan or neighbourhood development order in the relevant neighbourhood area (this may include an additional referendum if the neighbourhood area has been designated as a 'business area')
- bring the neighbourhood development plan into force or make the neighbourhood development order as soon as reasonable practicable if more than half of those voting in each relevant referendum have voted in favour of the plan. This does **not** apply if the planning authority considers that bringing the plan into force would be incompatible with any EU obligations or any rights under the Human Rights Act. In these circumstances the planning authority must follow a procedure set out in regulations by the Secretary of State
- publish all decisions to accept or reject neighbourhood development plans, including the reasons for making the decision
- follow the procedure for dealing with neighbourhood development order requests set out in regulations from the Secretary of State (the government is currently consulting on these regulations)

Local authorities can refuse to consider 'repeat proposals.' A proposal is a 'repeat proposal' if

a similar proposal has been refused by the local authority or the subject of an unsuccessful referendum within the last two years and there has been no 'significant change' in national policies or guidance or the strategic policies of the local development plan.

Charges to recover costs incurred by neighbourhood planning

The Act gives the Secretary of State power to make regulations on the introduction of charges to cover expenses incurred by local planning authorities when exercising their neighbourhood planning functions.

A charge will need to be paid to a local planning authority when development under a neighbourhood planning order is commenced. Regulations may allow liability for the charge to be passed to land owners and developers before or after the charge becomes due.

Regulations will make provision for enforcement to collect unpaid charges and unpaid charges will be treated as a collectible civil debt due to the local planning authority.

The Act also gives the Secretary of State power to provide financial assistance for neighbourhood planning, for example to help a neighbourhood forum draft a neighbourhood development plan or order.

Implications for Wiltshire	Next steps For more information please contact: Alistair Cunningham, Service Director for Economy and Enterprise at alistair.cunningham@wiltshire.gov.uk
Neighbourhood planning will provide an opportunity for parish councils to lead on the preparation of neighbourhood development plan(s) for their area. Neighbourhood development plans must conform with the existing and emerging Local Development Plan, particularly the emerging Wiltshire Core Strategy. Localism Act introduces a new legal duty for Wiltshire Council (as local planning authority) to support the preparation and administration of neighbourhood planning. Neighbourhood planning will be a potentially onerous and resource intensive process for the council and participating town/parish councils. Full legislation is not currently in place for Neighbourhood Planning – the government is expected to publish the remaining regulations on 25 July 2012.	The council will: • provide workshops for town/parish councils to improve their understanding and knowledge of neighbourhood planning. In March 2012 the council held four events for rural parishes and market towns which focused on the relationship between neighbourhood planning and the emerging Wiltshire Core Strategy • develop guidance and a Wiltshire Neighbourhood Planning web-portal to provide accessible information on neighbourhood planning in Wiltshire. This will include information on projects (such as the Wiltshire's 'front-runner' pilot projects) and guidance on the legality of multiple parishes working together • provide guidance which explains that neighbourhood plans are not compulsory and outlines the choices parishes will need to make when deciding whether a neighbourhood plan is appropriate for them

	• develop procedures to manage the neighbourhood planning process – these will cover governance arrangements and the potential recovery of costs through charges • respond to all government consultations on regulations for neighbourhood planning

Requirement for developers to consult local communities before submitting applications for planning permission (s122)	Status: regulations expected 1 October 2012

The Act introduces a requirement for developers to consult local communities before submitting applications for planning permission.

Before submitting planning applications developers will need to:

- publicise the proposed application in a way that is likely to bring it to the attention of the majority of people who live near the land – this must include information about the length of the consultation and how the developer can be contacted
- consult anyone specified in the development order
- have regard to any advice about good practice for consultation provided by the local planning authority
- consider any comments or responses received during the consultation when deciding whether to make any changes to their proposed planning application
- submit an account of the consultation to the local authority with their planning application

The Act also gives the Secretary of State power to introduce regulations which set out the detail of how developers should consult local communities.

Implications for Wiltshire	Next steps For more information please contact: Brad Fleet, Director of Development Services at brad.fleet@wiltshire.gov.uk
The council will need to add pre-submission consultation to the current planning application validation checklist. Officers will need to assess evidence of consultation before a planning application can be registered. If the evidence is inadequate, this will delay the registration of the planning application. It is likely that these additional consultation requirements will apply to 'major' schemes. Refusing to register applications before adequate consultation has been undertaken may be seen as additional 'red tape'. The council will need a clear policy on what it regards as 'good practice' for consultation on planning applications.	The council will add pre-submission consultation to the planning application validation checklist. This cannot be done until the government publishes regulations (expected October 2012) and the council knows: • the level of consultation required • which types of planning application will require pre-submission consultation The council will review and update its Statement of Community Involvement to reflect the new requirements. The council will issue clear guidance on 'good practice' for consultation with communities before submitting a planning application. For some types of planning applications this may include a requirement to consult Area Boards.

Changes to planning enforcement (s123-127)	Status: in force from 6 April 2012

The Act allows local authorities to refuse to consider planning applications for development that has already taken place in circumstances where an enforcement notice was issued for all or part of the development **before** the planning application was submitted.

It also changes the right to appeal against enforcement notices to prevent appeals against similar developments using both planning application and enforcement routes.

The Act allows local planning authorities to take enforcement action against concealed 'breaches of planning control' (development that has taken place without planning permission or where the developer has failed to comply with the conditions of planning permission) by:

- applying to the magistrates' court for a 'planning enforcement order' – this must be within six months of the day when the local planning authority discovered the breach of planning control and the magistrates' court can only make a 'planning enforcement order' if they are satisfied that the individual has deliberately concealed the breach of planning control
- serving a copy of the application for a planning enforcement order on the individual that will be given an enforcement notice if the order is granted
- including all 'planning enforcement orders' in their enforcement registers

The Act raises the maximum penalty for failing to comply with a notice on the conditions of planning permission from level three on the standard scale (currently £1,000) to level four (currently £2,500). It also gives local planning authorities powers to:

- remove structures which are used for illegal advertisements after a removal notice has been served
- take action against persistent fly-posting on surfaces
- remove signs (including graffiti) that they consider offensive or detrimental to the amenity of the area after an action notice has been served
- remove signs or graffiti at the expense of the owner of a building or land when requested to by the owner

Implications for Wiltshire	Next steps For more information please contact: Brad Fleet, Director of Development Services at brad.fleet@wiltshire.gov.uk
The council will be able to refuse to consider planning applications where: • an enforcement notice has already been issued; or • the applicant is still able to appeal an earlier decision not to grant planning permission. This will reduce delay because work will not be duplicated across a planning appeal and an enforcement appeal. The council will be able to take action against concealed breaches of planning control after the normal time limits for enforcement have	The council will: • refuse to consider planning applications where the legislation allows • seek an order through the Magistrates Court in cases of concealed breaches of planning control Information on the new rules will be published on the Wiltshire Council website.

expired. This will act as a strong deterrent and reduce the number of unauthorised developments. However, the impact on Wiltshire will be minimal because deliberate concealment does not happen very often.	

Changes to the system for approving nationally significant infrastructure projects (s128-142)	Status: in force from 1 April 2012

The Act makes a number of changes to the regime for approving nationally significant infrastructure projects. The changes include:

- abolishing the independent Infrastructure Planning Commission (IPC), transferring all of the IPCs property, rights and liabilities to the Secretary of State (this will be treated as a relevant transfer for the purposes of the TUPE Regulations 2006) and giving the Secretary of State powers to make transitional arrangements for applications received before or after the abolition of the IPC

- giving the Secretary of State the right to appoint an inspector (or panel of inspectors) to examine applications for nationally significant infrastructure projects and make recommendations to the Secretary of State and allowing the Secretary of State to charge fees for the costs incurred in considering applications for planning permission for major infrastructure projects

- requiring the House of Commons to approve all national policy statements and amendments that significantly ('materially') change existing national policy statements- this must be done within 21 sitting days unless the Secretary of State requests an extension (up to another 21 sitting days)

- clarifying the rules for consultation with local planning authorities - where a national policy statement has been changed consultation only needs to be carried out on the changes and not on the whole of the policy statement

- giving the Secretary of State powers to:

    - change the types of consents that are automatically granted when consent is granted for a nationally significant infrastructure project, such as consent under the Electricity Act
    - decide that infrastructure projects below the threshold set in the Planning Act 2008 are nationally significant and require development consent – this power can only be used when the Secretary of State receives a written request and the Secretary of State is required to make a decision with 28 days
    - allow applicants (or proposed applicants) to serve a notice on the landowner requiring them to write to the applicant with the name and address of anyone with an interest in the land or anyone who may be entitled to make a relevant claim for compensation (e.g. for compulsory purchase of the land or a reduction in the value of the land because of public works)
    - require successful applicants for development consent to gain approval throughout the project from the Secretary of State or the local planning authority

- no longer requiring applicants for development consent to publish a statement setting out how local people will be consulted on the proposed application – a statement of when and where the statement can be viewed will still need to be published in a local newspaper

- extending the ability of applicants to compel landowners to allow them to enter their land to survey it – this now applies regardless of whether the applicant is likely to ask for compulsorily purchase of the land

Implications for Wiltshire	Next steps For more information please contact: Brad Fleet, Director of Development Services at brad.fleet@wiltshire.gov.uk
It is unlikely that a nationally significant infrastructure project, such as a major train line or a power station, would take place in Wiltshire. If a nationally significant infrastructure project does take place in Wiltshire, decision making will be taken out of the council's hands. However, the council would be a key consultee in any decision making process.	The council will: • respond to any relevant government consultations on nationally significant infrastructure projects that affect Wiltshire • work with the Swindon and Wiltshire Local Enterprise Partnership as appropriate

Clarification that 'local finance considerations' can be taken into account when assessing planning applications (s143)	Status: in force from 15 January 2012
The Act amends the Town and Country Planning Act 1990 to make it clear that local planning authorities can take 'local finance considerations' into account when assessing planning applications. Local finance considerations are defined as: • grants or financial assistance that are, could be or would be provided to the local authority by a government minister, such as the New Homes Bonus • money that the local authority has received, will receive or could receive from the Community Infrastructure Levy	
Implications for Wiltshire	Next steps For more information please contact: Brad Fleet, Director of Development Services at brad.fleet@wiltshire.gov.uk
Previously planning applications were based on compliance with the council's policy and the visual or environmental impact. The Localism Act adds a new consideration: how much money the council will receive if it grants planning permission. This is subjective and very much a political decision. This may make decision making more complicated and less transparent than it is at present.	The council will produce clear and transparent guidelines on the weight it will give to financial considerations in the planning process.