Development Management: Initial Guidance

1 Introduction

1.1 Since September 2004, local authorities have been concentrating their efforts on producing spatial plans. The first batch of Core Strategies has been adopted and others are on the way, so local authorities should prepare to put their forthcoming spatial plans into practice through Development Management.

1.2 This paper is aimed at giving initial guidance on the emerging practice of Development Management to an audience drawn principally from planning staff and managers in local authorities. Project work with eight local authorities during the next twelve months will provide practical experience for inclusion in an updated and improved version of this guidance to be published in November 2008.

1.3 The guidance is set out in four parts, followed by three technical annexes and a summary annex as follows:

- What does Development Management mean?
- What is Development Management based upon?
- How will it operate in practice?
- What are the benefits?
- Annex A: Development Management activities
- Annex B: Approaches to changing culture and practice
- Annex C: Useful further reading
- Annex D Summary

2 What does Development Management mean?

2.1 Development Management is not a new name for Development Control. It is part of the spatial planning system, so it has a different basis and it seeks to achieve a greater focus on sustainable and higher quality development and greater community benefit than under previous planning legislation.

2.2 Development Management includes a wide number of planning activities such as designing, analysing, influencing, promoting, engaging, negotiating, decision-making, co-ordinating, implementation, compliance and enforcement.

2.3 There are several definitions of development management in circulation. The Department for Communities & Local Government (DCLG) speakers at the series of Planning Advisory Service (PAS) regional seminars on development management in November & December 2007 defined development management by reference to its role in delivering sustainable development. DCLG definition:

- “Development Management is end-to-end management of the delivery chain for sustainable development”
The Planning Officers Society Enterprises (POSe) has coined its own definition of development management that refers to its role in the spatial planning activities of local authorities. POSe definition:

- “Development Management is an integral part of the spatial planning process; it puts spatial development plans into action and seeks to achieve good design and sustainable development”

2.4 The two definitions of Development Management describe a concept and process that are quite different from Development Control based on traditional land-use plans such as Local Plans and Unitary Development Plans. The differences in approach are characterised in table 1 below.

Table 1: Comparison of Development Control & Development Management

<table>
<thead>
<tr>
<th>Development Control</th>
<th>Development Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose is seen as to control development to minimise harm and enhance the quality of the final product, with a focus on processing applications</td>
<td>Purpose is seen as to manage development to maximise achievement of planning objectives, including 'place-shaping' &amp; high quality, with a focus on the pre-application stage</td>
</tr>
<tr>
<td>Restricted to land use matters</td>
<td>Includes spatial considerations as expressed in the RSS + LDF &amp; SCS etc.</td>
</tr>
<tr>
<td>Restricted to considering planning applications and other consents</td>
<td>Includes working with partner agencies to ensure implementation of other actions in the plan, e.g. delivery of infrastructure</td>
</tr>
<tr>
<td>Other agencies are consultees in the process</td>
<td>Key agencies are named as partners in the plan’s objectives &amp; work jointly to secure the agreed development.</td>
</tr>
<tr>
<td>Asks “What do our policies say about this?”</td>
<td>Asks “What are we trying to achieve, how do our policies reflect this, and how does this proposal measure up?”</td>
</tr>
<tr>
<td>The development plan is the main determinant of decisions</td>
<td>Looks beyond the development plan to the sustainable community strategy to illuminate “what are we are trying to achieve?”</td>
</tr>
<tr>
<td>Requires interpretation of national, regional &amp; local policy</td>
<td>Calls for similar interpretation and also an evaluation of proposals against spatial vision, objectives and policies</td>
</tr>
<tr>
<td>A focus on separate environmental, economic, social &amp; resources issues raised by proposals</td>
<td>A focus on the sustainability and the likely outcomes of proposals</td>
</tr>
<tr>
<td>Asks “Is this proposal good enough to approve or bad enough to refuse?”</td>
<td>Asks “Can this proposal help to achieve our spatial vision and objectives?”</td>
</tr>
</tbody>
</table>
3 What is Development Management based upon?

3.1 Development Management is an integral part of the spatial planning system operated by local authorities and is based upon the 2004 Act. Table 2 below highlights the context for operating Development Management.

Table 2: Spatial planning context for Development Management:

- The Local Development Framework and the Development Management service fit together as the complete spatial planning process undertaken by a Local Planning Authority (LPA).

- Development Management is derived from national policy and the vision and wider objectives of a two-tier (local and regional) spatial development plan and not driven solely by policies in the Local Development Framework.

- The spatial development plan is linked to the Sustainable Community Strategy and other relevant local strategies, so Development Management is a key mechanism for achieving delivery of these strategies.

- Both the Sustainable Community Strategy (SCS) and the Local Development Framework (LDF) seek to achieve progress towards sustainable development, so sustainable development is the principal “driver” of Development Management (DMt).

- DMt relies upon strong co-operative working with agencies that commission and provide services and infrastructure to achieve timely delivery of agreed requirements in the right places.

- DMt is vital to ‘place shaping’ through its ability to harness opportunities created by development proposals and seek outcomes that achieve well planned developments which contribute positively to the area and provide community benefits.

Diagram 1 on the following page shows how Development Management is related to key sources of policy and the delivery of services and infrastructure in a local authority area. In order to keep the diagram uncluttered, it does not show the existing direct links from national and regional policy to development management (or the proposed direct links from national and regional policy to supplementary planning documents: ref Planning Bill).
4 How will it operate in practice?

4.1 Local authorities need to make a major shift in their culture and processes before they can operate a complete Development Management service. The following paragraphs suggest how Development Management could operate in a local authority that had fully embraced the change.

4.2 Setting an early agenda: The Council actively pursues the vision, objectives and policies in its spatial plans. Issues and objectives are shared between the authority, developer and community. All the public sector agencies have agreed (via a Local Area Agreement) on their delivery of services in the area during the next three years. The council uses Planning Forums to promote effective pre-application discussions between developers, statutory consultees and local people. It produces site briefs, design codes, master-plans etc to identify development opportunities and requirements before pre-application discussions take place. Priorities for infrastructure and affordable housing have been established and published with the involvement of development management staff. Individual major site requirements are established pro-actively with partner agencies and promoted through LDFs, Regional Spatial Strategies (or London
Plan, and Sustainable Community Strategies as appropriate. Tariffs, formulae and model forms of Section 106 Agreement have been published. Resources have been redirected following a review of handling processes for householder and minor applications. The authority knows what it wants from new development, so the development management staff have a sense of vision and purpose when evaluating the contributions that particular proposals could make to ‘place shaping’ in the area.

4.3 **Focus on the pre-application stage:** There has been early attention to strategic and other major issues with the focus of negotiation shifted to the pre-application stage. Developers and their agents are actively encouraged to enter into pre-application discussions. These discussions also involve how the scheme, if approved, will be implemented and monitored. Local authority-wide co-ordination of priorities in the corporate strategy, sustainable community strategy & local development framework is in place to facilitate agreed outcomes. Information reports on pre-application discussions provide feedback. Councillors have been involved in pre-application discussions on major sites (in accordance with a published protocol). Working practices have been changed to prioritise and maximise the case officer’s involvement in the broad thinking about proposals. Administrative tasks for case officers have been minimised. Project management is used to ensure that professional resources are maximised at the beginning of the process with appropriate support (including ATLAS or external independent consultants available if necessary).

4.4 **Assigning responsibilities and rewards for the delivery of objectives:** The purpose of spatial planning is recognised at the heart of the authority’s corporate work. Leading members, the Chief Executive and directors fully understand and support the role of development management. Development proposals that are fundamentally contrary to established policy are assessed for any significant benefits that could be achieved by negotiation; and proportionate staff resources are allocated to potentially beneficial cases. Progress on major development schemes, which contribute to the vision in the corporate strategy, sustainable community strategy or the LDF, is reported regularly to management team, cabinet and backbenchers. Development management objectives are highlighted in relevant staff appraisals, e.g. appreciation for contributions to spatial objectives which are attributable to development management staff. Incentive systems involving rewards to staff are subject to appropriate probity checks.

4.5 **Delivering the requirements of spatial planning objectives:** Joint working by the council’s planning staff and infrastructure and service providers has agreed effective mechanisms and realistic programmes for timely provision of social and physical infrastructure. These are linked to the Local Area Agreement (LAA). Thresholds are identified, after which development cannot take place without social or physical infrastructure. Protocols covering the council’s approach to planning gain have been published after public participation. Development management staff have agreed a balance between direct and indirect (via a shared tariff approach) contributions towards necessary site infrastructure. This balance reflects priorities in the Sustainable Community Strategy, LDF and LAA. The viability of infrastructure provision, including contributions from other sources
(e.g., national and regional funding and joint working mechanisms) has been identified and established with development management staff.

4.6 **Adopting a ‘layered’ approach to managing proposals:** The Authority has identified practical thresholds for handling pre-application discussions concerning minor development. It assessed the cumulative impacts of minor development and set area-specific thresholds for planning application handling processes (e.g., single dwelling or 300 sq m commercial threshold, or major development definitions given on DCLG forms PS1 & PS2). It has set standards for planning contributions from minor residential developments. The Authority may also have released professional resources by a development order or householder guidance effectively extending permitted development for householder development and used the resources in more productive areas of development management and spatial planning work. (DCLG’s current review of householder consents may release significant resources).

4.7 **Enabling teamwork between council members and staff:** Council members, management team and staff understand the potential of strategic planning to deliver priority outcomes. Regular briefings are given to the Chief Executive, Council Leader and members to establish and update a pool of knowledge amongst top management and members. Councillors use their experience of SCS and LAA / MAA working parties to have a wide view of the council’s direction and priorities. Members have a good grasp of spatial vision and objectives as a result. The members understand fully the probity which is demanded in their planning role, both in policy formulation and as ‘decision makers’ on planning applications. Attention has been paid to building good working relationships and mutual trust. Team building events include an annual review of successes and failures in order to agree implications and future actions.

4.8 **Involving the community:** The Council actively seeks a dialogue with the local community and encourages the public to be involved at appropriate stages in decision-making on applications, such as pre-application Planning Forums consultations and at committee meetings. It provides user-friendly guidance on participation at these events. Published advice explains clearly the links between spatial planning documents and the Community Plan, and it paints a picture of what the council is trying to achieve on the major issues in the area. Regular updates are published by the council on its progress towards creating more sustainable development in the area. This information helps local groups and members of the public to participate in decision-making on future plans, infrastructure, service provision and other possible community benefits; and to make informed comments on development proposals.

4.9 **Reviewed and updated guidance:** The Authority makes available printed and website guidance which sets out clearly the operational planning documents for the area. It advises agents that it welcomes pre-application discussions on major and minor development. It issues advice on standard parameters for householder development. It negotiates any submitted response to pre-application discussions, rather than refusing an application outright. It involves councillors at the pre-application stage of major applications and has procedures for keeping planning authority members briefed. It has published advice on how to deal with
post-submission amendments. It sets a time for applicants to respond if pre-
application issues still need attention.

4.10 **Protocol for pre-application contacts with developers:** The Authority holds
regular meetings with agents, developers and other interested parties to
encourage pre-application discussions, explain procedures and highlight
anticipated changes. It advises agents on its requirements for check-list
validation and seeks feedback on improvements though an agents’ forum or a
similar arrangement. The Authority explains what the local authority (and others)
need for constructive pre-application discussions. A Planning Forum is held for
major applications to allow pre-application scrutiny and "no-commitment"
comment by the public and councillors in a public presentation by the developer.
Even if an initial proposal appears fundamentally contrary to established policy, it
will seek to clarify what benefits may still be achievable. (The experience of
ATLAS is that, provided it is made clear that the council is committed to the
process of evaluating benefits and not the eventual outcome, difficulties in
explaining its actions can be minimized).

4.11 **Reports reflect spatial vision and objectives:** Reports refer to statutory
requirements, core strategy objectives and other relevant strategies. They
assess the contribution that schemes could make to these council priorities (e.g.
reports on affordable housing proposals would cover Sustainable Community
Strategy and Local Area Agreement). Reports analyse the ‘positives’ of
proposals and the extent to which any technical difficulties might be overcome.
Appeal statements also contain a similar analysis. (The Inspectorate is expected
to be interested in how the proposal is judged to relate to the Core Strategy and
spatial objectives).

4.12 **Management systems and service performance:** Targets and measurements
of the efficiency and effectiveness of the development management service have
been tailored to the authority. They are geared to encouraging changed working
practices of development management staff and others. A proportionate part of
the Housing and Planning Delivery Grant (HPDG) is used for the development
management service. An annual review of the service linked to the Annual
Monitoring Report allows development management staff to suggest
amendments or adjustments to policies and ways to improve quality of outcomes.

Management targets include:

- Achievement of the required level of planning permissions for new dwellings
  (joint target for development management and planning policy staff).
- Number of affordable housing units or the percentage of new housing which
  is affordable in the grant of planning permission.

Management analysis includes:

- Comparison of approval rates between applications involving pre-application
discussions and applications not involving pre-application discussions.
- Customer survey satisfaction levels.
- Measured quality of outcomes.
5 What are the benefits?

5.1 The expected advantages of Development Management are shown below.

**Table 3:** Benefits of shifting to Development Management

- Easier to relate the council’s development management service to the Sustainable Community Strategy, Local Area Agreement / Multi Area Agreement and other relevant strategies e.g. Local Transport Plan.
- Higher profile within the Council for the important role of planning and development management in delivering agreed priorities and sustainable outcomes for the area.
- Better understanding of the influence exerted by external factors, political direction, vision, identification of issues, spatial objectives and the creation of policies on development management action and delivery.
- More communication and co-operation with outside agencies allowing more influence and greater certainty on the planned delivery of housing, jobs, infrastructure, services etc.
- More systematic monitoring and review of the effectiveness of the vision, objectives, policies and delivery mechanisms used in spatial plans.
- Justifies training programmes that enhance understanding of the council’s strategic direction by managers, members and staff. This will lead to more effective teamwork when seeking opportunities for community benefits and other improvements for the area.
- Increased collaborative working by planning policy and development management staff, (possibly using the skills and knowledge of other policy staff who may normally work on other tasks such as the Sustainable Community Strategy) on spatial planning and development management issues.
- Opportunity for planning staff to obtain wider experience and job satisfaction by involvement in project management, sustainable development and related activities.
- Help in explaining to the press and the public ‘what spatial planning is and what it is aiming to do’ by referring to what development management is achieving on the ground. This will lead to more effective public engagement in development management and in later preparation of spatial plans.
- Enables the council’s publications to highlight the influence of local distinctiveness, community engagement and sustainability appraisal on the council’s overall direction, policy framework and decision-making processes.
- More effective early contact with developers and other interested parties with greater opportunities to enhance proposals, derive planning gain and achieve higher quality developments that reflect local distinctiveness.
- Opportunity to review and redesign the processes, protocols and working practices used in handling planning applications.
Annex A: Development Management activities

Setting-up and operating a development management service will involve adopting a wide range of new or modified activities. The following list of activities is expected to be undertaken by most local authorities, although they will be tailored to suit local circumstances.

Giving direction

- Reaching a consensus across the council (and key partner authorities) on its overall corporate direction set by the sustainable community strategy and the local development framework. This will include agreement on how the spatial vision, objectives and policies (regional and generic local policies), and the local distinctiveness in its spatial development plan will be interpreted when the council is managing change and making planning decisions.
- Informing the council’s decision-making processes by using references to any relevant feedback obtained during community involvement on the authority’s spatial plans and other strategies including the Sustainable Community Strategy.
- Writing committee and other council reports that clearly reflect the importance of the spatial vision and objectives (and their underlying justifications such as sustainability appraisal) when considering the likely outcome of development proposals or related matters.
- Framing appeal and enforcement statements to include an assessment of the likely outcome of proposals that refers to the spatial vision and objectives which have underpinned the council’s earlier planning decisions.

Keeping up-to-date

- Establishing a programme of regular communications with all key service and infrastructure providers to agree and update their commitment to the relevant LDF objectives and policies. This will also cover the joint consideration of the likely impact of emerging issues and patterns of development that might not be covered fully in the LDF.
- Maintaining a comprehensive programme of Development Management training and refresher sessions tailored to the requirements of the council. This will involve all planning staff, members and all relevant parts of the council (e.g. corporate policy and other services). Joint training sessions on selected topics will reinforce understanding and teamwork among members and staff.

Providing authoritative advice

- Regularly updating all guidance (printed, website and spoken) published for use by applicants and other interested parties at the pre-application and post-application stages. So, the council’s advice is always up-to-date and relevant to the current state of the council’s spatial development plan.
- Releasing publicity that explains clearly the progressive replacement of the Local Plan/Unitary Development Plan and enables everyone to identify all the operational parts of the current development plan and current supplementary planning documents.
• Publishing supplementary planning documents to cover particular topics (such as a local design guide or a site development brief) that require written guidance to assist Development Management without the need for a development plan document.

• Using publications and other methods of communications to ensure that developers are fully informed of the council’s intentions to take account of local distinctiveness and the individual and cumulative outcomes of development proposals. Also, that the council’s spatial vision, objectives and policies will be used in development management. This will be aimed at the first contacts by developers so the information can influence subsequent financial and design appraisals. It will also promote high quality development and proportionate contributions to infrastructure and other community benefits (see Annex C).

• Creating easy to read information and advice material for use in statutory consultations and public notification of planning proposals. This will point to the overall vision and objectives which give direction to the council’s spatial planning. It will also show how local distinctiveness and higher-level policy influences the council’s operation of development management in the area.

Ensuring probity

• Publishing clear protocols of conduct by members and staff to ensure that the development management service is seen as impartial, fair and the council’s decision-making is not subject to pre-determination based upon the spatial development plan or other strategy.

• Adopting and publishing a protocol for the conduct of pre-application contacts between the council and developers to ensure that the applicants and other interested parties are fully aware of the changed methods of working by the council that are engendered by Development Management.

• Using the latest advice from authoritative sources in regular advice to councillors on their roles and responsibilities when they are involved in Development Management activities (see Annex C).

Monitoring & reviewing

• Monitoring external and internal information and publishing regular briefings throughout the year to keep planning staff, corporate staff and members up-to-date on the council’s progress towards corporate and spatial objectives. This should alert the council to changed external circumstances, such as national and regional requirements or the expected provision of services, social and physical infrastructure by other agencies.

• Holding regular meetings between policy (corporate & spatial) staff and development management staff to examine the effectiveness of the documents within the LDF as the basis for the development management service. This will include a review of the spatial vision and objectives as well as individual documents and policies. It will look at both the short-term and long-term implications.

• Running a regular programme of meetings with representatives drawn from wards, parishes, pressure groups, developers, architects and agents to generate ‘customer feedback’ on the council’s development management service and to seek short-term and long-term improvements.

• Undertaking a formal annual review by members and staff (possible input from external bodies) of the council’s development management performance based upon
data in the Annual Monitoring Report and other measures and targets. This will help to clarify roles and facilitate teamwork among staff and members. The review could be linked to a peer review with a similar council to stimulate innovation and possible joint initiatives.

**Designing systems & managing resources**

- Establishing development management systems and managing resources to match the processes to the types of proposals on the basis of their expected outcomes and impact upon the spatial plan. So, the handling of applications for individual suburban house extensions will be less intensive in management and resources than the processes applied to proposals for major residential estate regeneration. They will be designed to ensure there is no drop in quality standards of development.
- Adopting new working practices for staff to enable the development management service to operate efficiently whilst incorporating the wider vision and objectives of spatial planning. This will shift the focus of advice, discussions and negotiations to a pre-application stage and involve greater involvement by case officers at earlier stages.
- Using performance management systems for staff involved in the operation of DMt that contain targets and other measurements related to the quality and delivery of spatial objectives as well as to the efficiency and effectiveness of the service.
- Tailoring the authority’s Information Technology systems to the new processes required for Development Management.
Annex B Approaches to changing culture and practice

Experience suggests that the leadership of change within local authorities usually comes from one of these sources:

- management (top-down direction)
- staff (bottom-up direction)
- council members (political direction)
- a ‘change agent’ (internal or external)
- cross-disciplinary (or possibly cross-hierarchical) team of ‘change agents’
- process re-engineering

Approaches to shifting to development management could include one or more of the following initiatives:

- **As part of a council-wide strategy for corporate change:** Adopting development management in these circumstances could move it closer to the heart of the authority by promoting its role in delivery of the Sustainable Community Strategy and other key strategies. It might also benefit from corporate support, funding and shared thinking on ‘change management’.

- **Leadership by planning management:** Senior planning managers could instigate the shift to development management by preparing a programme for change, commissioning guidance and training for staff and members, raising expectations, liaising with other key players, setting a personal example, responding to feedback, reviewing and rewarding success.

- **Creating the LDF as an exemplar of a spatial plan:** Spatial plans with really clear links from vision to objectives to policies, and a smaller number of generic policies would present the staff, councillors and developers with a pressing need to change from control-based working practices. This approach should feature in all change strategies, because creating plans that are not truly spatial would not prompt a shift to development management.

- **Champions of change:** A team of LDF and other planning staff who understand the spatial planning requirements for a development management service could act as the council’s ‘champions’, working closely with their development control colleagues to devise the necessary strategy for change, monitor actions and review progress.

- **Self-generated initiative:** A team of development control staff could be given responsibility to develop their own strategy, liaise with other key players, make changes, track their progress, identify problems and find solutions.

- **Councillors creating momentum for change:** Politicians could be encouraged to suggest improvements to development control practices which could be taken into account during the shift to development management. This could help them make adjustments in their own thinking and behaviour, and gain support for the staff during changes.
- **Individuals or team empowered as ‘change agents’:** This could work best if the change agents worked closely with planning managers and staff to develop a sound strategy and agree it with management and members before the council undertakes the shift to development management. Cross-disciplinary and cross-hierarchical teams could have an advantage by assembling a wide range of skills, experience and viewpoints in drawing up a change strategy.

- **Process re-engineering and resource management:** Using a recognised method of managing change which would enable managers and councillors to drive the shift from existing to new processes. This would require the affected staff to adapt their thinking and working practices to the changed processes.

- **New system of performance management:** Creating a system that assigns responsibilities to individuals for key roles in creating and maintaining the development management service. This would measure and provide feedback on their performance and reward success judged against agreed criteria.

- **Linking policy planning and development management teams:** Providing the most favourable conditions for interaction between planning policy and planning implementation teams. This is most likely to occur when the two teams are contained within one department that is headed by a senior qualified development professional.
Annex C  Further useful reading

“Open for Business: changing the way that local authorities work with developers”
Planning Advisory Service (2007)

“Constructive Talk: investing in pre-application discussions discussion”
Planning Advisory Service (2006)

“Shaping and delivering tomorrow’s places: effective practice in spatial planning”
Planning Advisory Service (2007)

“Positive engagement: a guide for planning councillors”
PAS + LGA + ODPM + RTPI + Standards Board for England (200?)

“Development management network” website
Royal Town Planning Institute
www.development.management@rtpi.org.uk

“Planning Together: Local Strategic Partnerships & Spatial Planning: a practical guide”
Department for Communities & Local Government (2007)

“Negotiating New Local Area Agreements” & “Development of the new LAA Framework – Operational Guidance 2007”
Department for Communities & Local Government (2007)

“An introduction to the Local Performance Framework – Delivering Better Outcomes for Local People”
Department for Communities & Local Government (2007)

“Preparing Design Codes – A Practice Manual”
Department for Communities & Local Government (2006)

“Implementing Planning Performance Agreements: Guidance Note”
Advisory Team for Large Applications (ATLAS) (2007)

“Planning for Large Scale Development” website
Advisory Team for Large Applications (ATLAS)
www.atlasplanning.com/page/index.cfm

“By Design – urban design in the planning system: towards a better planning system”
CABE (2000)

“Use of urban design codes: building sustainable communities”
CABE (2003)

“Creating excellent buildings: A guide for clients”
CABE (2003)
Annex D  Summary

Development Management is.....

- a more complex activity than Development Control and is aimed achieving more sustainable and higher quality development and greater community benefit than was possible under previous planning legislation.
- part of the spatial planning system set up by the Planning and Compulsory Purchase Act 2004, so it puts the Council's Local Development Framework into action;
- made up of a wide number of planning activities such as designing, analysing, influencing, promoting, engaging, negotiating, decision-making, co-ordinating, implementation, compliance and enforcement;
- a different way of decision-making by the council on planning proposals that asks “What is the Council trying to achieve in this locality, how do our policies reflect this, and how does this proposal measure up?”;
- a key mechanism for achieving delivery of the relevant objectives in the Sustainable Community Strategy and other relevant local strategies such as the Council’s Corporate Plan, Housing Strategy, Local Transport Plan etc;
- reliant upon strong co-operative working with agencies that commission and provide services and infrastructure to achieve timely delivery of agreed requirements in the right places.

Development management is linked to other key policy documents and initiatives

![Diagram showing the relationship between different policy documents and initiatives related to development management.]

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