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27 January 2012

Strategic Monitoring Framework
for the planning system
(Consultation)
Planning Division
Welsh Assembly Government
Cathays Park
Cardiff
CF10 3NQ

Dear Sir / Madam

Consultation Response: Strategic Monitoring Framework for the planning system

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners; RTPI Cymru represents the interests of almost 1,100 members in Wales. The RTPI exists to advance the science and art of town planning for the benefit of the public.

This document responds to the invitation to comment on the proposals for Strategic Monitoring Framework for the planning system. The response has been formed following consideration by RTPI Cymru's Policy and Research Forum.

RTPI Cymru welcomes the initiative to establish a framework for measuring the delivery of Sustainable Development through the planning system. The Forum particularly welcomes the attempt to rationalise data collection and make monitoring more logical and relevant to Sustainable Development. The structure and the useful diagrammatic outline as a step towards getting the thinking on objectives and impacts clarified are welcomed. The Forum considers that this could be very useful for setting up LDP monitoring.

Whilst the qualitative measures around PPW objectives are difficult, RTPI Cymru welcomes the focus on these instead of traditionally speed / quantitative measures.

However, the Forum considers that the proposals overall are not acceptable in their present form and there needs to be some detailed collaborative work with Local Planning Authorities (LPA) and other relevant parties, to devise a solution which is both practical and meaningful. Specifically, it is felt that the indicators are not well enough developed to be used to evaluate LPA performance. The Forum would also recommend that discussions should also be held with the WLGA to ensure that other Welsh Government departments are consulted in case they ask for / keep similar information from LAs.

The indicators vary to the degree which the planning system contributes to the desired outputs and outcomes - in some the planning system has a more direct and substantial role while in others it is less so and other legislation and players and agents are more significant - so this raises a question as to how to derive a view on the planning system's performance towards achieving more

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sustainable development. This may generate positive and / or negative 'myths' about the planning system in the future.

RTPI Cymru strongly recommends that further consideration is given to the proposed indicators and the issues of the practicalities of collecting and interpreting this data, including the value that it will offer in terms of measuring the delivery of sustainable development through the planning system. There will be an inevitable burden on LPAs for the collection of this data, which is why it must be clear what the value of it is and the practicalities of the indicators.

Those indicators using total numbers and areas of development or loss (e.g. loss of open space) are not much use unless they are seen in relation to identified need (e.g. was there an abundance of inaccessible open space in this particular area?) and / or weighed against the benefits of replacement activity. These measures should focus on relative change as opposed to absolute change.

It would be appropriate to think about the contributions of other agencies in terms of having a clearer picture of how all the players are performing in terms of achieving sustainable outcomes.

RTPI Cymru agrees that It is valuable to focus on the collective impact of the planning system over time but once established, the indicators should not be changed for a good period.

The Forum would welcome clarification about how the collected data would be used by the Welsh Government: would it be just totalled and then left until the next year; who would use them and for what purpose; would the annual report be published? This then begs the question as to whether all Government services should be assessed in a similar manner, given the overall Sustainable Development ethos of the Welsh Government.

I trust you find the Forum's comments helpful but do not hesitate to contact me should you require any further clarification.

Yours faithfully,



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