

## CONSULTATION FORM

Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
<b>Name</b>	Roisin Willmott	
<b>Organisation</b>	Royal Town Planning Institute (RTPI Cymru)	
<b>Address</b>	PO Box 2465 Cardiff CF23 0DS	
<b>E-mail address</b>	roisin.willmott@rtpi.org.uk	
<b>Type</b> <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input checked="" type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1 Do you agree with our conclusion that the current information is not sufficient for us measure the contribution of the planning system to our vision of a sustainable Wales?		Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Additional comments:</b>                      The first step should be to consider how current information could be used to contribute to measuring the contribution of the planning system to a sustainable Wales wherever it is feasible. Adding new data collection requirements to LPAs should not be done without discussions with and agreement of local government. Similarly it is considered that the existing data collection requirements should not be discontinued without consultation with and agreement of LPAs. This would avoid imposing unnecessary burdens on local planning authorities (LPAs) and avoid the loss of valuable trend data.</p>			

Q2 Do you agree with the proposed approach to use the 'logic-chain' identify appropriate measures of the planning system?		Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

**Additional comments:**

In principle, a logical and structured approach is supported but the value and utility of the approach is dependent on the connections between each element being identified and evidenced and, where there may be multiple components to an element, to the relative significance of each of those components being also able to be identified and evidenced - otherwise the true picture will not be represented and the overall assessment incomplete and skewed.

This is a very complex model to apply and the data collection and interpretation required to be confident about the conclusions to be drawn are likely to be extremely resource hungry. It is considered that its use needs to be examined carefully and thoroughly in collaboration with local government before a firm conclusion can be drawn about its use and implementation.

<b>Q3</b>	Do you agree with the strategic groupings of the 19 <i>Planning Policy Wales</i> objectives into five categories for the purpose of developing a set of new measures?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Additional comments:</b>                  The five categories seem a reasonable starting point for trying to organise the PPW objectives into thematic groupings. However, RTPI Cymru considers that further development is required, for example, minimising the need to travel and accessibility and integration are closely linked, so why are they separated?</p> <p>There are also likely to be other ways to group them - it is suggested that this should be subject of further discussions.</p> <p>The strength of the connection between the planning system and each factor, from a sustainability point of view, should also be explained to assist discussions about measures.</p>			

<b>Q4.1</b>	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
<p><b>Additional comments:</b>                  The Forum is aware that this indicator is already in use by Welsh Government, most recently in the Sustainable Development Annual Report 2010-2011, but it is not clear how a context for interpreting the proposed planning indicators will be created from this (or the other) over-arching indicators. More and clearer explanations should be provided.</p>			

<b>Q4.2</b>	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing		
<p><b>Additional comments:</b>                  The Forum is aware that this indicator is already in use by Welsh Government, most recently in the Sustainable Development Annual Report 2010-2011, but it is not clear how a context for interpreting the proposed planning indicators will be created from this (or the other) over-arching indicators. More and clearer explanations should be provided.</p>			

<b>Q4.3</b>	Do you agree with the proposed overarching indicator?	Yes	No
-------------	---	-----	----

		<input type="checkbox"/>	<input type="checkbox"/>
<b>3</b>	<b>Gross Value Added (GVA) and GVA per head</b>		
<p><b>Additional comments:</b>                  The Forum is aware that this indicator is already in use by Welsh Government, most recently in the Sustainable Development Annual Report 2010-2011, but it is not clear how a context for interpreting the proposed planning indicators will be created from this (or the other) over-arching indicators. More and clearer explanations should be provided.</p>			

<b>Q4.4</b>	<b>Do you agree with the proposed overarching indicator?</b>	<b>Yes</b>	<b>No</b>
		<input type="checkbox"/>	<input type="checkbox"/>
<b>4</b>	<b>Percentage of the population in low-income households</b>		
<p><b>Additional comments:</b>                  The Forum is aware that this indicator is already in use by Welsh Government, most recently in the Sustainable Development Annual Report 2010-2011, but it is not clear how a context for interpreting the proposed planning indicators will be created from this (or the other) over-arching indicators. More and clearer explanations should be provided.</p>			

<b>Q4.5</b>	<b>Do you agree with the proposed overarching indicator?</b>	<b>Yes</b>	<b>No</b>
		<input type="checkbox"/>	<input type="checkbox"/>
<b>5</b>	<b>Wellbeing in Wales</b>		
<p><b>Additional comments:</b>                  The Forum is aware that this indicator is already in use by Welsh Government, most recently in the Sustainable Development Annual Report 2010-2011, but it is not clear how a context for interpreting the proposed planning indicators will be created from this (or the other) over-arching indicators. More and clearer explanations should be provided.</p>			

<b>Q4.6</b>	<b>Do you agree with the proposed overarching indicator?</b>	<b>Yes</b>	<b>No</b>
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6</b>	<b>Proportion of LPAs with an up to date adopted LDP</b>		

**Additional comments:**  
 Insofar as this will give an indication of the extent to which LPAs across Wales as a whole have forward plans with up-to-date sustainability appraisals, there is a logic in considering this a contextual indicator.

This indicator should also include up to date Unitary Development Plans (UDPs), not just LDPs.

<b>Q4.7</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

**7** Net change in open space and playing fields

**Additional comments:**  
 This appears to relate purely to the change in the total area of open space and playing field and not to the issue of strategic location, i.e. whether open space and playing field space is more or less accessible.

There are also issues of the practicalities of collecting and interpreting this data.

<b>Q4.8</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

**8** Total floor space granted/refused (by type) on greenfield and brownfield land

**Additional comments:**  
 As the explanatory comments explain, the suitability and appropriateness of developing brownfield and greenfield sites is very complex and it will be difficult to draw accurate inferences from bald total floor space data.

Further consideration should be given to this. There are also issues of the practicalities of collecting and interpreting this data.

<b>Q4.9</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

**9** Number of application submitted with Transport Assessments

**Additional comments:**  
 A simple number submitted is not informative by itself; this indicator does not appear to measure anything worthwhile.

The starting point here is the number of applications involving significant traffic generation - the expectation would be that in these cases the LPA should require a Transport Assessment. The sustainability assumption would be that a Transport Assessment would lead to a more sustainable transport outcome - so the proportion of these where a Transport Assessment was actually required would be an indicator of the extent to which LPAs were enabling improved consideration of sustainable transport solutions. Further consideration should be given to this proposed indicator and the issue of the practicalities of interpreting this data.

Q4.10		Do you agree with the proposed indicator?	
		Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)		
<p><b>Additional comments:</b>                      Areas would be a clearer measure than numbers and data needs to be provided with a context to clarify year on year variations.</p> <p>Further consideration should be given to this proposed indicator and the issues of the practicalities of collecting and interpreting this data.</p>			

Q4.11	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification		
<p><b>Additional comments:</b>                      It is unclear how this information adds value to the performance of the planning system; with the current requirement for housing and non-domestic properties of a certain threshold to be of a minimum standard, this does not appear to improve sustainable outcomes. It may be improved by specifying a BREEAM or Code threshold above the standard planning policy requirement. Further consideration should be given to this proposed indicator.</p>			

Q4.12	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
12	The proportion of local or recycled materials used in new developments		
<p><b>Additional comments:</b>                      This would appear to require changes to information requirements to be supplied by applicants with planning applications - this needs further discussion on reasonableness, cost and practicality of supplying meaningful data and the burden this would place on LPAs and developers / applicants.</p> <p>There is high chance that there will be changes in the source of the products used in the final development (source of materials is rarely a condition or in the control of the planning permission. Whilst the commentary acknowledges this, it makes it a meaningless indicator if there are significant changes in actual developments built. Collecting post-completion data does raise significant questions about practicalities and reasonableness of data collection.</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
13	Renewable energy generation (mW) granted/refused by type and capacity		
<p><b>Additional comments:</b>                      Interpretation would require some information on reasons for refusal - there may well be good sustainable development reasons for refusing permission. Further consideration should be given to this proposed indicator and the issues of the practicalities of collecting and interpreting this data.</p>			

<b>Q4.14</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
<p><b>Additional comments:</b>                  This should really relate to development which would be damaging to protected areas. Further consideration should be given to this proposed indicator and the issues of the practicalities of collecting and interpreting this data.</p>			

<b>Q4.15</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
<p><b>Additional comments:</b>                  Consents could be for works which involve preserving or enhancing LBs and CAs or for works which are damaging; there needs to be distinction between the two, to be meaningful. Further consideration should be given to this proposed indicator and the issues of the practicalities of collecting and interpreting this data.</p>			

<b>Q4.16</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
16	Number of new homes (by type) granted permission		
<p><b>Additional comments:</b>                  The Housing Land Availability Studies provide a more substantial picture of the housing supply situation - if there is felt to be a gap in data this could better be added to the HLASs to provide a more comprehensive picture - it would be more informative than a bald no of new homes granted permission. Further consideration should be given to this proposed indicator and the issues of the practicalities of collecting and interpreting this data.</p>			

<b>Q4.17</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
17	Employment land bank (years provided)		

**Additional comments:**  
 A clearer picture would be provided by an Employment Land Availability Assessment along the lines of the HLASs. A single figure is not particularly meaningful. Further consideration should be given to this proposed indicator and the issues of the practicalities of collecting and interpreting this data.

<b>Q4.18</b>	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

**18** Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)

**Additional comments:**  
 This could be better combined with the previous indicator proposal and given further consideration. Further consideration should be given to this proposed indicator and the issues of the practicalities of collecting and interpreting this data.

<b>Q5</b>	Do you agree that these measures should not be taken as representing the full picture of the influence of the planning system on sustainable development but represent an appropriate high level framework?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Additional comments:**  
 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 sustainable development.  
  
 Given individual comments the conclusion is that these proposals would benefit from extensive further consideration and discussion.

<b>Q6</b>	Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Additional comments:**  
 The logic of this structure would be a good starting point for further consideration of measurement and indicators.

**Q7** What are your views on whether the proposed framework should be phased?

**Additional comments:**

There are many questions about the appropriateness and practicality of undertaking the proposed measurements - a further stage of more in depth discussions with LPAs and other stakeholders would be beneficial and these discussions could also include consideration of the phasing of introduction of the framework.

<b>Q8</b>	Do you agree that we should consolidate/revise the existing other output indicators set out in LDP Manual (2006) with the proposed new indicators to measure the outputs of the planning system?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
Additional comments: Following further discussion and agreement as suggested above, it would be beneficial to consolidate and revise the LDP Manual.			

<b>Q9</b>	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
Additional comments: N/A to RTPI Cymru.	

<b>Q10</b>	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Additional comments: We think that a collaborative approach with LPAs to compiling and providing contextual information in the report would be beneficial to ensure that the data is fully explained to aid understanding by the wider audience but the practicalities and potential burden of the approach raise concerns which we think need to be discussed further.			

<b>Q11</b>	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.
Additional comments: Please see the attached covering letter.	

<b>Confidentiality</b>
Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential please indicate here: <input type="checkbox"/>