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Consultation Responses – Part 1

A Strategic Monitoring Framework for the Planning System

Date of issue: **March 2013**

Overview

This document contains copies of responses to the consultation on proposals for a Strategic Monitoring Framework for the Planning System held 4 November 2011 - 27 January 2012 (WG13303).

www.wales.gov.uk/planning
Planning Division
Welsh Government
Cardiff
CF10 3NQ

E-mail: planning.division@wales.gsi.gov.uk

Telephone: 029 2082 3722

Fax: 029 2082 5622

WELSH GOVERNMENT CONSULTATION (WG 13303)

A Strategic Monitoring Framework for the planning system: Measuring progress towards a sustainable Wales.

Submission by Stan Edwards MBA FRICS, sole Director of Evocati Limited a consultancy specialising in regeneration, planning, compulsory purchase orders and their strategic concept, site assembly, promotion and project management. Special focus is on the role of well-being and community engagement.

VIEWS WERE REQUIRED ON THE FOLLOWING ISSUES:

- Our approach to measuring the contribution of the planning system to our vision of a sustainable Wales;
- Each of the proposed indicators;
- The phasing and reporting levels of the new framework;
- The consolidation of existing measures;
- The impacts on local planning authorities, and
- The reporting arrangements for the framework.

OVERVIEW

The approach is only of limited use given the nature of the bias and irregularities in the policy it was measuring. Sustainability is supposed to be the long-term maintenance of **well being**, which has environmental, economic, and social dimensions. The current approach reflects an unnecessary bias towards the environment that is not in the true spirit of sustainability.

CONSIDER THE STATEMENT:

The Welsh Government's scheme for Sustainable Development, One Wales: One Planet, defines sustainable development as “**enhancing the economic, social and environmental well being** of people and communities, achieving a better quality of life for our own and future generations, in ways which:

- promote social justice and equality of opportunity, and;
- enhance the natural and cultural environment and respect its limits - using only our fair share of the earth's resources and sustaining our cultural legacy”.

Comment.

1. Well-being is supposed to apply to the economy, environment and social factors and yet in the published indicators it is only highlighted in respect of physical, mental health and life satisfaction of people. The well being of the economy should be covered here as part of sustainable governance but has been discarded.
2. The sustainable governance of Wales has been fettered by a deliberate bias of a previous administration towards social and particularly environmental sustainability. The economic and therefore social well-being of Wales is being put at risk by the misdirected ideological policies of the past.

CONSIDER

Government of Wales Act 2006

60 Promotion etc. of well-being

(1) The Welsh Ministers may do anything which they consider appropriate to achieve any one or more of the following objects—

- (a) the promotion or improvement of the **economic well-being of Wales**,
- (b) the promotion or improvement of the **social well-being of Wales**, and
- (c) the promotion or improvement of the **environmental well-being of Wales**.

This is a mechanism of achieving any of the well-being objects but not meant to be a fetter on the others. Well-being is the object of sustainability but **in Wales environmental sustainability has been given an undeserved priority over the other two.**

Sustainable Development Indicators for Wales

Has been measured in terms of:

1. Economic output - Gross Value Added (GVA) and GVA per head
2. Social justice - percentage of the population in low-income households
3. Biodiversity conservation - status of priority habitats and species
4. Ecological Footprint – Wales’ global ecological footprint.
5. Wellbeing - physical and mental health - life satisfaction

However

1. **Economic well-being has not been mentioned** and the only headline measurement is in terms of GVA. Economic well-being is located in another Assembly department silo and so little input is seen here
2. **Social well-being is not mentioned** - social justice should be part of it but only physical and mental health is highlighted.

Measured headlines:

- a. Social justice - percentage of the population in low-income households
- b. physical and mental health - life satisfaction

N.B. Community factors are part of social well-being.

3. **Environmental well-being is not mentioned** but an ecological bias is pervasive throughout the Welsh approach to sustainable development.

Measured headlines only in terms of:

- a. Biodiversity conservation - status of priority habitats and species
- b. Ecological footprint - Wales’ global ecological footprint

4. **Community.** Is a feature of sustainable development but because it is located in another Assembly department silo it is not addressed here.

Therefore the comments in respect of the stated consultation requirements are as follows:

1. Our approach to measuring the contribution of the planning system to our vision of a sustainable Wales;

Of limited use. The selection of interviewees in particular demonstrated a high environmental bias.

2. Each of the proposed indicators;

A lot of thought and text but little light at the end of it because they did

not align with economic, social and environmental well-being.

3. The phasing and reporting levels of the new framework;

Misdirected (see above)

4. The consolidation of existing measures;

Fragmented (see above)

5. The impacts on local planning authorities,

They have to wrestle with poor and conflicting guidance. (see above)

6. The reporting arrangements for the framework.

**Directed towards positive responses to support a poorly aligned policy.
(see above)**

GENERAL COMMENT

If the whole of the Welsh Government planning policy flowed logically from the statement in 'One Wales: One Planet' defining sustainable development as "enhancing the economic, social and environmental well being of people and communities," there would be no problem. However mostly everything is contrived towards environmental sustainability and as such all indicators and outcomes will be out of kilter with the requirements of good governance. Most of all is the perception of an unsustainable ideological bias towards social and environmental factors embedded within the administration itself and therefore provides poor building blocks because of an unstable foundation.

If only the Welsh Government would give itself the flexibility to operating within true environmental, social and economic sustainability instead of being confronted with an environmental 'stacked-deck' there would be a confidence to invest.

RECOMMENDATION

Before it is too late scrap what has been advanced to date and provide a framework for a 'triple bottom line' (economic, social, environment) cost / benefit approach that allows sentient AMs to govern effectively. A built-in bias towards ANY of the three elements is unhelpful.

Stan Edwards MBA FRICS
DIRECTOR
EVOCATI LIMITED
15, EASTFIELD ROAD,
CAERLEON,
NEWPORT.,
NP18 3FU
Tel. 01633 421831 Mobile 07879441697
Email stan.edwards@dsl.pipex.com
Or stan.edwards@evocati.co.uk

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	Marcus Goldsworthy	
Organisation	Vale of Glamorgan Council	
Address	Docks Office, Barry Docks, Barry CF634RT	
E-mail address	mjgoldsworthy@valeofglamorgan.gov.uk	
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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"/>
Additional comments: Local Planning Authorities are already under pressure in respect of the responses and returns which must be provided to the Welsh Government and associated agencies. It is clear that the majority of information being sought in respect of this consultation can be extrapolated from the existing information provided by Welsh Local Planning Authorities. This appears to be a case of the Welsh Government wishing to be "spoon fed" rather than analysing existing data to gain the information it needs. In these times of diminishing resources and reduced expenditure, forcing Councils to expend resources, time and money on new recording and survey work in this regard seems at best to be perverse.			

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 checked="" type="checkbox"/>

Additional comments:

Whole process appears far to complex and will not achieve the aims. Moreover it appears that the proposed assessment process will become overly onerous

Q3	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 checked="" type="checkbox"/>
<p>Additional comments:</p> <p>There are many items in this list that are well outside the control of the LPA and moreover the LPA has no input into matters such as social inclusion at a micro level and health and well being. Even in respect of monitoring of materials in construction, once again the process appears to be trying to use the planning process to achieve aims which are well outside its remit.</p>			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
1	Wales' Ecological Footprint		
<p>Additional comments:</p> <p>In theory yes but the measures proposed do not specifically relate to the Planning process i.e. % of low income families, wellbeing in Wales etc</p>			

Q4.2	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing		
<p>Additional comments:</p> <p>This is not a land use planning indicator.</p>			

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		

Additional comments:

How will this be accurately measured through the planning process?

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

4 Percentage of the population in low-income households

Additional comments:

Not a planning input

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

5 Wellbeing in Wales

Additional comments:

How will it be measured?

Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

6 Proportion of LPAs with an up to date adopted LDP

Additional comments:

This is one example of an indicator that relates to 'core business' and is easily assessed.

Q4.7	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 would be a yes if it worked from the planning approvals process but as it has been indicated that the intention is to require a survey of sites on a yearly basis, the resource demands for such work go beyond what the LPA can provide.

Q4.8	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
8	Total floor space granted/refused (by type) on greenfield and brownfield land		
<p>Additional comments:</p> <p>This can be monitored but will necessitate significant further inputting of data which is not currently recorded and thus has manpower and cost implications</p>			

Q4.9	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
9	Number of application submitted with Transport Assessments		
<p>Additional comments:</p> <p>Relatively easy to monitor but has manpower and cost implications. Also one must question what value does such an indicator add to the process. What matters is the quality of those TA's and what impact have the findings had on the development.</p>			

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>Additional comments:</p> <p>This is information that is obtainable from the EAW and until now was obtained from them. Will have manpower and cost implications for Councils.</p>			

Q4.11	Do you agree with the proposed indicator?	Yes	No
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments:</p> <p>This is superfluous as the legislation now requires all dwellings and buildings to achieve a required standard. Moreover this is not information that is currently recorded by Local Authorities and if needed would be more appropriately obtained from the relevant consenting bodies (ie BREEAM). If this requirement was to be passed to LPAs it would entail significant manpower and cost implications both in terms of information recording and inputting and monitoring.</p>			

Q4.12	Do you agree with the proposed indicator?	Yes	No
12	The proportion of local or recycled materials used in new developments	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments:</p> <p>There is no way for the LPAs to measure this as authorities do not monitor the actual builds at all stages of construction - moreover building regulations sections are in competition with approved inspectors for work and therefore LPAs are often unable to cross reference when a development starts and therefore any measure would be meaningless.</p> <p>A more appropriate measure would be to monitor the number of planning applications where a condition was used to require recycled materials etc, although that will have manpower and cost implications</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
13	Renewable energy generation (mW) granted/refused by type and capacity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments:</p> <p>This will require significant amendments to the LPAs recoding and logging of planning applications and associated costs in respect of amending the relevant software etc. Will have significant manpower and cost implications</p>			

Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
Additional comments: This would be relatively easy to measure through current systems but has manpower and cost implications.			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
Additional comments: Assumed this would not change from the current situation. Again, must question what value does such a measurement provide?			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
Additional comments: Assume this is the same as the current method of information gathering.			

Q4.17	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	Employment land bank (years provided)		
Additional comments: This information is already recorded			

Q4.18	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)		
<p>Additional comments: This will entail the LPA in significant additional recording of information and has both manpower and cost implications</p>			

Q5	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"/>
<p>Additional comments: Most of the proposed indicators do not relate to Planning, but other functions. Other do not actually measure outcomes of the process, and as a consequence have no value.</p>			

Q6	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"/>
<p>Additional comments: see comments above and please note the Councils views that the monitoring regime as set out will inevitably lead to increased cost for Councils in terms of both personnel, data collection, surveying and software.</p>			

Q7	What are your views on whether the proposed framework should be phased?
<p>Additional comments: As previously advised in the form, it is suggested that the framework is considered to be overly onerous and largely unimplementable by local authorities - regard should be given to significant changes to the proposed monitoring, based around existing information gathering and provision.</p>	

Q8	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 checked="" type="checkbox"/>
Additional comments: The focus should be on ensuring an effective planning system, not on producing reams and reams of data, which offers very little to the process.			

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
Additional comments: If implemented as proposed this monitoring regime would have huge manpower implications both in terms of surveying and information noting and reporting. The vast majority of the information being sought is not currently recorded by LPAs and would necessitate additional recording methods being placed with the Councils databases, this will also have financial implication for the Council as software providers etc will undoubtedly charge for recording the new information.	

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Additional comments: The measurements you are seeking can be obtained in respect of built development from existing returns and from information which would be readily available from BREEAM regarding how many dwellings/buildings are achieving code 3 plus credits and the excellent standard or the EA.			

Q11	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: This seems to be a scatter gun approach to monitoring a situation where the majority of information is already provided in one form or another to the Welsh Government or its agencies. The reliance on only Welsh Local Authorities to provide the information on items such as development in flood risk areas, where previously the information has been provided by the EAW would also seem unfair and overly onerous when Council budgets are under pressure from competing areas.	

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	David Llewellyn	
Organisation	Bridgend County Borough Council	
Address	Civic Offices Angel Street Bridgend CF31 4WB	
E-mail address	developmentplanning@bridgend.gov.uk	
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Additional comments:

Bridgend County Borough Council (CBC) does agree that the current information obtained in order to measure the contribution of the planning system to a sustainable Wales is not sufficient. However it has great reservations as to whether an entirely new system of recording data is necessary to undertake this work.

Local Planning Authorities are already required, through their Local Development Plans, to adopt monitoring frameworks and produce Annual Monitoring Reports giving relevant data as to the performance of their planning policies; most of this performance is measured in a similar way to those indicators included in the framework.

Bridgend CBC considers that it is a duplication of work and resources to require local planning authorities to monitor their planning applications / planning policies in two separate frameworks. Particularly if the indicators used in each have different definitions, measures, base dates etc. Bridgend CBC considers that a more sensible approach would be to introduce core LDP monitoring indicators in to the system which would have a dual role in both measuring the performance of an LDP policy and also the contribution of the planning system to a more sustainable Wales. Additionally, LDP Sustainability Appraisals also have monitoring indicators which will need to be updated regularly; these could also be incorporated in to a single framework.

This approach would also leave local planning authorities with the flexibility to introduce their own additional LDP monitoring indicators, on top of the revised core indicators, to monitor particular local variations / situations.

It would seem sensible that one, over-arching monitoring framework is put in place which should cover planning policies, development management and sustainable development. This would involve additional consultation on relevant indicators which could apply to all areas, but the result would be a streamlined approach which meets the needs of all three aspects of planning, without over-burdening local planning authorities with many different frameworks; each of which will require resourcing.

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

Additional comments:

N/A

Q3	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 checked="" type="checkbox"/>
<p>Additional comments:</p> <p>Perhaps, in order to give equal weights to the three aspects of sustainability (social, economic, environment), group E (Social, Cultural and Economic Wellbeing) should be subdivided into Social and Cultural Wellbeing and Economic Context.</p>			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
<p>Additional comments:</p> <p>N/A</p>			

Q4.2	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing		
<p>Additional comments:</p> <p>N/A</p>			

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		
<p>Additional comments:</p> <p>N/A</p>			

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Percentage of the population in low-income households		
<p>Additional comments:</p> <p>N/A</p>			

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Wellbeing in Wales		
<p>Additional comments:</p> <p>N/A</p>			

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

Q4.7	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
7	Net change in open space and playing fields		
<p>Additional comments:</p> <p>It is important for this indicator that advice, guidance and resources are given to LPAs to undertake regular open space assessments. Whilst existing guidance suggests undertaking a study, it is implied by the indicator that it will now be necessary to undertake a study on an annual basis to effectively report on changes.</p> <p>It will also be necessary to provide clear definitions on those areas of land which can be classified as open space and playing fields, and how 'anomalies' can be recorded (i.e. where open space is lost by a development but is to be replaced in due course). Additionally, consideration should also be given to the setting of a threshold size of open spaces which should be monitored and if private land and redundant school playing fields would be included in such an assessment. There are also situations, such as artificial playing surface developments, whereby playing field provision could be enhanced by development by making them useable in all weathers.</p>			

Q4.8	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		
<p>Additional comments:</p> <p>It is acknowledged that this indicator is important in establishing the amount of development which is taking place on previously-used land. It will, however, be paramount that terms are accurately defined in order to ensure consistency across all local planning authorities. In this respect (and elsewhere) it will be important to provide guidance on when consent is deemed to be granted and what types of application (Full, Outline or Reserved Matters) should be monitored.</p>			

Q4.9	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
9	Number of application submitted with Transport Assessments		
<p>Additional comments: It is not clear how monitoring the quantity of Transport Assessments (TA) submitted with planning applications will give an indication of impact on sustainable development without any recourse to the quality of the TA, its outcomes or impacts on the development proposed. This indicator needs to be re-examined to ensure it is fit-for-purpose and will give an effective indication of progress in this area.</p>			

Q4.10	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)		
<p>Additional comments: This indicator is supported in principle. However, again, definitions will be key to the success of this indicator. What is defined as the 'flood plain'? What if an FCA concludes that development would be acceptable?</p> <p>Would a more appropriate indicator be sourced from the Environment Agency Wales which uses their data on planning applications which are approved with an outstanding objection from the organisation. This would then ensure consistency across Wales.</p>			

Q4.11	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification		
<p>Additional comments: This indicator again is supported in principle. However it needs to be clarified. Does it refer to buildings given permission or those actually constructed?</p> <p>It is stated in the framework that this information is available from the DCLG. Why then will it fall to the local planning authorities to report on this data? Surely it would be a more streamlined process if the Welsh Government went directly to the source of the data to ensure consistency.</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>Additional comments: Even though it is recommended in guidance, many local planning authorities do not attach conditions on the use of local or recycled materials to their development consents.</p> <p>Will this indicator relate to planning permissions or buildings constructed?</p> <p>Even with such conditions it may be difficult for a local planning authority to monitor these conditions and report on implementation.</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Renewable energy generation (mW) granted/refused by type and capacity		
<p>Additional comments: N/A</p>			

Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
<p>Additional comments: This indicator is supported in principle. However, as with the flooding indicator, would it not be more pertinent to use Countryside Council for Wales data to record this?</p>			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
<p>Additional comments: It is unclear how simply monitoring the number of applications for Listed Building and Conservation Area Consent will relate to the impact on these sensitive buildings / areas generally.</p> <p>Instead of this, could Cadw provide more reliable information on the number of consents approved by LPAs that it opposes on heritage grounds?</p>			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
Additional comments: N/A			

Q4.17	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	Employment land bank (years provided)		
<p>Additional comments:</p> <p>Whilst it seems sensible to note the employment land banks each authority holds. It may also be worth splitting the data collected into strategic and local sites; as well as greenfield / brownfield.</p> <p>Collecting this data could improve the indicator as having a large strategic employment land bank on greenfield sites could infer that land suitable for other forms of development is not being withheld; as their release for employment would only be made in exceptional circumstances.</p> <p>Additionally, in conjunction with the review of Chapter 7 of <i>Planning Policy Wales</i>, guidance will need to be produced in order for local planning authorities to consistently calculate their available supply of employment land in years.</p>			

Q4.18	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
18	Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)		
<p>Additional comments:</p> <p>Whilst this indicator is supported; definitions need to be very precise to maintain consistency across Wales. Will the measurement be gross or net? Will changes of uses etc. be recorded?</p> <p>Local planning authorities will also need to be supported and advised on the best way to capture this information and record it effectively.</p>			

Q5	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"/>
<p>Additional comments:</p> <p>Whilst Bridgend CBC agrees that this should be a high-level approach there is a risk that the indicators suggested are so high level they will not give any meaning to enable a judgement to be made on the policy objectives given in table 1. For example how will 'Number of houses built', 'Amount of employment land available' and floorspace figures for development be able to measure a policy objective of safe neighbourhoods, social inclusion, economic diversity and health and wellbeing.</p> <p>It is difficult to see any relationship between the indicator and the desired policy objective outcome. There is a danger that big assumptions could be made in the interpretation of data, and that inaccurate results are drawn.</p> <p>This is not the case for all the objectives, especially when there are clear relationships that can be derived (ie. renewable energy generation); however perhaps the links could be more clearly defined and more information be given on how the results and conclusions will be used to make statements on the planning system's contribution to sustainable development.</p>			

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

Q7	What are your views on whether the proposed framework should be phased?
<p>Additional comments:</p> <p>Bridgend CBC considers that the introduction of this framework should be phased and there are many uncertain areas that need to be clarified which cannot be done before April 2012 when this is proposed to be introduced.</p> <p>It is considered that guidance will need to be prepared and issued to local planning authorities on how best to start recording the relevant data; how this should be recorded; and how it could be co-ordinated throughout an authority. A pilot study could be initiated which looked at these issues and reported on best practice before the scheme is rolled out across Wales.</p>	

Q8	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 checked="" type="checkbox"/>	<input type="checkbox"/>

Additional comments:

See answer to question 1 above regarding Bridgend CBC's opinion that there is a need for one, single planning system monitoring framework which should include the LDP Monitoring Framework.

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
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Additional comments:

The new monitoring framework will have a significant impact upon Bridgend local planning authority. This will start with having to put a completely new system in place of recording the outcomes of planning applications and the detail with them. The way in which an LPA should do this is not set out in the consultation document and, as mentioned above, should be subject to assessment, guidance and best practice advice.

Some of the indicators are very specific and so it may only be the planning officer dealing with the application who would be able to make a judgement on a particular issue. However, the priority for that officer will always be to be determining applications rather monitoring performance; there is then a training implication of administrative / junior members of staff to be able to pick out the relevant issue.

The amount of information being monitored and recorded could be tantamount to employing another member of staff to solely undertake this work. Bridgend CBC does not have the resources to do this and would expect further assistance from WG in order to do this. This situation will only worsen when the current economic downturn starts to get better and so more and more planning applications will be submitted which, in themselves, will require monitoring.

One issue which will need addressing is the information required by the framework actually being asked of developers from the outset. This may require that changes are made to 1APP in Wales to ensure that the required level of data is received from the outset and no further communication would be required from an applicant which, although having no bearing on the merits of a planning application, would still be required from the monitoring framework.

The alternative to this approach would be for WG to undertake its own monitoring of planning applications and planning policies by using the extensive online resources that local planning authorities have now invested in to display their planning application / policy information to members of the public and developers / consultants.

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments: N/A			

Q11	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: N/A	

Confidentiality
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"/>

How to respond

Please submit your comments by 27 January 2012, in any of the following ways:

Email	Post
Please complete the consultation form and send it to : planconsultations-E@wales.gsi.gov.uk [Please include 'Strategic Monitoring Framework for the Planning System' in the subject line]	Please complete the consultation form and send it to: Strategic Monitoring Framework for the Planning System (Consultation) Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3NQ

Additional information
If you have any queries on this consultation, please Email: planconsultations-E@wales.gsi.gov.uk Telephone: Andrew Charles on 029 2082 3869

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	Sue Evans	
Organisation	<p>Country Land and Business Association (CLA)</p> <p>The CLA represents over 35,000 members in England and Wales. Our members both live and work in rural areas; they operate a wide range of businesses including agricultural, tourism and commercial ventures – at the last count the CLA represents some 250 different types of rural businesses. They also manage and/or own a quarter to a third of all heritage, so that the CLA is by far the largest heritage-owner stakeholder group.</p> <p>The quality of the countryside is of vital importance to our members and frequently brings them into contact with the planning system. Most planning objectives for the countryside - economic, social and environmental - rely on landowners and managers for their success, and thus the CLA has a special focus on such matters.</p> <p>The rural economy makes an important contribution to the national economy: land-based businesses, within the rural economy, provide the environmental and recreational benefits in the countryside that are valued by the population as a whole. The best security for rural areas is a successful and sustainable rural economy allied to a flexible, integrated and sustainable planning system.</p> <p>We have pleasure in setting out our response to the consultation below.</p>	
Address	CLA Unit 8 Broadaxe Business Park Presteigne Powys LD8 2LA	
E-mail address	sue.evans@cla.org.uk	
Type (please select one from the following)	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 checked="" type="checkbox"/>	<input type="checkbox"/>

Additional comments:

Existing monitoring does not provide any information on quality of decisions made by LPA's and NPA's.

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

Additional comments:

We are very much in favour of a logical approach.

Q3	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 checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments:			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
Additional comments:			
The CLA has concerns that rural planning is prejudiced against rural development and that the generation of business in rural areas is imperative to a healthy rural Wales.			

Q4.2	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing		
Additional comments:			
BAP recording is not reliable or consistent nor is it a viable indicator. There is no direct correlation between the increase in biodiversity in a BAP and buildings development. BAP results are directly attributable to the management of habitat which have nothing to do with the planning system.			
We appreciate that there are no local environmental indicators appropriate to planning but there's a huge range of variables that affect BAPS with no direct link to planning therefore they are not a good indicator.			

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		

Additional comments:

The CLA believes that this is a useful indicator.

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Percentage of the population in low-income households		
Additional comments:			

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5	Wellbeing in Wales		
Additional comments:			
Nice idea, but how would you measure wellbeing? Would you use life expectancy? This is too difficult to assess and too emotive. Wellbeing is expected to be higher in rural areas yet suicide in farming is very high.			

Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Proportion of LPAs with an up to date adopted LDP		
Additional comments:			
It is good to know what basis each LPA is working from.			

Q4.7	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 indicator could be very misleading in rural areas therefore an urban-only indicator would possibly be more appropriate.

Q4.8	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Total floor space granted/refused (by type) on greenfield and brownfield land		
<p>Additional comments:</p>			

Q4.9	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	Number of application submitted with Transport Assessments		
<p>Additional comments:</p> <p>We would welcome drilling down further to find out what number of Transport Assessments support development in each case within the LPA and NPA.</p>			

Q4.10	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)		
<p>Additional comments:</p> <p>There are many countries where they build successfully on flood plains by raising the floor level in properties and putting the buildings on stilts or a platform. There has been a lot of building done on flood plains in the past and priority should be given to appropriate future development measuring quality and appropriateness of the development not just its existence.</p>			

Q4.11	Do you agree with the proposed indicator?	Yes	No
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments: WG needs to agree its priority in development as these certifications add to development costs. While BREEAM may be appropriate for developers of large building projects it may not be practical for individual dwellings. The CLA supports building to the highest standards practical and achievable in both design construction and sustainability terms. However, it may be cheaper to set simple parameters for small developments.</p>			

Q4.12	Do you agree with the proposed indicator?	Yes	No
12	The proportion of local or recycled materials used in new developments	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments: Again, the requirement for local products artificially affects the market demand for that product and can result in far higher costs. The CLA supports the use of local and recycled materials, but would like to express caution in further developing this approach.</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
13	Renewable energy generation (mW) granted/refused by type and capacity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments: We would welcome this.</p>			

Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
<p>Additional comments:</p> <p>We would like to see this going further. There is a need to monitor the amount of applications that come forward following pre-application advice being given by planning officers. The CLA has concerns that potential applicants are being inappropriately put off from making a planning application during pre-application advice given by planning officers e.g. in the Brecon Beacons National Park. Word of mouth then results in fewer applications coming forward where applicants believe there is no likelihood of an application being successful.</p>			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
<p>Additional comments:</p> <p>There is a great need for Listed buildings to be usefully adapted so that they will continue to be maintained and generate an economic return. The same goes for Conservation areas, i.e. that they must be developed sympathetically in order to provide a thriving rural economy.</p>			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
<p>Additional comments:</p>			

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

Additional comments:

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

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

Additional comments:

This would need to be presented in context, with details given of how many applications are made or pre-application consultations discussed.

Q5	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:

There should be scope for adding an additional measure when necessary. The CLA would like to see more information available on SME's in rural areas - and growth and development in rural areas specifically - in order to provide a thriving rural economy.

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

Additional comments:

Again the CLA would like to see separate information for rural areas.

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

Additional comments:

It should be taken forward at a practicable pace. With the current economic climate, LPA's and NPA's should have the resources to adopt change now.

We would like to see an indicator for new business creations on the one hand and one for the increase in business profitability on the other hand.

Q8	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 checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments: The other indicators only measure output and not quality.			

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
Additional comments: The CLA would like the information to be published on the WG website each year and in a format where rural development can be viewed as separate from urban development.	

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments: Again, we would like to see separate information on rural areas and rural business development.			

Q11	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.
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Additional comments:

There is a need to monitor the number of applications that come forward in each LAP and NPA following pre-application advice being given by planning officers. The CLA has concerns that potential applicants are being inappropriately put off from making a planning application during pre-application advice given by planning officers e.g. in the Brecon Beacons National Park. Word of mouth then results in fewer applications coming forward where applicants believe there is no likelihood of an application being successful.

The CLA would like the views of a wider audience to be sought with particular reference to their satisfaction with the Planning system and their engagement with it so that a picture can be formed of obstacles to development.

The CLA would like to see a greater record of the quality of planning applications which are approved e.g. a survey of people's perceptions of the aesthetic nature of planning outcomes. For example, Anglesey LPA some years ago required that all residential development was pebble-dashed which produced a period of unsightly development where even some traditional sandstone cottages were completely pebble-dashed in black and white as a condition of having an extension approved. It is imperative that there is a method of feeding information into WG where this type of undesirable policy is being pursued.

Confidentiality

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: ☐

How to respond

Please submit your comments by 27 January 2012, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to :</p> <p>planconsultations-E@wales.gsi.gov.uk</p> <p>[Please include 'Strategic Monitoring Framework for the Planning System' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Strategic Monitoring Framework for the Planning System (Consultation) Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3NQ</p>

Additional information

If you have any queries on this consultation, please

Email: planconsultations-E@wales.gsi.gov.uk

Telephone: Andrew Charles on 029 2082 3869

FFURFLEN YMGYNGHORI

A Fframwaith Monitro Strategol ar gyfer y System Gynllunio (Ymgynghoriad)		
4 Tachwedd 2011 – 27 Ionawr 2012		
Enw	Eliw Owen	
Sefydliad	Awdurdod Parc Cenedlaethol Eryri	
Cyfeiriad	Swyddfa'r Parc Cenedlaethol Penrhyndeudraeth	
Cyfeiriad e-bost	elliw.owen@eryri-npa.gov.uk	
Math o sefydliad (dewiswch un o'r canlynol)	Busnes	<input type="checkbox"/>
	Awdurdod Cynllunio Lleol	<input checked="" type="checkbox"/>
	Asiantaeth y Llywodraeth/Corff Sector Cyhoeddus arall	<input type="checkbox"/>
	Corff Proffesiynol/Grŵp Buddiant	<input type="checkbox"/>
	Y Sector gwirfoddol (grwpiau cymunedol, gwirfoddolwyr, grwpiau hunan-gymorth, cwmnïau cydweithredol, mentrau, mudiadau crefyddol, sefydliadau di-elw)	<input type="checkbox"/>
	Arall (grwpiau eraill nad ydynt wedi'u rhestru uchod)	<input type="checkbox"/>

C1	Ydych chi'n cytuno â'n casgliad ni, sef nad oes digon o wybodaeth ar hyn o bryd inni allu mesur cyfraniad y system gynllunio at ein gweledigaeth o greu Cymru gynaliadwy?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Sylwadau ychwanegol:</p> <p>Mae'r system gynllunio yn hyrwyddo datblygiad cynaliadwy ond nid yw o reidrwydd yn golygu bydd datblygiad yn cael ei gyflawni, felly mae'n annodd iawn mesur canlyniadau (outcomes) datblygiadau cynaliadwy y system gynllunio.</p> <p>O bosib mae gwasanaethau rheoleiddio eraill e.e. rheoli adeiladu mewn gwell sefyllfa i fonitro canlyniadau rhai datblygiadau cynaliadwy.</p> <p>Eisioes mae llawer o ddata perthnasol yn cael ei gaslu. Cyn cynnig mwy o ddata rhaid gwerthuso perthnasedd data cyfredol i'r perwyl hwn.</p>			

C2	Ydych chi'n cytuno â'r cynnig i ddefnyddio'r 'gadwyn resymegol' i nodi dulliau priodol o fesur cyfraniad y system gynllunio?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sylwadau ychwanegol:

C3	Ydych chi'n cytuno y dylid rhannu 19 amcan <i>Polisi Cynllunio Cymru</i> yn bum categori strategol er mwyn datblygu set o fesuryddion newydd?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Sylwadau ychwanegol:</p> <p>Mae angen rhoi ystyrieath o fesuryddion yr iaith Gymraeg yma gan bod annog defnydd o'r iaith yn rhan o hybu datblygiad cynladwy.</p>			

C4.1	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	Ôl troed ecolegol Cymru		
<p>Sylwadau ychwanegol:</p> <p>Rydym yn cymeryd mai ar lefel Cymru yn unig y bydd dangosyddion 1 i 5. Noder nad yw gwybodaeth ol traed ecolegol ar gael ar lefel Parciau Cenedlaethol.</p>			

C4.2	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Y ganran o'r cynefinoedd a rhywogaethau y cofnodir eu bod yn sefydlog neu'n cynyddu yn y Cynllun Gweithredu Bioamrywiaeth		
<p>Sylwadau ychwanegol:</p> <p>Rydym yn cymeryd mai ar lefel Cymru yn unig y bydd dangosyddion 1 i 5.</p>			

C4.3	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir ?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Gwerth Ychwanegol Crynswth (GYC) a GYC y pen		
Sylwadau ychwanegol: Rydym yn cymeryd mai ar lefel Cymru yn unig y bydd dangosyddion 1 i 5.			

C4.4	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Y ganran o'r boblogaeth sydd mewn cartrefi incwm isel		
Sylwadau ychwanegol: Rydym yn cymeryd mai ar lefel Cymru yn unig y bydd dangosyddion 1 i 5.			

C4.5	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Lles pobl Cymru		
Sylwadau ychwanegol: Rydym yn cymeryd mai ar lefel Cymru yn unig y bydd dangosyddion 1 i 5.			

C4.6	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Canran yr Awdurdodau cynllunio Lleol sy'n diweddarau eu CDLI		
<p>Sylwadau ychwanegol: Cytuno. Mae CDLI sydd wedi cael ei fabwysiadu (ac felly wedi bod yn destun Gwerthusiad Cynaliadwyedd) yn sicrhau bod datblygiad cynaliadwy yn ganolog i bolisiau cynllunio yr Awdurdod.</p>			

C4.7	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Y newid net mewn mannau agored a chaeau chwarae		
<p>Sylwadau ychwanegol: Mae unrhyw ddatblygiad o fewn mannau agored sydd wedi cael ei ddynodi yn y cael ei fonitro drwy Gynllun Datblygu Lleol yr Awdurdod drwy ddefnyddio system GIS. Nid yw system feddalwedd sydd yn cofnodi ceisiadau cynllunio yr Awdurdod (System Swift) yn nodi cynnydd mewn mannau agored sydd yn deillio o ddatblygiadau newydd, felly byddai angen addasu ffurfleni cais cynllunio a'r system swift er mwyn monitro hyn. Nid yw caeau chwarae wedi eu plotio yn GIS felly byddai angen i'r Awdurdod wneud gwaith ychwanegol ar gyfer monitro y newid net mewn caeau chwarae.</p>			

C4.8	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
8	Cyfanswm yr arwynebedd llawr a gymeradwyir/a wrthodir (fesul math) ar safleoedd maes glas a safleoedd tir llwyd		

Sylwadau ychwanegol:

Ar hyn o bryd nid yw system feddalwedd sydd yn cofnodi ceisiasdau cynllunio yr Awdurdod Cynllunio (System Swift) yn nodi cyfanswm arwynebedd llawr datblygiadau newydd. Yn hytrach, dim ond nodi arwynebedd y safle cynllunio yn ei gyfanrwydd (sydd yn cael ei gyfrifo yn awtomatig o'r system GIS).

Er mwyn gallu monitro y dangosydd yma byddai angen addasu ffurfleni cais yn genedlaethol fel bod yr ymgeisydd yn nodi arwynebedd llawr datblygiadau.

Nid yw'n glir pa gategorïau math o ddatblygiad y dylid cyfieirio atynt ar gyfer y dangosydd yma.

Yn oystal mewn ardal wledig fel Parc Cenedlaethol Eryri nid oes llawer o diroedd llwyd ar gael ac felly ni fyddai yn dangos yn bositif.

Efallai byddai yn werth ysytried newid diffiniad safleoedd gwyrdd a safleoedd llwyd oherwydd gall safleoedd gwyrdd gynnwys beudai amaethyddol sydd ddim yn cael eu defnyddio sydd yn werth eu trosi tra gall safleoedd llwyd gynnwys gerddi domestic fod gyda gwerth ecolegol uchel. Byddai cynnwys rhain yn dangos darlun anghywir ar gyfer mesur effaith cynllunio ar ddatblygiad cynaliadwy.

C4.9	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	Nifer y ceisiadau a gyflwynir gydag Asesiadau Trafnidiaeth		
<p>Sylwadau ychwanegol: Mae nifer o'r trothwyon ar gyfer gofyn am Asesiad trafndiaeth ym mholisi Cynllunio Cymru ar gyfer datblygiadau mawr ac felly nid ydynt yn debygol o ddigwydd o fewn y Parc Cenedlaethol. Mae'n bwysig bod y fframwaith monitro yn hyblyg i esbonio amgylchiadau lleol.</p>			

C4.10	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Nifer y ceisiadau a gymeradwyir/a wrthodir (fesul math) ar orlifdir (fesul categori perygl llifogydd)		
<p>Sylwadau ychwanegol: Ar hyn o bryd nid yw system feddalwedd yr Awdurdod Cynllunio (System Swift) yn nodi categorïau gwahanol TAN 15. Byddai rhaid defnyddio ein system GIS er mwyn cwblhau'r gwaith ar gyfer y dangosydd yma. Nid yw'r dangosydd yma o reidrwydd yn mynd i roi'r wybodaeth angenrheidiol oherwydd gall yr Asiantaeth Amgylchedd dynnu eu gwrthwyneboad yn nol neu gynnig dulliau lliniaru. A fyddai yn fwy cywir defnyddio'r dangosyddion isod?:</p> <ul style="list-style-type: none"> • Nifer o geisiadau sydd yn cael eu cymeradwyo yn groes i wrthwynebiad perygl llifogydd yr Asiantaeth yr Amgylchedd. • Nifer o geisiadau lle mae'r Asiantaeth yr Amgylchedd yn tynnu eu gwrthwynebiad yn nol ar sail llifogydd • Nifer o geisiadau sydd yn cael eu cymeradwyo gyda dulliau lliniaru i leihau perygl llifogydd. <p>Er mwyn mesur y dangosyddion uchod byddai angen gwneud newidiadau o fewn system swift.</p>			

C4.11	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
11	Nifer yr adeiladau sy'n ennill yr ardystiad BREEAM a/neu ardystiad y Cod Cartrefi Cynaliadwy		

Sylwadau ychwanegol:

Credwn bod gwasanaeth rheoli adeiladu mewn gwell sefyllfa i sicrhau bod adeiladau yn cwrdd a gofynion cynaliadwyedd BREEAM a Cod Cartrefi Cynaliadwy, felly credir y dylai'r dangosydd hwn gael ei fonitro gan y gwasanaeth rheoli adeiladau yr awdurdod lleol ac nid yr awdurdod cynllunio.

C4.12	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym <input type="checkbox"/>	Nac ydym <input checked="" type="checkbox"/>
12	Cyfran y deunyddiau lleol neu ddeunyddiau wedi'i ailgylchu a ddefnyddir mewn datblygiadau newydd		
<p>Sylwadau ychwanegol:</p> <p>Dangosydd annodd iawn i'w fonitro. Nid yw'r wybodaeth am gyfran y deunyddiau lleol neu ddeunyddiau wedi'i ailgylchu yn cael ei gasglu ar hyn o bryd. Byddai rhaid addasu ffurfleni cais a'r system swift. Byddai rhaid dibynnu ar yr ymgeisydd i nodi cyfran y deunyddiau lleol / ailgylchu a ddefnyddir yn eu datblygiad. Mae hyn yn cymlethu pethau i'r ymgeisydd ac yn arwain at gostau ychwnaegol i weithio allan y gyfran. Hefyd, byddai yn rhaid cael diffiniad o 'lleol' er mwyn sicrhau cysondeb.</p> <p>Ar ddechrau y broses o ddatblygu h.y.sicrhau caniatad cynllunio ni fydd yr ymgeisydd / asiant yn ymwybodol o darddiad y deunyddiau nad o bosib beth fydd y deunyddiau. Ar y gorau amcangyfrif fyddai hwn a rhaid pwysleisio na ddylid cymlethu y broses gynllunio fwy fwy.</p>			

C4.13	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym <input type="checkbox"/>	Nac ydym <input checked="" type="checkbox"/>
13	Y cynlluniau cynhyrchu ynni cynaliadwy (mW) a gymeradwyir/a wrthodir, yn ôl eu math a'u capasiti		
<p>Sylwadau ychwanegol:</p> <p>Nid yw system yr Awdurdod yn nodi capacist cynlluniau ynni cynaliadwy ar hyn o bryd. Byddai yn rhaid addasu y system swift i nodi beth mae'r ymgeisydd yn datgan fel capasiti'r cynlluniau. Gan mai cynlluniau ynni adnewyddol ar raddfa fach yn unig a gefnogir o fewn y Parc Cenedlaethol byddent yn cael eu mesur mewn kW.</p>			

C4.14	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym <input checked="" type="checkbox"/>	Nac ydym <input type="checkbox"/>
14	Cyfanswm arwynebedd y datblygiadau a gymeradwyir/a wrthodir mewn ardaloedd sy'n cael eu gwarchod (dynodiadau Ewropeaidd a chenedlaethol)		

Sylwadau ychwanegol:

Ar hyn o bryd nid yw'r system feddalwedd sydd yn cofnodi ceisiasdau cynllunio yr Awdurdod yn nodi cyfanswm arwynebedd llawr datblygiadau newydd. Yn hytrach, dim ond nodi arwynebedd y safle cynllunio yn ei gyfanrwydd (sydd yn cael ei gyfrifo yn awtomatig o'r system GIS).

Er mwyn gallu monitro y dangosydd yma byddai angen addasu ffurfleni cais fel bod yr ymgeisydd yn nodi arwynebedd llawr datblygiadau.

Byddai rhaid defnyddio ein system GIS er mwyn cwblhau'r gwaith ar gyfer y dangosydd yma.

A ddylid hefyd monitro effaith datblygiadau sydd yn cael caniatad gan Adrannau Llywodraeth y Deyrnas Unedig ar ardaloedd gwarchodedig e.e pibelli nwy, gwifrau trydan uchwen ayyb?

C4.15	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Nifer y Caniatadau Adeilad Rhestredig ac Ardal Gadwraeth a gymeradwyir/a wrthodir		
<p>Sylwadau ychwanegol:</p> <p>Cytuno. Ond ni fydd ffigwr uchel o ganiatadau o reidrwydd yn golygu dangosydd positif, yn hytrach gall fod yn ddibynnol ar y nifer o adeiladau rhestredig mewn ardal gynllunio benodol.</p>			

C4.16	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Nifer y cartrefi newydd a ganiateir (fesul math)		
<p>Sylwadau ychwanegol:</p> <p>Cytuno. Gall yr awdurdod ddarparu gwybodaeth am nifer y tai marchand agored a tai fforddiadwy a ganiateir.</p> <p>Bydd yn annoddach darparu gwybodaeth fwy manwl e.e. nifer rhan-berchnogaeth oherwydd gall Gymdeithasau Tai osod y tai ar ddeiliadaeth Niwtral ac felly ni fydd yn bosib i'r Awdurdod Cynllunio wybod os yw'r ty yn cael ei osod fel ty rhent neu rhan berchnogaeth.</p> <p>Mae'n bwysig nodi er bod gan y system gynllunio rôl i'w chwarae mewn darparu tai fforddiadwy, mae dulliau eraill mwy priodol y dylid eu hystyried yn fanwl er mwyn cwrdd a'r angen am dai fforddiadwy megis defnyddio tai gweigion a'r stoc dai bresennol.</p>			

C4.17	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
17	Banc tir cyflogaeth (y blynyddoedd a ddarperir)		

Sylwadau ychwanegol:

Nid yw'r Awdurdod yn cyfrifo banc tir cyflogaeth mewn blynyddoedd.

Yn hytrach dylid casglu gwybodaeth ynglyn a tir cyflogaeth gyda caniatad cynllunio gan yr awdurdodau cynllunio lleol ac unrhyw arwynebedd llawr sydd yn wag gan yr awdurdodau lleol.

Mae mwyafrif y trefi sydd yn darparu gwasanaethau i drigolion y Parc Cenedlaethol yn ffinio gyda ardal y Parc cenedlaethol ac yno mae'r safleoedd diwyddiannol wedi eu lleoli.

Mae polisiau Cynllunio yr Awdurdod yn caniatáu datblygiad cyflogaeth a hyfforddiant perthnasol o fewn, neu gyfagos at y rhan fwyaf o ganolfannau gwasanaethau lleol, aneddiadau gwasanaethau ac aneddiadau eilaidd o fewn y Parc Cenedlaethol yn hytrach na dynodi safleoedd mawr diwyddiannol. Yn hyn o beth, mae polisi yr Awdurdod yn fwy hyblyg na dynodi safleoedd cyflogaeth ac yn cydfynd gyda Polisiau Cenedlaethol economi wledig.

Unwaith eto, pwysleisir pwysigrwydd cael fframwaith monitro sydd yn hyblyg i amgylchadau lleol.

C4.18	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
18	Cyfanswm yr arwynebedd tir a gymeradwyir/a wrthodir (fesul math) (o gyfuno tir glas a thir llwyd) (swyddfeydd/diwydiant/manwerthu/dosbarthu)		
<p>Sylwadau ychwanegol:</p> <p>Mae'r dangosydd yma yn ail-adrodd dangosydd 8 i raddau helaeth ac felly yn dyblygu gwaith.</p> <p>Gweler sylwadau blaenorol ar ddangosydd 8.</p>			

C5	Ydych chi'n cytuno na ddylid ystyried bod y mesuryddion hyn yn rhoi darlun cyflawn o ddylanwad y system gynllunio ar ddatblygu cynaliadwy ond eu bod yn darparu fframwaith lefel-uchel priodol?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Sylwadau ychwanegol:</p>			

C6	Ydych chi'n cytuno â strwythur arfaethedig y Fframwaith Monitro Strategol ac y dylid mesur y pedwar cam a nodir uchod?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Sylwadau ychwanegol:</p> <p>A ddylai y golofn olaf yn tabl 3 gyfeirio at tabl 2 yn hytrach na tabl 1?</p>			

C7	A ddylid cyflwyno'r fframwaith arfaethedig gam wrth gam, yn eich tyb chi?
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Sylwadau ychwanegol:

Dylid yn bendant. Fel sydd wedi cael ei esbonio yn yr ymatebion i ddangosyddion 7 i 18 mae rhai o'r dangosyddion hyn yn annodd iawn i'w monitro. Nid yw'r holl wybodaeth yn cael ei gasglu ar hyn o bryd a byddai yn rhaid addasu ffurfleni cais, system meddalwedd a system GIS yr Awdurdod er mwyn medru eu casglu. Yn ogystal bydd yn rhaid dibynnu ar yr ymgeisydd i gyflwyno peth o'r wybodaeth a fydd yn cynyddu'r gofynion a chymlethu pethau i'r ymgeisydd gan arwain at gostau ychwnaegol iddynt.

Mewn gweithdy asiantwyr diweddar un o'r prif bryderon a godwyd gan yr asiantwyr oedd y gofyn cynyddol am wybodaeth dechnegol a chymlethdod y system gynllunio sydd yn fwrn ar ymgeiswyr.

C8	Ydych chi'n cytuno y dylem gyfuno/adolygu'r dangosyddion allbwn eraill a nodwyd eisoes yn y Llawlyfr CDLI (2006) gyda'r dangosyddion newydd arfaethedig, er mwyn mesur allbynnau'r system gynllunio?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

Sylwadau ychwanegol:

Wrth i'r awdurdod lunio fframwaith monitro ar gyfer y Cynllun datblygu Lleol rhoddwyd ystyriaeth i'r dangosyddion craidd perthnasol a bennwyd yn llawlyfr y Cynllun Datblygu Lleol (2006). Cafodd rhai o'r rhain eu cynnwys yn fframwaith monitro y CDLI, cafodd eraill eu haddasu fel dangosyddion lleol i gyd-fynd gyda amgylchiadau lleol a cafodd eraill eu hepgor gan eu bod yn amherthansol.

Mae'n bwysig bod y fframwaith monitro a gynigir yma yn hyblyg i amgylchiadau lleol a'i bod yn bosib i Awdurdodau Cynllunio hepgor rhai o'r dangosyddion os ydynt yn amherthnasol i'r ardal gynllunio.

C9	Sut fyddai'r fframwaith Monitro Strategol newydd yn effeithio ar eich awdurdod chi? (Awdurdodau Cynllunio Lleol)	
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Sylwadau ychwanegol:

Fel yr esbonwyd eisoes mae rhai o'r dangosyddion hyn yn annodd iawn i'w monitro. Nid yw'r holl wybodaeth yn cael ei gasglu ar hyn o bryd a byddai yn rhaid addasu ffurfleni cais, system meddalwedd a system GIS yr Awdurdod er mwyn medru ei casglu. Byddai hefyd angen hyfforddiant ar gyfer swyddogion i recordio'r wybodaeth yn gywir a chyson. Yn ogystal bydd yn rhaid dibynnu ar yr ymgeisydd i gyflwyno peth o'r wybodaeth a fydd yn cynyddu'r gofynion a chymlethu pethau i'r ymgeisydd gan arwain at gostau ychwnaegol iddynt.

Bydd recordio rhai dangosyddion yn annodd i awdurdod Parc cenedlaethol fel sydd wedi ei nodi yn yr ymatebion i ddangosyddion 7 - 18. Mae'n bwysig felly bod amgylchiadau lleol yn cael eu cymeryd i ystyriaeth.

C10	Ydych chi'n cytuno â'r dull a gynigiwn ar gyfer adrodd ar y Fframwaith Monitro Strategol?	Ydym	Nac ydym
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sylwadau ychwanegol:

Ai ar lefel Cymru yn unig fydd y Llywodraeth yn adrodd ar y fframwaith monitro strategol? neu a fyddent hefyd yn adrodd ar lefel awdurdodau cynllunio? Os ydynt am adrodd ar lefel awdurdodau lleol mae'n bwysig bod y fframwaith digon hyblyg i gymeryd i ystyriaeth amgylchiadau lleol. Rhaid hefyd sicrhau fod y diffiniad o 'ddatblygiad cynaliadwy' yn golygu yr un peth i bob Awdurdod er mwyn sicrhau unffurfiaeth.

C11

Rydym wedi gofyn nifer o gwestiynau penodol. Os hoffech dynnu sylw at unrhyw faterion eraill, nodwch hwy isod.

Sylwadau ychwanegol:

Mae'r system gydymffurfiaeth yn rhwystro nifer o ddatblygiadau anghynaliadwy. Nid yw'r dangosyddion yn cynnwys dylanwad y system gydymffurfiaeth. Yn ogystal, mae'r system gynllunio yn gwrthod ceisiadau oherwydd nifer o resymau e.e. leoliad anaddas. Byddai'n syniad cael dangosydd ar gyfer datblygiadau anghynaliadwy a wrthodir.

Bydd angen sicrhau bod dangosyddion yn cymryd i ystyriaeth gwahaniaethau rhwng Awdurdodau gweldig a threfol.

Cyfrinachedd

Mae'n bosibl y bydd yr ymatebion i ymgynghoriadau yn cael eu cyhoeddi – ar y rhyngwrdd neu mewn adroddiad. Os hoffech gadw'ch ymateb yn gyfrinachol, ticiwch y blwch: ☐

Sut i ymateb

Anfonwch eich sylwadau atom erbyn 27 Ionawr 2012, drwy un o'r dulliau canlynol:

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	Martina Dunne	
Organisation	Pembrokeshire Coast National Park Authority	
Address	Llanion Park Pembroke Dock Pembrokeshire SA72 6DY	
E-mail address	martinad@pembrokeshirecoast.org.uk	
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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 type="checkbox"/>
Additional comments: □□□□□			

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: Figure 1 could include less jargon. Worth checking if the policy statements in PPW etc have been sustainably appraised in any explicit way. The logic seems to fall down otherwise.			

Q3	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>Additional comments:</p> <p>As sustainable development is currently defined in the planning system this makes sense. Ensuring consistency with the emerging Natural Environment Framework will need to be considered. As always clarity is needed in relation to the weighing of the various elements of sustainable development for National Park Authorities. This is also an issue when considering defining overarching measures as set out in Table 2 of the consultation.</p>			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
<p>Additional comments:</p> <p>Support - ecological footprinting is a powerful tool for diagnosing and communicating why specific behavioural changes are required, and for assessing their effectiveness.</p> <p>We suggest that the individual components of the ecological footprint should also be published as well as overall measures, and, where meaningful, given on a regional/county basis (as per the SEI Wales footprint report of 2008).</p> <p>Welsh Government may wish to consider accompanying the standard ecological footprint measures with measures of opportunity cost, e.g. the sequestration costs (in terms of Mt Carbon, rather than £) of failing to manage existing carbon sinks. This would help partners to focus on proactive (maintenance), as well as reactive, management and policy.</p>			

Q4.2	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>Additional comments:</p> <p>Support. This indicator should also specify changes in those habitats and species which are in decline (or which are stable but in unfavourable condition). To this end we suggest using the UK Common Standards (JNCC) terminology, if this is not already what is being proposed.</p>			

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Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

3 Gross Value Added (GVA) and GVA per head

Additional comments:

Useful as contextual information and for comparison, but only useful as an indirect proxy for wellbeing, so should be presented in conjunction with the other measures in this bundle.

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

4 Percentage of the population in low-income households

Additional comments:

Welsh Government may also wish to consider including a single measure relating high and low income groups (e.g. Gini coefficient).

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

5 Wellbeing in Wales

Additional comments:

We strongly support the measure. Social benefit (wellbeing/equity) should be the main outcome of economic activity, subject to environmental limits and the precautionary principle (using ecological footprinting and habitats and species measures etc to inform this).

We hope that the contextual measures as a whole will help Welsh Government in its mission to adopt sustainability as its central organising principle, and that economic activity can become a concerted means of enabling this.

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Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

6	Proportion of LPAs with an up to date adopted LDP
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Additional comments:

□□□□□

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

7	Net change in open space and playing fields
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Additional comments:

Should relate to the open space identified through the Open Space Assessment as part of the LDP.

Q4.8	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
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Additional comments:

This is one where if an authority is predominantly rural and must rely on a significant proportion of its land supply coming forward from greenfield sites it can look the 'poor relation' against a more urban authority. Nevertheless the search for land for development plan purposes must follow the sequential approach.

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

9	Number of application submitted with Transport Assessments
<p>Additional comments: Useful to know how many submitted with Transport Assessments but to establish effectiveness how many applications approved/refused on the basis of the transport impacts.</p>	

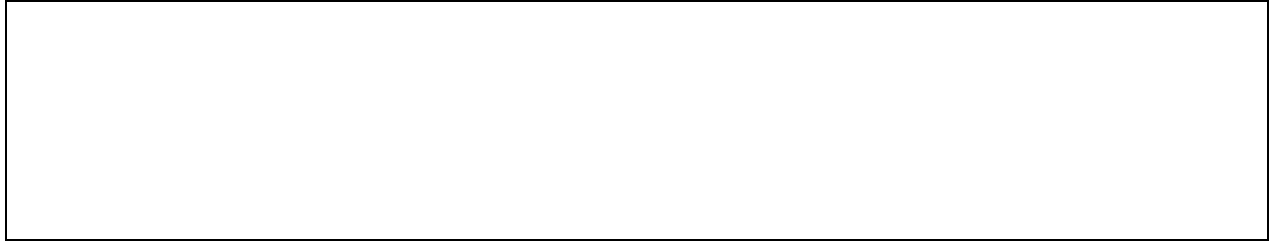
Q4.10	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)
<p>Additional comments: □□□□□</p>	

Q4.11	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification		
<p>Additional comments:</p> <p>There is a need to clarify that it would need to be in accordance with national planning policy expectations. Clarify if it is the interim or post construction certification that is being referred to.</p>			

Q4.12	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
12	The proportion of local or recycled materials used in new developments		
<p>Additional comments:</p> <p>The Authority does not currently collect this information via the 1 App process (no relevant question) or during the submission of planning applications. An SPG / guidance note can be devised to set out guidance about this measure, and a process put in place to require information to be provided as part of a development proposal by the applicant. The proportions provided cannot however be effectively monitored either during or following development.</p> <p>There will necessarily be a delay in bringing this additional requirement into action, and definitions of 'local' will need to be set out as will 'new' developments. A nationally coined definition would provide the most consistent foundation for this. Some development eg demolition will not require the use of materials and should be excluded so as not to sway figures.</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
13	Renewable energy generation (mW) granted/refused by type and capacity		
<p>Additional comments:</p> <p>Although we would agree in principle there are two main difficulties with monitoring renewable energy provision. Firstly renewable energy generated from micro household renewable schemes and small scale individual schemes are allowed as permitted development and secondly applicants do not currently need to provide information in respect of the renewable energy capacity associated with their planning application. There is also difficulty in distinguishing whether the panels are for electricity generation or heating water. Biomass in particular is seen as a potentially significant contributor to the renewable heat targets in this Authority's Plan and generally enjoys permitted development rights.</p>			



Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
<p>Additional comments: This information will also be important in considering in-combination effects on protected areas (e.g. marginal environmental impact may increase with successive developments).</p>			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
<p>Additional comments: Inclusion of both refusals and consents should provide a comparative indicator, covering the variables discussed in the commentary. This Authority is shortly to be awarded delegated powers for processing the majority of listed building consent applications.</p>			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
<p>Additional comments:</p>			

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

Additional comments:

□□□□□

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

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

Additional comments:

Clarity is needed on why floor space rather than area is proposed particularly as these types of uses can be frequently rural in nature. Is it net or gross floor space?

Q5	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 type="checkbox"/>	<input type="checkbox"/>

Additional comments:

Having 18 indicators appears a little excessive. It should be restricted to 5 or 6 meaningful indicators. It may be better to reduce the number of national indicators, but encourage local authorities to maintain those of local importance for their own LDP process.

Q6	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 type="checkbox"/>

Additional comments:

Having 18 indicators appears a little excessive. It should be restricted to 5 or 6 meaningful indicators. It may be better to reduce the number of national indicators, but encourage local authorities to maintain those of local importance for their own LDP process.

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

Additional comments:

WG propose introducing these in 2012/13, but that does not provide sufficient time for data collection techniques and computer systems may need to be changed, probably involving external suppliers.

Q8	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"/>
<p>Additional comments: It is important to achieve consistency.</p>			

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
<p>Additional comments: These indicators are likely to require additional work to collect the data, and in some cases the indicators are 'compound' with as yet undefined sub categories. Getting precise definitions and achieving consistency of data may not be simple. WG propose introducing these in 2012/13, but that does not provide sufficient time for data collection techniques and computer systems may need to be changed, probably involving external suppliers.</p>	

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments: A few general comments</p> <ul style="list-style-type: none"> • These indicators are likely to require additional work to collect the data, and in some cases the indicators are 'compound' with as yet undefined sub categories. Getting precise definitions and achieving consistency of data may not be simple. • Some of the indicators will be more relevant to certain authorities resulting in wide variations of results and the inevitable league table mentality when these are examined. • Having 18 indicators appears a little excessive. It should be restricted to 5 or 6 meaningful indicators. It may be better to reduce the number of national indicators, but encourage local authorities to maintain those of local importance for their own LDP process. • WG propose introducing these in 2012/13, but that does not provide sufficient time for data collection techniques and computer systems may need to be changed, probably involving external suppliers. 			

Q11	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.
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Additional comments:

□□□□□

Confidentiality

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: ☐

How to respond

Please submit your comments by 27 January 2012, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to :</p> <p>planconsultations-E@wales.gsi.gov.uk</p> <p>[Please include 'Strategic Monitoring Framework for the Planning System' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Strategic Monitoring Framework for the Planning System (Consultation) Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3N</p>

Additional information

If you have any queries on this consultation, please

Email: planconsultations-E@wales.gsi.gov.uk

Telephone: Andrew Charles on 029 2082 3869

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	□□□□□	
Organisation	Ceredigion County Council	
Address	Penmorfa, Aberaeron SA46 0PA	
E-mail address	□□□□□	
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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 type="checkbox"/>
Additional comments: The indicators and frameworks quoted in the document that are currently used do not cover all aspects of sustainable development, they are not all directly related to land use planning and are not collected or used in a coherent or consistent manner. It is therefore considered that a single monitoring framework would address much of this in that it would provide a consistent approach to measuring sustainability.			

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:

Although as noted in the document, the logic chain has very much simplified the various stages.

It is however questioned how objectives specific to the LDP would enter into the monitoring framework. The basis for these objectives may have come from national guidance but could be requiring something more than the national objectives require because it has been modified or made more detailed to deal with the local matters relevant for that County.

Q3	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>Additional comments:</p> <p>In general the groups seem sensible and inclusive, however, the LPA consider that category A should also include 'minimising impact on the environment' or 'minimising impact on ecosystems' as the location of development can result in minimal or large impact depending on where it is located in the first place. By avoiding effects in the first place there is less work, land and money required to conserve and enhance biodiversity, protect rivers etc.</p> <p>Also under this category should be reference to flood inundation, sea level rise, coastal squeeze and coastal erosion as these factors will also impact where development is and putting development on a cliff that will erode in the next 10 years, or by the sea which will be permanently flooded in 50 years is not sustainable development and therefore needs to also be measured.</p> <p>Under category B there should be mention on use of local materials (although this could feasibly come under zero carbon).</p> <p>Within category D it is questioned whether there could be a category on innovative design. Innovative design has an important role to play in enhancing an area.</p> <p>Furthermore, there are concern that the indicators do not capture the needs of rural areas. For example, strategic location in a rural area doesn't necessarily conform with urban shape or minimising the need to travel. As far as can be seen, the notion of preserving the rural heritage in terms of small communities and landscape management through traditional agricultural practices is not expressed in these indicators.</p>			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
<p>Additional comments:</p> <p>In broad terms, but given the remoteness of rural communities, their ecological footprint will be less than optimal and other less quantifiable benefits might outweigh this measure.</p>			

Q4.2	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		

Additional comments:

This is a good indicator, however, there may be issues relating to the frequency that this is measured - due to resources. In addition, it is unclear what the baseline for many of our habitats and species are. How does this fit in with the new Ecosystem Approach and the NEF?

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

3 Gross Value Added (GVA) and GVA per head

Additional comments:

□□□□□

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

**4 Percentage of the population
in low-income households**

Additional comments:

□□□□□

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

5 Wellbeing in Wales

Additional comments:

□□□□□

Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

6	Proportion of LPAs with an up to date adopted LDP
Additional comments: This is an accepted indicator which is currently used. It is agreed that it is necessary for all LAs to have an up to date plan. It is questioned however this is the best indicator and whether an overview of the delivery of LDPs may be better.	

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

7	Net change in open space and playing fields
Additional comments: However, the net change needs to consider not only land area, but also the quality, accessibility etc. Although a smaller area may replace a larger area, it may be more central to the community, on the better side of a busy road, have better equipment etc and therefore be better. In addition, it needs to also consider the change in type of open space. Although there may be no net change in open space if say a woodland was lost and replaced with a playing field, this would be a loss in the type of open space that may have been the only natural greenspace for the community. This needs to be clear to LA on how they should measure this as it could be interpreted differently depending on the factors above.	

Q4.8	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: However, as noted in the document, brownfield land can in some cases be more biodiverse than a greenfield site, and therefore always emphasising this preference over greenfield can lose this message. In addition, there is a lack of brownfield in Ceredigion and therefore these results would be different to somewhere like Cardiff. A low level of development on brown field sites in rural areas should not therefore be seen as a failure to deliver sustainable development.	

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

9	Number of application submitted with Transport Assessments
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Additional comments:

However, commentary associated with the quantitative measure would be useful to indicate the nature of the changes to proposals arising from Transport Assessment/quantitative improved outcomes.

Also, it is worth noting that accessibility is one of the key issues in rural areas, but since only a few applications in Ceredigion would be large enough to have an impact, the LA might find it is being compared unfavourably with more urban and populous authorities.

Q4.10	Do you agree with the proposed indicator?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)		
<p>Additional comments:</p> <p>□□□□□</p>			

Q4.11	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification		
<p>Additional comments:</p> <p>As this is a requirement and therefore all buildings (depending on whether they fit the criteria) should receive certificate it would be better to look at what code level or BREEAM level was achieved rather than whether a certificate was achieved at all.</p>			

Q4.12	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
12	The proportion of local or recycled materials used in new developments		
<p>Additional comments:</p> <p>However, it is considered that it would be better if the indicator was amended to:</p> <p>"The proportion of recycled materials used in new developments and the proportion of these recycled materials sourced locally"</p> <p>Whilst it is agreed that the use of sustainable materials including those produced from local sources should be maximised, it does not necessarily follow that all local materials are sustainable. Under the commentary section it reads though as if it is automatically assumed that all locally sourced materials are sustainable. This is not the case. For example it may be important to specify the use of local materials in order to match the existing vernacular, where such materials may not necessarily be the most sustainable ones available, notwithstanding the proximity principle.</p> <p>Furthermore, the availability of local materials (building stone and primary aggregates) is determined as much by geology as anything else. Minerals can only be worked where they occur, so there will be more opportunities for some authorities to utilise local materials than others.</p> <p>Accordingly the LA not convinced that the two elements (local and recycled materials) should be added together to provide a compound indicator. If the percentage of local materials used is collated with the percentage of recycled materials to give an overall indicator performance value it may be of some use in assessing an authority's performance against its previous performance levels, but it should not be used to make comparative judgements of the relative performance of different authorities as the value is likely to reflect unfairly on those authorities with little or no locally available sources of buildings stone or primary aggregates materials.</p> <p>Under 'process' the supporting measure proposed should be expanded to include policies i.e. 'Proportion of LPAs with policies and/or SPGs in place...' As it stands the measure would not give credit to those authorities that have adequately covered this within their LDPs.</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
13	Renewable energy generation (mW) granted/refused by type and capacity		
<p>Additional comments:</p> <p>However, there is scope for a measure of consistency against Renewables Resources Audit/LDP policies, once in place – these should identify the most appropriate exploitable resources in a locality. This should impact on the nature of renewables development which will otherwise be entirely driven by funding stimuli, irrespective of impacts and preferable options to limit negative impacts according to the environmental context.</p>			

Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
<p>Additional comments:</p> <p>However, this indicator does not take into account impacts on these areas that aren't within the protected areas. In addition, it is like said in the report, a difficult indicator as development although within may have no or minimal impact depending on the site and mitigation measures and is not a figure that should be set alone or taken at face value.</p> <p>This should include local protected areas as well and the different designations should be separated. Furthermore, there should be a indicator which looks at the net change in BAP habitats and species. Although again one that will need to be considered in terms of not just area, but quality and location. In addition, it will only count on the fact that it has been noted that a BAP habitat or species is there. Potentially it would be easier and more accurate to look at habitats or ecosystems.</p>			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consent granted/refused		
<p>Additional comments:</p> <p>□□□□□</p>			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		

Additional comments:

However, it is important when deciding on 'type' that definitions of type are revisited in a wider consultation context, since these current definitions are broadly perceived to relate to the South Wales experience. Also there is a lack of clarity re the role of intermediate affordable housing.

Q4.17	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

17 Employment land bank (years provided)

Additional comments:

However, the LA does have concerns relating to how the indicator is proposed to be used. The LA do not necessarily consider the over-supply of land to be detrimental to social, cultural and economic wellbeing. When economic needs assessments are conducted, the level of land they recommend allocating represents a minima not a maxima, in fact a slight oversupply may be seen to be beneficial, as it provides an additional level of flexibility should the economic situation change over the Development Plan period. Furthermore, it is inappropriate to assume that an oversupply is an indication that an excessive number of sites are being held back from other forms of development, particularly if sites have been chosen based on the recommendations of a land use study, since these sites are likely to provide the best opportunities for economic growth beyond the Development Plan period.

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

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

Additional comments:

However, the proportion of development on brownfield sites is not always a good indicator of sustainability. As has already been stated earlier, brownfield sites may be of greater biodiversity value than their neighbouring greenfield ones. Furthermore, it is the case that brownfield sites may not be available or best suited for office/industry/retail/distribution uses. This is particularly true for rural authorities, who in general have few brownfield sites, and many that do exist may be in close proximity to incompatible uses, particularly where industry is concerned.

Furthermore, the granting of additional retail floorspace is not necessarily a good indication of sustainability in this sector. For example, the focus of planning policies in relation to town centres is largely focused on the retention of retail uses and as worded, this indicator does not measure the health of town centres. Perhaps therefore, an additional indicator is needed in this regard, though given the different town centre management strategies and policy approaches adopted by LAs, it appears difficult to suggest an appropriate and realistic indicator to measure.

Q5	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 type="checkbox"/>	<input type="checkbox"/>

		<input type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments:</p> <p>However, there appears to be quite large gaps such as indicators on social, cultural and economic wellbeing, natural heritage and accessibility to facilities. For example, despite there being a nation wide means of measuring landscape value in the form of LANDMAP, no indicators have been proposed for measuring the effect of the Planning System on landscape. Furthermore, despite PPW and TAN 20 highlighting the requirement of the Planning System to consider the Welsh language, no indicators have been included to measure its effects on it.</p>			

Q6	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 type="checkbox"/>
<p>Additional comments:</p> <p>However the Development Management Statistics should also include information on outcomes of referrals of contrary to policy decisions to the Welsh Government.</p>			

Q7	What are your views on whether the proposed framework should be phased?
<p>Additional comments:</p> <p>Very clear instructions should be provided as soon as possible to allow maximum time to develop mechanisms to capture the data. There will a considerable increase in workload involved and a phased introduction, initially selecting only some of the measures for 2012/3, would be preferable. We can't retrofit means of capturing this data. Consideration needs to be given to how the monitoring would fit into both Development Management and the LDP's monitoring frameworks.</p>	

Q8	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: All output indicators coming from the Welsh Government should be concise and the same across the board. and confusion and conflicting requirements between the two sets should be avoided at all costs.			

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
Additional comments: There is likely to be a considerable development time and resources to design and implement data capture and induct staff into new procedures, and to develop mechanisms to check data quality. Consequently, it considered that the phasing of the framework is extremely important.	

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
Additional comments: However, greater information is required as to how it is considered that the information is to be collected. It would also be useful to provide LA's and any other interested organisations with the raw data collected during the process, since it is likely to be of some use to them with regard to their own monitoring frameworks and policy creation.			

Q11	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: <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

Confidentiality

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	Stefan Preuss	
Organisation	National Grid Plc	
Address	National Grid House Warwick Technology Park Gallows Hill Warwick, CV34 6DA	
E-mail address	stefan.preuss@uk.ngrid.com	
Type (please select one from the following)	Businesses	<input checked="" type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments: We agree that, given the range of monitoring frameworks, processes and indicators currently in place, there is merit in reviewing these with a view to streamlining and integrating these frameworks, processes and indicators to ensure they cover the key planning issues that should be monitored and that the information is accessible and easy to understand.			

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

Additional comments:

The approach is generally supported. However, the monitoring framework should be kept as simple and easy to understand as possible, whilst ensuring the collection and reporting of timely, robust and accurate information on the key planning issues that should be monitored.

Q3	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 checked="" type="checkbox"/>	<input type="checkbox"/>

Additional comments:

There are various ways in which the objectives could be structured but the proposed structure seems an appropriate way forward. We particularly welcome and strongly support the establishment of the category relating to "Facilitating Infrastructure and its Use" which reflects the importance assigned to the energy sector by the Welsh Government.

In his Written Statement on Energy of 7th December 2011, the Welsh First Minister highlighted the importance of facilitating the transition to a low carbon future and ensuring security of energy supplies. As recognised by the First Minister, this also presents significant economic opportunities. We welcome the First Minister's commitment that the Welsh Government wants to maximise the generation of electricity from low carbon sources, including onshore and offshore renewables, clean fossil fuels and nuclear, while ensuring value for money. As recognised in his Written Statement, this will require a stable and supportive investment environment and we strongly welcome the First Minister's commitment to ensuring that there is a clear and transparent planning and consenting process for energy infrastructure and to simplify the consenting system in the areas of responsibility of the Welsh Government.

National Policy Statement (NPS) EN-1 highlights the close links between sustainable development, climate change and the development of low carbon energy infrastructure. Indeed, it states that the UK Government's wider objectives for energy infrastructure include contributing to sustainable development and ensuring that our energy infrastructure is safe. EN-1 recognises that energy is vital to economic prosperity and social well-being and that it is therefore important to ensure that the UK has secure and affordable energy. It explains at paragraph 2.2.27 that "Sustainable development is relevant not just in terms of addressing climate change, but because the way energy infrastructure is deployed affects the well-being of society and the economy. For example, the availability of appropriate infrastructure supports the efficient working of the market so as to ensure competitive prices for consumers".

Against this background, EN-1 sets out that major investment is needed in low-carbon technologies and in more diverse sources of energy supply to meet Britain's future energy needs. Some of that will be remote from the existing electricity transmission network or will require network reinforcement to carry the amount of power that will be generated. Less predictable renewable energy sources will need to be balanced with more flexible gas-fired power stations and more stable nuclear sources. More of our natural gas will be imported. Some of those energy developments will be onshore and some offshore. Meeting those challenges will also require changes to the electricity and gas transmission networks and the development of carbon capture and storage transportation networks.

Planning Policy Wales (February 2011), at paragraph 4.4.2, sets the objective to "Support the need to tackle the causes of climate change by moving towards a low carbon economy". It explains that "This includes facilitating development that reduces emissions of greenhouse gases in a sustainable manner, provides for renewable and low carbon energy sources at all scales and facilitates low and zero carbon developments". Planning Policy Wales also states that planning policies and proposals in Wales "Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities (including water supplies, sewerage and associated waste water treatment facilities, waste management facilities, energy supplies and distribution networks and telecommunications)".

Against the background of the importance assigned by the Welsh and UK Governments to energy infrastructure development, we strongly support the proposal to include a category on "Facilitating Infrastructure and its Use". We make further comments about specific issues that should be monitored in this category and indicators that should be used in our responses to other questions below.

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
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		<input type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
<p>Additional comments:</p> <p>Whilst National Grid does not object to this overarching indicator, we strongly recommend that an overarching indicator on carbon dioxide emissions is incorporated into the monitoring framework.</p> <p>Planning Policy Wales (February 2011) at paragraph 4.2.3 recognises that "Climate change will have potentially profound environmental, economic and social justice implications and failure to address it will make planning for sustainability impossible". Tackling climate change and facilitating the transition to low carbon energy sources, whilst also ensuring secure and affordable energy supplies, are therefore crucial aspects of sustainable development.</p> <p>The Climate Change Act 2008 stipulates that the UK's carbon dioxide (CO₂) emissions must fall steeply. By 2020 they must be 34% lower than in 1990 and by 2050 they must have fallen by 80%. As the Welsh Government's Energy Policy Statement – A Low Carbon Revolution (March 2010) recognises, we need to reduce our energy needs through energy efficiency action, increased use of renewable heat and most importantly from the carbon emission reduction perspective, by providing much more of our energy needs through electricity and low-carbon electricity systems.</p> <p>We therefore strongly recommend that an overarching indicator on carbon dioxide emissions in Wales should be incorporated into the monitoring framework.</p>			

Q4.2	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>Additional comments:</p>			

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		
<p>Additional comments:</p>			

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
4	Percentage of the population in low-income households		
Additional comments:			

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
5	Wellbeing in Wales		
Additional comments:			

Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Proportion of LPAs with an up to date adopted LDP		
Additional comments:			
<p>The timeliness of decision making is a key component of a planning system that provides clarity and certainty to developers and communities alike. National Grid is aware of the slow progress that has been made in preparing and adopting Local Development Plans in Wales as shown in the data published by the Welsh Government in September 2011 . This is a matter of concern as it means that in many areas plans are likely to be out of date. Having up-to-date, evidence based plans is essential in ensuring that planning decisions are robust and adequately address the challenges we face now and in future. National Grid therefore supports the proposed indicator.</p> <p>As with development plans, it is important that decisions on planning applications are also taken in a timely manner to provide a clear and supportive environment for investment decisions. According to the latest available statistics published by the Welsh Government, only about 70% of planning applications were decided within 8 weeks during the period July 2010 to September 2011. We therefore also strongly suggest that an indicator is incorporated that monitors the length of time taken for development management decisions.</p>			

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

7	Net change in open space and playing fields
Additional comments:	

Q4.8	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:			

Q4.9	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
9	Number of application submitted with Transport Assessments		
Additional comments:			

Q4.10	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)		
Additional comments:			

Q4.11	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification		
Additional comments:			

Q4.12	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
12	The proportion of local or recycled materials used in new developments		
Additional comments:			

Q4.13	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Renewable energy generation (mW) granted/refused by type and capacity		

Additional comments:

In order to gauge progress towards the achievement of climate change and carbon reduction targets as well as security of energy supplies (see our response to Questions 3 and 4.1 above), it is vital to monitor the delivery of energy projects. We therefore strongly support the proposed indicator.

For clarity, this should include monitoring the delivery of nationally significant energy infrastructure projects (NSIP) under the Planning Act 2008 as far as they relate to Wales. Meeting climate change and energy targets will require action at all levels and therefore the monitoring should include smaller schemes as well as major energy projects. As far as monitoring the delivery of NSIPs is concerned, this should include the type of renewable energy generation and capacity granted/refused.

As set out in the Energy NPSs, timely delivery of NSIPs is needed in order to achieve climate change and energy policy objectives. Monitoring the delivery of NSIPs should have regard to the specific consenting and licensing requirements for these projects in Wales. Whilst a 'single consent' was how the Planning Act 2008 revisions were first described, there is now an understanding that the process is in fact one of coordinating a number of different consents in different regimes. In particular, the 'single consent' concept is only available in Wales in limited circumstances, as in Wales a Development Consent Order (DCO) may only grant consent for development associated with an NSIP (as well as for the NSIP itself) in respect of certain works associated with proposals for underground gas storage in natural porous strata, whereas in England 'associated development' may be consented if it relates to any NSIP. It is therefore necessary to obtain separate consents from the IPC (for the NSIP) and from the local planning authorities (for associated development) for NSIPs in Wales. Further, there are certain prescribed non-planning consents/authorisations ('ancillary consents') which may be provided for in a DCO application in Wales with the agreement of the normal decision-making body. In many cases, that power lies with the Welsh Ministers or an ASPB. The 'cooperative timetabling' required for these consents/authorisations leads to what has been described as 'Aligned consenting'.

In the light of this, the monitoring of NSIP delivery should cover i) the granting of planning/development consents for NSIPs; ii) ancillary consents which may be needed in connection with NSIP proposals (including those consents/authorisations that may be provided for in a DCO application in Wales with the agreement of the normal decision making body); and iii) development which is associated with an NSIP but cannot be included in the DCO application and so is usually decided by local planning authorities (such as electricity substations or above ground installation on the high pressure gas pipeline transmission system). This should be incorporated into the Strategic Monitoring Framework.

Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
Additional comments:			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
Additional comments:			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
Additional comments:			

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

Q4.18	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
18	Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)		
Additional comments:			

Q5	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:			
We agree that the proposed indicators provide an appropriate high level framework, subject to the comments in our responses to Questions 4.1, 4.6 and 4.13 above.			

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

Q7	What are your views on whether the proposed framework should be phased?
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Additional comments:

It is important that plan making and decisions on planning applications are based on robust evidence. National Grid therefore considers that the monitoring framework should be implemented as soon as possible so that the information gathered can be used to inform plan making and development management. This also means that as much as possible the framework should be implemented as a whole and not in a piecemeal manner.

Should the Welsh Government consider that it is necessary to adopt a phased approach, we strongly recommend that the indicators relating to climate change and energy infrastructure should be a key priority, given the urgency of action that is required in these fields to meet legally binding carbon reduction and renewable energy targets. The Climate Change Act 2008 stipulates that the UK's carbon dioxide (CO₂) emissions must fall by 34% by 2020 (compared to 1990). Under the EU Renewable Energy Directive of 2009, the UK is also legally required to increase the proportion of energy from renewable sources from currently 3% to 15% by 2020.

Q8	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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments: National Grid agrees that it is important to ensure that data is collected consistently across the whole of Wales. We also agree that the Local Development Plan Manual should be revised to reflect the revised list of indicators, subject to the suggestions on indicators made in our responses to Questions 4.1, 4.6 and 4.13 above.</p>			

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

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments: National Grid supports the proposal to report on an annual basis via the publication of an annual report. The report should present the information both individually for each planning area and in aggregated form for the national level. Wherever possible, the data should be reported against relevant targets and objectives. The annual report should not only compare targets and measured values but it should also provide an analysis of the extent to which targets have been met/not been met and, if targets have not been achieved or if trends are moving away from targets, why that is the case and what remedial action is required to ensure targets are being met.</p> <p>The report should be made easily accessible, including by providing data tables separately in an electronic format for further use and analysis by interested parties (e.g. in Microsoft Excel).</p>			

Q11	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.
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Additional comments:

Given the importance of tackling climate change and ensuring security of energy supplies (see Questions 3, 4.1 and 4.13 above), National Grid strongly recommends that consideration is given to incorporating an overarching indicator on carbon dioxide emissions.

Planning Policy Wales (February 2011) at paragraph 4.2.3 recognises that "Climate change will have potentially profound environmental, economic and social justice implications and failure to address it will make planning for sustainability impossible". Tackling climate change and facilitating the transition to low carbon energy sources, whilst also ensuring secure and affordable energy supplies, are therefore crucial aspects of sustainable development.

The Climate Change Act 2008 stipulates that the UK's carbon dioxide (CO₂) emissions must fall steeply. By 2020 they must be 34% lower than in 1990 and by 2050 they must have fallen by 80%. As the Welsh Government's Energy Policy Statement – A Low Carbon Revolution (March 2010) recognises, we need to reduce our energy needs through energy efficiency action, increased use of renewable heat and most importantly from the carbon emission reduction perspective, by providing much more of our energy needs through electricity and low-carbon electricity systems.

We therefore strongly recommend that an overarching indicator on carbon dioxide emissions in Wales should be incorporated into the monitoring framework.

Confidentiality

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: ☐

How to respond

Please submit your comments by 27 January 2012, in any of the following ways:

Email	Post
Please complete the consultation form and send it to : planconsultations-E@wales.gsi.gov.uk [Please include 'Strategic Monitoring Framework for the Planning System' in the subject line]	Please complete the consultation form and send it to: Strategic Monitoring Framework for the Planning System (Consultation) Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3NQ

Additional information

If you have any queries on this consultation, please

Email: planconsultations-E@wales.gsi.gov.uk

Telephone: Andrew Charles on 029 2082 3869

Strategic Monitoring Framework for the Planning System
Planning Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

By email only

26 January 2012

Dear Sir / Madam,

Welsh Government Consultation (WG 13303)
A Strategic Monitoring Framework for the Planning System: Measuring progress
towards a sustainable Wales

I refer to your correspondence received on 04 November 2011 inviting views on the above consultation. We have carefully considered our position and the subject matters at hand and accordingly have no comments to make on the consultation. The Commission has to maintain its impartiality and therefore a clear separation between policy making and our decision making role in the form of a recommendation to the relevant secretary of state.

We will be glad to assist the Welsh Government with any reasonable requests for factual data in relation to our role in Wales which may assist in contributing to the strategic monitoring work.

Should you require any further information, please do not hesitate to contact me.

Yours Faithfully,



Owain George
Case Manager

Tel: 0303 444 5053

Email: Owain.George@Infrastructure.gsi.gov.uk

The IPC gives advice about applying for an order granting development consent or making representations about an application (or a proposed application). The IPC takes care to ensure that the advice we provide is accurate. This communication does not however constitute legal advice upon which you can rely and you should note that IPC lawyers are not covered by the compulsory professional indemnity insurance scheme. You should obtain your own legal advice and professional advice as required.

We are required by law to publish on our website a record of the advice we provide and to record on our website the name of the person or organisation who asked for the advice. We will however protect the privacy of any other personal information which you choose to share with us and we will not hold the information any longer than is necessary.

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CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	Charlie Mason, Dipt, M Litt, Msc	
Organisation	Chairman, The Environmental Network for Pembrokeshire	
Address	Pantybigni, Hermon, Glogue, Pembrokeshire SA36 0DZ	
E-mail address	charliemasonfz@btinternet.com	
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input checked="" 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 checked="" type="checkbox"/>
		<input type="checkbox"/>

Additional comments:

Question 1: Answer: Yes but..it's not just about information. You haven't got it, but even with it you haven't got adequate powers to 'deliver' SD objectives and the powers you have you don't seem to use. Information won't change this fundamental weakness.

I offer below the observations that led to this Answer:

In the Introduction: it says:

"Planning doesn't determine outcomes in terms of what is built"

MY Comment 1: OK, I see what you mean, Building Regs determine that, but on the other hand : design (including the selection of materials), scale, volume, location and use are all determined by Planning and Planning can influence by refusal (ie send a message to the developers!)..Planners say NO to wind turbines and dormer windows!! Designate land for new build when renovation of existing might be better (VAT rules affect the market, of course, none on new build)

MY Comment 2: The issue here is what priority Planning gives to sustainability and the 'weight' it gives to social and environmental objectives. There is nothing in the list of 'material consideration' that refers to SD or SD principles, so planners are not empowered...and the power to encourage SD (s39 2004 Act) is not even mentioned in this paper!?!?

"It is a fundamental purpose of the planning system to help facilitate SD"

MY Comment 3: Where is that declaration made?. What powers are available and what evidence is there that they are used?. The fact is that this role is implicit and discretionary, so it might or might not happen.!

"We already measure our progress towards SD and measure the performance of the planning system in Wales but we do not think that we have the right information to help us understand its role in delivering SD"

MY Comment 4: I'm really sorry but this is not good enough., You measure progress but don't understand its role in delivering and to what extent it does. What is this 'progress' then? What value does it have? This needs clarifying. Why can't you admit "we don't have the power or the understanding or the right information BUT we feel that we do make a contribution and this consultation will help us do this" ?

The Introduction then distinguished the 2 functions of planning:

- i) the right development in the most sustainable location (plan production)
- ii) granting or refusing planning permission.

And the assertion is made that both activities are carried out with a view to promoting SD

MY Comment 5: What does 'promote' mean? How can you make this assertion when you previously said that you don't understand your role in delivering? This is inconsistent.

We then get "It is difficult to measure specific SD outcomes because the planning system is not the mechanism by which development is built"

MY COMMENT 6: Of course it's not, but it is the mechanism by which development is prevented (until they go to Appeal), but about 80-85% of all applications are approved.

So how much of that 85% is unsustainable and how much is sustainable? You have no way of knowing yet make the claim that they are making progress. And the fact is that the 'material conditions' don't include SD as a result it can be and is ignored.

MY COMMENT 7: OK Planners don't build...but they do allocate land and designate use ,etc., which facilitates development. Sometimes (as with PCC's 50:50 split) they don't think in terms of low ecological footprints, reducing travel by car etc. The reality is that low priority is given to Environment and Bio-diversity (see a recent WBP ecosystem group report) . I feel that responsibility is being abdicated here!

The document continues: " So we have decided to measure the processes and outputs of the planning system as they can help show the contribution the planning system makes to our vision of a Sustainable Wales"

MY Comment 8: How can they help? What has process got to do with it if what you are processing (the decision) is not alert to SD principles and doesn't prioritise SD / Environment /Bio-diversity?. In fact it is quite possible that structure for process can exclude SD even if there was a duty to 'deliver' SD, which there is not!!.

NEXT section: ' WE want to Change'.

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

Additional comments:

The 'logic chain' has attractions and benefits, ie it identifies the policy - implementation process as a series of orderly and logical steps. That clarity is useful as it also identifies key points of decision making, and the type of information each 'stage' should or could use and provide. AS an analytical tool it is useful, but it has serious limitations such as the choice of measures and the assumption that conforming to a process is necessarily influential in determining outcomes

Clearly it is advisable to find new measures, but your measures include process (speed, time) measures which a) it is hard to see how they are relevant to SD (you haven't explained their relevance) and b) you admit it has taken 4 years to discuss process issues with the LPAs. Neither can you require LPAs to produce an LDP that is based on low carbon and low ecological footprint objectives. Unless you take a more interventionist role in advocating a more prominent status for SD objectives there is no guarantee that LPAs will deliver. You have also listed limits (in Para 23) which are misrepresented and misleading and in some cases very narrow to the point of suggesting an abdication of responsibility for social and environmental objectives.

One other frustration is the use of the word 'states' WITHOUT explanation. You refer to Diagram 2 but there is no reference to 'states' in it. This is very confusing.

I add a number of observations below:

In Para 23: Difficulties are listed:

"Planning has the potential to assist in the delivery of SD but there are limits": Which are:

-How to balance all aspects of SD

(Comment 18: well you need to think about how to achieve the vision and make sure decisions support that and not contradict it. Incremental decisions taken in accordance with principles is the step-by-step process. There will be winners and losers, like now)

-Planning only influences new development.

(Comment 19: This is true but new development has impacts. Think of a new Tesco supermarket, a planning decision in favour influences the local economy, land values, the local retail sector, jobs, etc, and not always for the better. An SD approach would ask questions about travel to work impacts (CO₂), the impact on locally produced food outlets, impact on the environment and bio-diversity, impact on pay levels and local labour supply, etc. An SD policy might focus on green jobs and planners would be encouraged to take this into account, and where the unemployed (or those about to be made redundant) live and integrate with local labour initiatives provided by the Employment Service and training providers. As the SD Bill consultation advocates, we need more integration and joined up thinking and if planners are to extend their role to incorporate the environmental and social dimension of SD then they have a critical role to play.

-Market factors – development requires a desirable and viable economic position in order to be proposed and implemented.

(Comment 20: So as with comment 13, this would appear to expose the 'true' rationale of the planning system: to facilitate and enable the development process. Of course we know this but the question is what does SD require and how can the planning system provide it? Is it inclined to do so? Would planning be prepared to inhibit the market if unsustainable development was involved (surely planning gain is one form of intervention in the market by the LPA?)

-Planning enables it does not implement development (ie build)

(Comment 21: Well the LPAs and WG are party to negotiations, be the developer the private sector or the public sector, eg Planning Gain, public sector funded infrastructure, Local Authority projects, etc. So this limitation is not quite as clear cut as is being suggested

-It cannot influence how development is used.

(Comment 22: We are talking about land use planning are we not? The LPA has enforcement powers, it can place conditions on permissions. There are 'Use Class Orders'.

Comment 23 This list, it is argued, influence what can be measured currently, BUT these limiting factors don't prevent a greater understanding, in fact they should encourage analytical and innovative thinking about how an SD perspective within planning would respond to these limitations. This list is not followed by any ideas about how the limitations might be reduced and what can be learned, which is pity!.

I think you are being side-tracked by this 'logic chain concept' (ie trying to force reality to conform to it), interesting though it might be to you. We know planning is a process, at least in theory, but after 30 years in academia (policy implementation studies and planning practice), I have to inform you the logic chain is a too simplified reflection of the real world. Of course you have policy linked to objectives and decisions taken at all levels, etc, etc. But what is characteristic of all implementation is that you can have policy without action and

Q3	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>Additional comments:</p> <p>The question that arises is: Why would you choose these 5 categories when the SD Bill appears to be advocating the 5 UKSDC principles?:</p> <ol style="list-style-type: none"> 1) Living Within Environmental Limits, 2) Ensuring a Strong, Healthy and Just Society, 3) Achieving a Sustainable Economy, 4) Promoting Good Governance, and, 5) Using Sound Science Responsibly. <p>These principles can accommodate your objectives and are much more ‘active’ in tone. They also enable planning to identify its contribution to SD.</p> <p>If we are to achieve integrated working and joined up thinking we should “all be singing from the same hymn sheet”, surely? You could see the 5 Strategic objectives as the next level in a hierarchy below the UKSDC principles then followed by the 19 PPW objectives. Alternatively you could simplify things by dispensing with the 5 Strategic objectives and place each of the 19 PPW objectives within the appropriate UKSDC principle, thereby reducing the ‘hierarchy’ by one level. The UKSDC list also enables you to refer to the public participation dimension of planning, within ‘governance’ which, surprisingly, has not been mentioned</p>			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	Wales’ Ecological Footprint		

Additional comments:

Before commenting on the overarching indicators I would like to make the following general observations:

a) What is disturbing is that you have adopted quantitative indicators, eg net change in playing fields and Biodiversity Action Plans show stable or increasing ? (what if they are decreasing?) but you have no target of what is desirable? This seems very odd when the rhetoric is about how planning can contribute to a sustainable Wales. However this difficulty is explained by the paradox that planning is necessarily reactive. As a service it reacts to applications and then determines them, but the scale or rate or number of applications is outside the LPAs control (except that European, National or Local Government might encourage applications through a grant regime or marketing exercise). The fact is that planning has no control but depends on the market, or wealth or the advantage of the area as an attractive place to invest to stimulate development and therefore planning applications. In addition, of course, not all development needs permission and 80% of applications are approved as they 'conform' to policy and guidance which currently has no clear sustainable development content. This strongly suggests that planning is at the 'margins' of facilitating sustainable development and makes little direct and intended contribution. As this is the case how will you analyse the indicators and what action would result ? A related point is that the SMF will be dismissed if it is seen to have no practical relevance to promoting SD.

b) The myth of control is further undermined by the LDP production process, it takes up to 8 years, and therefore the plan is out of date and relies on Planning guidance to update it. Planning is forever chasing to catch up with events rather than leading and directing. This is a major issue for WG and LPAs in relation to achieving a sustainable future and requires a paradigm shift in the way the planning function operates. Nothing in the 5 categories, the list of 19 objectives, nor the indicators seem to have confronted or resolved this dilemma.

c) I can suggest that planning for a Sustainable future will need to be more directive and disciplined, and based on scenario building over regular intervals (every 2-3 years to keep pace with rapidly changing events), producing strategic plans with regular updates every few years. Planning will need to be future orientated, analysing trends and responding to changes. The development control function will need to make transparent the process of negotiation which characterises planning proposals with decisions based on the UKSDC principles converted into statutory guidance with less room for local discretion (otherwise we will see 'a race to the bottom' with each LPA seeking to reduce the barriers to development which will lead unsustainable development). WG and LPAs will have to agree to policy objectives and outcomes, with WG endorsing LDPs, so that applicants are clear that policy is supported at every level and consistently interpreted. The Wales Spatial Plan and Low Carbon Regions initiatives are precursors to this necessary development. The material considerations for determined planning applications will need to be revised with SD principles having priority.

d) A final observation is that earlier in this document you seemed keen to emphasise the limits to what planning can achieve, yet many of the indicators that you have set are outside these limits. For example you made the point that planning does not determine what is built yet you have 'Overarching indicators' which it is impossible to say how planning contributes to them as they are not under the direct control of the planning authority. This is very confusing and seems to characterise a dramatic change in the 'power perception' that you have of the 'planning function'. Clearly indicators 7-10 are influenced by planning as are 13-18. 11 and 12 are questionable and there is no clear explanation for why 6 is included.

:

Wales Ecological footprint: Yes it is important to record this but from a planning perspective it is important that there is a clear policy commitment to contributing to its reduction and this is not the case at present.

Q4.2	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing		

Additional comments:

Again the indicator is very important but Bio-diversity is insufficiently incorporated in policy and LDP production. High profile developments seem to precedence over environmental objectives (see the CCW concerns over the waste water being piped into a MSAC..

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		

Additional comments:

I'm afraid I reject this indicator for the simple reason that I cannot see how you can use it to indicate a contribution to Sustainability.

GVA is the contribution to the economy of each individual producer , industry or sector in the UK. It is an indication of the state of the whole economy.

At an area levele it is a measure of the performance of an area and based on the value of goods and services produced by an area sector or producer minus the cost of raw materials and other inputs to produce them.

For sub national GVA the ONS uses an income based measure, that is, earnings lus business income (profits and surplus) as a result of production.

GVA per head of resident is date that it work place based, so where the work is NOT where people involved actually live. So if people commute to work in another area the figures will be distorted .

IT doesn't inlcude economic activty rates or part- time workers.

GVA per job shows considerably less variation in productivity between regions and the national average and GVA per hour worked is lees so.

Nothing in these descriptions of GVA refer to sustainable production (how) , nor does it refer to what goods are produced. Nor does it help us to investigate economic inequality and the distribution of wealth and how it is used.

I understand the 'instinct' to want to have a measure of growth. We know that planning inevitably increases wealth by adding value to land by rationing development land and giving permissions. The wealth accrues to the land owner and developer. In this sense planning creates wealth and financail gain and increases land values (which can be a barrier to some development, eg low rent/social housing). Whether this it is benefical wealth and growth is open to debate.

Planning, it seems to me, needs to appreciate the distinction between 'growth' which means a quantitative increase in the scale of the physical dimensions of the economy, and 'development' which is to exand or realise potentials.. A growing economy is one that is getting bigger, a developing economy is one that is getting better. Sustainability is about development , not growth for it's own sake where businesses have to deliver goods and services in a way that reduces consumption, energy use, distribution costs, soil degradation and erosion, pollution etc. (see Hawken 'The Ecology of Commerce' for a more detailed explanation). By taking on the costs of avoiding 'externalities' prices will be higher and consumption may diminish.

The question then is can Planning /Planners integrate this dimension of sustainability (sustainable production and consumption) inot their contribution to sustainability?

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Percentage of the population in low-income households		

Additional comments:

Yes recording poverty levels is important for a number of reasons, not least because social cohesion, wellbeing and equality is a UKSDC sustainable development principle. However it is not clear how planning can directly reduce the percentage of low income households in a specific area. How , and what powers do you have, to influence household incomes DIRECTLY ?.

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Wellbeing in Wales		
<p>Additional comments:</p> <p>Yes, but only if a convincing explanation of wellbeing can be found which relate to the planning function. Some views suggest that well being diminishes as income increases above a certain level !</p> <p>Wellbeing may relate to access to open spaces, space standards, access to allotments , close to essential services, etc. Where wellbeing relates to development space standards then planning will have a role. However, once again the 'market' is moving in the other direction, towards a greater density of development with insufficient space to provide for physical well being. Under what conditons would planning enforce better/higher space standards and would planners be well disposed to negotiate these standards against the financial interests of developers (a return to garden suburbs?)?.The indications are that we would see a 'race to the bottom' as the desire for 'growth' at any 'price ' would see LAPs competing by acceting developers criteria!</p>			

Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Proportion of LPAs with an up to date adopted LDP		
<p>Additional comments:</p> <p>I think this is a competely marginal indicator. LDP's are out of date as soon as they are adopted, and this is obvious as the pace of change increases eg fuel cost increasing, C02 emissions rising, information on seal level rise being updated.</p> <p>AS I have suggested above Planning needs to Plan for a Sustainable Future!! This is the paradox for planning ! The challenge for planners is to make a credible contribution to a sustainable Wales and the SMF is a useful starting point, a vehicle for important discussions.</p>			

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

7	Net change in open space and playing fields
<p>Additional comments: This is acceptable but the issue of location is even more important, as it relates to social cohesion , social justice and well being.</p>	

Q4.8	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Total floor space granted/refused (by type) on greenfield and brownfield land		
<p>Additional comments: Again, this is very simplistic . A brown field site may appear preferable but not if it is in an inaccessible location.</p> <p>Renovation and utilising existing buildings would be a far better option if the accessibilty was good (close enough or cycle or walk to or get a bus.</p>			

Q4.9	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	Number of application submitted with Transport Assessments		
<p>Additional comments:</p>			

Q4.10	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)		
<p>Additional comments:</p>			

Q4.11	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification		
Additional comments:			

Q4.12	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
12	The proportion of local or recycled materials used in new developments		
<p>Additional comments:</p> <p>However local materials would have to be 'low/zero carbon' , ie lower than importing low carbon alternatives. In fact all new build should be as zero carbon in construction and use as possible, so this indicator should be much more specific. Cement production generates a significant % of C02 emmissions in the UK. Alternatives to concrete exist: limecrete, hempcrete, straw bales, timber framed buildings, etc.</p> <p>The policy objective for zero carbon property (construction and use) has to be clarified.</p> <p>I should point out that in this document you have said that planning has a limited influence on materials selection.</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Renewable energy generation (mW) granted/refused by type and capacity		

Additional comments:

This indicator 'dovetails' with the issue of urban shape. Without a reliable local source of energy the ability to avoid a dramatic reduction in rural settlements is diminished. Sweden and Hungary, in the 1980's, took dramatic steps to reduce the number of rural communities, for a number of reasons. Norway, in contrast (with its small population and significant and growing oil revenues) could afford to maintain the most isolated of communities (building expensive bridges and providing ferry service). It is highly unlikely that Wales will have the Norwegian policy option and a sparsely distributed settlement pattern in Wales is unlikely to be sustainable in relation to energy costs, CO2 emissions, social cohesion, access to public services, etc. With 968,000 people living in rural counties in Wales, Planners should be developing spatial planning options and considering re-location programmes (this is already happening in the Mid - Wales coastal area in response to sea level rise /flooding).

The natural extension of this approach, perhaps 'thinking the unthinkable', would be to restrict all new development in rural areas to 'key workers' only. In addition a 'carbon' tax' (alongside Council Tax) would be applied to those homes in rural and isolated locations which impose greater costs in the delivery of public services in the form of fuel use and carbon emissions. Such policies would need to be supported by investment in social and affordable housing.

The principle is clear, high CO2 /high ecological footprint locations become high cost locations. Without such action electricity use will increase far beyond the ability for Wales/UK to ensure that the 'lights stay on' (unless of course there is a massive increase in renewables which WG and LPAs are prepared to support, which does not seem to be that case 'in practice' at the moment.. The UK expects energy use to increase 3 fold by 2050. Germany is committed to maintaining current levels!

Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
Additional comments:			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
Additional comments:			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
<p>Additional comments:</p> <p>Instinctively , Yes, but I'm not sure what you mean by type. This is a very coarse indicator. It has to be set against need (tenure/homelessness/affordability) and location (near services, employment , transport servcies, in established communities, etc) issues. Simply counting the number of new homes will tell us nothing about sustainability/unsustainability. The outcome could be numerous commuter villages in rural areas, or isolated urban estates lacking facilities!!</p> <p>You. should also look at renovation run-down housing stock as a preferred, sustainable, option.</p> <p>There is also a concern about a mindset that exists in some LPAs that housing is the 'motor' for growth, so the more homes, preferably owner occupied, attracting wealthy people into the area, will boost the local economy (Known as 'white flight' in France). Of course if all LPAs adopted this approach you would have the very real prospect of an over provision of homes unattainable to those in greatest need as well as dro in cost and quality and developers and LPAS compete for incomers! One consequence is to drive out young people thereby losing talent and skills. This instinct has to be tempered by SD principles linked to social cohesion (the very real issue of inter-generation tension), and well being,.</p> <p>See also 4.13 above.</p>			

Q4.17	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
17	Employment land bank (years provided)		
Additional comments: This links of the growth/GVA indicator and it is too coarse.			

Q4.18	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: NO, because it is not clear how it links to sustainability.....and is a continuation of the preoccupation with growth rather than development (see above under GVA). Planning really needs to move away from, means (floor space) to ends when thinking of sustainability.			

Q5	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 type="checkbox"/>	<input type="checkbox"/>

Additional comments:

I agree, but with the caveats in answer to Question 4), so there is more refinement needed. The difficulty is that the limited role of planning has to be made clear before the function can be made fit for the purpose of contributing to sustainable development. At the moment rhetoric and assumptions are not matched by reality, and powers are weak, non existent or ignored.

Of course any list of indicators is unlikely to do justice to the full influence of planning on sustainable development. There are intended and unintended outcomes and 'influence' takes many forms. However there are a couple of difficulties which arise:

- a) Some of your indicators are measures of 'growth': increasing consumption, increase energy use, and use of scarce or diminishing resources (bio- diversity is a critical asset and we see to be 'asset stripping'!) and it is not clear how planning alleviates the impact of this process. Put more clearly, planning promotes and supports consumption and an unsustainable society (of course 'planning gain' can , but is not often used, to compensate).
- b) There is no indication whatever that planning is intending to make the necessary adjustments to make a meaningful contribution to a sustainable society. Planning has to make a decision to commit to social and environmental responsibilities and support a reduction in resource use (in practice not just rhetoric). This will mean declaring support for the 5 UKSDC principles and expressing them consistently in all policies and decisions. This is the higher strategic level issue which you fail to refer to in this document. For planning and public policy in general this is a matter of challenging the 'market imperative'.
- c) You do mention the market, in para 23, as a limiting factor in the ability of planning to contribute to SD , but you don't explain these limits other than to say that the economic conditions need to be supportive of investment. I wonder what success you have had in ensuring that development is truly sustainable? That is not clear.. Of course this is a matter of degree, even in a period of austerity some investment and development takes place. However a sustainable society which is based on 'low/no growth' requires planners to adopt a different 'mindset' and think in terms of managing for 'decline' or stagnation and great prosperity and social cohesion which will raise a whole host of issues for the planning function. Minimising traffic movements and urban shape are relevant but only a part of the response that is needed.
- d) The last, related, point is that it is very difficult to see how current planning policy and practice is supporting sustainability. For example:
 - i) Planners do not consider the 'carry capacity' of the soil (or it's carbon sink value) when determining applications for slurry lagoons (WG even offers grants for them) and in doing so supports the intensification of farming beyond sustainable levels which have profound impacts on the environment and bio-diversity. One explanation for this is the lack of any specific reference to sustainable development principles in the list of material considerations used to determine a planning application. The outcome is that agencies such as EA are not in a position to challenge issues of location and scale but can only ensure the integrity of the construction and design.
 - ii) You have a One Planet Development Policy (ODP) based on belief, rather than evidence (contrary to UKSDC SD principles), which promotes development in the open countryside which contradicts any commitment reducing CO2 emissions and achieving a lower ecological footprint (this is according to recent scientific studies which indicate that levels are much lower in urban and suburban areas). Some LPAs continue to advocate high proportions of residential development in the countryside which is quite contrary to trends in the location of public services, a commitment which extends to 2023!. The provision of affordable homes/social housing is lagging behind need and this contributes to poverty and economic inequality.

The point be made here confirms the limits to a 'coarse' set of indicators as failing to reflect the processes at work in society which planning needs to confront if it is to make a genuine contribution to achieving a sustainable Wales. .

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

Additional comments:

I think the logic chain and 4 stages (or levels) makes analytical sense.

The 4 stages, should inter-link, and it should be clear that a decision and measure at stage 1 logically relates to the next stage and decision and indicators .

The problem you have is that as an abstract concept the SMF is fine but it does not withstand the 'reality' test, ie the dynamic, politics and practicalities of planning. Furthermore it is clear from the choice of some indicators that you are being extravagant in your claims about what influence planning can have in contributing to sustainability. You need to be disciplined and concentrate on activities where planning has a direct impact (urban shape).

The other difficulty is a legal one . Planning does not have the powers or duty to 'deliver ' sustainability in those areas where it does have the potential for direct influence. Finally planning is the outcome of negotiations and planning is weak at negotiating in areas central to contributing to sustainability.

My advice is to scale down your expectations and select one or two measures or indicators across the 4 levels as a 'pilot' in 3 or 4 supportive LPAs

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

Additional comments:

No, it should be introduced as a coherent package. In practical terms if that is not possible and you want a partial introduction you should take one or two indicators across all four levels, and choose ones that you are confident planning can actually deliver across all four levels. This could be a form of 'pilot' and would need to be linked to a staff development programme and dovetail with the SD Bill (we need to break down silos, not build them up, if we are to achieve integrated working and joined up thinking.)

Q8	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 checked="" type="checkbox"/>

Additional comments:

I don't think all the indicators you have suggested in this document past the test...that they show that planning contributes to sustainability. You have much more work to do on this, not least assessing whether you have the powers and disposition in WG, LPAs and the profession to deliver them.

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
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Additional comments:

My prediction would be that it would seen as an onerous task and assimilated very slowly and the collection of data may not happen as you would wish and coverage would be patchy and variable across the Country.

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

Additional comments:

Q11	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.
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Additional comments:

(This is the first opportunity in the form to make clear that these are my personal views not those of The Environmental Network for Pembrokeshire. If you want more information on sustainable development you can go onto : www.tenp.org.uk and download a 'Sustainable Development Directory: policy and practice', available in English and Welsh.).

On a general point, while the logic in para 44 is undeniable and sensible the issues is whether indicators are useful, so in Fig 4 you have impacts which, with all the will in the world, you cannot attribute directly to planning, eg economic growth , CO2 reduction. So this is a case of planning wanting to take credit for things it is not completely responsible ("success has many parents , failure is an orphan") and so the approach has logic , but lacks intellectual rigour.

Your example of a flood plain policy and decision cannot be faulted but how often does this sequence occur, ie that 'policy is not distorted or overturned? and which policies are most likely to be overturned? We know that some developments are permitted on flood plains or areas liable to flooding because the implementation of public policy is negotiable with the developer/land owner . (You may be aware that in recent years the RTPI has published a press release about planners getting increasingly frustrated because developers will not take their environmental responsibilities seriously). It is only the intervention of the 'market' in the form of insurance company policy, not to provide cover, which is inhibiting some developments and reinforcing policy. The point here is that if planning is serious about contributing to sustainability it has to understand the processes that are at work (as I'm sure it does) and then set about establishing more 'robust delivery mechanisms' which some of measurement you are suggesting will help to inform.

I add below other concerns I wish to express (comments 9-17):

In the section: ' WE want to Change'.

- i) Make evidence sound and local
- ii) Make progress on the adoption of LDPs
- iii) Make progress on the time taken to determine applications,
- iv) Show decisions are made on key SD Objectives

MY Comments 9: Would local evidence include soil quality, homelessness, potential to renovate rather than have new build, and community views? And what weight would it have?. How does adoption of LDP and faster determination inherently support SD?..It's the decision that matters not the speed at which it is made! What are the key SD Objectives..do they draw upon the UKSDC principles as part of 'logic chain' ? .

The document then looks at Main Issues

"WG has a legal obligation to have a scheme setting out how we will promote SD" (duty: s79 Government of Wales Act).

(Comments 10: what does promote mean? And why no mention of section 39 of the 2004 Planning Act?.

"Economic, Social, and Environment should be considered at the same time"

Comment 11: What does 'consider at the same time' really mean? How does that ensure that environmental and social objectives get the same consideration , or even a higher priority than economic considerations?

"The SD Scheme identifies planning as one of four themes that underpin the approach to reducing our ecological footprint and deliver SD"

Comment 12: Planning might be a theme but we don't know if it delivers so it (planning) has a symbolic function, only! In practice TAN 6 and OPD are opening up the country to development, how does that achieve a low ecological footprint?.

"The aim of planning is to provide homes, infrastructure and jobs in a way that helps reduce the ecological footprint"

Comment 13: Now is that all planning aims to provide, really? If so, at least I admire the honesty because that's the impression I get, that any other objectives are a low priority!. "Planning doesn't determine outcomes in terms of what is built" we were told above. Now we are told 'planning aims to provide homes', so does planning determine outcomes or not ?! This is very confusing. A cynical view is that Planning will take credit for what it does achieve and find excuses for what it can't achieve. Another concern is, as R Sennett observed in 'Uses of Disorder' , that planning as a profession is detached from reality and has an exaggerated sense of its power and control, and I think this underpins a major problem with this document (and I speak as a planner who got the RTPI exam prize from Dundee Uni! and so I have a great deal of interest in the credibility of the planning profession). So in providing these 3 things (obviously a statement of priorities) how are environment , bio-diversity, social justice, equality etc, taken into account? They are part of SD and planning has a 'duty' to encourage SD' (2004 Planning Act). My guess is that the 'politics of policy' and the 'natural' affiliation of

Confidentiality

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: ☐

How to respond

Please submit your comments by 27 January 2012, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to : planconsultations-E@wales.gsi.gov.uk [Please include 'Strategic Monitoring Framework for the Planning System' in the subject line]</p>	<p>Please complete the consultation form and send it to: Strategic Monitoring Framework for the Planning System (Consultation) Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3NQ</p>

Additional information

If you have any queries on this consultation, please

Email: planconsultations-E@wales.gsi.gov.uk

Telephone: Andrew Charles on 029 2082 3869

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name		
Organisation		
Address		
E-mail address		
Type (please select one from the following)	Businesses	<input checked="" type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments:			

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

Q3	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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments: This is provided the categorisation does not become a hierarchy of importance with category E being deemed to have lower importance. It is imperative that social, cultural & economic wellbeing are primary objectives</p>			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
<p>Additional comments: Again provided the proposed new measures do not become a hierarchy. The economic value of development must be of paramount importance</p>			

Q4.2	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing		
<p>Additional comments: Again provided the proposed new measures do not become a hierarchy. The economic value of development must be of paramount importance</p>			

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		

Additional comments:

This should be seen as of paramount importance

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Percentage of the population in low-income households		
Additional comments:			

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Wellbeing in Wales		
Additional comments:			

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

Q4.7	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Net change in open space and playing fields		

Additional comments:

Provided this does not become a prescription for inertia and resistance to change in land use.

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

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

Additional comments:

Provided this does not become a prescription for inertia and resistance to change in land use.

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

9 Number of application submitted with Transport Assessments

Additional comments:

Provided a realistic and pragmatic approach to the provision of transport assessments and improvement plans

Q4.10	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

10 Number of applications granted/refused (by type on the flood plain (by flood risk category)

Additional comments:

Provided this does not become a prescription for inertia and resistance to change in land use.

Q4.11	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification		
Additional comments: Provided a realistic and pragmatic approach to development is taken			

Q4.12	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
12	The proportion of local or recycled materials used in new developments		
Additional comments: Provided a realistic and pragmatic approach to development is taken			

Q4.13	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Renewable energy generation (mW) granted/refused by type and capacity		
Additional comments:			

Q4.14	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
Additional comments: Provided this does not become a prescription for inertia and resistance to change in land use			

Q4.15	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
Additional comments:			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
Additional comments:			

Q4.17	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	Employment land bank (years provided)		
Additional comments: Provided this does not become a prescription for inertia and resistance to change in land use			

Q4.18	Do you agree with the proposed indicator?	Yes	No
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		<input checked="" type="checkbox"/>	<input type="checkbox"/>
18	Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)		
<p>Additional comments: Provided this does not become a prescription for inertia and resistance to change in land use</p>			

Q5	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"/>
<p>Additional comments: There are concerns about the measures become ends rather than means which must be avoided. The collection of data for the measures should not be at the expense of the efficient and timely operation of the planning system. Therefore the resource requirements must not be onerous and must be supported by the Assembly</p>			

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

Q7	What are your views on whether the proposed framework should be phased?
<p>Additional comments: Given the pressures on local authority budget and resources the phased introduction is imperative if the efficient & timely operation of the planning system is not to be compromised.</p>	

Q8	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 checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments:			

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
Additional comments:	

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments:			

Q11	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:	

Confidentiality
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 checked="" type="checkbox"/>

CONSULTATION FORM

Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name		
Organisation		
Address		
E-mail address		
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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>Additional comments:</p> <p>The planning system is underpinned by principles of sustainable development. Consideration of sustainable development is central to the preparation of Local Development Plans (LDPs), which are subject to sustainability appraisal and strategic environmental assessment and assessed against sustainability indicators. LDP objectives are assessed to ensure they are sustainable. I understand the suggested Framework is attempting to assess the outcomes of the planning process, but many of these will be measured on a local scale by the LDP monitoring frameworks. These points were raised during the consultation event where the majority of attendees seemed unsure of the role and purpose of the proposed framework as it seemed to be duplicating existing work, particularly the Welsh Governments (WG) Sustainable Development Indicators.</p> <p>Local Planning Authorities (LPAs) currently provide quarterly returns to the WG. Some of the information being sought within this consultation already exists, either from local authority data or other sources and is available on the statswales website. Perhaps it would be more useful and less resource intensive if each LPA has the suggested standard indicators within their LDP monitoring reports and the WG collate the relevant information following the annual returns and compile this information with the quarterly local authority returns. This would avoid duplication of work and be less onerous on LPA's.</p>			

Q2	Do you agree with the proposed approach to use the 'logic-	Yes	No

	chain' identify appropriate measures of the planning system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments: The logic chain just seems to be an obvious statement of the relationship between the planning system and sustainable development. It is not clear what 'new thinking' it provides.</p>			

Q3	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 checked="" type="checkbox"/>
<p>Additional comments:</p> <p>The five categories appear appropriate, however the associated 'areas' are not necessarily something the land use planning system collects data on - much of the information is collected by local authorities from other data sources in order to provide a sound evidence base for the LDPs. It is not data collated by the LPAs themselves. The WG could obtain this data directly from source without having LPAs spending time and resources gathering the data for them, much of which is not at 'local' level anyway.</p>			

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	Wales' Ecological Footprint		
<p>Additional comments:</p> <p>This indicator has become standard for measuring sustainable development and data is currently obtained from the Environment Agency's State of the Environment Report . However, it is not currently updated by LPAs and not something that should be the responsibility of LPAs and the planning system to measure. Additional resources in terms of finance, staff time, additional training, computer programmes and data collection would all be required in order for the LPA to provide data on the annual ecological footprint of the County.</p>			

Q4.2	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing		

Additional comments:

Would this be local biodiversity action plan habitats and species or the BAP, i.e. would these be local level or national indicators? Once again these indicators would be highly resource intensive for the LPA. Is there a suggested baseline date for the purpose of monitoring?

It would be beneficial if the WG produced a list of national indicator species that each local authority could monitor in order to give consistency and meaning to this indicator, rather than all BAP habitats and species - it would be virtually impossible to annually monitor all BAP species and habitats. However, the process of annual surveying and monitoring is very intensive and additional resources for staff would be required to fund this work.

Some national data collection is already undertaken by other organisations, e.g. the farmland birds survey. Could this data be used by the WG instead of the onus being on LPAs to provide data?

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		
<p>Additional comments:</p> <p>This data is not collated by LPA's - the data is obtained from other departments/organisations and used to inform a sound evidence base for the formulation of LDP policies. It is not a specific land use planning indicator. The WG could obtain this data themselves and not put additional time and resource constraints on the LPA to submit the data.</p>			

Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Percentage of the population in low-income households		
<p>Additional comments:</p> <p>This data is not collated by LPA's - the data is obtained from other departments and used to inform a sound evidence base for the formulation of LDP policies. It is not a specific land use planning indicator. The WG could obtain this data themselves and not put additional time and resource constraints on the LPA to submit the data.</p>			

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Wellbeing in Wales		

Additional comments:

Again. This data is not collated by LPA's . Furthermore, has there been any consensus on how this is to be measured or how meaningful it is? The WG could obtain this data themselves and not put additional time and resource constraints on the LPA to submit the data.

Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Proportion of LPAs with an up to date adopted LDP		
<p>Additional comments:</p> <p>Most UDPs are still up to date. Should this indicator refer to an extant development plan rather than focusing on LDPs?</p>			

Q4.7	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Net change in open space and playing fields		
<p>Additional comments:</p> <p>This could be obtained from LPAs open space assessment. However, annual assessment will be resource intensive with significant cost implications for LPA's. Is there a national consensus on the definition of 'open space' to ensure that each LPA is monitoring the same areas of open space other than playing fields and the results give rise to meaningful comparison -would this be using the CCW toolkit for example?. If this was done from a planning application basis then additional data collection and monitoring would be required by planning applications staff, leading to pressure on resources. Modification of the computer database in order to record and monitor whether planning applications are located on open space/playing fields would also involve significant cost.</p>			

Q4.8	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Total floor space granted/refused (by type) on greenfield and brownfield land		

Additional comments:

This is not currently measured and would require modification to the development control database in order to collect and measure the information, resulting in significant cost and time implications for LPA's. The indicator relies in part on applicants correctly providing the information, but could potentially be monitored as a variation of the annual housebuilding survey to include all development. Nevertheless this would have resource implications for the LPA.

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

9 Number of application submitted with Transport Assessments

Additional comments:

Once again this would require additional workload for planning applications staff in the recording and monitoring of information and modification of the planning applications database. It is questioned how meaningful this indicator is - it is the quality of the Transport Assessment and the actual outcomes of the Assessment that should be measured, not whether an Assessment was submitted.

Q4.10	Do you agree with the proposed indicator?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>

10 Number of applications granted/refused (by type) on the flood plain (by flood risk category)

Additional comments:

This information is also available from the Environment Agency Wales. It could be monitored and collated by LPA staff but would require additional resources resulting in cost implications.

Q4.11	Do you agree with the proposed indicator?	Yes	No
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments: BREEAM developments are not collated/recorded at Unitary Authority level and it is very difficult to obtain the data from the consenting authority (BREEAM). Would question the relevance of this indicator as all new residential development has to meet CODE 3 and all commercial development over 1,000 square metres should meet BREEAM. If this indicator is to be kept, then the WG should obtain the information directly from the consenting bodies, not expect LPAs to undertake the data collection and monitoring.</p>			

Q4.12	Do you agree with the proposed indicator?	Yes	No
12	The proportion of local or recycled materials used in new developments	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments: How will this be measured? Waste management plans are not yet in force and they will be monitored by building regs not the planning system. It is not clear how the planning system can monitor or record this data. Using a planning condition to require local or recycled materials during construction will require extensive monitoring, with significant resource implications for the LPA. What is the definition of 'local' materials? Would the proportion be a percentage of total materials used? How would this be accurately measured?</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
13	Renewable energy generation (mW) granted/refused by type and capacity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments: This could be measured and monitored via the planning application database, with resultant time and resource constraints on planning applications staff. However, many small scale renewables do not require planning permission and would not show in the data collected for this indicator, giving a misrepresentation of the actual figure. Furthermore, permission may be granted but never implemented, therefore the outcome may not tally with the proposed indicator.</p>			

Q4.14	Do you agree with the proposed indicator?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
14	Total area of granted/refused development in protected areas (European and national designations)		
<p>Additional comments:</p> <p>The indicator is not clear. Does this include both areas designated for their ecological importance and natural beauty (e.g. SACs, SSSI's and national parks and AONBs) as there are different reasons underlying their designations and therefore different reasons for allowing/refusing planning permissions. Furthermore, not all planning permissions are negative in a protected area, for example permission may be granted in order to enable ecological enhancement, not as a detriment. Area of development granted in AONBs may include planning applications granted which would enhance the landscape or a building conversion where there is no increase in the total area of new development. It is not clear what the indicator would actually show other than a presumption that permission granted is 'bad' and refused is 'good'.</p>			

Q4.15	Do you agree with the proposed indicator?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
15	Number of Listed Building and Conservation Area Consents granted/refused		
<p>Additional comments:</p> <p>This data can be collected, but again it is questioned how meaningful this is. Planning permission should only be granted which preserves or enhances the appearance of the conservation area or its setting. Similarly there has to be strong justification for demolition of a listed building.</p>			

Q4.16	Do you agree with the proposed indicator?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
16	Number of new homes (by type) granted permission		
<p>Additional comments:</p> <p>This data can be collected, but the indicator does not measure the output, i.e. whether the houses are actually constructed.</p>			

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

Additional comments:

An employment land bank assessment has been undertaken to provide an up to date evidence base for the LDP. However an annual review of the landbank will entail significant resource implications for the local authority. The LPA does not currently record and monitor the data and would need to enlist the services of other departments, with potential cost implications. Will the base year be standardised for each local authority for the purposes of this indicator in order to enable meaningful comparison across unitary authorities?

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

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

Additional comments:

The use of the indicator is understood, however, the current computer database used by planning applications would require significant amendments with associated costs for staff, new/amended software and time implications.

Q5	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 planning system itself has no direct impact on the majority of the indicators, and some of the outcomes cannot be measured and therefore do not relate to the indicators. There is a need to be realistic about the scope of the land use planning system, what it directly influences and what the outcomes are.

Q6	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:

It will require additional work and much duplication of measuring/recording that is already done elsewhere by other organisations.

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

Additional comments:

Phasing will not help to provide any meaning the process, though it will help LPAs ensure they have the correct procedures in place. However, in order to gain any meaningful comparisons all the data should be collated at the same time or the whole exercise is meaningless. The framework is onerous on LPAs - they will have to contact other authorities for the information (which the WG could do), redesign their planning application data bases and hire consultants to undertake a number of the reviews which are outside the remit of the planning system.

Q8	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 checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments: Unsure how this will relate to adopted LDP's - will they have to alter their monitoring frameworks as part of the annual monitoring?			

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
Additional comments: Much of the data required by this proposed monitoring framework is readily available from other organisations and it should not be the onus of the LPA to collate this data to send to the WG. Much of the data required will require modifications to existing computer systems, additional staff time and expenditure. This will have major implications for LPAs in terms of budgets.	

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Additional comments: No. Seems an unnecessary burden and pointless exercise putting additional time/resource constraints on staff at a time when many LPAs are losing staff and funding is decreasing.			

Q11	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.
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Additional comments:

In order to aid the collection of information necessary to record and monitor the suggested indicators does the standard planning application form (1APP) need modifying? If so, there is a reliance on applicants to fill forms in correctly - would application be invalid if forms were not filled in with required data?

Also relying on d.c. officers to fill in data and changing data during the processing of planning applications or there may be a backlog of data required to complete the annual survey.

Appears to be yet another data gathering exercise which will not actually improve the effectiveness of the planning system or its outputs.

Please note that this response is [REDACTED]
[REDACTED]

Confidentiality

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: ☐

How to respond

Please submit your comments by 27 January 2012, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to :</p> <p>planconsultations-E@wales.gsi.gov.uk</p> <p>[Please include 'Strategic Monitoring Framework for the Planning System' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Strategic Monitoring Framework for the Planning System (Consultation) Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3NQ</p>

Additional information

If you have any queries on this consultation, please

Email: planconsultations-E@wales.gsi.gov.uk

Telephone: Andrew Charles on 029 2082 3869

FFURFLEN YMGYNGHORI

A Fframwaith Monitro Strategol ar gyfer y System Gynllunio (Ymgynghoriad)		
4 Tachwedd 2011 – 27 Ionawr 2012		
Enw	Rhodri Roberts	
Sefydliad	Bwrdd yr Iaith Gymraeg	
Cyfeiriad	Yr Hen Argraffdy Ffordd Santes Helen CAernarfon LL55 2YD	
Cyfeiriad e-bost	rhodri.roberts@byig-wlb.org.uk	
Math o sefydliad (dewiswch un o'r canlynol)	Busnes	<input type="checkbox"/>
	Awdurdod Cynllunio Lleol	<input type="checkbox"/>
	Asiantaeth y Llywodraeth/Corff Sector Cyhoeddus arall	<input type="checkbox"/>
	Corff Proffesiynol/Grŵp Buddiant	<input type="checkbox"/>
	Y Sector gwirfoddol (grwpiau cymunedol, gwirfoddolwyr, grwpiau hunan-gymorth, cwmnïau cydweithredol, mentrau, mudiadau crefyddol, sefydliadau di-elw)	<input type="checkbox"/>
	Arall (grwpiau eraill nad ydynt wedi'u rhestru uchod)	<input type="checkbox"/>

C1	Ydych chi'n cytuno â'n casgliad ni, sef nad oes digon o wybodaeth ar hyn o bryd inni allu mesur cyfraniad y system gynllunio at ein gweledigaeth o greu Cymru gynaliadwy?	Ydym <input type="checkbox"/>	Nac ydym <input type="checkbox"/>
<p>Sylwadau ychwanegol:</p> <p>Mae'r Gymraeg yn ran o wead cymdeithasol Cymru ac mae'n un o'r prif ffactorau sy'n rhoi i Gymru ei hunaniaeth a'i diwylliant unigryw. Mae i benderfyniadau polisi'r drefn gynllunio effaith pellgyrhaeddol ar iechyd a lles y Gymraeg gan fod yr un materion y mae'r drefn gynllunio yn mynd i'r afael â hwy, sef tai, gwaith a llif poblogaeth, yr un rhai a fydd yn llywio dyfodol y Gymraeg.</p> <p>Ar hyn o bryd, nid oes unrhyw ffordd o fesur beth yw cyfraniad y system gynllunio at les y Gymraeg fel iaith gymunedol. Ceir cydnabyddiaeth cenedlaethol fod tai fforddiadwy a gwaith yn hanfodol i sicrhau y gall siaradwyr Cymraeg ifanc barhau i fyw yn eu cymunedau, ond ni wyddys pa lefel o adeiladu sy'n llesol i'r Gymraeg ac ar pa bwynt y mae'n troi o fod yn llesol i fod yn andwyol.</p> <p>Credwn felly ei bod yn holl bwysig y mesurir effaith penderfyniadau'r drefn gynllunio ar les y Gymraeg.</p>			

C2	Ydych chi'n cytuno â'r cynnig i ddefnyddio'r 'gadwyn resymegol' i nodi dulliau priodol o fesur cyfraniad y system gynllunio?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
Sylwadau ychwanegol: Dim sylw			

C3	Ydych chi'n cytuno y dylid rhannu 19 amcan <i>Polisi Cynllunio Cymru</i> yn bum categori strategol er mwyn datblygu set o fesuryddion newydd?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Sylwadau ychwanegol:</p> <p>Nid yw'r Gymraeg wedi ei chynnwys yn unrhyw un o'r grwpiau. Mae'n amhosib ystyried effaith y drefn ddatblygu ar gynaliadwyedd heb ystyried yr effaith ar les yr iaith Gymraeg. Rhaid felly sicrhau llei i'r Gymraeg ar ei ben ei hun fel un o'r is-gategorïau. Nid yw'n ddigonol ystyried y Gymraeg o dan unrhyw un o'r is-gategorïau a gynnigir yn y ddogfen hon oherwydd (i) nid yw'n ffitio i'r un o'r is-gategorïau a (ii) ni fyddai ystyried yr iaith gyda ffactorau eraill, dyweder, Treftadaeth Ddiwyllianol a Hanesyddol yn sicrhau ystyriaeth ddigonol i'r mater.</p> <p>Mae absenoldeb unrhyw ddangosydd i fesur yr effaith ar y Gymraeg yn brawd nad oes ystyriaeth ddigonol i'r Gymraeg yn y categorïau a'r is-gategorïau.</p>			

C4.1	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
1	Ôl troed ecolegol Cymru		
<p>Sylwadau ychwanegol:</p> <p>Dim sylw</p>			

C4.2	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
2	Y ganran o'r cynefinoedd a rhywogaethau y cofnodir eu bod yn sefydlog neu'n cynyddu yn y Cynllun Gweithredu Bioamrywiaeth		
<p>Sylwadau ychwanegol:</p> <p>Dim sylw</p>			

C4.3	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
3	Gwerth Ychwanegol Crynswth (GYC) a GYC y pen		
Sylwadau ychwanegol: Dim sylw			

C4.4	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
4	Y ganran o'r boblogaeth sydd mewn cartrefi incwm isel		
Sylwadau ychwanegol: Dim sylw			

C4.5	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
5	Lles pobl Cymru		
Sylwadau ychwanegol: Dim sylw			

C4.6	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

6 Canran yr Awdurdodau cynllunio Lleol sy'n diweddarau eu CDLI

Sylwadau ychwanegol:
 Dim sylw

C4.7	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

7 Y newid net mewn mannau agored a chaeau chwarae

Sylwadau ychwanegol:
 Dim sylw

C4.8	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

8 Cyfanswm yr arwynebedd llawr a gymeradwyir/a wrthodir (fesul math) ar safleoedd maes glas a safleoedd tir llwyd

Sylwadau ychwanegol:
 Dim sylw

C4.9	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

9 Nifer y ceisiadau a gyflwynir gydag Asesiadau Trafnidiaeth

Sylwadau ychwanegol:
 Dim sylw

C4.10	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

10 Nifer y ceisiadau a gymeradwyir/a wrthodir (fesul math) ar orlifdir (fesul categori perygl llifogydd)

Sylwadau ychwanegol:
 Dim sylw

C4.11	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

11 Nifer yr adeiladau sy'n ennill yr ardystiad BREEAM a/neu ardystiad y Cod Cartrefi Cynaliadwy

Sylwadau ychwanegol:
 Dim sylw

C4.12	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
12	Cyfran y deunyddiau lleol neu ddeunyddiau wedi'i ailgylchu a ddefnyddir mewn datblygiadau newydd		
Sylwadau ychwanegol: Dim sylw			

C4.13	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
13	Y cynlluniau cynhyrchu ynni cynaliadwy (mW) a gymeradwyir/a wrthodir, yn ôl eu math a'u capasiti		
Sylwadau ychwanegol: Dim sylw			

C4.14	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
14	Cyfanswm arwynebedd y datblygiadau a gymeradwyir/a wrthodir mewn ardaloedd sy'n cael eu gwarchod (dynodiadau Ewropeaidd a chenedlaethol)		
Sylwadau ychwanegol: Dim sylw			

C4.15	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
15	Nifer y Caniatadau Adeilad Rhestredig ac Ardal Gadwraeth a gymeradwyir/a wrthodir		
Sylwadau ychwanegol: Dim sylw			

C4.16	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
16	Nifer y cartrefi newydd a ganiateir (fesul math)		
Sylwadau ychwanegol: Dim sylw			

C4.17	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>
17	Banc tir cyflogaeth (y blynyddoedd a ddarperir)		
Sylwadau ychwanegol: Dim sylw			

C4.18	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

18 Cyfanswm yr arwynebedd tir a gymeradwyir/a wrthodir (fesul math) (o gyfuno tir glas a thir llwyd) (swyddfeydd/diwydiant/manwerthu/dosbarthu)

Sylwadau ychwanegol:
 Dim sylw

C5	Ydych chi'n cytuno na ddylid ystyried bod y mesuryddion hyn yn rhoi darlun cyflawn o ddylanwad y system gynllunio ar ddatblygu cynaliadwy ond eu bod yn darparu fframwaith lefel-uchel priodol?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

Sylwadau ychwanegol:
 Cytunwn mai anodd fyddai cael darlun llawn o effaith y drefn gynllunio ar gynaliadwyedd, ond anghytunwn fod yr hyn a gynnigir yn addas ar gyfer fframwaith lefel uchel ddigonol gan nad yw'n rhoi unrhyw fesur o effaith cynllunio ar y Gymraeg. Fel y nodwyd eisoes, mae'r Gymraeg yn fater llawn mor ddilys a materion amgylcheddol wrth ystyried cynaliadwyedd ac felly rhaid sicrhau ystyriaeth i effaith y drefn gynllunio ar hynny.

C6	Ydych chi'n cytuno â strwythur arfaethedig y Fframwaith Monitro Strategol ac y dylid mesur y pedwar cam a nodir uchod?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

Sylwadau ychwanegol:
 Dim sylw

C7	A ddylid cyflwyno'r fframwaith arfaethedig gam wrth gam, yn eich tyb chi?
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Sylwadau ychwanegol:

Dim sylw

C8	Ydych chi'n cytuno y dylem gyfuno/adolygu'r dangosyddion allbwn eraill a nodwyd eisoes yn y Llawlyfr CDLI (2006) gyda'r dangosyddion newydd arfaethedig, er mwyn mesur allbynnau'r system gynllunio?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

Sylwadau ychwanegol:
 Dim sylw

C9	Sut fyddai'r fframwaith Monitro Strategol newydd yn effeithio ar eich awdurdod chi? (Awdurdodau Cynllunio Lleol)
-----------	--

Sylwadau ychwanegol:
 Dim sylw

C10	Ydych chi'n cytuno â'r dull a gynigiwn ar gyfer adrodd ar y Fframwaith Monitro Strategol?	Ydym	Nac ydym
		<input type="checkbox"/>	<input type="checkbox"/>

Sylwadau ychwanegol:
 Dim sylw

C11	Rydym wedi gofyn nifer o gwestiynau penodol. Os hoffech dynnu sylw at unrhyw faterion eraill, nodwch hwy isod.
------------	--

Sylwadau ychwanegol:
☐☐☐☐☐

Cyfrinachedd

Mae'n bosibl y bydd yr ymatebion i ymgynghoriadau yn cael eu cyhoeddi – ar y rhyngwrdd neu mewn adroddiad. Os hoffech gadw'ch ymateb yn gyfrinachol, ticiwch y blwch: ☐

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)		
4 November 2011 – 27 January 2012		
Name	Phil Williams	
Organisation	Cardiff Council	
Address	City Development City Hall Cathays Park CARDIFF CF10 3ND	
E-mail address	P.A.Williams@cardiff.gov.uk	
Type (please select one from the following)	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input 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"/>

		Yes	No
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments: Planning's real/tangible impact on the Sustainable Wales agenda lies most directly in the development that gets built, and how that development functions and is used in the long term. We do need to ensure that the right policies are in place and the right decisions are being made, and it is important to monitor the processes in place for that, but we also need a much clearer means of monitoring the longer term impact and performance of the things that get developed, the "end result".			

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

Additional comments:

This seems to be an overcomplicated approach - The emphasis needs to be put on the 'Impacts' stage to identify the intended impacts which are likely to be measurable and the data which needs to be collected to assess these.

The policy process is important in leading to these impacts and it will also be necessary to measure the availability of sustainability policies at various levels in the process .

Para 30 assumes that - "we can make causal links between processes..of planning system and sustainable development" - how can these links be made and shouldn't the focus be on actual measurable impact?

Q3	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 checked="" type="checkbox"/>	<input type="checkbox"/>

Additional comments:
 Additional areas to be included in either category A (strategic location) or B (design) are:
 - walkable neighbourhoods with easy access to open space, community facilities and transport systems.
 - Appropriate densities to support provision of services
 - Quality of place/distinctive and legible environments
 - Site design - layout for solar gain, SUDS etc
 - Mixed use land-uses supporting range of activity at local level
 Additions to E to include:
 - good quality and appropriate play opportunities
 - local food production

Additional possible headings : Sustainability in site construction
 Place making in addition to building design
 Community development, support and involvement

There may be a need for targets for the indicators to be set at the Local Level to allow for variations in local context and local sustainable objective priorities.

Measures should ideally be based on data already collated by LPA's with a focus on the use of existing technologies and IT systems available. It is recognised that new areas of data will need to be collected to give a clearer understanding of policy impact but the resource/skills demand for this must be recognised.

Q4.1	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

1	Wales' Ecological Footprint
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Additional comments:
 Yes as this is already measured as part of the annual 'Sustainable Development Indicators for Wales'.
 If this is to be an annual measurement will it be by the same methodology as the 2006 version to allow comparison of progress?
 This overarching indicator is affected by many factors beyond the Planning Process and so as such can only be seen as a 'scene setting' indicator - it would be difficult to extrapolate from the data the direct effect of local and national planning policy.

Q4.2	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing
<p>Additional comments: Yes as this is already measured as part of the annual 'Sustainable Development Indicators for Wales'.</p> <p>However how will areas where species / habitat data is not available be dealt with? There is concern at the resource demands for collating data given the significant number of sites and species involved.</p> <p>This overarching indicator is affected by many factors beyond the Planning Process and so as such can only be seen as a 'scene setting' indicator - it would be difficult to extrapolate from the data the direct effect of local and national planning policy</p>	

Q4.3	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Gross Value Added (GVA) and GVA per head		
<p>Additional comments:</p> <p>Yes as this is already measured as part of the annual 'Sustainable Development Indicators for Wales'.</p> <p>This overarching indicator is affected by many factors beyond the Planning Process and so as such can only be seen as a 'scene setting' indicator - it would be difficult to extrapolate from the data the direct effect of local and national planning policy.</p>			

Q4.4		Do you agree with the proposed overarching indicator?		Yes	No
				<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Percentage of the population in low-income households				

Additional comments:

Yes as this is already measured as part of the annual 'Sustainable Development Indicators for Wales'.

However would the Welsh Index of Multiple Deprivation be a better measure ?

This overarching indicator is affected by many factors beyond the Planning Process and with this indicator in particular, planning has a limited role to play in affecting this measure - it would be difficult to extrapolate from the data the direct effect of local and national planning policy

Q4.5	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Wellbeing in Wales		
<p>Additional comments:</p> <p>Yes as this is already measured as part of the annual 'Sustainable Development Indicators for Wales'.</p> <p>Currently this indicator shows no / little change since 2003 - as such is this the right measure to be using?</p> <p>Well being would need to be clearly defined along with the role of Planning in affecting a change.</p> <p>This overarching indicator is affected by many factors beyond the Planning Process and so as such can only be seen as a 'scene setting' indicator - it would be difficult to extrapolate from the data the direct effect of local and national planning policy</p>			

Q4.6	Do you agree with the proposed overarching indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Proportion of LPAs with an up to date adopted LDP		
<p>Additional comments:</p> <p>Once all LDP's are in place this measure will become redundant. May be more appropriate to measure decisions taken which comply with a 'sample set' of LDP policies.</p>			

Q4.7	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:

Annual measurement of this will be onerous as this measure does not just relate to applications determined. Currently only measured by LPA's every 4-5 years. This indicator does not measure the quality of changes eg. Partial development of an open space may lead to an improvement in quality and provision of that space.

This overarching indicator is affected by many factors beyond the Planning Process and so as such can only be seen as a 'scene setting' indicator - it would be difficult to extrapolate from the data the direct effect of local and national planning policy.

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

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

Additional comments:

It is difficult to see how this could be a measure of sustainability, or how it could accurately reflect impact "on the ground" for a number of reasons. e.g.

- Is it assumed Greenfield is always better than Brownfield?
- the number of planning application submitted in any year will vary with economic circumstances;
- many permissions do not get implemented;
- there is an increasing trend in the recession for developers to seek multiple permissions on individual sites which could skew the indicator
- there is no mechanism to capture appeal decisions.
- Floorspace is not a measure of land-take - Different densities of development will have different impacts.

A much better indicator would be to capture completed development floorspace, which is already accurately monitored by most authorities.

The measure should consider the balance between the proportion of Greenfield and Brownfield land developed with the emphasis on Brownfield first.

There may be double counting where several extant permissions exist for each site.

Q4.9	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:

It is difficult to see how the presence or absence of an assessment could be a measure of sustainability. We need to consider how the results of the assessment affected the final planning decision, and how accurate the assumptions were in the longer term for those developments that get built.

The modal shift envisaged in the transport plans would be a better measure of the sustainability of the plan.

There may be double counting where several extant permissions exist for each site.

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>Additional comments:</p> <p>Assumes same impact of all development. More definition is required about the acceptable forms/ types of development taking into account the future impacts of Climate Change.</p> <p>There may be double counting where several extant permissions exist for each site.</p>			

Q4.11	Do you agree with the proposed indicator?	Yes	No
11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments: As BREEAM and CSH are now mandatory it would be more useful to monitor the levels attained as well as considering longer term compliance measures. Would be useful to monitor levels achieved over and above national policy standards LPA's could only measure developments approved and conditioned to BREEAM/CSH standards, not those 'built'. There may be double counting where several extant permissions exist for each site.</p>			

Q4.12	Do you agree with the proposed indicator?	Yes	No
12	The proportion of local or recycled materials used in new developments	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Additional comments: This measure relies on developers self reporting back on use of both local and recycled materials in builds - can we rely on this as being accurate / representative data? Need to define local - region/Wales/UK? This objective is not currently controlled or enforceable through the planning process. Suggest look to the construction industry for monitoring currently undertaken on this.</p>			

Q4.13	Do you agree with the proposed indicator?	Yes	No
13	Renewable energy generation (mW) granted/refused by type and capacity	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Additional comments:

The measure does not include smaller scale renewables that can be installed by householders under permitted development. This could add up to a significant contribution in urban areas, but it is unknown as to how this could be measured. This also works against the 'fabric first' approach where renewables are unlikely to be necessary. Again does not measure what is actually put in place, only permissions granted.

There may be double counting where several extant permissions exist for each site.

Q4.14	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>Additional comments: Should this refer to local designations too?</p> <p>Not a qualitative measure - some development in certain areas eg. Conservation Areas will be beneficial (or would not have been granted consent)</p> <p>There may be double counting where several extant permissions exist for each site.</p>			

Q4.15	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>Additional comments: Not a qualitative measure. Number of consents/refusals reflects development/market pressure as much as impact of planning policy. More appropriate to measure reduction in nos of LB 'Buildings at Risk'.</p> <p>There may be double counting where several extant permissions exist for each site.</p>			

Q4.16	Do you agree with the proposed indicator?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Number of new homes (by type) granted permission		
<p>Additional comments: The split of affordable and market homes is necessary to give the social sustainability picture, and again, the real measure of sustainability lies in how many new homes are built and where, rather than just a tally of permissions which may or may not be implemented</p> <p>There may be double counting where several extant permissions exist for each site.</p> <p>Clarification of 'type' required</p>			

Q4.17	Do you agree with the proposed indicator?	Yes	No
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		<input type="checkbox"/>	<input checked="" type="checkbox"/>
17	Employment land bank (years provided)		
<p>Additional comments: Difficult to establish what this measure is likely to show in terms of being a measure of sustainability.</p>			

Q4.18	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)		
<p>Additional comments: Please see response to Q4.8. In addition, it is unclear what this measure would tell us with regard to sustainable development unless we're able to analyze the relationship between identified needs (e.g. housing no. and type, employment opportunities) and development delivered (not just consented). Again, floor space does not indicate land-take impact.</p> <p>There may be double counting where several extant permissions exist for each site.</p>			

Q5	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 type="checkbox"/>	<input checked="" type="checkbox"/>

Additional comments:

No - there has been opportunity to comment on the proposed measures within the proposed categories but not on the measures that may also need to be included to give a comprehensive overview of sustainable development in the planning system. In particular there is concern that the framework is too focussed on process and not on tangible, built outcomes and how they perform- the "end result". In addition:

- + The overarching measures don't make a mention of the multiple indices of deprivation - these are already produced so why not use them to set the scene?
- + SUDS are not included in the measures - is this because they will soon become a legal requirement? However BREEAM is also a legal requirement and is included as a measure.
- + Omission of any measure relating to waste - from construction and end user perspectives, and spatial planning.
- + 'Facilitating infrastructure and its use' category only has one measure relating to renewable energy generation. What about infrastructure for communities that increases accessibility and integration - measures around cycle networks, walkable access to local and district centres etc.?
- + 'Social, cultural and economic wellbeing' category only has measures relating to economics and none relating to social and cultural. Suggestions are measures on access to core social services, affordable housing, homelessness, ratio of salaries to cost of homes, land designated for SMEs, green / social economy etc.
- + There may be need for further monitoring of the long term consequences of development. For example longer term energy performance of buildings once occupied, travel plan monitoring and other behavioural patterns.

Q6	Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Additional comments:</p> <p>The impacts box could be more sophisticated (see areas outlined in above question). The impact is greatest in completed developments and not necessarily all applications and plans.</p>			

Q7	What are your views on whether the proposed framework should be phased?
<p>Additional comments:</p> <p>Phasing suggestion is welcomed as it gives LPAs time to collect the information. Collecting a select number of indicators from Table 2 with a view to collection of all by a set date is the preferred option. Suggest first reporting year as 2013/14 to allow for monitoring systems to be updated.</p>	

Q8	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 checked="" type="checkbox"/>	<input type="checkbox"/>
Additional comments: A useful starting point avoid duplication of effort. Revision needed in line with the individual comments set out above and to reflect changes in national policy objectives.			

Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)
Additional comments: Need to amend system to enable monitoring of new indicators and those that we may currently monitor in a different way. Some of the new indicators may be problematic to monitor. For example with CSH, developers don't currently provide the final certificates. The collection of new data sets could be resource heavy at a time when resources are severely constrained. Would hope that support could be available through the Planning improvement fund.. Existing monitoring systems should form the basis of any additional needs.	

Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Additional comments: If we are to start measuring according to the proposed Framework then we need to know well before the suggested monitoring period of 2012-13 in order for systems to be amended / established even if phased.			

Q11	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: There is need to consider how to measure issues that are beyond planning such as the end occupancy of the development and the behaviours of the occupants.	

Confidentiality
