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Welsh Government

Consultation Responses – Part 2

A Strategic Monitoring Framework for the Planning System

Date of issue: March 2013

Overview

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

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WG 13303 - 15

CONSULTATION FORM

Strategic Monit	oring Framework for the Planning System (Co	nsultation)	
	4 November 2011 – 27 January 2012		
Name	Roisin Willmott		
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Type (please select	Businesses		
one from the following)	Local Planning Authority		
	Government Agency/Other Public Sector		
	Professional Bodies/Interest Groups		\boxtimes
	Voluntary sector (community groups, volunteers help groups, co-operatives, enterprises, religiou profit organisations)		
	Other (other groups not listed above)		
Da way assura	with a consequence that the account	V	NI-
	with our conclusion that the current not sufficient for us measure the contribution	Yes	No 🖂
of the plannin	g system to our vision of a sustainable Wales?		
The first step should be to consider how current information could be used to contribute to measuring the contribution of the planning system to a sustainable Wales wherever it is feasible. Adding new data collection requirements to LPAs should not be done without discussions with and agreement of local government. Similarly it is considered that the existing data collection requirements should not be discontinued without consultation with and agreement of LPAs. This would avoid imposing unnecessary burdens on local planning authorities (LPAs) and avoid the loss of valuable trend data.			
Do you agree	with the proposed approach to use the 'logic-	Yes	No
	appropriate measures of the planning		

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments:

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

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

Do you agree with the strategic groupings of the 19 Planning	Yes	No
Policy Wales objectives into five categories for the purpose of developing a set of new measures?		
Additional comments: The five categories seem a reasonable starting point for trying to organise the PPW objectives into thematic groupings. However, RTPI Cymru considers that further development is required, for example, minimising the need to travel and accessibility and integration are closely linked, so why are they separated?		
There are also likely to be other ways to group them - it is suggested that this should be discussions.	subject of furth	er
The strength of the connection between the planning system and each factor, from a sust should also be explained to assist discussions about measures.	ainability point	t of view,
Q4.1 Do you agree with the proposed overarching indicator?	Yes	No 🗆
1 Wales' Ecological Footprint		
Additional comments: The Forum is aware that this indicator is already in use by Welsh Government, most red Development Annual Report 2010-2011, but it is not clear how a context for interpreting indicators will be created from this (or the other) over-arching indicators. More and clear be provided.	g the proposed	planning
Do you agree with the proposed overarching indicator?	Yes	No 🗆
Percentage of Biodiversity Action Plan habitats and specie or increasing	s recorded	as stable
Additional comments: The Forum is aware that this indicator is already in use by Welsh Government, most reconstructed Development Annual Report 2010-2011, but it is not clear how a context for interpreting indicators will be created from this (or the other) over-arching indicators. More and clear provided.	g the proposed	planning

Q4.3

Do you agree with the proposed overarching indicator?

Yes

No

3 Gross Value Added (GVA) and GVA per head		
Additional comments: The Forum is aware that this indicator is already in use by Welsh Government, most red Development Annual Report 2010-2011, but it is not clear how a context for interpreting indicators will be created from this (or the other) over-arching indicators. More and cleaprovided.	g the proposed p	olanning
	Vac	No
Q4.4 Do you agree with the proposed overarching indicator?	Yes	No 🗆
4 Percentage of the population in low-income households		
Additional comments: The Forum is aware that this indicator is already in use by Welsh Government, most red Development Annual Report 2010-2011, but it is not clear how a context for interpreting indicators will be created from this (or the other) over-arching indicators. More and cleaprovided.	g the proposed p	olanning
Q4.5 Do you agree with the proposed overarching indicator?	Yes	No
5 Wellbeing in Wales		
Additional comments: The Forum is aware that this indicator is already in use by Welsh Government, most red Development Annual Report 2010-2011, but it is not clear how a context for interpreting indicators will be created from this (or the other) over-arching indicators. More and cleaprovided.	g the proposed p	olanning
	Yes	No
Q4.6 Do you agree with the proposed overarching indicator?		
6 Proportion of LPAs with an up to date adopted LDP		

	nal comments:	1. h f	11:41-
Insofar as this will give an indication of the extent to which LPAs across Wales as a whole have forward plans with up-to-date sustainability appraisals, there is a logic in considering this a contextual indicator.			
This indic	ator should also include up to date Unitary Development Plans (UDPs), not just	st LDPs.	
		Yes	No
Q4.7	Do you agree with the proposed indicator?		
7	Net change in open space and playing fields		
Addition	nal comments:		
	ars to relate purely to the change in the total area of open space and playing fie ocation, i.e. whether open space and playing field space is more or less accessi		e issue of
		3101	
There are	also issues of the practicalities of collecting and interpreting this data.		
		Yes	No
Q4.8	Do you agree with the proposed indicator?		
8	Total floor space granted/refused (by type) on greenfield ar	nd brownfiel	d land
Addition	nal comments:		
	planatory comments explain, the suitability and appropriateness of developing by complex and it will be difficult to draw accurate inferences from bald total f		
	•	-	
	onsideration should be given to this. There are also issues of the practicalities of ag this data.	f collecting and	
-			
Q4.9	Do you agree with the proposed indicator?	Yes	No
Q1.3	bo you agree with the proposed maleator:		
9	Number of application submitted with Transport Assessment	nts	

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments: A simple number submitted is not informative by itself; this indicator does not appear to measure anything worthwhile.
The starting point here is the number of applications involving significant traffic generation - the expectation would be that in these cases the LPA should require a Transport Assessment. The sustainability assumption would be that a Transport Assessment would lead to a more sustainable transport outcome - so the proportion of these where a Transport Assessment was actually required would be an indicator of the extent to which LPAs were enabling improved consideration of sustainable transport solutions. Further consideration should be given to this proposed indicator and the issue of the practicalities of interpreting this data.

		Yes	No
Q4.10	Do you agree with the proposed indicator?		
	lumber of applications granted/refused (by type) on the floisk category)	od plain (by	flood
	al comments: d be a clearer measure than numbers and data needs to be provided with a con	ntext to clarify ye	ear on year
	asideration should be given to this proposed indicator and the issues of the practing this data.	acticalities of col	lecting

0444	Decree was the three was and the Production	Yes	No
Q4.11	Do you agree with the proposed indicator?		
	mber of buildings receiving BREEAM and/or Code for Sirtification	ustainable	Homes
It is unclear he requirement for not appear to	comments: ow this information adds value to the performance of the planning system; or housing and non-domestic properties of a certain threshold to be of a mi improve sustainable outcomes. It may be improved by specifying a BREE dard planning policy requirement. Further consideration should be given to	nium standard AM or Code tl	, this does hreshold
Q4.12	Do you agree with the proposed indicator?	Yes	No 🖂
12 Th	e proportion of local or recycled materials used in new d	evelopmen	ts
applications - and the burder There is high of materials is this, it makes	spear to require changes to information requirements to be supplied by appoints needs further discussion on reasonableness, cost and practicality of sugnethis would place on LPAs and developers / applicants. Chance that there will be changes in the source of the products used in the frarely a condition or in the control of the planning permission. Whilst the it a meaningless indicator if there are significant changes in actual developed on data does raise significant questions about practicalities and reasonables.	pplying meaning final developm commentary appears built. Comments built.	ngful data nent (source acknowledges ollecting
		Yes	No
Q4.13	Do you agree with the proposed indicator?		
13 Re	newable energy generation (mW) granted/refused by typ	be and cap	acity
Interpretation development	comments: would require some information on reasons for refusal - there may well be reasons for refusing permission. Further consideration should be given to the practicalities of collecting and interpreting this data.		

		Yes	No
Q4.14	Do you agree with the proposed indicator?		
14	tal area of granted/refused development in protected are tional designations)	as (Europe	an and
This should re	comments: ally relate to development which would be damaging to protected areas. It is not to this proposed indicator and the issues of the practicalities of collecting		
Q4.15	Do you agree with the proposed indicator?	Yes	No 🖂
15 Nu	mber of Listed Building and Conservation Area Consent	s granted/r	
Consents could damaging; the	comments: d be for works which involve preserving or enhancing LBs and CAs or for the needs to be distinction between the two, to be meaningful. Further const and indicator and the issues of the practicalities of collecting and interpretin	sideration shou	
Q4.16	Do you agree with the proposed indicator?	Yes	No 🖂
16 Nu	mber of new homes (by type) granted permission		
Additional The Housing I is felt to be a g would be more	comments: Land Availability Studies provide a more substantial picture of the housing gap in data this could better be added to the HLASs to provide a more come informative than a bald no of new homes granted permission. Further coroposed indicator and the issues of the practicalities of collecting and inter-	prehensive piconsideration sho	ture - it ould be
Q4.17	Do you agree with the proposed indicator?	Yes	No 🖂
17 Em	ployment land bank (years provided)		

Additional comments: A clearer picture would be provided by an Employment Land Availability Assessment a HLASs. A single figure is not particularly meaningful. Further consideration should be indicator and the issues of the practicalities of collecting and interpreting this data.		
	Yes	No
Q4.18 Do you agree with the proposed indicator?		
18 Total floor space granted/refused (by type) (combining gree brownfield land) (offices/industry/retail/distribution)	enfield and	
Additional comments: This could be better combined with the previous indicator proposal and given further conconsideration should be given to this proposed indicator and the issues of the practicaliti interpreting this data.		
Do you agree that these measures should not be taken as	Yes	No
representing the full picture of the influence of the planning system on sustainable development but represent an appropriate high level framework?		
Additional comments: The indicators vary to the degree which the planning system contributes to the desired outputs and outcomes - ir some the planning system has a more direct and substantial role while in others it is less so and other legislation and players and agents are more significant - so this raises a question as to how to derive a view on the planning system's performance towards achieving more sustainable development.		gislation
Given individual comments the conclusion is that these proposals would benefit from ex consideration and discussion.	tensive further	
Do you agree with the proposed Strategic Monitoring	Yes	No
Framework structure and measurement of each of the four stages identified above?		□ NO
Additional comments: The logic of this structure would be a good starting point for further consideration of me	asurement and	indicators.

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

Additional comments:

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

Do you agree that we should consolidate/revise the	Yes	No
existing other output indicators set out in LDP Manual		
(2006) with the proposed new indicators to measure the outputs of the planning system?		
Additional comments:		
Following further discussion and agreement as suggested above, it would be beneficial to	consolidate a	nd revise
the LDP Manual.		
What would be the impacts on your authority from the new S	trategic Mc	nitorina
Framework? (Local Planning Authorities)	trategie ivie	mornig
Additional comments:		
N/A to RTPI Cymru.		
	Yes	No
Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?		
Additional comments: We think that a collaborative approach with LPAs to compiling and providing contextua	l information is	n the report
would be beneficial to ensure that the data is fully explained to aid understanding by the	wider audience	e but the
practicalities and potential burden of the approach raise concerns which we think need to	be discussed i	furtner.
We have asked a number of specific questions. If you have a	any related	issues
which we have not specifically addressed, please use this specifically		
Additional comments:		
Please see the attached covering letter.		
Confidentiality		
Responses to consultations may be made public – on the internet of		rt. If
you would prefer your response to be kept confidential please indic	ate nere:	

FLINTSHIRE COUNTY COUNCIL

AGENDA ITEM NUMBER: 6

REPORT TO: PLANNING PROTOCOL WORKING GROUP

<u>DATE:</u> <u>27 JANUARY 2012</u>

REPORT BY: HEAD OF PLANNING

<u>SUBJECT:</u> <u>WELSH GOVERNMENT CONSULTATION - 'A STRATEGIC</u>

MONITORING FRAMEWORK FOR THE PLANNING SYSTEM'

1.00 PURPOSE OF REPORT

- 1.01 To advise the working group of the current consultation document issued by Welsh Government (WG) in respect of a proposed strategic monitoring framework for the planning system in Wales. The consultation document asks a series of questions in relation to the proposals and this report includes a draft response (at the time of going to print) to these where appropriate. As the closing date for consultation response is set at 27th. Jan. 2011 these responses can be updated by the Planning Protocol Working Group before a final response is forwarded to WG. The full text of the consultation document is appended to this report (Appendix 1).
- 1.02 Following the consultation, the intention is to review and analyse responses before issuing a Strategic Monitoring Framework early this year. This, it is envisaged, should allow time for local authorities to set up the required systems to measure the annual indicators for the period 2012 2013.

2.00 BACKGROUND

- 2.01 The proposed Strategic Monitoring Framework will measure the contribution the planning system makes to Welsh Government's vision of a sustainable Wales, on the basis of annually collected statistics. It sees the role of the planning system as being two-fold. Firstly, it can promote and guide the right development to the most sustainable location —by preparing a plan for an area (**plan making** process). Secondly, it can enable development by granting permission for development to occur or prevent development by refusing permission (**decision taking** process). Both responsibilities are taken with a view to promoting sustainable development.
- 2.02 Currently, The Welsh Government collects statistical information on the number of planning applications being received and determined, on a quarterly basis, which is known as the Development Control Quarterly survey (DCQS). The statistical returns give an indication of the workload of planning authorities, the speed with which planning applications are determined and provide indications of trend. This provides the Welsh Government with a high level view of the impact of issues such as changes in legislation, development plan position and market conditions on the throughput of Welsh local planning authorities.

- 2.03 The Welsh Assembly Government chose to move to its own set of performance indicators in 2001, known as the Wales Programme for Improvement (WPI) Indicators. The WPI indicators focus on a limited number of Planning factors:
 - **PLA/004** Percentage of planning applications determined (householder, minor and all others within 8 weeks, <u>major within 13weeks</u>)
 - PLA/002 Percentage of applications approved annually
 - PLA/003 number of <u>appeals</u> against decisions and enforcement, and percentage upheld
 - PLA/005 Percentage of enforcement cases resolved within 12 weeks
 - **PLA/006** Affordable housing built during the year as a percentage of all new housing
 - **PLA/007** Housing built on previously developed land during the year as a percentage of all new housing
- 2.04 WG recognises that it is very difficult to measure the specific sustainable development **outcomes** of the

planning system because the planning system is not the mechanism by which development is built – this is the role of other

parties . The consultation document instead seeks to measure the **processes** and **outputs** of the planning system.

- 2.05 Under the **Strategic Monitoring Framework**, every year, WG will publish information across Wales to show:
- the preparation of sound local evidence on key sustainable development planning objectives (plan making process);
- the progress being made on the adoption of local development plans (plan making outputs);
- the time taken to determine applications (decision taking process);
- the planning decisions made on key sustainable development objectives (decision taking outputs); and
- contextual information on key sustainable development objectives (outcomes).
- 2.06 This information will help WG to measure the contribution the planning system makes to

the vision of a sustainable Wales. It will also help to measure the progress against national planning

sustainability objectives set out in Planning Policy Wales; report on the progress on the preparation and adoption of local development plans; and when appraising proposals for grant support through the Planning Improvement Fund. It believes that this information may also be useful to local planning authorities, stakeholders, other Government departments and the wider industry to understand more about the planning system and its role in delivering wider objectives.

3.00 CONSIDERATIONS

- 3.01 The approach taken to this consultation document, which runs to over 50 pages, is markedly different to the other current consultation on the review of the Planning System (which is also reported to this meeting of the Working Group). Here, the information given in each section of the report, in relation to each of the ten questions asked, is quite prescriptive in its level of detail, resulting in the fact that some of the questions posed are almost superfluous. This detailed approach follows on from the identification of the fundamental issue, mentioned above, that any sustainable development **outcomes** of the planning system are very difficult to measure. The document therefore concentrates on **processes** and **outputs** of the planning system, seeking to measure the contribution these make to WG's vision of a sustainable Wales.
- 3.02 The approach taken to this is explained on pages 9-11 of the document; referred to as the 'logic-chain', this sets out the components of the planning system in a structured (or logical) manner in order to seek an understanding and potentially measure how each influences sustainable development. The sequence within this chain is:

 Objectives > Inputs > Processes > Outputs > Outcomes > Impacts. Question 2 of the consultation document asks whether this is considered to be the right approach and, short of designing a fundamentally different framework, it would be difficult to reject it.
- 3.03 In taking this forward to devising new measures for assessing the role of the planning system in contributing to sustainable development, the 'logic chain' structure is rooted against each of the key 'Planning for Sustainability' objectives set out in Planning Policy Wales. For the purposes of the framework these are grouped into five strategic categories and 18 indicators are identified across these to measure the key outputs of the planning system (See page 15 of the document).
- 3.04 Each of the questions is set out below, with a proposed response where applicable. Clearly, each question follows a detailed passage in the document which covers that particular issue and that should be read in conjunction with the views expressed here (Q4 also needs to be read in conjunction with Appendix B of the consultation document).
- 3.05 Q1. Do you agree with our conclusion that the current information is not sufficient for us to measure the contribution of the planning system to our vision of a sustainable Wales?

RESPONSE: The information within the consultation document which leads up to this question effectively recognises the conundrum which it poses. The planning system is not the mechanism by which development is built and its impact is further limited by the fact that it can only influence <u>new</u> development and even in the case of that new development it has a marginal role in controlling individual choices (lifestyle, working practices, etc.) once the development is established. On the other hand new sustainable development can not occur unless the planning system is geared towards facilitating it.

The current measures for collecting information have their drawbacks, for example the existing Development Control Quarterly Survey is essentially a measure of speed of decision and it has been recognised for some time that there is no reflection of the 'quality' which is attached to a development through the planning application process. If this 'quality' equates to sustainability then it is agreed that there is a need for new measures but these should not seek a 'contribution' from the planning system which it is not currently designed (or equipped) to deliver.

3.06 **Q2.** Do you agree with the proposed approach to use the 'logic-chain to identify appropriate measures of the planning system?

RESPONSE: The 'logic-chain' provides a simple formulaic overview of the planning system. In view of what is said above it is right that the supporting text recognises that "In the wider chain of events that deliver sustainable development the planning system becomes one of the processes that helps to facilitate sustainable development outputs and outcomes". This again presents the role of planning in context by suggesting that the "outputs" of the planning system become one of the "inputs" of a (hypothetical) similar logic chain reflecting the sustainable development responsibilities at a national level.

3.07 Q3. Do you agree with the strategic groupings of the 19 *Planning Policy Wales* objectives into five categories for the purpose of developing a set of new measures?

RESPONSE: It is not entirely clear why it is felt necessary to group the 19 Planning Policy Wales objectives (which are set out in Annex A of the consultation document) into five strategic categories. The reason given, that "multiplying each of the 19 against the component stages of the logic chain would result in an excessive number of indicators" is not really convincing. Clearly, each of the 19 is relevant, otherwise they would not be presented as objectives within the national statement of planning policy, but there are significant differences in the extent to which they can be influenced by the planning system, as operated by local planning authorities. As a consequence these strategic groupings are to an extent contrived and there is a significant overlap between categories. For example, there is significantly more to 'Design' than "Zero carbon building standards" and "Renewable materials and reuse". If this is accepted as a failing then it is compounded in the next section, where the measures presented to assess the contribution to sustainability with regard to 'Design' are given as Code and BREEAM certification, and proportion of recycled materials (The latter of which can only be measured with difficulty in any case)

3.08 Q4. Do you agree with the proposed indicator (Nos. 1 - 18)?

RESPONSE: It is not intended to analyse each indicator for the purpose of this report but the first five are recognised as 'overarching', with the local authority planning system having a limited influence on them. The sixth, within the same category," the proportion of LPA's with an up to date adopted LDP" conflicts to some extent with the preceding text, which refers to "the status of adopted development plans". Flintshire, with the full support of Welsh Government has proceeded with its UDP to adoption and will, consequently, not have an adopted LDP for some time. Bearing in mind that these measures are effectively performance indicators then Flintshire will not 'score' against this criterion and we are therefore at a disadvantage.

Alternatively, if this is seen purely as a quantitative 'overarching' measure, then it disadvantages national government in its assessment of performance against its 'Sustainable Development Scheme'. There is perhaps a danger in over analysing, but the inference would be that LDP's contribute to sustainability whilst UDP's do not.

It is intended to provide comments in relation to most of the indicators listed and this will be elaborated upon at the meeting.

3.09 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?

RESPONSE: This question is almost rhetorical in nature, the preceding text having set out that the measures identified "cannot measure all the actions..." and "they represent a limited number of areas where information can be collected...", etc. Th text goes on to recognise one of the fundamental weaknesses of the proposed framework, in that a properly balanced planning decision may provide a benefit in one field at the expense of another. It would therefore fail to meet a particular measure but the development would be no less sustainable because of it. The planning application process is after all about reconciling conflicting interests and producing the right decision at the end. Certainly in Flintshire, this decision will now be in accordance with the relevant policies in an 'up to date' development plan, which, in its adoption, will have been accredited as being 'sustainable'.

3.10 **Q6.** Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?

RESPONSE: The intention is to consolidate the existing mechanisms into the proposed Strategic Monitoring Framework. Considering what has been said above it makes sense to measure the processes and the outputs of plan making and decision taking, being more tangible than other elements in the context of the local planning authority's role. This information is collected at the moment (albeit in far fewer fields with regard to Development Control) but in grouping these together in a new framework it needs to be recognised that there will be a significant difference in the timescales involved in registering the information in relation to a particular site or planning application. The Development Plan (DPP and DPO) will in most cases predate the planning application (DMS and DMO), which in turn will predate the 'Outcome' (Development built), in some cases by more than five years. The result will be that data collected across the spectrum (including national monitoring under the Sustainable Development Scheme) is not comparing like with like as it will relate to different sites or different developments within the specific reporting period.

Turning to the application of the framework across the 18 measures identified I have concerns as to how it will be applied effectively in some cases. The formula works reasonably with the example given in paragraph 44 - 'flood risk', but even here the commentary on Headline Measure 10 in Annex B recognises that this does not tell the whole story. It recognises the fact that 'flood risk' is not the sole factor in the determination of a planning application and there may be other factors (e.g. employment) which are sustainable in their own rights and on balance lead to the grant of planning permission. The measure would not recognise any mitigation which may have swung the balance, nor would it recognise any design adaptations which might have been necessary to address specific issues relating to flood risk.

This potential failing is addressed in the document through the statement that "interpreting this data will need to be done in the round", but the more general the analysis the less reliable any conclusions will be.

Finally, in relation to the application of the framework, there is a danger of not fully recognising the significant role of professional officers and elected members which would come under 'Inputs', and would not therefore be measured. In this context it might be argued that the planning system is far too complex to lend itself to be categorised and slotted into boxes to be ticked but, rather than challenging the whole principle of the framework, it is noted purely to register how difficult the task of measuring sustainability actually is.

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

RESPONSE: This question should really follow Question 9, but it can be seen from that response that the changes should be phased, perhaps starting with DMS (the new version of the DCQS), which needs to be agreed to reflect the information needs of the Framework.

3.12 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?

RESPONSE: If information regarding the plan making processes is to be included in the Framework (DPP and DPO in paragraph 47) then there is a need to adapt the current indicators to comply with this.

3.13 **Q9.** What would be the impacts on your authority from the new Strategic Monitoring Framework?

RESPONSE: We are currently in discussion with our ICT providers CIVICA (FLARE) over the capabilities of the system to adapt to the proposed information gathering. There are potential issues with the inability of the current system to report within many of the proposed fields and the cost/timing of the required adaptations.

3.14 Q10. Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?

RESPONSE: There will still be a need to monitor performance both within Flintshire and in comparison with other Authorities on a quarterly basis in line with the new equivalent of the existing DCQS. The intention here, however, is to report annually on the contribution the planning system makes to "sustainable resource use, a sustainable economy, sustaining the environment, a sustainable society and the well-being of Wales". These are clearly the high level, national goals and this consultation document rightly recognises the fact that the planning system can only have a limited impact. This relatively narrow role needs to be set out in the annual reports, as well as the parameters that govern the planning system, so that any expectation or indeed any perceived lack of performance is viewed in context.

4.00 RECOMMENDATIONS

4.01 That the report is noted and any responses to the questions coming out of the Planning Protocol Working Group meeting (be they the responses included, additional responses or changed responses) are to be forwarded to the Welsh Government.

5.00 FINANCIAL IMPLICATIONS

5.01 None at present. Adaptation of the ICT reporting systems will probably be required at cost but discussions need to be undertaken with Welsh Government with regard to this.

6.00 ANTI POVERTY IMPACT

6.01 None

7.00 ENVIRONMENTAL IMPACT

7.01 None direct (The Framework is designed to provide more robust information with regard to sustainability)

8.00 EQUALITIES IMPACT

8.01 None

9.00 PERSONNEL IMPLICATIONS

9.01 None direct

10.00 CONSULTATION REQUIRED

10.01 No

11.00 CONSULTATION UNDERTAKEN

11.01 This report seeks to establish the Authority's response to the consultation document

12.00 APPENDICES

12.01 Welsh Government Consultation Document - 'A Strategic Monitoring Framework for the Planning System'

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WG CONSULTATION DOCUMENT – A STRATEGIC FRAMEWORK FOR THE PLANNING SYSTEM

RESPONSE TO QUESTION 4 (1-18) – Do you agree with the proposed indicator ?

4.1	'Overgrebing' indicator on which planning system has limited impact
	'Overarching' indicator on which planning system has limited impact
4.2	'Overarching' indicator on which planning system has limited impact
4.3	'Overarching' indicator on which planning system has limited impact
4.4	'Overarching' indicator on which planning system has limited impact
4.5	'Overarching' indicator on which planning system has limited impact
4.6	This is again categorized as an 'overarching' measure, but recognizing that it is purely a quantitative indicator. The reference to LDP's conflicts with the text which precedes this question, which refers to "the status of adopted development plans". As Flintshire has, with the full support of Welsh Government, proceeded to the adoption of its UDP and is only now about to embark upon the LDP process. Bearing in mind that these are essentially performance indicators, Flintshire will not 'score' against this criterion for some time. Considering that the UDP has been rigidly scrutinized for its 'sustainability ' in the process leading to its adoption it would be more appropriate that this measure referred to 'up to date development plan' rather than 'LDP'.
4.7	The reasoning for this measure is set out in Annex B-07, along with the potential limitations which might arise if it was based on permissions granted rather than actual provision. Flintshire currently carries out TAN 16 Open Space Assessment, so could report annually against this measure but the information provided would primarily be area based. What is more difficult to assess is the 'quality' of a particular area of open space. The 'net change in open space and playing fields' does not tell the whole story in that a smaller area might be purpose designed, far better equipped and of greater benefit to the community it serves than a larger area of open land.
4.8	This exists as an indicator at the moment (PLA/007) in relation to 'Housing built on previously developed land'. We have difficulty at the moment in providing robust information to report on this and it is envisaged that if it is opened out to include all categories of development it will become even more difficult. In reality the 'sustainability' implications are purely the quantitative loss of greenfield land, so what significance has the category of development? In this context it can also be asked, what is the significance of reporting on refusals (on both greenfield and brownfield land), without analyzing the reasons given, which might be based on factors which are entirely unrelated to what this measure seeks to identify?
4.9	The text in Annex B-09 recognizes the weakness of this measure. Would it be more appropriate to report on developments where the submission of a 'Green Travel Plan' has been volunteered or has been required through the planning application process? The success of this in

	providing more sustainable means of transport would depend on its implementation and possibly on its enforcement by the local planning authority. However, the existence of a Travel Plan would seem to provide more tangible evidence than that of a Transport Assessment, which might only address the capacity of roads or even individual junctions in the context of a particular development.
4.10	The commentary in Annex B-10 recognises that this does not tell the whole story in relation to assessing potentially unsustainable development within flood risk areas. It recognises the fact that 'flood risk' is not the sole factor in the determination of a planning application and there may be other factors (e.g. employment) which are sustainable in their own rights and on balance lead to the grant of planning permission. The measure would not recognise any mitigation which may have swung the balance towards a grant of planning permission, nor would it recognise any design adaptations which might have been necessary to address specific issues relating to flood risk. This potential failing is addressed in the document through the statement that "interpreting this data will need to be done in the round", but, as with all these measures, the more general the analysis the less reliable any conclusions will be.
4.11	Code for Sustainable Homes certification is now a requirement in respect of all new dwellings so an indication of the number of dwellings which exceed the minimum standard (currently Code 3) might provide a better measure of sustainability, Similarly, with non–residential buildings, the number of developments which achieve an 'Excellent' rating.
4.12	As with a number of these measures, this relies on the planning application process to impose a requirement for the use of 'local or recycled' (should these be grouped together?) materials. Apart from the potential lag between the grant of planning permission and the actual development in some cases, there is a potential difficulty with definition and reporting. The aim is commendable but there are a number of factors e.g. availability, cost, which would influence this.
4.13	This measure is obviously key to sustainability, but, again, number of permissions/refusals does not tell the whole story as a number of other factors might come into play.
4.14	Comments on this are as 4.10 above
4.15	Arguably, this is the most tenuous of the proposed measures in its contribution to the over-riding aim of a 'sustainable Wales'. The text in Annex B-15 states that it is intended to record this information through the revised DCQS and it is almost suggested that it 'thrown in' here for that reason. Clearly, the preservation of our built heritage is highly important but the number of consents/refusals (which might be for demolition or significant alteration) tells very little about how this is being achieved. The link is slightly less tenuous in respect of the identified 'process' (Proportion of Conservation Areas with an up to date appraisal

	in place) but there is no link between this and the proposed measure, or with the 'outcome' (Number of Listed Buildings on the 'Buildings at Risk' register)
4.16	This is an adaptation of the existing indicator PLA/006 – 'Affordable housing as a percentage of all housing' which we and other Authorities have an issue with on the basis that the planning process does not provide affordable homes, but facilitates the process. The adaptation of the indicator to reflect only the grant of planning permission recognizes this issue and the explanatory text refers to it as a "compound indicator containing several related pieces of information" (one of them being the number of planning permissions). As with most of these measures the role of the planning system is recognized as being limited but the new measure will at least highlight the impact of the economy on the viability of providing affordable housing.
4.17	The text recognizes the fact that there is currently no formal requirement for collating an 'employment land bank' register, but Flintshire (in common with some other Authorities) do record this information. Whilst it is useful in the plan making process this measure would provide only a very broad indicator of 'sustainability' as any land so identified for employment development would presumably have had to pass the assessment of sustainability in both the plan making and the planning application processes.
4.18	Although it is not clear from its title, this measure again refers to employment land. As mentioned in the response to Q.4.08 above, we have difficulty at the moment in providing robust information to report on this in a housing context and it is envisaged that if it is opened out to include all categories of development it will become even more difficult. In reality the 'sustainability' implications are purely the quantitative loss of greenfield land, so what significance has the category of development? In this context it can also be asked, what is the significance of reporting on refusals (on both greenfield and brownfield land), without analyzing the reasons given, which might be based on factors which are entirely unrelated to what this measure seeks to identify? The reason given in the supporting text in Annex B-18, "this indicator will give a summary feel for the mix and scale of employment and development coming forward by its approximate use" is unconvincing and, frankly, incorrect, in that this, again, only measures the grant of planning permission, not the actual development and provision of employment.

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CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)							
	4 November 2011 – 27 January 2012						
Name	Anne Meikle						
Organisation	WWF Cymru						
Address	WWF Cymru Baltic House Mount Stuart Square Cardiff CF10 5FH						
E-mail address	ameikle@wwf.org.uk						
Type (please select	Businesses						
one from the following)	Local Planning Authority						
	Government Agency/Other Public Sector						
	Professional Bodies/Interest Groups						
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	\boxtimes					
	Other (other groups not listed above)						
Do you ogra-	with our conclusion that the current	No					
Q1 information is	with our conclusion that the current not sufficient for us measure the contribution g system to our vision of a sustainable Wales?	No 🗆					

Additional comments:

WWF Cymru welcomes the proactive approach that the Welsh Government is taking towards understanding the role that the planning system can play in achieving sustainable development and implementing the objectives and policies from the Sustainable Development Scheme - One Wales: One Planet and the Wales Spatial Plan.

Whilst the terrestrial planning system is not a key policy focus for WWF Cymru, we can understand how the current information collected in relation to the planning system may not be sufficient to fully understand whether or not the planning system is actually delivering outcomes that contribute towards achieving a One Planet Wales. We agree that most of the information currently collected includes statistical data related to processes, indicators and particular policy areas. We support the more positive approach to developing a monitoring framework that will truly measure the impact of the planning system, to help improve understanding of its role in achieving sustainable development objectives in Wales.

Furthermore, WWF Cymru is not aware of similar monitoring frameworks existing within the UK that adequately measure the impacts and role of the planning system. If this monitoring framework works well, it may provide a useful example of best practice that can be promoted elsewhere. However, for this to happen there must be regular review and updating of the monitoring framework to ensure that it is working efficiently and effectively and providing the right information for a proper evaluation of the planning system.

WWF Cymru represents the third sector on the Wales Coastal and Maritime Partnership's Marine Planning Group, tasked with providing advice to the Welsh Government on marine planning. Welsh Government, as the marine plan authority, are in a critical phase of determining their approach to marine planning for Welsh seas, particularly the role of national marine plans. Marine planning will establish for the first time a coherent approach to decision making in the Welsh marine environment, balancing different interests. As such, marine plans will be key to contributing towards achieving sustainable development in the Welsh marine area, and for Wales as a whole. Evaluation of the performance of planning systems to contribute to sustainable development in Wales should encompass both land-use and marine planning systems. Whilst we recognise that respective monitoring frameworks may need to be different, a strategic, integrated evaluation should be undertaken by Welsh Government if we are to truly undertstand in both spatial and policy terms, progress towards a sustainable Wales.

In implementing the proposed monitoring framework, there must be clarity in its purpose and outcomes. WWF Cymru believes that there must be clear communication and understanding that this monitoring framework is not setting new targets or objectives for the planning system to achieve. Rather, it is seeking to assess whether the planning system is actually helping to achieve objectives already established in other existing policy documents. There must be a clear distinction between the policy or objective and the monitoring and evaluation procedures.

	Do you agree with the proposed approach to use the 'logic-	Yes	No
Q2	chain' identify appropriate measures of the planning system?		

Additional comments:

WWF Cymru generally agrees with the 'logic-chain' approach. However, we have some concerns with the conclusions reached about the influence that the planning system currently has which feeds into the development of the logic chain and the indicators and measures to be used (paragraph 23, pg 9 of the consultation report). It appears that some of the assumptions made about the planning system are limited and do not fully acknowledge the different elements of a spatial planning system. For instance:

- A: Varied Sustainability this states that there are difficulties that exist in 'balancing' all aspects of sustainability. WWF Cymru believes that the role of the planning system should be focused on integration, not balancing, of all elements of sustainable development. To 'balance' these elements implies that they are in competition with each other and that there will inevitably be trade-offs. Rather, the role of the planning system is to act as a policy coordinator, to understand the spatial implications of relevant policies and objectives and to identify conflicting and competing interests, as well as complimentary ones. Integrated delivery then allows for management of these conflicts to try and resolve the issues and achieve multiple benefits, 'win-win' situations.
- B: Limited Direct Contact there is an assumption that planning can only influence new development. However, WWF Cymru believes that this is a very limited view of the planning system as a development control function alone and does not take account of the wider role that planning can play. We must remember that planning is not just about controlling and enforcing what gets built. There may in fact be times where planning can influence existing development, for example through control of land use (whether on the site of the development or surrounding it), designation of particular areas (nature or heritage conservation), enforcement, retrospective planning, modifications to existing buildings (particularly listed buildings or those covered by conservation policies) and removal of development.
- C: Market Factors WWF Cymru acknowledges that viability of development is an important consideration for a developer, as well as the planning authority. However, viability must not be an overriding factor where development would cause significant local impacts. Development that brings economic benefits for certain individuals or businesses should not be progressed at the cost of local social and/or environmental wellbeing and sustainability.
- D: Enabling Framework WWF Cymru acknowledges that the planning system is a decision making framework that enables and guides development and that the actual building is done by people. However, the very fact that it is the overarching framework is extremely important because it establishes the boundaries within which development can be built. It is through the development of policy and spatial plans that the planning system can set standards and requirements for development that are then implemented and enforced through the decision making function. This is an incredibly important role that guides development and can contribute significantly to ensuring that what actually gets built is sustainable.

E: Individual Choices - There is an assumption that the planning system cannot influence behaviour change. WWF Cymru disagrees with this and there has also been research to investigate the role that planning can play in helping people to live more sustainable lifestyles (see for example research undertaken by CityForm http://www.city-form.org/uk/index.html). The way in which the built environment is planned and designed can influence behaviour change and how development is used. For example, by including recycling stores, bicycle parking, no car parks and mixed services within the development, residents of development can be encouraged to recycle, to use their car less, to buy locally - but this does need to be supported by other services.

Consideration does not appear to have been given to other functions that exist within the planning system, other than plan making or deciding planning applications. WWF Cymru queries how enforcement processes are included within this.

Do you agree with the strategic groupings of the 19 Plan	nning	Yes	No
Policy Wales objectives into five categories for the purpo of developing a set of new measures?	_		
Additional comments: WWF Cymru generally agrees with the strategic grouping of the objectives. How caution needs to be applied to this approach. In particular, we would not wish to applied to the objectives, which reduces their meaning and importance, in order f heading. Further, we consider that there would be some overlap between each of objectives within them, such that some objectives may be relevant to more than obe so easy to completely separate the objectives into one category. For instance, t be just as relevant to the location and design of a development as facilitating infra Cymru would like more information on how interlinkages/crossovers between the	see an o or them the strat one strat he use o	ver-generalisate to fit within of tegic topics and egic topic and of onsite renewere and its use.	tion ne strategic d the it may not rables may WWF
Q4.1 Do you agree with the proposed overarching indica	tor?	Yes	No 🗆
1 Wales' Ecological Footprint			
WWF Cymru is supportive of Ecological Footprint as a long-term indicator of lik scales needed to underpin evaluation associated with this framework, we would presponsive interim indicators such as carbon footprint. This would allow Welsh Comeasure in a more rapid timeframe than that associated with the Ecological Footprint.	romote Governn	additional monent to moniton	re
Q4.2 Do you agree with the proposed overarching indica	tor?	Yes	No
bo you agree with the proposed overarching indica	lOI :		
Percentage of Biodiversity Action Plan habitats and s or increasing	pecies	s recorded	as stable
Additional comments:			
		Yes	No
Q4.3 Do you agree with the proposed overarching indica	tor?		
3 Gross Value Added (GVA) and GVA per head			

WWF Cy towards e	mru queries how this indicator assists in understanding the contribution that the conomic sustainability, as it does not appear to include consideration of the new or the 'Beyond GDP' approach.		
Q4.4	Do you agree with the proposed overarching indicator?	Yes 🖂	No
4	Percentage of the population in low-income households		
Additio	nal comments:		
		V.	NI.
Q4.5	Do you agree with the proposed overarching indicator?	Yes 🖂	No
5	Wellbeing in Wales		
Additio	nal comments:		
		Vaa	N/a
Q4.6	Do you agree with the proposed overarching indicator?	Yes 🖂	No 🖂
6	Proportion of LPAs with an up to date adopted LDP		

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Whilst WWF Cymru agrees with the need for all LPAs to have an up to date and adopted LDP, we are not certain that this is necessarily the most advantageous indicator to understand how those LDPs are actually helping to implement sustainable development on the ground. It is the content and application of the LDPs that is also vitally important, particularly ensuring that LDPs contain sustainability objectives and policies that are relevant and appropriate for the specific local area and that these are being considered and applied appropriately when examining applications. We are not certain whether considering if a plan is up to date will include consideration of whether LDPs include sustainability objectives and policies and the adequacy of those objectives and policies. Clarification on this point would be welcome. In addition, there does not appear to be scope for measuring how often LPAs apply or rely on sustainability objectives and policies in deciding planning applications. We query whether this indicator is sufficient or whether it could be expanded to also cover the content and application of the LDPs.

		Yes	No
Q4.7	Do you agree with the proposed indicator?		
7 N	let change in open space and playing fields		
Whilst WW fields, again Space Assest that will independent that open are be utilised. development whether this	Al comments: The Cymru can see that it will be valuable to have information on the numbers as we query whether this is sufficient - particularly to meet the aspiration of in assments by Local Authorities. The quality of the open space or playing field dicate its usage and contribution that it makes to the wellbeing of the local conditional spaces make to sustainable development are not just based on the planning system does have some control over quality of spaces, through at or use conditions and also through management objectives and/or conditions indicator could be modified, or an additional one included, that measures the or playing field which would lead to indications of how valuable it is to the lead to the conditions of the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to the playing field which would lead to indications of the valuable it is to the lead to th	creasing the use will be important mmunity. The community being there, the application as. We, therefore quality and us	e of Open nt, because contribution by have to of e, query se of the

040		res	INO
Q4.8	Do you agree with the proposed indicator?		
8 7	otal floor space granted/refused (by type) on greenfield a	nd brownfie	d land
Additiona	al comments:		

		Yes	No
Q4.9	Do you agree with the proposed indicator?		\boxtimes

9	Nu	mber of application submitted with Transport Assessmen	nts	
Additional comments: WWF Cymru does not completely agree that this is the most appropriate indicator of how a development may contribute to sustainable transport. Merely submitting a Transport Assessment does not mean that a development will include measures to promote sustainable transport modes, modal shift or reduced reliance on high carbon infrastructure. Perhaps a better indicator of the planning system's contribution to sustainable transport would be the number of applications approved with a Green Travel Plan (or similar), car-free developments, or contributions towards improving local public transport or walking/cycling routes secured by planning condition or Section 106 Agreement.				
			Yes	No
Q4.1	0	Do you agree with the proposed indicator?		
10		mber of applications granted/refused (by type) on the flocategory)	od plain (by	flood
Additio	nal	comments:		

		Yes	No
Q4.11	Do you agree with the proposed indicator?		
	mber of buildings receiving BREEAM and/or Code for Setification	ustainable	Homes
the number of improved. In a	comments: considers that this indicator could be more ambitious. We are not clear how certifications can be used as an indication that sustainability within the buddition, the indicator should be measuring the level of certification for BR omes to indicate whether or not the sustainability standards for housebuilding	ilding of home EEAM and/or	es has been r Code of
0.4.40		Yes	No
Q4.12	Do you agree with the proposed indicator?		
12 Th	e proportion of local or recycled materials used in new d	evelopmen	its
			T
Q4.13	Do you agree with the proposed indicator?	Yes	No
Q-1.15	bo you agree with the proposed maleator:		
13 Re	newable energy generation (mW) granted/refused by typ	oe and cap	acity
developments, housing develo	clear whether this indicator will be focused on applications that are purely or whether it will also include other developments that have a renewable opment that includes onsite generation). WWF Cymru considers that it sho come clarification on this point.	energy elemen	nt (such as a

0444	De very come a with the proposed in disease.	Yes	No	
Q4.14	Do you agree with the proposed indicator?			
	tal area of granted/refused development in protected are tional designations)	as (Europe	ean and	
Additional comments: WWF Cymru is concerned that this indicator may not be sufficient to capture and understand whether development adversely effects the natural environment and how this contributes to achieving sustainable development. Whilst we accept the limitations of this indicator, as acknowledged in the consultation report, we query whether this indicator could be improved to provide a better measure of the impact of development on the environment. Whether a planning application is granted or refused does not necessarily represent an impact, or negotiation that would result in no/less/acceptable impacts. The development may not be built, meaning there may be no impact, or the development may be built in such a way that it does not comply with the recommendations from an environmental assessment or conditions of the planning conditions and, therefore, creates significantly more impact than envisaged or agreed. We query whether additional matters could be included within this indicator that demonstrate a more sustainable approach to development that may impact on a designated site, such as: - the number of Environmental Impact Assessments and/or Appropriate Assessments undertaken, - the number of enforcement proceedings against development where an EIA and/or AA was required or where the development is in a designated site, - the number of times conditions have been imposed for the protection of designated sites, which could also include reference to type of condition and whether complied with; - the number of times a developer has been required to provide compensatory measures to offset impacts, or other types of community benefit, etc.				
		Yes	No	
Q4.15	Do you agree with the proposed indicator?			
15 Nu	mber of Listed Building and Conservation Area Consent	s granted/r	efused	
	comments:			
		Yes	No	
Q4.16	Do you agree with the proposed indicator?	Yes		

Number of new homes (by type) granted permission

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

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There appears to be an assumption that provision of housing will increase with more planning consents granted for housing developments. Whilst this may be a natural assumption to make, it does not necessarily reflect the reality. As can be seen at the moment, the economic climate is an incredibly important determining factor in whether or not housing actually gets built. There are a number of cases where planning permission has been granted, yet the housing has not been built because the developer will not realise a profit in the current climate. WWF Cymru suggests that this indicator must recognise that the planning permission is only one element in ensuring that there is sufficient housing.

In order to monitor whether there is shift towards sustainable housing and communities, WWF-Cymru suggests that an additional indicator could be the number of mixed use developments granted or refused. In our view, this could provide evidence of development of the local community, the integration of different uses within development to encourage buying local, supporting local business, less use of car, more walking and cycling, employment opportunities for local people, community initiatives, etc.

We also query whether it will be important to consider housing policy included within LDPs and the relationship to housing provision. The desired result would be for Local Planning Authorities to ensure that their LDPs include relevant and robust policy to encourage housing supply that will meet local needs and is sustainable. We suggest that additional indicators to measure this could include the number of LDPs that include designations of land for housing (by type), percentage targets for housing supply, sustainability standards (that support or extend beyond building regulations), etc.

~	l _	163	140
Q4.17	Do you agree with the proposed indicator?		
17 En	nployment land bank (years provided)		
Additional comments: WWF Cymru can see that the information collected by this indicator would be useful. However, we are not sure it is an indicator of wellbeing or sustainable economic growth that would be central to a green economy. There are a number of different policy approaches that could be adopted by local authorities to help improve the economic situation of their area, such as designation of economic development zones, use of local development orders to encourage particular types of development, town centre first policies, etc. We suggest that an indicator which includes consideration of all the various types of approaches may help to provide more information on how planning contributes to the economic wellbeing of the community.			There are a conomic orders to which

Q4.18			Yes	No	
		Do you agree with the proposed indicator?			
18	Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)				

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NIA

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments: WWF Cymru queries whether the calculation of floorspace would be relevant to all types uses, that would support the economy. For instance, we are not sure how easy it would be floorspace of a development for energy generation, such as a wind farm. Perhaps in those to measure site area as a whole.	to calculate t	he			
Do you agree that these measures should not be taken as	Yes	No			
representing the full picture of the influence of the planning system on sustainable development but represent an appropriate high level framework?					
Additional comments: WWF Cymru welcomes the recognition that there are limitations for what the monitoring and that some indicators are difficult to develop. For this reason, we believe that it will be review the monitoring framework and its outcomes after a short period of time to assess v indicators are appropriate and returning the right kind of information.	e incredibly in	portant to			
Do you agree with the proposed Strategic Monitoring	Yes	No			
Framework structure and measurement of each of the four stages identified above?					
Additional comments: WWF Cymru is slightly confused about how Impacts will be taken into account. It would seem that the ultimate objective is to make sure that the planning system has a positive, rather than negative, impact which helps to deliver sustainable development objectives. In this regard, we wonder whether the monitoring framework also needs to analyse the impacts that are arising from the various processes and outputs being measured to enable the system to be considered through all stages and to identify the links between process, output, outcome and impact which lead to sustainability. Having said that, WWF Cyrmu recognises that it may be difficult to know for certain at this time whether the proposed approach will produce the information necessary to properly monitor the planning system and assess its contribution to sustainable development. As mentioned, we believe that there will need to be a learning phase, review and modification of the framework where necessary.					
What are your views on whether the proposed framework show	uld be pha	sed?			
Additional comments: WWF Cymru considers that the proposed phasing sounds sensible. We feel that this is be: Planning Authorities who will have to undertake the necessary work to capture the inform an approach that is easy, efficient and reliable, without imposing undue burdens on Local	nation. We wo	uld support			

Do you agree that we should consolidate/revise the	Yes	No
existing other output indicators set out in LDP Manual (2006) with the proposed new indicators to measure the outputs of the planning system?		
Additional comments: WWF Cymru has no particular opinion on this. We consider that consistency in the way monitored might be useful, but this may also be dependent on what is meant to be achiev processes. There may be a need for different indicators to enable collation and use of different indicators.	ed by the diffe	rent
What would be the impacts on your authority from the new S Framework? (Local Planning Authorities)	trategic Mo	onitoring
Additional comments:		
Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
Additional comments: WWF Cymru agrees that annual reporting is a good approach because there is a need for the information being gathered, but also of the indicators being used to assess whether the year is good time frame for reference. We would welcome further information on the replace how the monitoring framework may be modified, adapted and updated where necessary, changed, caution should be excercised in defining too many indicators and changing these definitions.	regular analys are approproorting process Whilst indicat	iate. A and also
We have asked a number of specific questions. If you have a which we have not specifically addressed, please use this specific questions.		
Additional comments:	<u> </u>	
Confidentiality		

WG 13303 - 18

CONSULTATION FORM

A Strategic Monit	oring Framework for the Planning System (Co	nsultation)	
	4 November 2011 – 27 January 2012		
Name	James Caird		
Organisation	Institute of Historic Building Conservation		
Address			
E-mail address			
Type (please select	Businesses		
one from the following)	Local Planning Authority		
	Government Agency/Other Public Sector		
	Professional Bodies/Interest Groups		
	Voluntary sector (community groups, volunteers help groups, co-operatives, enterprises, religiou profit organisations)		
	Other (other groups not listed above)		
Do vou agree	with our conclusion that the current	Yes	No
Q1 information is	not sufficient for us measure the contribution g system to our vision of a sustainable Wales?		
Additional comment The current information			
	with the proposed approach to use the 'logic-	Yes	No
system?	appropriate measures of the planning		

Additional comments:

But this has the drawback that the proposed system does not much utilize the first two links in the chain (as they are fixed by legislation) or the last two (as the Consultation acknowledges would result in information collection on too great a scale). The proposal needs to develop somehow the production of proper information on outcomes and impacts even if this is carried out on a sample basis.

	egic groupings of the 19 Planning	Yes	No
Q3 Policy Wales objectives into of developing a set of new n	five categories for the purpose neasures?		
Additional comments:			
		Yes	No
Q4.1 Do you agree with the p	proposed overarching indicator?		
1 Wales' Ecological Footpri	nt		
A 1 11(1)			
Additional comments: Although the weights given to its	various components need careful	considerati	on and
are not likely to please everybody	•		0.1. 0.1.0.
		Yes	No
Q4.2 Do you agree with the p	proposed overarching indicator?	Yes	No 🗆
	proposed overarching indicator? y Action Plan habitats and specie	\boxtimes	
2 Percentage of Biodiversit or increasing		\boxtimes	
2 Percentage of Biodiversit or increasing Additional comments:	y Action Plan habitats and specie	s recorded	
2 Percentage of Biodiversit or increasing	y Action Plan habitats and specie	s recorded	as stable
2 Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measure.	y Action Plan habitats and specie	s recorded	as stable
2 Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measurenvironment, which we would like	y Action Plan habitats and specie	s recorded	as stable
2 Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measurenvironment, which we would like	y Action Plan habitats and specie	s recorded	as stable
2 Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measurenvironment, which we would like	y Action Plan habitats and specie	s recorded	as stable
2 Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measurenvironment, which we would like	y Action Plan habitats and specie	s recorded	as stable
2 Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measurenvironment, which we would like	y Action Plan habitats and specie	s recorded historic t of form as	as stable this one.
Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measurenvironment, which we would like (Indicator 15)	y Action Plan habitats and specie	s recorded	as stable
Percentage of Biodiversit or increasing Additional comments: This is an outcome/impact measurenvironment, which we would like (Indicator 15)	y Action Plan habitats and specie are of the sort also required for the to see amended to the same sort or see a sec and the sec amended to the same sort or see a sec and the sec amended to the same sort or see a sec and the sec amended to the sec and the sec amended to the sec ame	s recorded historic t of form as	as stable this one.

Addition	nal comments:		
		Yes	No
Q4.4	Do you agree with the proposed overarching indicator?		
4	Percentage of the population in low-income households		
	r creentage of the population in low income households		
Addition	al comments:		
Q4.5	Do you agree with the proposed evergraphing indicator?	Yes	No
Q4.5	Do you agree with the proposed overarching indicator?		
5	Wellbeing in Wales		
Addition	nal comments:		
7 taaitioi	di commenta.		
		Yes	No
Q4.6	Do you agree with the proposed overarching indicator?		П
6	Proportion of LPAs with an up to date adopted LDP		
U	1 reportion of Er 7.5 with all up to date adopted EB1		
Addition	al comments:		
04 7	Do you agree with the proposed indicator?	Yes	No

			Ш
7	Net change in open space and playing fields		
Additio	nal comments:		
		Yes	No
Q4.8	Do you agree with the proposed indicator?		
8	Total floor space granted/refused (by type) on greenfield a	nd brownfiel	d land
۸ ما ما:۱: م	nal comments:		
Additio	nai comments.		
			1
Q4.9	Do you agree with the proposed indicator?	Yes	No
Q5	bo you agree with the proposed maleator:		
9	Number of application submitted with Transport Assessme	nts	
Additio	nal comments:		
	nk this indicator could be extended to other aspects requiring	g assessme	nt on
applica	tion e.g. historic environment.		
		Yes	No
Q4.1	Do you agree with the proposed indicator?		
10	Number of applications granted/refused (by type) on the florisk category)	ood plain (by	flood
	nak calegory)		
i .			

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments:

Q4.11	Do you garee with the proposed indicator?	Yes	No
Q4.11	Do you agree with the proposed indicator?		
	umber of buildings receiving BREEAM and/or Code for Sertification	ustainable	Homes
Additional	comments:		
Additional	comments.		
Q4.12	Do you agree with the proposed indicator?	Yes	No
12 Th	no proportion of local or recycled materials used in new d		oto.
12 11	ne proportion of local or recycled materials used in new d	evelopmen	115
	comments: It clear how this information is to be collected.		
		Yes	No
Q4.13	Do you agree with the proposed indicator?		
13 Re	enewable energy generation (mW) granted/refused by typ	oe and cap	acity
Additional	comments:		
, aditional			

0444		Yes	No
Q4.14	Do you agree with the proposed indicator?		
	otal area of granted/refused development in protected are ational designations)	eas (Europe	ean and
Additiona	I comments:		
Additiona	r comments.		
04.45	Decree with the constant indicate 0	Yes	No
Q4.15	Do you agree with the proposed indicator?		
15 N	umber of Listed Building and Conservation Area Consent	ts granted/r	efused
Additiona	comments:		
We think	this indicator needs to be supplemented with a system of		
	decisions taken five years previously as to outcome and it we between authorities by being a specified part of their D		
monitorin	· · · · · · · · · · · · · · · · · · ·	·	
		Yes	No
Q4.16	Do you agree with the proposed indicator?		
16 N	umber of new homes (by type) granted permission		
Additiona	comments:		
Additiona	i comments.		
		Yes	No
Q4.17	Do you agree with the proposed indicator?	\boxtimes	
17 E	mployment land bank (years provided)		

Additional comments:		
	Yes	No
Q4.18 Do you agree with the proposed indicator?	∏ ⊠	
18 Total floor space granted/refused (by type) (combining gree brownfield land) (offices/industry/retail/distribution)	enfield and	
Additional comments:		
Do you agree that these measures should not be taken as representing the full picture of the influence of the planning	Yes	No
system on sustainable development but represent an appropriate high level framework?		
Additional comments: We think that LPAs should continue to be required to monitor the or	utcomes ar	nd
impacts of their development plans against a full range of sustainal	oility criteria	۱.
Do you agree with the proposed Strategic Monitoring Geographics Framework structure and measurement of each of the four	Yes	No
stages identified above?		
Additional comments: We feel that an outcomes and impacts assessment process for the	planning s	ystem
as a whole out to be included. This should be formally attached to process as it will serve to advise Development Plan revisions.	the plan-m	onitoring

Welsh Government Consultation WG13303

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

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments: We have no views on this.			

	Do you agree that we should consolidate/revise the	Yes	No
Q8	existing other output indicators set out in LDP Manual		
QU	(2006) with the proposed new indicators to measure the		
A 1 111	outputs of the planning system?		
Addit	ional comments:		
-00	What would be the impacts on your authority from the new S	trategic Mo	nitoring
Q9	Framework? (Local Planning Authorities)	J	
Addit	ional comments:		
	ave no comments on this.		
		Yes	No
Q10	Do you agree with our proposed approach to reporting the		
	Strategic Monitoring Framework?		
Addit	ional comments:		
044	We have asked a number of specific questions. If you have a	anv related	issues
Q11	which we have not specifically addressed, please use this sp	•	
∧ ddit	ional comments:	· .	
Addit	ional comments.		
Conf	identiality		
Resp	onses to consultations may be made public – on the internet of	or in a repo	rt. If
	vould prefer your response to be kept confidential please indic		
1			

How to respond

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



27th January 2012

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

By email to planconsultations-E@wales.gsi.gov.uk

Dear Sir/Madam,

A STRATEGIC MONITORING FRAMEWORK FOR THE PLANNING SYSTEM: MEASURING PROGRESS TOWARDS A SUSTAINABLE WALES

Wales:	We therefore welcome the opportunity to to this consultation process. General points on our experience of the planning system in are discussed below and answers to the specific questions posed in the consultation can do in Annex 1.
•	
•	
•	

Recent Experience with the Planning Process in Wales

The Climate Change Act 2008 commits the UK to reduce greenhouse gas emissions by 80% by 2050, and the EU Renewable Energy Directive requires 15% of all energy to be from renewable sources by 2020. These policy instruments provide the framework for the UK to increase its electricity generated by renewables from 6.7% in 2009 to in excess of 30% by 2020. When

1
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considered alongside the further need to replace over a quarter of the existing generation, the scale and urgency of the energy challenge across the entire UK is clear. Wales has an important role in meeting these targets, and with its significant renewable energy resources Wales could derive a significant proportion of its electricity supply for renewable sources. Not only would this ensure a sustainable and secure low carbon energy supply for Wales but would also deliver substantial economic benefits for Wales on a local and national level.

However, despite Wales' renewable energy aspirations the delivery of wind farm projects and grid projects has proved to be slow and unpredictable. Local planning authorities have been unable to progress wind farm planning applications (both TCPA applications and Section 36/IPC applications) with grid transmission system upgrades in a timely manner. Transport related issues have also proven to be a serious obstacle, even for those projects with grid capacity already secured and no cumulative traffic impacts.

Our concern is that without planning applications being considered within a reasonable timescale, investors could ultimately turn to alternative markets where there is greater certainty, either elsewhere in the UK, in Europe or beyond. This could limit the contribution renewable energy can make to the Welsh economy and could jeopardise the delivery of the Welsh Government's renewable electricity targets. We welcome recent clarification from the First Minster on this matter¹ and look forward to the energy statement expected in early 2012.

We welcome the scrutiny of these issues and look forward to the outcome of this Inquiry as in our view; it successfully drew together some useful and consistent evidence from a range of stakeholders.

Recommendations

We welcome the current raft of consultations on the delivery of the planning system in Wales, and commend the Welsh Government for undertaking work to identify potential issues and improve the system. From our experience of the planning process, we have the following general recommendations:

- Wales should look to other devolved administrations, such as Scotland, who have made good progress towards their renewables targets. Scotland has been able to demonstrate a sense of urgency in decision-making as there are clear targets and policies set at a national level and this is underpinned with supportive local plan policies. This framework enables local planning authorities to make informed and robust planning decisions for projects less than 50MW with Scottish Ministers taking decisions on projects over this threshold with a national overview.
- In order to deliver on its renewable targets, the Welsh Government should ensure that
 the planning system is properly resourced and decision makers have access to
 professional energy expertise. Consenting officials should be capable and confident to
 make informed decisions and recommendations

Our response to the specific questions posed in the consultation document can be found in Annex 1. I hope these comments are of use

Yours faithfully,

¹ Carwyn Jones, First Minister (7th December 2011) Written Statement by the for the Welsh Government: Energy.



Annex 1:

comments on the Consultation Questions

1. 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. While, we recognise that measuring the contribution of the planning system to the delivery of sustainable development in Wales is a challenging issue, we do not consider that the current information collected is sufficient for this purpose. In terms of monitoring the contribution of the planning system to the sustainable development of renewable energy, the current system measures this via the collection of data for onshore windfarms both within and outside the Strategic Search Areas defined in TAN8. While this is a useful statistic, it does not consider a number of key issues in the deployment of renewable energy.

For instance, it does not directly link the development of renewable energy to national renewable energy targets. Nationally Significant Infrastructure Projects (NSIPs), including onshore wind farms, will be determined by the Infrastructure Planning Commission and its successor body in accordance with the UK's National Policy Statements (NPS). TAN8 predates the NPS and the NPS states that where a conflict exists between these two policies, that NPS takes primacy over TAN8 in planning decisions. Therefore, it is important that the monitoring framework scrutinises the delivery of the objectives set out in the NPSs – particularly EN-1 Overarching Energy NPS² and EN-3 Renewable Energy Infrastructure NPS³.

In addition to this, it does not provide an overview for renewable energy technologies other than onshore wind, neither does it consider any other consenting issues such as timescale.

2. Do you agree with the proposed approach to use the 'logic-chain' to identify appropriate measures of the planning system?

No comment

3. Do you agree with the strategic groupings of the 19 Planning Policy Wales objectives into five categories for the purpose of developing a set of new measures?

No comment

- 4. Do you agree with the proposed indicator?
- 4.13 Renewable energy granted/refused (MW) by type and capacity

We do not consider this to be an appropriate indicator by which to measure the contribution of the planning system towards sustainable development in relation to renewable energy. While the proposed indicator gives a measure of the relative capacity of projects being consented and refused it does not given any measure of other key considerations such as:

• Timescale for determination – as mentioned above, one of the key problems encountered is the length of determination of renewable energy projects in Wales. Therefore, we would suggest that timescale for determination should be a key means by which to measure the successful delivery of sustainable development through the planning system.

Q

² Overarching Energy NPS (2011): http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/consents-planning/nps2011/1938-overarching-nps-for-energy-en1.pdf

Renewable Energy Infrastructure NPS (2011): http://www.decc.gov.uk/assets/decc/11/meeting-energy-eng-demand/consents-planning/nps2011/1940-nps-renewable-energy-en3.pdf

• The number of projects being refused and consented – the proposed indicator does not give measure of the consenting rate as a percentage of projects determined. This may help highlight particular areas where the consenting rate is particularly low.

In summary, in order to effectively monitor the success of the planning system in the delivery of sustainable development, we would suggest that variety of indicators are utilised, including the MW capacity of consented / refused projects; the number / percentage of projects consented/refused and the average timescale for determination.

5 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, while in principle the purpose of the indicators is to gauge the delivery of sustainable development, it is important that the indicators are appropriate and give an overview of the planning systems role in achieving these aims. Therefore, we welcome the consultation on the monitoring framework and proposed indicators and urge the Welsh Government to ensure that the indicator are as accurate and effective as possible in monitoring the delivery of sustainable development.

6 Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?

No comment

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

No comment

8 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, the previous indicator should be revised but please see our comment regarding the proposed indicators (questions 1 and 4).

9 What would be the impacts on your authority from the new Strategic Monitoring Framework?

Not applicable

10 Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?

No comment

Strategic Monitoring Framework for the Planning System (Consultation) Planning Policy Branch Division Welsh Government Cathays Park Cardiff CF10 3NQ



27th January 2012

To whom it may concern

RE: A STRATEGIC MONITORING FRAMEWORK FOR THE PLANNING SYSTEM - CONSULTATION





Summary of response

agrees that monitoring the planning system is essential to achieving an efficient, streamlined and transparent process to encourage businesses to invest in Wales. The process should monitor the ultimate success or failure of projects but should also provide information on the timescales taken for projects to progress through the planning system, any delays they encountered and the reasons for those delays. This would provide a means by which LPAs who consistently experience difficulties in delivering planning decisions within the statutory timeframe can be identified and measures put in place to improve the situation for all involved. Conversely, LPAs who deliver decisions on time could be recognised for there competence.

Q.1) Do you agree with our conclusion that the current information is not sufficient for us to measure the contribution of the planning system to our vision of a sustainable Wales?

The current reporting process is very one-dimensional and does not demonstrate where the planning system is operating effectively or ineffectively. It is founded upon a simplistic approach of reporting what is operational, what is consented, what is lodged and those at pre-application / scoping stage.

It is contended that the purpose of the Monitoring Framework is to measure how effective the planning system is in delivering the objectives of WAG policy. The current reporting process provides no information relating to the length of time planning applications have been waiting for determination or the reasons for this.

In order to effectively measure progress towards achieving WAG's target of installed capacity of renewable energy, it is essential to put in place more insightful evaluation to identify the impact and extent of delays in the processing of applications and the reasons for such delays.

Q.2) Do you agree with the proposed approach to use the 'logic-chain' to identify appropriate measures of the planning system?

has no firm views on the 'logic-chain' approach, however the following observations are made:

In terms of 'objectives' there is no reference to any UK policy that WAG policy seeks to deliver and, therefore, is complementary to. With specific regard to energy development, UK policy contained within the Renewable Energy Strategy and National Policy Statements are all relevant policy documents and play a role in decision making as material considerations.

It is noticeable is that the "process" box does not acknowledge any 'timescales' for determining applications. The outcome of a development being implemented in a timely manner is not simply dependent upon an application being determined but that the

application is also determined expediently by the local planning authority.

In measuring impacts, a consistent measure against WAGs installed capacity targets for renewable energy (as set out in PPW) should be applied to measure the effectiveness of the planning system. There is little value in measuring only implemented schemes if there is no consideration of progress towards the overall national target of installed MWs and those targets specific to the SSAs.

Q.3) Do you agree with the strategic groupings of the 19 Planning Policy Wales objectives into 5 categories for the purpose of developing a new set of measures?

Whilst the concept of the strategic groupings appears rational, it is concerning that the delivery of energy infrastructure is not specifically referred to.

The 'Key policy objectives' set out in PPW (para 4.4.2) include the clear requirement for planning policy and proposals to:

"Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities (including energy supplies and distribution networks)..."; and

"Support the need to tackle the causes of climate change by moving towards a low carbon economy. This includes facilitating development that reduces emissions of greenhouse gases in a sustainable manner, provides for renewable and low carbon energy sources at all scale s and facilitates low and zero carbon developments".

"Category C" of the proposed "Categorisation of key policy objectives" encompasses "Facilitating Infrastructure and its Use" and loosely covers the areas of "low carbon infrastructure" and "infrastructure for communities". These areas should be refined to recognise the specific objectives of delivering energy infrastructure and, particularly, renewable energy infrastructure.

Q.4) (1 - 18) Do you agree with the proposed indicator?

Q4.13 Renewable energy generation (MW) granted/refused by type and capacity.

Whilst reporting information relating to renewable energy applications that have been granted or refused is useful, such indicators do not in themselves provide a comprehensive illustration of progress towards WAG targets set out in PPW and TAN8.

The quality of the data gathered through a monitoring framework would be greatly improved by also including indicators relating to the number of applications that have not been determined within the statutory time period (normally 16 weeks for large scale renewable energy applications).

It would be useful if the data collected also made reference to LPA's input into consultations on renewable energy projects being dealt with under other consenting regimes (eg. IPC or legacy s36 projects).

Q.5 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?

As detailed in the response to question 4 above, a monitoring criteria relating to the timescales taken to determine renewable energy applications would provide a useful 'layer' of information to add to the proposed measures.

It is essential that WAG adopt a monitoring 'tool' that enables not only those applications that are 'granted' or 'refused' to be recorded, but also those applications that are the subject of delay. A further indicator could require local planning authorities to declare the reason for delay, such as awaiting the submission of revised plans or awaiting a representation from a statutory consultee.

Q.7 What are your views on whether the proposed framework should be phased?

The data required is not complex and there are no apparent reasons why this should be phased. All indicators are important to measure the delivery of WAG policy and it is considered important to gather and publish this information with undue delay.

Q.10 Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?

Whilst has no strong views on the proposed approach to reporting, the consultation does not provide any information on how WAG will ultimately use the information gathered. It is not clear, for example, whether good performing LPAs in terms of issuing timely decisions and delivering renewable energy development in accordance with WAG targets will be rewarded in any manner. It is suggested that good performing authorities should be rewarded in order to encourage the effective execution of the planning system.

Conversely, would welcome periodical Ministerial letters that provide commentary on the progress being made towards the targets for the delivery of renewable energy schemes as set out in PPW and TAN8.

In terms of publishing the monitoring data, it would be helpful to have an email list that developers are able to enrol upon to receive the documents and to provide a link to the relevant page on the WAG website.

I trust the above comments will be given due consideration and I kindly request that we are notified of the future progress of this consultation

Yours faithfully

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation) 4 November 2011 – 27 January 2012				
Name	Rhidian Clement			
Organisation	Dwr Cymru/Welsh Water			
Address	Dwr Cymru Welsh Water, Developer Services, PO Box 3146, Cardiff CF30 0EH	Linea, Fortra	n Road,	
E-mail address	Rhidian.Clement@dwrcymru.com			
Type (please select	Businesses			
one from the following)	Local Planning Authority			
3,	Government Agency/Other Public Sector			
	Professional Bodies/Interest Groups			
	Voluntary sector (community groups, volunteer help groups, co-operatives, enterprises, religio for profit organisations)			
	Other (other groups not listed above)			
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? Additional comments: Yes we agree. Although the information is contained within the current planning system, it is how this information is best used which can influence the vision of a sustainable Wales.				
information is of the plannin Wales? Additional commen Yes we agree. Although	not sufficient for us measure the contribution ag system to our vision of a sustainable nts: the information is contained within the current planning system			

Q3 Do you agree with the strategic groupings of the 19	Yes	No
Planning Policy Wales objectives into five categories for the purpose of developing a set of new measures?		
Additional comments:		
We agree in principle. However, we should not lose sight of the fact that the 19 objective	vaa ara ambadd	ad in
National Policy and their importance in delivering sustainable development needs to be		
National Folicy and their importance in derivering sustainable development needs to be	acknowledged	1.
		_
Q4.1 Do you agree with the proposed overarching indicator?	Yes	No
Do you agree man are proposed everal eming intareater.		
1 Wales' Ecological Footprint		<u> </u>
Additional comments:		
We fully support the proposal.		
The fairly support the proposal.		
Q4.2 Do you agree with the proposed overarching indicator?	Yes	No
Q4.2 Do you agree with the proposed overarching indicator?	Yes	
Q4.2 Do you agree with the proposed overarching indicator?	_	No 🗆
Percentage of Biodiversity Action Plan habitats and speci-		
Percentage of Biodiversity Action Plan habitats and species or increasing		
Percentage of Biodiversity Action Plan habitats and species or increasing Additional comments:		
Percentage of Biodiversity Action Plan habitats and species or increasing		
Percentage of Biodiversity Action Plan habitats and species or increasing Additional comments:		
Percentage of Biodiversity Action Plan habitats and speci- or increasing Additional comments:		
Percentage of Biodiversity Action Plan habitats and speci- or increasing Additional comments:		
Percentage of Biodiversity Action Plan habitats and speci- or increasing Additional comments:		
Percentage of Biodiversity Action Plan habitats and speci- or increasing Additional comments:		
Percentage of Biodiversity Action Plan habitats and speci- or increasing Additional comments:		
Percentage of Biodiversity Action Plan habitats and speci- or increasing Additional comments:		
2 Percentage of Biodiversity Action Plan habitats and species or increasing Additional comments: We fully support the proposal.	es recorde	d as stable
Percentage of Biodiversity Action Plan habitats and speci- or increasing Additional comments:		d as stable
2 Percentage of Biodiversity Action Plan habitats and species or increasing Additional comments: We fully support the proposal.	es recorde	d as stable

	al comments: pport the proposal.		
Q4.4	Do you agree with the proposed overarching indicator?	Yes	No
4	Percentage of the population in low-income households		
	al comments: pport the proposal.		
Q4.5	Do you agree with the proposed evergraphing indicator?	Yes	No
Q4.5	Do you agree with the proposed overarching indicator?	Tes	
5	Wellbeing in Wales		
	al comments: pport the proposal.		
Q4.6	Do you agree with the proposed overarching indicator?	Yes	No

Additional comments:

opted LDP

6

As end users of information contained in LDPs it is of paramount importance that we are informed of the progress of a Development Plan for each local authority area. We are specifically interested in where future growth will occur so that we can plan our utility infrastructure investment accordingly (subject to the Regulatory and Financial constraints we have to meet).

Proportion of LPAs with an up to date a

We would go one step further and request that LDPs are measured in terms of their overall target dates for adoption. Delivery Agreements set out the programme and timeline for each LDP stage and we suggest that these need to be measured to ensure the overall taget does not slip or should slippage occur, then this is justified, or if not, the LPA is accountable to the Welsh Government.

weasuring prog	gress towards a sustainable Wales		
Q4.7	Do you agree with the proposed indicator?	Yes	No
7 N	et change in open space and playing fields		
	comments:		
We fully supp	oort the proposal.		
040		Vaa	NI-
Q4.8	Do you agree with the proposed indicator?	Yes	No
0 T	etal floor anges granted/refused (by type) an grannfield	and brought	ld land
	otal floor space granted/refused (by type) on greenfield a comments:	and browniie	eid iand
	offilments. Iformation, in particular the floor space granted, as essential information t	hat could assit v	with any
Community Ir	nfrastructure Levy that may be applied.		
Q4.9	Do you caree with the proposed indicator?	Yes	No
Q4.9	Do you agree with the proposed indicator?	168	No
9 N	umber of ann		
9 N	umber of app a		
	n submitted with Transport Assessments		
	comments:		
We fully supp	oort the proposal.		
Q4.10	Do you agree with the proposed indicator?	Yes	No
- Q1. 10	bo you agree with the proposed indicator?	168	INO

A Strategic Monitoring Framework for the Planning System

10	Number of applications granted/refused (by type) on the floo pl in (by flood risk category)
	nal comments: support the proposal.

Q4.11	Do you agree with the proposed indicator?	Yes	No
11	Number of buildings receiving BREEAM and/or Code for Sert fication	Sustainable	e Homes
	al comments: s an extremely valuable indicator, which underpins the whole essence of susta	ainable develo	pment.
Q4.12	Do you agree with the proposed indicator?	Yes	No
12	The proportion of local or recycled materials used in new developments		
	al comments: upport the proposal.		
Q4.13	Do you agree with the proposed indicator?	Yes	No
13	Renewable energy generation (mW) granted/refused y type and capacity		
	al comments: upport the proposal.		

Q4.14	Do you agree with the proposed indicator?	Yes	No
14	Total area of granted/refused development in protected an national designations)	reas (Europ	pean and
Addition	al comments:		
	upport the proposal.		
Q4.15	Do you agree with the proposed indicator?	Yes	No
15	Number of Listed Building and Conservation Area Conser	nts granted	/refused
_	al comments:	9	7101000
We fully s	upport the proposal.		
Q4.16	Do you agree with the proposed indicator?	Yes	No
16	Number of new homes (by type) granted permission		
	al comments: upport the proposal.		
Q4.17	Do you agree with the proposed indicator?	Yes	No
17	Emplo		
	ment land bank (years provided)		

Employment Ro	comments: est that in addition to the above requirement, this indicator also allows the egister (similar to JHLAS) to enable additional details to be recorded e.g. area and use and future area available (and it use).		
Q4.18	Do you agree with the proposed indicator?	Yes	No
Q4.10	bo you agree with the proposed indicator:		
	al floor space granted/refused (by type) (combining greeld land) (offices/industry/retail/distribution)	enfield and	d bro
	omments: ormation, in particular the floor space granted, as essential information the rastructure Levy that may be applied.	nat could assis	st with any
repres systen	a agree that these measures should not be taken as enting the full picture of the influence of the planning on sustainable development but represent an oriate high level framework?	Yes	No
Additional c We fully suppo	omments: It that the measures should reflect the high level framework.		
Frame	u agree with the proposed Strategic Monitoring work structure and measurement of each of the four identified above?	Yes	No
Additional c			
Q7 What a	are your views on whether the proposed framework sho	uld be pha	sed?

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments:
We suggest that to assist the LPAs the proposed framework should be phased to allow them time to collect the
data required.

Q8	Do you agree that we should consolidate/revise the	Yes	No
	existing other output indicators set out in LDP Manual		
	(2006) with the proposed new indicators to measure the		
	outputs of the planning system?		
	onal comments:		
We full	y support the proposal of the new indicators to measure the outputs of the planni	ng system.	
Q9	What would be the impacts on your authority from the new S	Strategic M	onitorina
Q 3	Framework? (Local Planning Authorities)	dialegic ivit	ornioning
	Tranicwork: (Local Flaming Authorities)		
	onal comments:		
N/A.			
Q10	Do you agree with our proposed approach to reporting the	Yes	No
QIU	Strategic Monitoring Framework?		П
	- Chalcegie Worldoning Francework:		
	onal comments:		
We wo	ald suggest that the reporting is administered through the Welsh Government we	b page.	
Q11	We have asked a number of specific questions. If you have	any related	Lissues
٠	which we have not specifically addressed, please use this specifically	•	
	them.		
Additi	onal comments:		
	e noticed that Dwr Cymru/Welsh Water was not included on the consultation/co	nsultee list. W	hilst we
	not necessarily comment on every Welsh Govenment consultation we would like		
	ion/consultation list on any future planning consultations. It should also be noted		-
	nts on the Draft List of Statutory & non-Statutory Consultees in Nov 2010. At pr purposes, we are an advisory body. We therefore request that water and sewera		
	ry consultee' status in all planning matters to accord with Planning Policy Wales		
	by of water supply and sewage infrastructure are material in the consideration of		
and app	eals'.		
I			

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)			
	4 November 2011 – 27 January 2012		
Name	Mr Jon Timothy		
Organisation	Forward Planning Section, Carmarthenshire County Council		
Address	40 Spilman Street Carmarthen SA31 1LQ		
E-mail address	forward.planning@carmarthenshire.gov.uk		
Type (please select	Businesses		
one from the following)	Local Planning Authority	\boxtimes	
	Government Agency/Other Public Sector		
	Professional Bodies/Interest Groups		
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)		
	Other (other groups not listed above)		
Do you agree	with our conclusion that the current Yes	No	
Q1 information is	not sufficient for us measure the contribution g system to our vision of a sustainable Wales?		
Additional commer	nts:		
Do you agree with the proposed approach to use the 'logic-chain' identify appropriate measures of the planning system? Additional comments: Although we agree with the proposed approach to use the logic-chain it may be impractical and complicated to apply the logic chain to the planning system in respect of every proposed indicator.			

Do you agree with the strategic groupings of the 19 <i>Planning</i>	Yes	No		
Q3 Policy Wales objectives into five categories for the purpose of developing a set of new measures?				
Additional comments:				
	Yes	No		
Q4.1 Do you agree with the proposed overarching indicator?	\boxtimes			
1 Wales' Ecological Footprint				
Additional comments:				
Its effectiveness is however dependent upon the availability of up to date information. It figures are a number of years out of date and consequently its value in this monitoring fr				
significantly enhanced through the availability of regular up dates.	and work would			
	Yes	No		
Q4.2 Do you agree with the proposed overarching indicator?	\boxtimes			
Percentage of Biodiversity Action Plan habitats and species		as stable		
or increasing				
Additional comments:	·	4.1.		
The potential value of this indicator in monitoring terms is recognised however the qual dependent upon the consistency and quality of the information available. In this respect	a significant ar	nmount of		
data is held outside the council and other statutory bodies (including in various conservation groups) and as such there may be some issues in relation to the availability and reliability of this information.				
Q4.3 Do you agree with the proposed overarching indicator?	Yes	No		
the population of the proposed everaroning maleators				
3 Gross Value Added (GVA) and GVA per head				

A 1 111 1				
Additional comments:				
	Yes	No		
Q4.4 Do you agree with the proposed overarching indicator?		110		
20 year agree man and proposed everalering maisatern				
4 Percentage of the population in low-income households				
Additional comments:				
	Yes	No		
Q4.5 Do you agree with the proposed overarching indicator?				
5 Wellbeing in Wales				
Additional comments:				
There is a lack of clarity in terms of what is meant by Wellbeing and how this would be	monitored whi	ch data		
sources would be available and utilised and how this would be applied to the planning s				
recognised that planning has a relationship with well being it is often at a corporate or c				
where it features prominantly. There needs on this basis to be a strong linkage between				
and a clear understanding of the planning system's contribution.				
	Vaa	NIa		
Q4.6 Do you agree with the proposed overarching indicator?	Yes	No		
Do you agree with the proposed overaithing indicator:				
0 D 0 (1DA 01 1 1 1 1 DD				
6 Proportion of LPAs with an up to date adopted LDP				
Additional comments:				
Recognition should be given to those authorities with an adpoted UDP which are based on the same pricriples of				
sustainable development. The indicator should read an up to date adopted development plan				

Q4.7 Do you agree with the proposed indicator?	Yes	No		
7 N	let change in open space and playing fields			
Additional comments: Although it is agreed that this is a valuable indicator, the definition of open space in TAN 16 comprises a wide range of land and there are real concerns that this would be difficult to monitor. We would suggest that a narrower definition of open space is provided. Furthermore, this indicator takes no account of the accessibility of open space and we would suggest that monitoring this would present a fuller picture of open space provision.				
		Yes	No	
Q4.8	Do you agree with the proposed indicator?			
8 T	otal floor space granted/refused (by type) on greenfield a	nd brownfiel	d land	
Yes subject to the following. There should however be a recognition that not all previously developed land is appropriate or indeed suitable for development. A notable example is where a site has a high ecological and a misplaced view that PDL is always good brings potential for conflict with other indicators. The use of floor space is queried as different uses require operational land as such it should relate to site area.				
		Yes	No	
Q4.9	Do you agree with the proposed indicator?			
9 N	lumber of application submitted with Transport Assessme	nts		
Additional comments: This indicator in itself does not directly monitor the delivery of sustainable development. Further detailed assessment of the content of the transport assessments would be needed in order to monitor sustainable transport issues. It should also be noted that not all applications will require transport assessments.				
		Yes	No	
Q4.10	Do you agree with the proposed indicator?		NO	
Number of applications granted/refused (by type) on the flood plain (by flood				

risk category)

10

Additional comments:

It is unclear what is meant by type. This indicator should be amended to reflect the different types of applications by the development categories noted in TAN 15 paragraph 5.1. The indicator should also take account of any further assessments undertaken and up to date evidence and of mitigation measures adopted which overcome the issues of flooding. We would therefore recommend amending this indicator to measure those applications granted contrary to EAW advice. This would provide more accurate information of development permitted which, on balance, is considered to be sustainable.

Q4.11	Do you agree with the proposed indicator?	Yes	No		
Q4.11	Do you agree with the proposed indicator:				
	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification				
Additional	comments:				
		Yes	No		
Q4.12 Do you agree with the proposed indicator?	res	INO 🖂			
12 Th	l e proportion of local or recycled materials used in new d	evelopmen	_		
	comments:				
	is considered to be a valuable indicator there are real concerns that this infonitor as this data is not currently collected by the local authority. The collected by				
	d raise issues of accuracy for instance collection at application would be diation. Furthermore, a definition of 'local' would be needed.	fficult to verif	y in terms of		
		Yes	No		
Q4.13 Do you agree with the proposed indicator?	Do you agree with the proposed indicator?	\boxtimes			
13 Renewable energy generation (mW) granted/refused by type and capacity					
Additional	comments:				

	Do you gave a with the prepared indicator?	Yes	No
Q4.14	Do you agree with the proposed indicator?		
	tal area of granted/refused development in protected are tional designations)	as (Europe	ean and
The indicator development of located within this regard. Do	is too simplistic in that it does not have regard to the provisions of the Hab can have an adverse significant effect (both alone or in combination) witho a protected area. Suggest linking this indicator to the HRA regs and potent evelopment could also provide a betterment in terms of conservation statustive impact therefore concentrate on the adverse significant effect side of the state of t	ut necessarily tially liaise wi /objectives and	being th CCW in l is not
		Yes	No
Q4.15	Do you agree with the proposed indicator?		
15 Nu	mber of Listed Building and Conservation Area Consent	s granted/r	efused
This indicator value of monit	does not directly monitor the delivery of sustainable development and thereforing this information in relation to sustainability. Should also be noted the mary legislation and as such are not covered extensively by LDP policies.		
		Yes	No
Q4.16	Do you agree with the proposed indicator?		
16 Nu	mber of new homes (by type) granted permission		
Additional	comments:		
04-4-		Yes	No
Q4.17	Do you agree with the proposed indicator?	\boxtimes	
17 Em	ployment land bank (years provided)		

Additional comments:		
Q4.18 Do you agree with the proposed indicator?	Yes	No
18 Total floor space granted/refused (by type) (combining gree brownfield land) (offices/industry/retail/distribution)	enfield and	
Additional comments: Floor space is not always the most reliable indicator in relation to such uses, particularly often require a wider operational area (e.g. external storage). 'Site area' would represent measure.		
Do you agree that these measures should not be taken as	Yes	No
representing the full picture of the influence of the planning system on sustainable development but represent an appropriate high level framework?		
Additional comments:		
Do you agree with the proposed Strategic Monitoring	Yes	No
G6 Framework structure and measurement of each of the four stages identified above?		
Additional comments:		
Q7 What are your views on whether the proposed framework sho	uld be pha	sed?

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales



There are currently gaps in the availability of data which would be required to monitor each of the proposed indicators and there are resource and timing implications to establishing appropriate means of collecting the necessary data. Therefore, we would propose phasing the introduction of the monitoring framework starting with those indicators which can be monitored with accurate data which is already readily available for collating.

	Do you agree that we should consolidate/revise the	Yes	No	
_ Q8	existing other output indicators set out in LDP Manual (2006) with the proposed new indicators to measure the outputs of the planning system?			
Additional comments: There is unnecessary duplication of monitoring indicators between the LDP monitoring framework and the Strategic Monitoring Framework and therefore consolidating these indicators into one framework would reduce the impact upon resources and the time spent on monitoring. We would propose combining the indicators from both frameworks and allow the LPA the opportunity to supplement these indicators with their own local and contextual indicators which provide a fuller picture of sustainable development and take into consideration local characteristics and constraints.				
Q9	What would be the impacts on your authority from the new S Framework? (Local Planning Authorities)	trategic Mo	onitoring	
Monitor the loca undoub	onal comments: ring the above indicators in addition to the LDP monitoring framework would requive an impact upon resources. currently preparing our LDP and would prefer to focus available time and resources.	ata, and would	,	
	Do you agree with our proposed approach to reporting the	Yes	No	
Q10	Strategic Monitoring Framework?			
Additi	onal comments:			
	We have asked a number of specific questions. If you have a	any related	201122	
Q11	which we have not specifically addressed, please use this sp			
Additi	onal comments:			

CONSULTATION FORM

Strategic Monitoring Framework for the Planning System (Consultation)				
4 November 2011 – 27 January 2012				
Name	Wendy Richards			
Organisation	Design Commission for Wales			
Address	4th Floor, Building Two, Caspian Point, Caspian Way, Cardiff Bay CF10 4DQ			
E-mail address	wendy.richards@dcfw.org			
Type (please select	Businesses			
one from the following)	Local Planning Authority			
	Government Agency/Other Public Sector			
	Professional Bodies/Interest Groups			
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)			
	Other (other groups not listed above)			
Do you agree	with our conclusion that the current Yes	No		
	not sufficient for us measure the contribution g system to our vision of a sustainable Wales?			
Additional commen	nts:			

	Do you agree with the proposed approach to use the 'logic-	Yes	No
Q2	chain' identify appropriate measures of the planning system?		
Addi	tional comments:		

Ref page 9/para 23

The development management function may only be able to influence new development but planning should not sit in isolation within each local authority, whilst they deliver other services/buildings in their own estate/infrastructure which would support a sustainable Wales. If the 'logic chain' can improve integration within and between Local Authority departments, it is to be welcomed.

Whilst this is a monitoring framework for the planning system, it may be fruitful to prompt LPAs to clarify and demonstrate how they work in their authority with other departments, promoting multidisciplinary working avoiding silos – to deliver on the Government's sustainable development obligation.

This need not be onerous; a statement clarifying the interface between the workings of the planning team with economic development, regeneration and estates/property teams would serve as a prompt to the importance of a holistic approach to the delivery of services and development that contributes to a sustainable Wales.

The distinction between outputs and outcomes may be useful when assessing the impact of the planning system on sustainable development . For example clarifying the process whereby a commitment to achieve a certain BREEAM or CSH rating at the planning stage is (or is not) translated into a delivered building with postoccupation measured energy usage which reflects the design intent.

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 🗆
Additional comments: This will allow other organisations to input directly into their specific area of expertise. It categories have a bearing on the delivery of sustainable development, DCfW would be commenting on Category B: Design.		
Q4.1 Do you agree with the proposed overarching indicator?	Yes	No 🗆
1 Wales' Ecolo ical Footprint		
	Yes	No
Q4.2 Do you agree with the proposed overarching indicator?	\boxtimes	
Percentage of Biodiversity Action Plan habitats and species o increasing	s recorded	as stable
Additional comments:		
	Yes	No
Q4.3 Do you agree with the proposed overarching indicator?		
3 Gross Value Added (GVA) and GVA per head		

Additional comments:		
		NI.
Q4.4 Do you agree with the proposed overarching indicator?	Yes	No
4 Percentage of the population in low-income ouseholds		
Additional comments:	· · · · · · · · · · · · · · · · · · ·	
And could include figures on overall housing need, fitness of existing stock, and fuel po	verty,	
Q4.5 Do you agree with the proposed overarching indicator?	Yes	No
5 Wellbeing in Wales		
Additional comments: Yes but difficult to measure.		
	Yes	No
Q4.6 Do you agree with the proposed overarching indicator?		140
6 P oportion of LPAs with an up to date adopted LDP		
Additional comments:		
This is an indicator of the extent to which the LPA is 'fit for purpose'.		

	Yes	No
Q4.7 Do you agree with the proposed indicator?	\boxtimes	
7 Net change in open space and playing fields		
Additional comments: A net change in open space and playing fields can be easily measured and is generally di recreational/sports activity with a focus on health and well-being. A reflection on the am infrastructure/public realm/incidental open space and sustainable urban drainage implem if it is not picked up in the ecological footprint.	ount of landsca	pe
	Yes	No
Q4.8 Do you agree with the proposed indicator?		
8 Total floor space granted/refused (by type) on greenfield ar	nd brownfiel	d land
Important to know if and to what extent development on greenfield land is increasing - re	·	
Q4.9 Do you agree with the proposed indicator?	Yes 🖂	No 🗆
9 Number of application submitted with Transport Assessmen	nts	
Additional comments: Assuming a presumption that sustainable transport methods are optimised.		

Q4.1	0	Do you agree with the proposed indicator?	Yes	No
10		mber of applications granted/refused (by type) on the flo	o plain (by	flood
Importan	t to k d mat	comments: now how many applications refused on the main (or sole) ground of flood erial impact of global warming and would add weight to arguments for adareas most in need of flood protection or coastal defences.		

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales		
Q4.11 Do you agree with the proposed indicator?	Yes	No 🗆
Number of buildings receiving BREEAM and/or Code ertification		Homes
Additional comments: We are supportive of monitoring the numbers of buildings receiving BREEAM/this will also reflect the current requirements for a reduction in carbon emissions Regulations 2006 – i.e. Ene 1.		
There is a need to monitor more qualitative information. A development may ha proportion of recycled materials, which are useful credentials for energy and per as indicators of a wider good design quality. A proposal may have the highest te yet may not be a good sustainable development that properly responds to its con sustainable place making or make a positive contribution to the community in w components of design go towards delivering sustainable development, in line wi commitments expressed in Government policy and literature.	rformance but these a echnical environmenta text. Neither might it which it is placed. All	re inadequate il credentials contribute to these
Through our free Design Review service we provide the opportunity to appraise expert body – reviewing the strategic approach down to the detail, looking beyo building performance issue alone. Our service is most effective early in the preather Royal Institute of British Architects (RIBA) design stage C/D. We also offer initiatives including suport for local authorities which could be better used by Ll	application stage – co other client support	lary or inciding with
In order to understand and monitor LPA interface with the Commission it would LPAs which may ask:- How many and what proportion of pre-application discussions have recommend and/or use of the Design Review service? How many and what proportion of applicants have been advised to use the DCf application has been lodged? How many applicants and DC officers have attended Design Review following How many Design Review reports have been used to contribute to officers' reco applications, as a proportion of the total number issued within a local authority? Focussing on a sample number of xx planning applications, have the applicants in accordance with the Design and Access Statement submitted with the applicant targets promised by a particular BREEAM/CSH rating been realised in practice? Has the DAS been adopted as a dynamic 'living document' as considered in TAC.	ded consultation with W Design Review ser this advice? mmendations to commendation? Have the energy?	the DCfW vice once the

We would like to meet with you to discuss the possibilities and parameters for monitoring further, as we consider that there are ways to do this without placing further burden and that it may assist qualititive assessment in the

application process.

		Yes	No
Q4.12	Q4.12 Do you agree with the proposed indicator?		
12	ne proportion of local or recycled materials used in new d	levelopmer	nts
Yes, includ Design Rev	comments: In a materials which can be recycled in the future. Probably need a definition are we have been told that local materials means bought from the local but to see a measure of the embodied energy of construction materials used		

Q4.1	3	Do you agree with the proposed indicator?	Yes	No
13	Rα	newable energy generation (mW) granted/refused by typ	ne and can	acity
This wou	ıld be	necessary to assess the developmental impact of TAN 8 and any additionary generation, e.g. for strategic sites, which may be identified in LDPs.	al requirements	s for

		Yes	No
Q4.14	Do you agree with the proposed indicator?	\boxtimes	
	tal area of granted/refused development in protected are tional designations)	as (Europe	ean and
Additional	comments:		
Q4.15	Do you agree with the proposed indicator?	Yes	No
Q4.13	Do you agree with the proposed maleator:		
	mber of Listed Building and Conservation Area Consent	s granted/re	efused
Additional	comments:		
Q4.16	Do you agree with the proposed indicator?	Yes	No
Q4.10	Do you agree with the proposed indicator:		
	mber of new homes (by type) granted permission		
	comments: complying with housing targets.		
		Yes	No
Q4.17	Do you agree with the proposed indicator?	N	
17 E	ployment land ank (years provided)		
Additional			

Q4.18	Do you agree with the proposed indicator?	Yes	No		
18	Total floor space granted/refused (by type) (combining gree brownfield lan) (offices/industry/retail/distribution)				
Addition	al comments:				
Do	you agree that these measures should not be taken as	Yes	No		
os re	presenting the full picture of the influence of the planning				
-	stem on sustainable development but represent an propriate high level framework?		Ш		
	al comments:	rder to feedbac	k into the		
A qualitative analysis/evaluation of the monitoring statistics needs to be undertaken in order to feedback into the logic chain to improve development planning and management processes. Numerical data should also be used to identify and project significant trends					
identify at	d project significant dends				
	you agree with the proposed Strategic Monitoring amework structure and measurement of each of the four	Yes	No		
	iges identified above?				
Additional comments: An update on the preapplication process and how early consultation feeds into the development management					
would be useful.					
Q7 W	nat are your views on whether the proposed framework sho	uld be pha	sed?		
	al comments:				
The frame	work should be put in place as soon as reasonably practical.				

	Do you agree that we should consolidate/revise the	Yes	No		
Q8	existing other output indicators set out in LDP Manual (2006) with the proposed new indicators to measure the outputs of the planning system?				
Additi	onal comments:				
Q9	What would be the impacts on your authority from the new S Framework? (Local Planning Authorities)	trategic Mc	onitoring		
	onal comments:				
n/a					
Q10	Do you agree with our proposed approach to reporting the	Yes	No		
	Strategic Monitoring Framework?				
Additional comments: In order to achieve a full picture of the successful delivery of sustainable development across Wales, there will also be a need to ensure that interpretation of the data received is undertaken consistently, together with a qualitative analysis and interrogation of the information monitored. The interpretation of the data, undertaken both by the Government and the Local Planning Authority(LPA) will then aid the LPAs in understanding how well they are delivering well-designed sustainable development, the information should feed back into the development planning and management processes, strengthening the LPA vision for the area and understanding how it is being delivered.					
Q11	We have asked a number of specific questions. If you have a which we have not specifically addressed, please use this sp	•			
Additi	onal comments:				

WG 13303 - 24

CONSULTATION FORM

A St	Strategic Monitoring Framework for the Planning System (Consultation)					
		4 November 2011 – 27 January 2012				
Nam	ie	Kayna Tregay				
Orga	anisation	Environment Agency Wales				
Add	ress	Ty Cambria, 29 Newport Road, Cardiff, CF24 0TP				
E-ma	ail address	kayna.tregay@environment-agency.gov.uk				
Type (plea	e ase select	Businesses				
one from the following)		Local Planning Authority				
		Government Agency/Other Public Sector				
		Professional Bodies/Interest Groups				
		Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)				
		Other (other groups not listed above)				
Q1	information is	with our conclusion that the current not sufficient for us measure the contribution g system to our vision of a sustainable Wales?	Yes 🖂	No 🗆		

Additional comments:

We note that data is already being collected on a number of measures (paragraphs 12-16 of the consultation document). However, we agree that it is not currently clearly articulating the planning system's contribution to sustainable development in Wales.

It is important that the monitoring framework is sufficiently flexible to enable it to take account of future and emerging Welsh Government initiatives that will place requirements on, or support, the current planning system. We expand on this point below:

We consider that having up-to-date Local Development Plans (LDPs) in place is currently the most effective way of ensuring a sustainable basis for the planning system. Adopted Plans and their associated Sustainability Appraisals will be monitored annually and reviewed every 4-5 years. This will enable monitoring of Sustainable Development (SD) at a Local Planning Authority (LPA) level. However, given that only a few LDPs have been adopted, it does appear that current information is not sufficient to enable the measurement of the contribution the planning system makes to deliver sustainability. In our view, the fact that delivery agreements are frequently extended means that the LDP process (and thus, the delivery of SD) is slowed down.

Paragraph 13 (page 6) refers to the Wales Spatial Plan (WSP) setting a strategic framework to guide future development and policy interventions. The WSP and its refresh were produced prior to the current Welsh Government SD Scheme and seems to have little weight in respect of strategic or local planning decisions. It may not therefore be fit for that purpose.

In our view, the LDP process should be supported by national and regional tiers of planning, particularly for key infrastructure that would support the sustainable development of Wales and supplement the current WSP. This would enable infrastructure (such as energy, water and sewerage, transport, major housing, waste management) to be appropriately planned for at a local scale. A National Infrastructure Plan (or revised WSP) that has a statutory basis and informs the lower tiers of planning system would help to deliver a sustainable Wales. We have already set out our views on the need for a National Infrastructure Plan in our evidence to the National Assembly for Wales Sustainability Committee, and we refer you to this for a fuller explanation.

In addition, we are aware that there is an emerging regional planning agenda, which we support, for similar reasons. We will be setting out our views on the benefits of regional planning in response to the Planning Bill Call for Evidence consultation.

Recommendation: Given the above, we believe it is important that the monitoring system also needs to be capable of assessing future regional and national tiers of the planning system's contribution to delivering the vision of a sustainable Wales. While these tiers may not currently be in place, it is important that the monitoring system is regularly reviewed and updated to be able to account for any changes that come about.

We also believe that the Welsh Government should develop their monitoring framework in a way that is more closely aligned to other Welsh Government initiatives which will influence and be influenced by the planning system, including the emerging Sustainable Development Bill, Natural Environment Framework and the proposed review of designations, as we set out below:

The monitoring framework should also be designed in such a way to ensure that it can be revised to be in line with the Sustainable Development Bill. This is in order to ensure that it will be possible to demonstrate how the planning system will be contributing to the future requirements of the Sustainable Development Bill.

The monitoring framework should be more closely aligned to ongoing work on the Natural Environment Framework (NEF). We note that this work to develop the Strategic Monitoring Framework is being undertaken in advance of finalisation of NEF (the Green Paper on NEF will not be launched until 3 days after this consultation has closed).

If some of the proposals in the Environment Green Paper (A Living Wales) are implemented, this will inevitably have a 'knock-on' effect on this monitoring framework. For example, it will be important for LPAs at the beginning of the LDP development process to incorporate the aims of the NEF into their plans, and for LPAs with adopted LDPs to use the 4-5 year monitoring of their LDPs to incorporate NEF. Given that this will need to be done, the Monitoring Framework should ensure that it is suitably flexible to ensure it can be updated to take account of the NEF.

If the planning system is seen as a means to help deliver the Natural Resource Plans that are being developed through the NEF, then planning's contribution to this should be monitored in the strategic monitoring framework. Recommendation: The Welsh Government should consider how it can incorporate the NEF into the monitoring requirements of the planning system. The Planning Division should seek advice from colleagues working on the Natural Resource Plans.

Recommendation: It will also be important to ensure that the Strategic Monitoring Framework can be changed to take account of a review of designations (which we understand is likely to occur), which may affect measures such as Measure 14 (total area of granted/ refused development in protected areas).

	Do you agree with the proposed approach to use the 'logic-	Yes	No			
Q2	chain' identify appropriate measures of the planning system?					
Additional comments: Whilst a logic chain approach can offer a robust way of identifying good measures, it will only work if the outcomes are well-defined. It also risks being overcomplicated. It would be sufficiently clear to state that the						
monitoring framework should be linked to the sustainability objectives that are set out in Planning Policy Wales (PPW), as is stated in chapter 31 of the consultation document.						
Recommendation: future documents referring to the logic chain should be clear that sustainable development (in line with PPW) should be the 'outcome' of the planning process.						

Do you agree with the strategic groupings of the 19 <i>Planning</i>	Yes	No			
Q3 Policy Wales objectives into five categories for the purpose of developing a set of new measures?					
Additional comments: We also agree with the inclusion of the headline indicators from the SD Scheme (2009).					
TABLE 1 (p13-14)					
The strategic grouping of the objectives, as set out in Table 1, appears sensible. However objectives or alterations to wording in order to ensure that all aspects of the policy object out below:					
Category A: Strategic Location					
Recommendation: in Category A (Strategic Location), "minimising the risks posed by, adjacent to contaminated land" should be included in list of key policy objective Areas. key policy objective, as set out in paragraph 4.4 of Planning Policy Wales (PPW).					
We note that the term "flood risk adaptation" has been used. The reference in paragraph 4.4 of PPW is wider than this and reads, "Mitigate the risks posed by, or to, development on, or adjacent to [] land liable to flooding". Recommendation: "Flood risk adaptation" should be reworded to read, "flood risk adaptation and minimisation".					
Q4.1 Do you agree with the proposed overarching indicator?	Yes	No 🗆			
1 Wales' Ecological Footprint					
Additional comments: Overarching indicators: We agree that the overarching indicators in Table 2 (p15-16) are useful and we support their inclusion in the monitoring scheme. We would also support them being reported at the Local Authority Level, if this is possible. This would enable a comparison between Local Authorities in Wales.					
	Yes	No			
Q4.2 Do you agree with the proposed overarching indicator?					
Percentage of Biodiversity Action Plan habitats and species or increasing	s recorded	as stable			

Q4.3 Do you agree with the proposed overarching indicator? 3 Gross Value Added (GVA) and GVA per head Additional comments: Q4.4 Do you agree with the proposed overarching indicator?
Q4.3 Do you agree with the proposed overarching indicator? 3 Gross Value Added (GVA) and GVA per head Additional comments: Yes No O4.4 Do you agree with the proposed overarching indicator?
Q4.3 Do you agree with the proposed overarching indicator? 3 Gross Value Added (GVA) and GVA per head Additional comments: Yes No O4.4 Do you agree with the proposed overarching indicator?
Q4.3 Do you agree with the proposed overarching indicator? 3 Gross Value Added (GVA) and GVA per head Additional comments: Yes No O4.4 Do you agree with the proposed overarching indicator?
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Q4.3 Do you agree with the proposed overarching indicator? 3 Gross Value Added (GVA) and GVA per head Additional comments: Yes No O4.4 Do you agree with the proposed overarching indicator?
3 Gross Value Added (GVA) and GVA per head Additional comments: Yes No
Additional comments: Yes No O4.4 Do you agree with the proposed overarching indicator?
O4.4 Do you agree with the proposed overarching indicator?
04.4 Do you agree with the proposed overarching indicator?
04.4 Do you agree with the proposed overarching indicator?
04.4 Do you agree with the proposed overarching indicator?
04.4 Do you agree with the proposed overarching indicator?
04.4 Do you agree with the proposed overarching indicator?
04.4 Do you agree with the proposed overarching indicator?
4 Percentage of the population in low-income households
Additional comments:
V ₁ N ₂
Q4.5 Do you agree with the proposed overarching indicator?
5 Wellbeing in Wales
Additional comments:
Additional comments: It is unclear to us why the Wellbeing in Wales indicator is different to the indicator the Office for National
It is unclear to us why the Wellbeing in Wales indicator is different to the indicator the Office for National Statistics (ONS) use for the UK Wellbeing measure. The current Wellbeing in Wales indicator does not include broader environmental indicators.
It is unclear to us why the Wellbeing in Wales indicator is different to the indicator the Office for National Statistics (ONS) use for the UK Wellbeing measure. The current Wellbeing in Wales indicator does not include
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Q4.6	Do you agree with the proposed overarching indicator?	Yes	No			
6	Dranartian of LDAs with an up to data adented LDD		Ш			
	Proportion of LPAs with an up to date adopted LDP al comments:					
Addition						
		Yes	No			
Q4.7	Do you agree with the proposed indicator?					
7	Net change in open space and playing fields					
We agree to the planning Question 5	al comments: that it is useful to measure this, however, we suggest it would also be useful to the system is delivering access to and enhancement of open space, as we set out it. Indation: The number of open spaces with a Green Flag award would also be a the cessible, sustainably managed open spaces. You may wish to explore whether maked to planning and the strategic monitoring framework.	t in our respons	se to			
		Yes	No			
Q4.8	Do you agree with the proposed indicator?					
8	■ Total floor space granted/refused (by type) on greenfield ar	nd brownfie	ld land			
Additional comments: Recommendation: "Flood risk" should be added to the list of reasons why "not all previously developed land is suitable for development" (end of second paragraph of the commentary on page 30).						
		Yes	No			
Q4.9	Do you agree with the proposed indicator?	168	INO 🖂			
9	Number of application submitted with Transport Assessmen	nts				

Δd	d	itio	nal	com	me	nte

Measuring the number of planning applications accompanied by a transport assessment does not measure whether the planning process is delivering sustainable development. For example, the completion and submission of a transport assessment does not necessarily lead to better air quality and decreased carbon emissions, unless it is used as a tool to improve the development in question. Transport assessments can help deliver SD if they influence decision making that results in fewer trips generated or promotes walking, cycling and use of public transport. This is what should be measured.

Recommendation: Measure 9 should be re-written to take account of how transport assessments are being used as decision-making tools to improve the sustainability of developments.

			Yes	No
Q4.1	0	Do you agree with the proposed indicator?		
10		mber of applications granted/refused (by type) on the flo	od plain (by	flood

Additional comments:

We would welcome the Welsh Government taking over our current role of collating information from LPAs on this indicator. Currently we report annually to the Welsh Government on the extent to which LPAs have taken into account our expert advice on flood risk when determining planning applications (High Level Target 13 Report (HLT13)). We note that Proposed Measure 10 of the Strategic Monitoring Framework appears to partially duplicate our current obligation under HLT13. If Welsh Government collated the data for this measure, it would ensure that the decisions on all planning applications in flood plains were reported, not just the ones we are aware of (which is currently the case, as we do not receive all decision notices from LPAs). This would also enable Environment Strategy Indicator 31c (flood risk) to be more fully reported; currently this indicator relies on the information we have from the HLT13 report.

However, Welsh Government should be clear on what it wishes to measure with this indicator. Currently we do not believe the wording of Measure 10 is useful, as it is less detailed than the measures in HLT13; it does not differentiate between all developments in the floodplain and those developments where a developer has demonstrated that the risks and consequences of flooding could be managed in line with TAN15 due to the incorporation of mitigation measures, such as the raising of floor levels, for example.

Recommendation: We would therefore recommend that the measure should be reworded and expanded. There should also be clarity on what it is intended to measure. We have previously responded to the Welsh Government Consultation on Review of Directions requiring applications to be referred to the Welsh Ministers (WG10 – 11529). In that response we highlighted that there are situations in which the indicative tests of TAN15 are not met, but where we do not object, as we are not the appropriate body to be able to advise. This could be where we advise that the LPA should take advice from other professional bodies on escape and evacuation routes, for example emergency planners and emergency services. This should be reflected in the proposed measure.

We have included the detail of what would need to be included in Appendix 1 of this response.

We are aware that we have raised a lot of issues with regards to Measure 10, as set out above. We would be happy to meet with you to discuss ideas further.

Q4.11	Do you agree with the proposed indicator?	Yes	No		
	ber of buildings receiving BREEAM and/or Code for Sification	ustainable	Homes		
Additional co	omments: nments on this indicator.				
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					
		Yes	No		
Q4.12	Do you agree with the proposed indicator?				
12 The proportion of local or recycled materials used in new developments					
Additional comments:					
	measuring the use of recycled materials. This aim is included in the Weld Demolition Waste Sector Plan, which is currently out for consultation.		nt Draft		
Recommendation: It would also be useful to measure the proportion of sustainably sourced local products. The					
	e changed to incorporate this, as follows:				
"The proportion of sustainably sourced local or recycled materials used in new developments."					
Recommendation: We note that data collection for this proposed indicator relies on applicants setting out the percentage of recycled materials used on planning application forms. Welsh Government should ensure that they					
could monitor co	ompliance, as some applicants may not accurately report the percentages ns. Alternatively, the Welsh Government may wish to consider whether	of materials u	sed on their		
appropriately reported on through other regimes, such as Building Regulations.					
It would also be useful to measure the extent to which the planning system is helping to deliver a 'green economy', that is, low-carbon, resource-efficient industry, that generates 'green jobs'.					
	n: The Welsh Government should also use the monitoring framework to	n measure the	proportion of		
	nt that comprises low carbon industry and resource-efficient developmen		proportion or		
Q4.13	Do you agree with the proposed indicator?	Yes	No		
Q4.13	Do you agree with the proposed indicator?				
13 Ren	ewable energy generation (mW) granted/refused by typ	oe and cap	acity		

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales



Recommendation: The indicator should be reworded to measure the extent to which the renewable energy capacity delivered in a Local Planning Authority against the agreed targets in the LDPs.

Recommendation: We suggest that when the data is collected, the reason for refusal (if applicable) is also recorded. This would help to build up an understanding of the barriers to the delivery of renewable energy.

		Yes	No
Q4.14	Do you agree with the proposed indicator?		
	otal area of granted/refused development in protected are tional designations)	eas (Europe	an and
We note that adapted or su ecosystem se protected area designated si considering to located on) a pollution path	proposed Measure 14 is one of the few 'negative' measures. We would like pplemented to enable it to measure more positive and proactive approaches revices approach being developed by the Welsh Government. Currently the as (European/ national designations). The ecosystem services approach is vers, and planning should seek to embed an ecosystem services approach into the value of all ecosystems. In addition, there may be development propose protected site that has an impact on the protected site. For example, air or an aways. These issues should therefore be incorporated into the measure.	s, in line with the measure only ovider than mero its activities led in the vicinit	he emerging covers ely by of (but not
		Voo	No
Q4.15	Do you agree with the proposed indicator?	Yes	No П
15 Ni	umber of Listed Building and Conservation Area Consent	s granted/r	 efused
	comments: comments on this proposed measure.		
Q4.16	Do you agree with the proposed indicator?	Yes	No 🗆
16 N	umber of new homes (by type) granted permission		
	comments: comments on this proposed measure.		
		Yes	No
Q4.17	Do you agree with the proposed indicator?		
17 Er	mployment land bank (years provided)		

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Additional comments:						
We have no comments on this proposed measure.						
		T T				
		Do you agree with the proposed indicator?	Yes	No		
Q4	1.18					
1	8 Tot	al floor space granted/refused (by type) (combining gree	nfield and			
1			illielu allu			
	brownfield land) (offices/industry/retail/distribution)					
Addi	tional o	comments:				
VV C 112	We have no comments on this proposed measure.					
	Do you agree that these measures should not be taken as		Yes	No		
	representing the full picture of the influence of the planning	100	110			
	system on sustainable development but represent an			\boxtimes		
	annro	nriate high level framework?				

Additional comments:

We are of the view that in some cases, proxy indicators are an effective measure of SD. However, in this case, we believe that the proposed framework does not reflect all the high level issues needed to monitor contributions to SD.

We appreciate that there may be an "additional burden" placed on LPAs that will be responsible for collecting data and reporting on the proposed measures. Nevertheless, we believe that there are a number of additional issues which could be reasonably reported on, without an excessive burden being placed on LPAs. We expand on these below:

- A. Strategic Location: The planning system should seek to ensure that inappropriate additional development is not permitted within Air Quality Management Areas (AQMAs). The State of the Environment Report already measures the number of people living in Air Quality Management Areas. Planning should help to ensure that development is within environmental and legal limits, such as air quality limits for public health. Recommendation: The following indicator should be incorporated into the Strategic Monitoring Framework: "Number of new developments (by type) permitted in Air Quality Management Areas."
- C. Facilitating Infrastructure and its Use: It would be useful to measure the extent to which new development is supported by adequate sewerage infrastructure. We would not expect to see planning permission granted for nonmains drainage in sewered areas, as this is not a sustainable solution. Neither should permission be granted for development where there are no plans to make any necessary mains upgrades.

Recommendation: The above points should be incorporated into an additional measure which helps to measure whether sewerage infrastructure is in place to support additional proposed development. This would help to measure the aim of the PPW Key Policy Objective (paragraph 4.4.2), "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 [...]".

As we stated in our response to Question 3, the planning system should seek to minimise the risks posed to or from development by contaminated land. The planning system should be utilised to help remediate existing contaminated land.

Recommendation: the following additional measure be incorporated into the Framework: "Number of hectares of land affected by contamination brought back into beneficial use through the planning process." This would be in line with the current State of the Environment Report indicator 34, and so the information could be easily collated.

D. Conservation and Enhancement: It would be useful to measure the planning system's contribution to delivering the requirements of the Water Framework Directive (WFD). As the WFD is implemented, we would be pleased to discuss a relevant indicator with you.

We are aware that SuDS approval bodies will be introduced this year and that these new bodies will be responsible for approving new SuDS schemes incorporated into proposed developments. We see the incorporation of high quality SuDS schemes into development as a good example of sustainable development, due to the multiple benefits of SuDS schemes.

Recommendation: We advise that the following indicator also be included in the Strategic Monitoring Framework: "Number of planning permissions granted that include SuDS schemes."

Recommendation: As set out in our response to Question 4.14, we advise that Measure 14 be replaced with the following, more positive measures, which encompass the impact of planning on all biodiversity, not just designated sites, as follows: "Total net gain in biodiversity improvements (in hectares) as a result of planning permissions granted" and, "Net gain (in hectares) of land that includes environmental enhancement schemes, e.g. creation of wetland/woodland, opening up of watercourses, improvement and protection of land at risk of flooding etc."

As you are aware, the development of the Natural Environment Framework may incorporate wider ecosystem valuation. This may result in the need for additional monitoring to measure the extent to which the NEF is being implemented. We would be pleased to work with you to develop a relevant indicator in due course.

E. Social, cultural and economic wellbeing: The Office for National Statistics (ONS) has shown that access to and quality of the local environment is important for people's wellbeing. As set out in our response to Question 4.7 above, it would be useful to measure the way in which the planning system was delivering access to and enhancement of open space, not just additional new open space. This would be in line with our understanding of the way in which the Welsh Government wishes to work towards an ecosystem services approach. Recommendation: We therefore suggest the following additional indicator: "Number of planning applications which include enhancement of, or access to, public open space and playing fields.

Do you agree with the proposed Strategic Monitoring	Yes	No		
Q6 Framework structure and measurement of each of the four stages identified above?				
Additional comments: We support the statement made in paragraph 46, that the monitoring framework assesses both the plan making and decision taking roles of the planning system.				
Given the points we raised in question 2, regarding the outcomes of the planning system, we cannot agree with the structure set out in Table 4.				
Please see our comments on specific measures, as set out in response to questions 4 and 5.				

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

Additional comments:

Please see our comments in response to Question 1 about how the Strategic Monitoring Framework should be aligned with the other emerging initiatives.

With regards to Measure 10 (flood risk), given that we have reported on HLT13 annually since the launch of TAN15, we would recommend that it continues to be reported annually.

	Do you agree that we should consolidate/revise the	Yes	No		
Q8	existing other output indicators set out in LDP Manual (2006) with the proposed new indicators to measure the				
	outputs of the planning system?				
Additional comments: If this is done, then Welsh Government and LPAs need to be aware that some of the previous indicators in the 2006 Manual will be lost. It may be that this may not be desirable, as these measures may be useful for other purposes. The density of housing development is an example. This needs to be considered.					
Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework? (Local Planning Authorities)				
Addit N/A.	ional comments:				
0.10	Do you agree with our proposed approach to reporting the	Yes	No		
Q10	Strategic Monitoring Framework?				
Additional comments: We consider that the data should be reported at a LPA Level and at a Wales-wide level, in order to enable comparisons and measure trends.					
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:

Recommendation: It is important that sustainable development principles be factored into decision-making in order to make the final outcomes of the planning system more sustainable. In the LDP process, this should be done through the SEA/ SA. LPAs should be encouraged to demonstrate how this has been done, for example by making readily available a statement on how their SEA/ SA has informed the final Plan. Welsh Government should ensure that there is clear evidence that this is being done, either through this strategic monitoring framework, or by other means.

Recommendation: We would expect to see decisions on applications made in line with LDPs, or, where a LDP is not adopted, in line with SD principles set out in PPW. Welsh Government should collect data on departures from LDPs, at a Wales level, either as part of the Strategic Monitoring Framework, or elsewhere.

We would be pleased to meet with you to discuss any of the points we have raised above. Please contact us, should you wish to set up a meeting.

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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 :	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]	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

27 Heol y Wig / 27 Pier Street, Aberystwyth, SY23 2LN 🖀: 01970 611621 🖅: enquiry@waleslink.org Cadeirydd / Chair: Dr Madeleine Havard Cyfarwyddwraig / Director: Susan Evans www.waleslink.org

A Strategic Monitoring Framework for the Planning System: Measuring progress towards a sustainable Wales

January 2012

Wales Environment Link (WEL) is a network of environmental and countryside Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is officially designated the intermediary body between the government and the environmental NGO sector in Wales. Its vision is to increase the effectiveness of the environmental sector in its ability to protect and improve the environment through facilitating and articulating the voice of the sector.

Wales Environment Link values the opportunity to take part in this important consultation.

1. Introduction

WEL supports the Welsh Government's ambition to refine the means by which the contribution of the planning system to the achievement of sustainable development in Wales can be monitored. We also note and agree with the comment that it is very difficult to measure the outcomes or the role of the planning system in this respect. However, we feel that, in order to measure the contributions the planning system makes towards a sustainable Wales, it is not sufficient to consider only data that is currently collected. Any meaningful monitoring system must take into account the implications of major initiatives and developing legislation, which will affect the way in which the land and resources of Wales are used, such as the National Resource Strategy, the emerging ecosystems approach associated with the Natural Environment Framework and the Sustainable Development Bill. Therefore, we contend that the proposed suite of generic sustainable development indicators, transposed from the Government's current Sustainable Development Scheme, may not necessarily be the most appropriate or relevant indicators to use in the context of assessing the role of the planning system in delivering sustainable development in the future.

WEL believes that the many of the proposed indicators being used as the basis for the proposed Strategic Monitoring Framework are either too wide ranging or too narrow to measure the planning system's specific contribution towards moving Wales forward to a sustainable future. We are also concerned that a set of national indicators will be viewed and used as targets for the planning system, and thereby risk distorting the true purpose and operation of the planning system in Wales.

WEL does not feel that the concept or suggested approach associated with the logic chain was particularly helpful, as it made the document over-complicated, convoluted and hence difficult to understand. Similarly, whilst it is useful to have a record of all the existing data sources that are collected, listing these within the main body of the consultation document does make it impenetrable. So much data is presented that it is difficult to work out what is most useful and

how it will combine to provide an overall picture of the planning system's contribution to sustainable development.

2. Overarching Indicators

Q3.) Do you agree with the strategic groupings of the 19 Planning Policy Wales objectives into five categories for the purpose of developing a new set of measures?

While we agree with the principle of the grouping, we consider that the environmental objective has been over-summarised to the extent that several significant and wide-ranging elements of the objective disappear completely from the monitoring framework. We note in particular that no proper consideration has been given to the issues of landscape protection, the retention of undeveloped coast and the value and enhancement of the character of important aspects of urban environments.

Q4.1) Wales' Ecological Footprint

Whilst WEL strongly supports Wales' goal to reduce its Ecological Footprint, this is a very wide-ranging measure, and we believe the Framework should include further clarification on how this can be used to measure the particular contribution that the planning system makes to achieving a more sustainable Wales.

Q4.2) Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing.

WEL believes that biodiversity is an important indicator of sustainable development, and we note that there will be a requirement for the Welsh Government to report on biodiversity increases/losses as part of our EU and international obligations to halt the loss of biodiversity by 2020. However, we are not confident that this specific measure is fit for purpose in the context of assessing the effectiveness of the planning system. BAPs cover a range of issues that need to be tackled, many of which are not related to planning processes. Therefore, using BAPS generically as a measure of the contribution that planning makes in this respect, is unlikely to properly reflect the impact of planning decision outcomes.

Land use change, through the planning process, usually results in a change of habitat types (and therefore impact on species) which can be wide ranging. WEL suggests that it would be better to measure the relationship between the outcomes of planning decisions and the extent of habitat loss/change. We also feel that to measure this effectively, data collection on habitat loss/change needs to be improved and invested in, as BARS data shows that many habitats and species are marked as insufficient data, or best guess. It is important to note that some LDPs have put responsibility for monitoring and reporting trends in BAP species onto their LBAP partnership, and most simply do not have funds for this. If this is to be a requirement, there should be funding for monitoring or there is a risk that there will be a serious lack of data, potentially leading to the assumption that there is no change.

Neath Port Talbot CBC is one local authority which is beginning to measure habitat loss, and could provide an example that other local authorities could follow. They have a well supported Biodiversity Unit, and the ecologists in the unit record which planning applications they comment on, and the outcome in terms of BAP habitat losses (and gains through compensation/enhancement). This gives clear, quantitative data on BAP habitat trends directly related to planning. Planners that secure the most biodiversity gains are rewarded at the 'Biodiversity-Friendly Planner of the Year' awards.

WEL has called for a register of biodiversity losses/gains on all public land¹, which would also contribute to the improvement of data. Monitoring of the contribution the planning system makes to protecting biodiversity should also link to the outcomes of the Natural Environment Framework.

Q4.5) Wellbeing in Wales

Wellbeing is a very broad and multi-faceted issue, and we feel that to use it as an allembracing indicator, covering environmental, social and economic issues is inappropriate. Greater clarification is necessary to understand what precisely would be included in this measure. From an environmental point of view, WEL believes that if wellbeing is to be used as an indicator of the performance of the planning system, issues such as access to natural, wildlife-rich green spaces and urban green spaces, the changes in local environmental quality, and the change in the status and integrity of recognised heritage and landscapes assets should be included.

Q4.6.) Proportion of LPA with an up to date adopted LDP

WEL believes that this indicator is inadequate, as simply having an LDP does not necessarily mean that sustainable development will be achieved. Achieving a sustainable approach to development depends on the quality of the LDP and, in particular, whether planning decisions are taken in accordance with it. Many LPAs are currently in the process of adopting LDPs, which we feel is positive, but the real test will be whether these LDPs stand the test of time and are regularly reviewed and updated. For this reason, WEL suggests that a better performance measure would be one which measures the proportion of LPAs across Wales with an LDP which has either been in place for, or reviewed within a preceding three year period. We also believe there needs to be a specification of what is considered to be an "up to date" LDP. WEL suggests that LDPs needed to be reviewed and updated at periods of no longer than three years.

3. Other Indicators

Q4.7.) Net change in open space and playing fields

Whilst we agree that a measurement of the change in open space is useful, we do feel that this proposed indicator needs to be more clearly defined and should include a number of additional elements. The way this indicator is worded makes it appear orientated more towards the urban environment, and whilst we acknowledge that open space in urban areas is very important, there also needs to be a measure of the change in character or amenity value of Wales' rural environment, which accounts for 85% of its land area.

Furthermore, measuring the change in open space does not give a true or meaningful indication of the level of access that people have to natural or urban green spaces. Access to such facilities, e.g. quality green spaces, has a large impact on their wellbeing.

WEL suggests therefore, within this indicator, the following elements should be measured:

- the net reduction/increase of Tranquil Areas across Wales (as proposed in the original Environment Strategy) or alternatively, the relative decrease/increase in light pollution or loss in area of dark skies
- the reduction/increase of urban green spaces, including playing fields and parks
- the increase in the percentage of the population living within 300m of their nearest natural green space, as recommended by the CCW Greenspace Toolkit (2006)

¹ http://www.waleslink.org/what/policy/biodiversity2011

Q4.8.) Total floor space granted/refused (by type) on greenfield/brownfield land

WEL believes that some measure of the sustainability of the type of development must also be captured in order to give a clear indication of whether the development granted is environmentally damaging or not. Open Mosaic Habitat on Previously Developed Land' is now a UK Biodiversity Action Plan Priority Habitat, and Section 42 Habitat, so this indicator should be clarified to exclude brownfield land with high biodiversity interest, as defined in Planning Policy Wales, section 4.8.

Q4.9.) Number of applications submitted with Transport Assessments

It is not clear how the proposed indicator would contribute to the ambition of the monitoring framework. The weakness of this indicator is acknowledged in the consultation report. Perhaps a better indicator of the planning system's contribution to a sustainable Wales in terms of transport would be the number of applications approved with a Green Travel Plan secured by planning condition or s106 agreement. The Welsh Transport Statistics, published by Welsh Government, include information on issues such as traffic volume and accidents, and the DfT National Transport Statistics also include information on transport CO2 emissions, all of which have a bearing on sustainability and which are capable of being influenced by the planning system.

Q4.10.) Number of applications granted/refused (by type) on the flood plain (by flood risk category)

WEL suggests that this indicator should take into account whether development on the flood plain has been granted or refused contrary to advice. We assume that this measure will include the risk of coastal flooding as well as fluvial flooding.

Q4.11.) Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification

The indicator should also record the level of certification.

Q4.13.) Renewable energy generation (mW) granted/refused by type and capacity

WEL does not agree that measuring the amount of renewable energy generation alone is in itself a sound indicator of sustainability as it this depends on where renewable energy is generated, what other assets have been changed or used, the impact such development has on the amenity of the local environment and the actual amount of renewable energy these schemes deliver, which helps reduce Wales' CO2 emissions budget and hence reduce our Ecological Footprint. Generating more renewable energy will not reduce our fossil fuel consumption unless it displaces energy generated from conventional fossil fuel sources.

Q4.14.) Total area of granted/refused development in protected areas (European and National designations)

This would be a very crude measure that does not respond to whether the development has beneficial, harmful or neutral effects on the protected area in question. Failing to split the data by designation type would limit our understanding of which designations are not being adequately protected and where an adjustment of national planning policy or technical advice might be needed. WEL also believes that if the interpretation of the term Protected Areas includes, as is conventionally accepted, areas designated for their natural beauty, i.e. National Parks and AONBs, then the proposed indicator as it stands is comparatively meaningless.

WEL believes that protected areas of all types can be affected by development outside the area, which could affect ecological connectivity, access, amenity or create sources of pollution. Therefore we suggest that a better indicator might be "Total area of granted/refused"

development which adversely affects protected areas (European and National designations)." This indicator should include areas designated for biodiversity, landscape, geodiversity, and heritage value.

Q4.15.) Number of Listed Building and Conservation Area Consents granted/refused

It is not clear how this indicator would contribute to the ambition of the monitoring framework, particularly given the acknowledged difficulty in concluding whether high or low figures are positive or negative. WEL believes that the proposed supporting measures on conservation area appraisals and buildings at risk would make more suitable headline indicators.

4. General Comments and Conclusion

WEL agrees that the measures proposed in the consultation document do not represent the full picture of the influence of the planning system on sustainable development and agree that they should not be taken as such. We are concerned that the weakness of some indicators limits the appropriateness of this approach as a reliable high level framework.

The indicators do not take into account new policies and programmes, such as the National Resource Strategy, and the Natural Environment Framework, and we feel that there will be a need for indicators which measure the success of the planning system in helping to deliver these strategies.

WEL is concerned at the lack of indicators to measure the wider loss of environmental and landscape amenity, and feel that there should be some generic indicators which measure the change in the overall character of an area, alongside the more specific issues of biodiversity and open spaces. Measuring change against the baseline of CCW's LANDMAP information may be a possibility.

Finally, WEL believes that one of the key roles of the planning system is to prevent damaging, and hence unsustainable, development from taking place. In fact this is its greatest contribution to promoting a more sustainable approach to development and land use. Therefore, we believe that the quality of planning decisions, as opposed to the speed of decision making, is the best indicator of the effectiveness of the planning system, and quality needs to assured to ensure that the planning system achieves the desired sustainable outcomes.

The following WEL members support this document:

Bat Conservation Trust
Campaign for National Parks
Campaign for the Protection of Rural Wales
Keep Wales Tidy
RSPB Cymru
Wildlife Trusts Wales
Ymddiriedolaeth Genelaethol / National Trust

WG 13303 - 26

CONSULTATION FORM

A Strategic Monitoring Framework for the Planning System (Consultation)						
4 November 2011 – 27 January 2012						
Name	Name Simon Gale					
Orga	nisation	Rhondda Cynon Taf CBC				
Addr	ess	Sardis House, Sardis Road, Pontypridd, Rhondda Cynon Taf				
E-ma	il address	Simon.Gale@ rctcbc.gov.uk				
	se select	Businesses				
one fi follow	from the wing)	Local Planning Authority				
		Government Agency/Other Public Sector				
		Professional Bodies/Interest Groups				
		Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)				
	Other (other groups not listed above)					
	Do vou saree	with our conclusion that the current	Yes	No		
Q1	information is	not sufficient for us measure the contribution g system to our vision of a sustainable Wales?	□ □ □			
Additional comments: The Council recognises that the information currently being collected does not provide necessarily allow the Welsh Government to easily draw meaningful conclusions about the contribution the planning system makes to the delivery of suatainable development in Wales.						
However, the Welsh Government should be mindful of the pressure the proposed strategic monitoring framework is likely to place on Council resources. Every opportunity should be taken to identify the linkages between information obtained from established monitoring processes and /or from existing datasets. The fundamental objective of this process should be to simplify the monitoring process not to add another layer of complexity.						
Q2		with the proposed approach to use the 'logic- appropriate measures of the planning	Yes	No 🖂		

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments:

The 'logic chain' is essentially a straight forward theoretical model for the assessment of indicators. The theoretical nature of this approach means that it is unlikey to be realistic tool when applied in practice. For example the chain assumes;

- that in every instance there are 5 meaningful stages in a process,
- that there is a tangible difference between outputs and outcomes in all instances, and
- offers no opportunity for interpretation of impacts at local level.

There is a real danger that the development and implementation of the 'logic chain' will become a process in its own right. The emphasis should be on developing a simple system that allows for the monitoring of meaningful indicators from which sensible analysis can be drawn and if necessary meaningful actions developed.

Do you agree with the strategic groupings of the 19 <i>Planning</i>	Yes	No
Q3 Policy Wales objectives into five categories for the purpose of developing a set of new measures?		
Additional comments: The catagories proposed in the draft monitoring framework provides a more appropriate consideration of sustainable development in a planning context. There are however, still objectives and activities overlap, to avoid confusion further consideration will need to be are defined.	number of are	eas where
Q4.1 Do you agree with the proposed overarching indicator?	Yes	No 🗆
1 Wales' Ecological Footprint		
Additional comments: Whilst broadly supportive of the approach the Council considers that the collection of the the responsibility of the Welsh Government.	is information	should be
Q4.2 Do you agree with the proposed overarching indicator?	Yes 🖂	No 🗆
Percentage of Biodiversity Action Plan habitats and species or increasing	s recorded	as stable
Additional comments: Whilst broadly supportive of the approach it should be recognised that the data required cannot be obtained through the planning system. Environmental data of this type is how level. The Council considers that the collection of information for this indicator should I Welsh Government	ever, available	a national
	Yes	No
Q4.3 Do you agree with the proposed overarching indicator?		
3 Gross Value Added (GVA) and GVA per head		

Whilst breamot be national le	padly supportive of the approach it should be recognised that the data required obtained directly through the planning system. Socio-economic data of this ty evel. The Council considers that the collection of information for this indicator ility of the Welsh Government.	pe is however,	
		Yes	No
Q4.4	Do you agree with the proposed overarching indicator?		
4	Percentage of the population in low-income households		
Whilst breamnot be national le	paall comments: coadly supportive of the approach it should be recognised that the data required obtained directly through the planning system. Socio-economic data of this ty evel. The Council considers that the collection of information for this indicator illity of the Welsh Government.	pe is however,	
			NI.
Q4.5	Do you agree with the proposed overarching indicator?	Yes 🖂	No 🗆
5	Wellbeing in Wales		
Whilst br	pall comments: coadly supportive of the approach it should be recognised that the data required obtained directly through the planning system. Data of this type is however, a scil considers that the collection of information for this indicator should be the rent.	vailable a natio	nal level.
		Yes	No
Q4.6	Do you agree with the proposed overarching indicator?	T es	
6	Proportion of LPAs with an up to date adopted LDP		

Additiona	al comments:		
Q4.7	Do you agree with the proposed indicator?	Yes	No 🖂
7 N	Net change in open space and playing fields		
The wordin	al comments: g of the indicator should be revised to to make clear that it relates specifically etly from the planning system. Consideration should also be given to monitor oblic open space, such as new play equipment, delivered as a direct result of th	ring improveme	ents to
			Na
Q4.8	Do you agree with the proposed indicator?	Yes	No 🖂
·			
Additional The indicat Authority a as diverse a requiremen scale of dev	Total floor space granted/refused (by type) on greenfield are all comments: or implies that floorspace data is to be collected annually for all development rea. Potentially this could result in the collection of a significant amount of design small scale householder development to large scale residential and comments of this indicator need to be better defined. The indicator should make clear relopment is to be monitored. I questions the value of collecting data in respect of refused applications.	nd brownfiel in an Local Pla lata on a range or	d land anning of proposals nt. The
Additional The indicat Authority a as diverse a requiremen scale of dev	Total floor space granted/refused (by type) on greenfield are comments: or implies that floorspace data is to be collected annually for all development rea. Potentially this could result in the collection of a significant amount of design small scale householder development to large scale residential and comments of this indicator need to be better defined. The indicator should make clear relopment is to be monitored.	in an Local Pladata on a range or cial development exactly what to	Id land Inning of proposals nt. The ype and
Additional The indicat Authority a as diverse a requiremen scale of dev	Total floor space granted/refused (by type) on greenfield are comments: or implies that floorspace data is to be collected annually for all development rea. Potentially this could result in the collection of a significant amount of design small scale householder development to large scale residential and comments of this indicator need to be better defined. The indicator should make clear relopment is to be monitored.	nd brownfiel in an Local Pla lata on a range or	d land anning of proposals nt. The
Additional The indicat Authority a as diverse a requiremen scale of dev The Council	Total floor space granted/refused (by type) on greenfield are all comments: or implies that floorspace data is to be collected annually for all development rea. Potentially this could result in the collection of a significant amount of dissimilar small scale householder development to large scale residential and comments of this indicator need to be better defined. The indicator should make clear relopment is to be monitored. I questions the value of collecting data in respect of refused applications.	nd brownfiel in an Local Pla data on a range of the control of the	Id land Inning of proposals nt. The ype and

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

The Coumonitor	nal comments: ncil questions the value in this indiator. A more appropriate indicator in sustaia improvements to the highway network, public transport, walking and cycling price planning system.		
			NI-
Q4.1	Do you agree with the proposed indicator?	Yes	No
3 (∓. 1	bo you agree with the proposed maleator:		
10	Number of applications granted/refused (by type) on the florisk category)	ood plain (by	flood
	nal comments:		
	cates an existing national indicator. The Council questions the value of collect	ing data in respe	ct of
refused a	pplications.		

Q4.11	Do you agree with the proposed indicator?	Yes	No	
Q4.11	Do you agree with the proposed indicator?			
Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification				
Additional of The Council of	comments: urrently collects this data as part of the Local Development Plan Annual N	Ionitoring pro	cess.	
			1	
Q4.12	Do you agree with the proposed indicator?	Yes	No 🖂	
12 Th	e proportion of local or recycled materials used in new d	evelopmen	ıts	
and / or recycl Neither the Pla	LDP annual monitoring process the Council identified the need to collect of ed materials. Unfortunately, it has proved impossible to collect data in resonning or Building Control systems recored the use of local or recycled materials withdraw the indicator.	spect of this in	dicator.	
		T		
Q4.13	Do you agree with the proposed indicator?	Yes	No 🗆	
13 Renewable energy generation (mW) granted/refused by type and capacity				
Additional	comments:			

Q4.14 Do you agree with the proposed indicator?	Yes	No		
7 3 1 1				
Total area of granted/refused development in protected areas (European and national designations)				
Additional comments: This indicator needs to be better defined. Is it the Welsh Governments intention that all types of development are monitored?				
Again, the Council questions the value in monitoring planning applications that have b	een refused.			
Q4.15 Do you agree with the proposed indicator?	Yes	No		
15 Number of Listed Building and Conservation Area Conse	nts granted/r	efused		
Additional comments:				
Q4.16 Do you agree with the proposed indicator?	Yes	No		
16 Number of new homes (by type) granted permission				
Additional comments:				
Q4.17 Do you agree with the proposed indicator?	Yes	No		
17 Employment land bank (years provided)				

Additional comments: This indicator is already included in the Council's LDP AMR process.		
This indicator is already included in the Council's LDF AWK process.		
	Yes	No
Q4.18 Do you agree with the proposed indicator?		\square
18 Total floor space granted/refused (by type) (combining gree	enfield and	
brownfield land) (offices/industry/retail/distribution)	Fillela alla	
Additional comments:		
The Council questions the value of monitoring applications which have been refused.		
	Vaa	Nia
Do you agree that these measures should not be taken as representing the full picture of the influence of the planning	Yes	No
system on sustainable development but represent an		
appropriate high level framework? Additional comments:		
The Council doesn't believe that the approach being suggested represents a full picture o		
planning system has on the delivery of sustainable development at high level or indeed a being proposed simply represents a framework for monitoring the effectiveness of nation		
Do you agree with the proposed Strategic Monitoring	Yes	No
Pramework structure and measurement of each of the four stages identified above?		
Additional comments:		
Q7 What are your views on whether the proposed framework sho	uld be phas	sed?

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments:		

Do you agree that we should consolidate/revise the existing other output indicators set out in LDP Manual	Yes	No
(2006) with the proposed new indicators to measure the outputs of the planning system?		
Additional comments: Yes, the Council considers that the Welsh Government should take the opportunity to re proposed indicators with those contained in the LDP Manual.	view and conso	olidate the
What would be the impacts on your authority from the new S Framework? (Local Planning Authorities)	trategic Mo	nitoring
Additional comments: The Council's understanding is that the Welsh Government is proposing to collect data in indicators as part of the LDP AMR process. The Council has already expended conideral developing a monitoring process for collecting information in relation to the indicators of adpoted LDP. The revised process would require the Council reviewed and restructured process to address the draft indicators. Whilst this can be achieved, the Council consider Government should take the opportunity review all the information it currently collects is system and develop a single, comprehensive monitoring process.	able time and recontained within its existing more that the Welstein	esources on n the onitoring sh
Do you agree with our proposed approach to reporting the	Yes	No
Additional comments: Experience has demonstrated that the development of an effective system for the collective planning data is a challenging process. To expect the process to be in place to record data is unrealistic. A more sensible approach would be to ensure that the required systems are monitoring to take place for the period 2013/14.	ta for the period	d 2012/13
We have asked a number of specific questions. If you have a	any related	issues
which we have not specifically addressed, please use this sp	•	
Additional comments: The Council has no additional comments.		





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

27 January 2012

Dear Madam or Sir,

A Strategic Monitoring Framework for the Planning System - Measuring progress towards a sustainable Wales - Comments by RenewableUK

This document outlines RenewableUK's comments on the Strategic Monitoring Framework for the Planning System consultation.

RenewableUK is the trade and professional body for the UK wind and marine renewables industries. Formed in 1978, and with over 700 corporate members, RenewableUK is the leading renewable energy trade association in the UK. Wind has been the world's fastest growing renewable energy source for the last seven years, and this trend is expected to continue with falling costs of wind energy and the urgent international need to tackle CO2 emissions to prevent climate change.

Please feel free to contact me on 020 7901 3024, or at <u>Yana.Bosseva@RenewableUK.com</u> should you require any additional information.

Yours sincerely

Yana Bosseva Planning Advisor, RenewableUK

A Strategic Monitoring Framework for the Planning System – Measuring progress towards a sustainable Wales Comments by RenewableUK

Introduction

RenewableUK welcomes the publication of the consultation on a strategic monitoring framework for the planning system in Wales. We are pleased to provide this response on behalf of the wind, wave and tidal energy industry.

The renewable energy policy context in Wales in particular is set by the introduction of TAN8 and the 2010 Energy Policy Statement, which radically increased the renewables target for 2025. This was confirmed by a written statement from the Welsh Assembly Government in June 2010. Planning Policy Wales 2011 also states that planning policy at all levels should facilitate delivery of both the Assembly Government's overall Energy Policy Statement and UK and European targets on renewable energy.

Additionally, the UK is under a legal obligation under EU Directive 2009/28/EC of June 2009, and failure to deliver the renewable energy generation needed (i.e. 15% of energy consumption from renewable sources by 2020) could leave the UK exposed to infraction proceedings from the European Commission. Given this context RenewableUK welcomes the introduction of a renewable energy indicator in the proposed monitoring framework. In our responses to the questions below we make some suggestions as to how this indicator and the proposed framework could be refined.

Responses to Consultation Questions

Question 1 Do you agree with our conclusion that the current information is not sufficient for us to measure the contribution of the planning system to our vision of a sustainable Wales?

Yes, RenewableUK welcomes the new measures which are proposed, and in particular the proposed new indicator on renewable energy. However, as explained below we suggest that a time factor should be included with that indicator.

Question 2 Do you agree with the proposed approach to use the 'logic-chain' to identify appropriate measures of the planning system?

In our view the logic chain should also consider the timing aspect, which is crucial to the outputs, outcomes and impacts stages of the chain. For example, the time taken to develop and adopt a local plan and its policies, or the time taken for a renewable energy project to go through the planning process is crucial to progress towards sustainability and renewable energy targets.



Question 3 Do you agree with the strategic groupings of the 19 Planning Policy Wales objectives into five categories for the purpose of developing a set of new measures?

In RenewableUK's view energy and renewable energy generation in particular should be an 'overarching' measure. It underpins a number of the identified overarching measures such as Wales' ecological footprint, the wellbeing of species and biodiversity. This is through renewable energy's contribution to climate change mitigation as well as economic development; the building of a skills base; manufacturing; and a less fossil fuel dependant society and economy.

Question 4.13 Do you agree with the proposed indicator?

RenewableUK welcomes the inclusion of Indicator 13 relating to renewable energy. However, as indicated in the response to Question 2 above, the timing aspect is critical for renewable energy projects, a significant proportion of which are subject to delay in the planning system. On this basis we suggest that the indicator include monitoring of time frames, reasons for delays, as well as progress towards the national renewable energy targets. These would help identify the reasons for delays within the planning system, and possible ways of addressing the reasons for them.

In RenewableUK's view this indicator should definitely capture information on microgeneration, as suggested in the consultation document, as it also makes a valuable contribution to sustainability which should be monitored.

Collecting data on local planning authorities' responses as statutory consultees on renewable energy projects decided by the IPC or s36 projects would also be useful in establishing a clearer picture of progress towards national renewable energy targets.

Question 5 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, RenewableUK agrees that the proposed measures, with the addition of a timing aspect (and reasons for delays, etc), represent an appropriate high level framework.

Question 6 Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?

In our view, as indicated above, there should be a time-aspect to the measuring of indicators. In terms of renewable energy, it would be important to see the timeline of local and national policy as well as the time taken for planning applications to go through the system. The delay of proposals within the system in relation to progress towards Wales' and the UK's renewable energy targets.

Question 7 What are your views on whether the proposed framework should be phased?

In our view the framework should be introduced as a complete package within the timeframes suggested in the consultation document, i.e. in terms of output measures in the 2012/2013 financial year. We suggest that this include a timing aspect as stated above.



Question 10 Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?

We agree in principle with the proposed publication of an annual report to show the contribution of the planning system to the sustainable Wales vision. We suggest taking advantage of the Internet by introducing a dedicated monitoring framework website and the ability for the public and interested parties to sign up and receive automated updates on the publication of new information as it becomes available.



FFURFLEN YMGYNGHORI

A Fframwaith Monitro Strategol ar gyfer y System Gynllunio (Ymgynghoriad)					
4 Tachwedd 2011 – 27 Ionawr 2012					
Enw	Gruffydd Wyn Morris - Uwch Reolwr Gwasanaeth Cynllunio				
Sefydliad	Cyngor Gwynedd	Cyngor Gwynedd			
Cyfeiriad	Y Gwasanaeth Cynllunio, Swyddfa'r Cyngor Ffordd Y Cob, Pwllheli				
Cyfeiriad e-bost	GruffyddWynMorris@gwynedd.gov.uk				
Math o sefydliad (dewiswch un o'r	Busnes				
canlynol)	Awdurdod Cynllunio Lleol				
	Asiantaeth y Llywodraeth/Corff Sector Cyhoedd	us arall			
	Corff Proffesiynol/Grŵp Buddiant				
	Y Sector gwirfoddol (grwpiau cymunedol, gwirfoddolwyr, grwpiau hunan-gymorth, cwmnïau cydweithredol, mentrau, mudiadau crefyddol, sefydliadau di-elw)				
	Arall (grwpiau eraill nad ydynt wedi'u rhestru uc	hod)			
Vdych chi'n c	ytuno â'n casgliad ni, sef nad oes digon o	V.I	Nac		
C1 wybodaeth ar	hyn o bryd inni allu mesur cyfraniad y system	Ydym	ydym		
gynllunio at ein gweledigaeth o greu Cymru gynaliadwy?					
Sylwadau ychwanegol: Yn y pen draw mae'r system gynllunio o ran ei natur a'r angen i fod yn cydymffurfio a bob math o ddeddfwriaeth - yn gorfod rhoi ystyriaeth i faterion cynaliadwyedd. Fel mae'r ymgynghoriad ei hun yn nodi - mae mesur cyfraniad y system bron yn amhosib. Oherwydd y cyd-destun deddfwriaethol a'r fframwaith polisi cynllunio rhaid i raddau cymryd yn ganiataol fod y System yn cyfrannu'n gadarnhaol at Gymru gynaliadwy. Annodd iawn yw mesur beth yw'r cyfraniad - ond mae'r wybodaeth bresennol yn rhoi gwybodaeth am y llwyth gwaith a'r math o waith mae'r awdurdodau cynllunio yn wneud i gyfrannu at Gymru gynaliadwy. Ni chredir y byddai mesurau ychwanegol yn ein galluogi i fesur hyn yn well					
Ydych chi'n c	ytuno â'r cynnig i ddefnyddio'r 'gadwyn		Nac		
	odi dulliau priodol o fesur cyfraniad y system	Ydym	ydym		

gynllunio?			
Sylwadau ychwanegol:			
Mae'r hyn sydd yn cael ei alw'n "ga gwyddonol - i ddisgrifio rhywbeth s wedi ei wnued yma yw torri'r brose mewnbwn / allbwn etc.	ydd yn eithaf syml. Yn y pen dra	aw - yr oll s	
Mae edrych ar y camau yn y brose am y math o wybodaeth ychwaneg Awdurdodau Cynllunio Lleol. Er hy nodi dulliau mwy priodol na'r drefn	ol y gellir ei gyflwyno i'r Llywodra n, nid ydym yn credu fod hyn yn	aeth gan angenrheid	

Ydych chi'n cytuno y dylid rhannu 19 amcan <i>Polisi Cynllunio</i> C3 Cymru yn bum categori strategol er mwyn datblygu set o		Ydym	Nac
			ydym
	suryddion newydd?		
C3 - Er atebion	au ychwanegol: ein bod yn anghytuno gyda'r angen am fesyryddion ychwar blaenorol), os penderfynnir i gario'n 'mlaen gyda'r prosiect y on cenedlaethol i'w weld yn rhesymol		
		Ydym	Nac
C4.1	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?		ydym
1	Ôl troed ecolegol Cymru		
gyfer hy	ryd mai dim yr Awdurdodau Cynllunio Lleol fydd angen darp yn.		
		Ydym	Nac vdym
C4.2	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?		ydyiii
2	Y ganran o'r cynefinoedd a rhywogaethau y cofnodir eu boc cynyddu yn y Cynllun Gweithredu Bioamrywiaeth	d yn sefydlo	og neu'n
	au ychwanegol: ryd mai dim yr Awdurdodau Cynllunio Lleol fydd angen darp yn.	paru'r wybo	daeth ar

C4.3	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir ?	Ydym	Nac ydym
04.0	rayon onim cytano ar dangosyda cymicamor a gymgii :		
3	Gwerth Ychwanegol Crynswth (GYC) a GYC y pen		
	au ychwanegol: ryd mai dim yr Awdurdodau Cynllunio Lleol fydd angen darp rn.	oaru'r wybo	daeth ar
			Nac
C4.4	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	ydym
	Tayon on the cytame of admigocytate symbol a gying.	\boxtimes	
4	Y ganran o'r boblogaeth sydd mewn cartrefi incwm isel		
	au ychwanegol: ryd mai dim yr Awdurdodau Cynllunio Lleol fydd angen darp rn.	oaru'r wybo	daeth ar
		Ydym	Nac
C4.5	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?		ydym
5	Lles pobl Cymru	_	
	au ychwanegol:		
	ryd mai dim yr Awdurdodau Cynllunio Lleol fydd angen darp	oaru'r wybo	daeth ar

C4.6	Ydych chi'n cytuno â'r dangosydd cyffredinol a gynigir?	Ydym	Nac ydym
6	Canran yr Awdurdodau cynllunio Lleol sy'n diweddaru eu C	DLI	
Yn cyn	au ychwanegol: iryd y bydd hwn yn 100% bob tro - gan y bydd pawb yn gwn r y CDLI - y gellir ei ddehongli fel "diweddaru".	eud rhywfa	th o
C4.7	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
7	Y newid net mewn mannau agored a chaeau chwarae		

Sylwadau ychwanegol:

Beth mae'r wybodaeth yma am ddangos - a sut mae am fesur cyfraniad y System Gynllunio at Cymru Gynliadwy? Ai newid net positif neu negyddol fydd y system yn chwilio amdano? Bydd y gwybodaeth yn gallu cael ei ddehongli mewn nifer o ffyrdd gwahanol - ac nid yw lleihad mewn mannau agored yn angenrheidiol yn golygu bod cyfraniad y system yn negyddol. Mae cynnal Astudiaeth Llecynnau Agored wedi cael ei adnabod fel rhan o'r broses o ddarparu tystiolaeth ar gyfer y CDLI ar y Cyd sydd ag oblygiadau adnoddau dynol ac ariannol. Hefyd, mae oblygiadau adnoddau yma gan y buasai angen darparu adnoddau ar gyfer cael y wybodaeth yn flynyddol. Nid ydym yn casglu'r wybodaeth yma'n flynyddol ar hyn o bryd

C4.8	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
04.0	Tayon on in oyumb a r dangooyaa a gyriigii .		\boxtimes
Cyfanswm yr arwynebedd llawr a gymeradwyir/a wrthodir (fesul math) ar safleoedd maes glas a safleoedd tir llwyd			



Ni fyddai'r wybodaeth yn mesur cyfraniad y System ddim mwy na'r wybodaeth sydd yn cael ei ddarparu ar hyn o bryd. Buasai oblygiadau sylweddol o ran yr adnoddau ychwanegol y buasai eu hangen ar gyfer nodi a darparu'r wybodaeth yma. Nid ydym yn casglu'r wybodaeth yma ar hyn o bryd. Buasai'n llawer haws darparu gwybodaeth am nifer y ceisiadau yn ymwneud a throsi hen adeiladau i ddefnydd newydd - er na fyddai hyn dal ddim yn mesur cyfraniad y system.

C4.9	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
9	Nifer y ceisiadau a gyflwynir gydag Asesiadau Trafnidiaeth		
Nid yw' 0 mewi	au ychwanegol: r wybodaeth yn mesur dim byd o ran cyfraniad - a gall y rhif n awdurdod fel Gwynedd - a llawer mwy mewn awdurdodau rhywbeth fel yr isod yn fwy penodol :	•	•
	ceisiadau a gyflwynir gyda Datganiadau Dylunio a Mynediad ceisiadau a gyflwynir gyda Cynllun Teithio Gwyrdd	d	
Er hyn, nid yw'r uchod yn angenrheidiol yn mesur cyfraniad y System - ond mae yn rhoi mwy o wybodaeth ar sut mae'r System yn cyfrannu.			
C4.10	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
10	Nifer y ceisiadau a gymeradwyir/a wrthodir (fesul math) ar o perygl llifogydd)	orlifdir (fesul	categori
Sylwadau ychwanegol: Mae hwn yn rhoi mwy o wybodaeth, yn eithaf hawdd ei fesur ond eto - ddim yn siwr os yw hyn mesur cyfraniad y System Mae'r mapiau llifogydd yn seiliedig ar ddadansoddiad o wybodaeth gyfrifiadurol ac mae			

Mae'r mapiau llifogydd yn seiliedig ar ddadansoddiad o wybodaeth gyfrifiadurol ac mae posibilrwydd i ddatblygiad gael ei gymeradwyo ar orlifdir yn sgil derbyn casgliadau asesiad ardrawiad llifogydd.

Hefyd, cyn gweithredu ar hyn mae'n hanfodol cael arweiniad yn genedlaethol ar wybodaeth i'w ddefnyddio'n lleol ar gyfer effaith newid hinsawdd.

A fyddai 'nifer y ceisiadau a gymeradwyir fesul math ar orlifdir yn groes i argymhellion Asiantaeth yr Amgylchedd' yn ddangosydd gwell?

C4.11	C4.11 Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym

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

Sylwadau ychwanegol:

Yn cytuno fod hwn yn wybodaeth sydd yn berthnasol - ond dylid diwygio'r dangosydd fel ei fod yn cyfeirio at "Nifer y ceisiadau sydd yn cael eu caniatau".

Bydd hyn yn haws i fonitro.

C4.12	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym
02	r ay on on in cytaine an adingcey ac a gyringin i		\boxtimes
1 /	Cyfran y deunyddiau lleol neu ddeunyddiau wedi'i ailgylchu atblygiadau newydd	a ddefnyd	dir mewn
Beth yw	ı ychwanegol: 'lleol" yn y cyd-destun yma. Rhaid i dehongliad hyn fod yr	un peth ar	gyfer
_	vybodaeth nad ydym yn ei gasglu ar hyn o bryd ac mae go u gyda chasglu a darparu'r wybodaeth yma.	blygiadau	
			Nac
C4.13	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	ydym
	´ cynlluniau cynhyrchu ynni cynaliadwy (mW) a gymeradw u math a'u capasiti	yir/a wrthod	lîr, yn ôl
Cytuno g ei ddeho	u ychwanegol: yda'r dangosydd ond eto - ystadegyn ychwanegol yw hwn ngli mewn sawl ffordd. Yn awgrymu y dylid diwygio'r dang ol" ar y diwedd.		
		Ydvm	Nac
C4.14	Ydych chi'n cytuno â'r dangosydd a gynigir?	Ydym	Nac ydym ⊠



Yr wybodaeth yma yn or-fanwl - ac yn y pen draw - pa ddefnydd gellir ei wneud o'r wybodeth gasglir. Nid ydym yn casglu'r wybodaeth yma ar hyn o byd ac fe fuasai yna oblygiadau ar adnoddau yma. Os am hel y wybodaeth - beth am symleiddio'r dangosydd a'i gyfyngu i nifer y ceisiadau yn yr ardaoledd yma yn unig.

C4.15	Ydych chi'n cytuno â'r dangosydd a gynigir?		Ydym	Nac ydym
04.10	rayon on in cytano a raangosyda a gyriigii :			\boxtimes
	er y Caniatadau Adeilad Rhestredig ac Ardal Gadwr hodir	aeth	a gymerad	dwyir/a
Mae hwn y gynaliadwy	ychwanegol: n hawdd i'w fesur - ond eto mae'r wybodaeth yn arw redd yn hollol agored i ddehongliad. Oes cyfle yma gyfer "Listed Buildings at Risk"			
C4.16	Ydych chi'n cytuno â'r dangosydd a gynigir?		Ydym	Nac ydym
16 Nif	er y cartrefi newydd a ganiateir (fesul math)			
,	ychwanegol: s yn cael ei ddal fel rhan o'r gwaith blynyddol o barai Study".	toi'r '	"Joint Hous	sing Land
			Ydym	Nac
C4.17	Ydych chi'n cytuno â'r dangosydd a gynigir?		\boxtimes	ydym
17 Ba	nc tir cyflogaeth (y blynyddoedd a ddarperir)			
	/chwanegol:			
Hwn yn wybodaeth gall fod yn ddefnyddiol - ond nid ydym yn casglu'r wybodaeth yma ar hyn o bryd ac felly fe fyddai angen adnoddau ychwanegol ar gyfer hyn. Tra'n cytuno y byddai'n wybodaeth fyddai'n ddefnyddiol am resymau gweithredol - nid yw'n cyfrannu dim byd o ran mesur cyfraniad y system ay gynaliadwyedd.		'n cytuno		

C4.18	Ydych chi'n cytuno â'r dangosydd a gynigir?	,	Ydym	Nac ydym
	yfanswm yr arwynebedd tir a gymeradwyir/a wrthodir las a thir llwyd) (swyddfeydd/diwydiant/manwerthu/do			gyfuno tir
-	ı ychwanegol: ylwadau i C4.8.			
C5 hyn	ch chi'n cytuno na ddylid ystyried bod y mesuryddion yn rhoi darlun cyflawn o ddylanwad y system gynllun datblygu cynaliadwy ond eu bod yn darparu fframwai -uchel priodol?	io	Ydym	Nac ydym
Cytuno'n darparu -	i ychwanegol: llwyr. Rhagor o wybodaeth / ystadegau yn unig mae a'r gwirionedd yw na fyddant yn mesur cyfraniad y sy yy dim mwy na'r mesuryddion presennol.			
	ch chi'n cytuno â strwythur arfaethedig y Fframwaith hitro Strategol ac y dylid mesur y pedwar cam a nodir od?		Ydym	Nac ydym
	i ychwanegol: amwaith i weld yn synhwyrol - ond mae'n rhaid fod yr laeth.	ofalı	us o ran y	defnydd
niferoedd	outputs" yma - yr unig beth mae'r dangosyddion yn ei a tra'n cytuno ar y fframwaith yn gyffredinol ni chytur yr ymgynghoriad hwn.			
C7 A do	dylid cyflwyno'r fframwaith arfaethedig gam wrth gam	, yn e	ich tyb chi	?



Mae hyn yn dibynu ar beth fydd angen i'r Awdurdodau ei fesur yn y pen draw. Os yw'r fframwaith yn cynnwys yr holl fesuryddion gynigir yma - bydd yn rhaid iddo gael ei gyflwyno gam wrth gam.

Ydych chi'n cytuno y dylem gyfuno/adolygu'r dangosyddion allbwn eraill a nodwyd eisoes yn y Llawlyfr CDLI (2006)	Ydym	Nac ydym
gyda'r dangosyddion newydd arfaethedig, er mwyn mesur allbynnau'r system gynllunio?		
Sylwadau ychwanegol:		
Sut fyddai'r fframwaith Monitro Strategol newydd yn effeithio chi? (Awdurdodau Cynllunio Lleol)	ar eich aw	durdod
Sylwadau ychwanegol: Mae cyfle yma i resymoli'r holl fesuryddion presennol a'r newydd grnewydd ac i gwtogi ar yr holl wybodaeth sydd angen ei adrodd a'i g presennol a gyda'r mesurau / dangosyddion newydd sydd yn cael gyna oblygiadau sylweddol o ran adnoddau.	jasglu. Yn	ei ffurf
Nid ydym ar hyn o bryd yn casglu gwybodaeth ar gyfer nifer o'r me ac felly buasai angen adnoddau ar gyfer rhoi trefniadau yn eu lle i f darparu'r wybodaeth yma. Mae'r Gwasanaeth Cynllunio eisoes we toriadau ac wedi trawsnewid y Gwasanaeth er mwyn ceisio parhau gwasanaeth effeithlon ac effeithiol i gwsnleriaiad, ond gyda llai o st ariannol presennol, sydd yn debygol o barhau i'r dyfodol, nid ydym darparu unrhyw adnoddau ychwanegol i gwrdd a'r llwyth gwaith yc cael ei greu yn sgil yr holl fesuryddion ychwanegol y cyfeirir atynt y	od yn gallu di gorfod g i ddarparu aff. Yn yr h yn rhagwel hwanegol fy ma.	wneud ninsawdd d y gellir /ddai'n
Y cwestiwn sydd angen ei ofyn yw - beth fyddai gwir werth y gwybd draw?	odaeth yn y	pen
Vdych chi'n cytuno â'r dull a gynigiyn ar gyfar adradd ar y	Ydym	Nac
Ydych chi'n cytuno â'r dull a gynigiwn ar gyfer adrodd ar y Fframwaith Monitro Strategol?		ydym

Fframwaith Monitro Strategol ar gyfer y System Gynllunio Mesur y cynnydd tuag at greu Cymru gynaliadwy	-
Sylwadau ychwanegol: Hyn i weld yn iawn - ond mae system genedlaethol Ffynnon yn ei le ers rai blynyddoedd ac mae Cyngor Gwynedd eisoes yn adrodd i'r Cyngor drwy'r system yma. Oes sgop defnyddio'r system yma ar gyfer adrodd hyn?	
Rydym wedi gofyn nifer o gwestiynau penodol. Os hoffech dynnu sylw at unrhyw faterion eraill, nodwch hwy isod.	
Sylwadau ychwanegol: Rydym wrth gwrs yn sylweddoli ei bod bron yn amhosib i gael mesuryddion ar gyfer y system gynllunio sydd yn mesur cyfraniad y System at Gymru Gynliadwy, ond ar yr un pryd sylweddoli hefyd ei bod yn bwysig rhywsut i fod yn ceisio dangos fod y syster yn gwneud cyfraniad cadarnhaol. Y gwir amdani yw mai cyfaint yn unig sydd yn cael ei fesur yma a bod y wybodaeth yma am fod yn hollol ddangosol ac yn gallu cael ei ddehnogli mewn sawl ffordd.	n

Sut y bwriedir defnyddio'r wybodaeth yma gan y Llywodraeth ar ol iddo gael ei gyflwyno?

A fydd y Llywodraeth yn darparu adnoddau ychwanegol er mwyn gweithredu'r fframwaith newydd?

Ni ddylid defnyddio'r wybodaeth ("outputs") yma i geisio cymharu perfformiad Awdurdod mewn unrhyw ffordd, gan y bydd sefyllfa unigryw ym mhob awdurdod sydd yn mynd i gyflwyno ystadegau tra wahanol ar draws Cymru.

Rhaid pwysleisio eto bod gennym wir bryder o ran oblygiadau rhai o'r mesuryddion penodol y cyfeirir atynt yma ar adnoddau'r Gwasanaeth, a gallu'r Gwasanaeth yn yr hinsawdd ariannol presennol, i ymdopi a'r gwaith ychwanegol.

Cyfrinachedd
Mae'n bosibl y bydd yr ymatebion i ymgynghoriadau yn cael eu cyhoeddi – ar y rhyngrwyd 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	Alan Southerby			
Organisation	Powys County Council			
Address	Y Gwalia Ithon Road Llandrindod Powys LD1 6AA			
E-mail address	alan.southerby@powys.gov.uk			
Type (please select	Businesses			
one from the following)	Local Planning Authority			
	Government Agency/Other Public Sector			
	Professional Bodies/Interest Groups			
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)			
	Other (other groups not listed above)			
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?				
Additional commer	nts:			
Do you agree with the proposed approach to use the 'logic-chain' identify appropriate measures of the planning system?				
Additional commer	nts:			

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		
Additional comments:				
Q4.1 Do you agree with the proposed overarching indicator?	Yes	No		
1 Wales' Ecological Footprint				
Additional comments:				
Do you garee with the proposed evererships indicator?	Yes	No		
Q4.2 Do you agree with the proposed overarching indicator?				
Percentage of Biodiversity Action Plan habitats and species or increasing	s recorded	as stable		
Additional comments: This is potentially a good indicator although the Council is concerned at the necessary le				
will be needed across all 25 LPAs in Wales and the capacity for undertaking such a task. Further guidance on a consistent approach would be needed to include the establishment of a baseline position.				
O4.2 Do you agree with the prepared everywhing is director?	Yes	No		
Q4.3 Do you agree with the proposed overarching indicator?	\boxtimes			
3 Gross Value Added (GVA) and GVA per head				

Additional comments:		
	Yes	No
Q4.4 Do you agree with the proposed overarching indicator?		
4 Percentage of the population in low-income households		
Additional comments:		
	Yes	No
Q4.5 Do you agree with the proposed overarching indicator?		
5 Wellbeing in Wales		
Additional comments:		
	Yes	No
Q4.6 Do you agree with the proposed overarching indicator?		\boxtimes
6 Proportion of LPAs with an up to date adopted LDP	1	
Additional comments:		
A more meaningful position would be the proportion of LPAs with an adopted Develop	ment Plan, UDF	or LDP
	Yes	No
Q4.7 Do you agree with the proposed indicator?		

In a County	such as Powys with its vast open spaces and good access to such, a net reducentially very misleading in terms of impact on health and well-being. The incrovision		
		Yes	No
Q4.8	Do you agree with the proposed indicator?		
8 T	otal floor space granted/refused (by type) on greenfield ar	nd brownfield	land
	the indicator as a matter of principle but how does it differentiate between the of brownfield land opportunities compared to those such as Powys with very		
		Yes	No
Q4.9	Do you agree with the proposed indicator?		
9 1	lumber of application submitted with Transport Assessmer	nts	
Presumably	al comments: , therefore, the anticipated new regulations governing the validation of plann latory requirement.	ing applications	will make
		Vaa	NIa
Q4.10	Do you agree with the proposed indicator?	Yes 🖂	No 🗆
Number of applications granted/refused (by type) on the flood plain (by flood risk category)			
Additiona	al comments:		

Q4.11		D	Yes	No
		Do you agree with the proposed indicator?		
11		mber of buildings receiving BREEAM and/or Code for Sotification	ustainable	Homes
		comments:		
For now.	This	should be something that, in time, the devolved Building Regulations in V	Vales will pick	c up.
			Yes	No
Q4.1	2	Do you agree with the proposed indicator?		
12	The	e proportion of local or recycled materials used in new d	evelopmer	ıts
Additio	nal (comments:	-	
		measure in any meaningful way alhough, again, this could potentially be so	omething to b	e picked up
as part of	f the d	evolved Building Regulations in Wales.		
04.4	2		Yes	No
Q4.1	3	Do you agree with the proposed indicator?		
13 Renewable energy generation (mW) granted/refused by type and capacity				
Additio	nal	comments:		

		Yes	No	
Q4.14	Do you agree with the proposed indicator?	\boxtimes		
1 /1	tal area of granted/refused development in protected are tional designations)	as (Europe	an and	
In principle, a	comments: Ithough there is an enormous difference potentially in terms of impact bety Itake. Also, it is not clear how this indicator can factor in mitigation.	veen building f	ootprint and	
Q4.15	Do you agree with the proposed indicator?	Yes	No 🗆	
15 Nu	I Imber of Listed Building and Conservation Area Consent		efused	
Additional	comments:			
Q4.16	Do you agree with the proposed indicator?	Yes	No 🗆	
16 Nu	mber of new homes (by type) granted permission			
	comments: ype' will be the subject of further guidance.			
		Yes	No	
Q4.17	Do you agree with the proposed indicator?		\boxtimes	
17 Employment land bank (years provided)				
Additional comments: Would this not be a policy matter to be determined through existing studies or the Annual Monitoring Report?				

		Yes	No	
Q4.18	Do you agree with the proposed indicator?			
Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)				
Additiona	I comments:			
	ou agree that these measures should not be taken as	Yes	No	
	esenting the full picture of the influence of the planning em on sustainable development but represent an			
	ropriate high level framework?			
	comments: prefore, are detailed circumstances and the justifications for exceptions facto	rad into the pro	page? Tha	
danger is tha	t the new indicators are potentially misleading and misrepresentative and co	ould be used to	criticise	
	cal authorities when in actual fact, through the proper planning process, souve been made and in line with Section 38 (6) of the Act - the statutory appro			
	ou agree with the proposed Strategic Monitoring nework structure and measurement of each of the four	Yes	No	
	es identified above?			
Additiona	I comments:			
What are your views on whether the proposed framework should be phased?				
Additional comments: As proposed subject to further consideration of how qualitative detailed matters can be factored into the process.				
Such further consideration might necessarily mean that the first reporting year would be 2013/14 and not 2012/13.				
1				

Do you agree that we should consolidate/revise the	Yes	No
existing other output indicators set out in LDP Manual (2006) with the proposed new indicators to measure the outputs of the planning system?		
Additional comments:		
What would be the impacts on your authority from the new S Framework? (Local Planning Authorities)	Strategic Mo	onitoring
Additional comments: There would be some impact in terms of devising a means to be able to provide the data up to scrutiny and audit. In terms of resource, we would hope that local authorities would for grant assistance through the Planning Improvement Fund, subject to the fund continu	d be able to ma	
	. V	NT.
Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	No
Additional comments: subject to there being a full and meaningful opportunity to provide any necessary comminformation to set out the local circumstances of individual local authorities, if necessary		he
We have asked a number of specific questions. If you have which we have not specifically addressed, please use this s	•	
Additional comments: There needs to be an assessment of decisions made in accordance with the Developmen Government 'call-ins' but, also, a means of demonstrating that decisions that are seeming indicator or other have still met the statutory test set out in Section 38 (6) of the Act in the account of all material considerations. Perhaps, therefore, the existing quality measure of should be given greater creedence?	gly contrary to erms of properl	one y taking

Confidentiality

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	Businesses			
one from the following)	Local Planning Authority			
	Government Agency/Other Public Sector			
	Professional Bodies/Interest Groups			
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)			
	Other (other groups not listed above)			
Do you agree	with our conclusion that the current Yes	No		
Q1 information is	not sufficient for us measure the contribution g system to our vision of a sustainable Wales?			
Additional commen	nts:			
	with the proposed approach to use the 'logic- appropriate measures of the planning	No 🖂		

The overall aim of the process should be the identification of a set of SMART indicators that provide a meaningful measure of how the planning system contributes towards sustainable development. In addition to this the indicators need to be well defined and be based upon a standard method of collection, which would preclude issues of variance due to data incompatibilities. It is essential that the proposed Monitoring Framework only includes indicators that provide useful information, which is likely to change over time, otherwise the indicators become meaningless.

The Welsh Government published its Sustainable Development Scheme "One Wales: One Planet" in 2009. This addresses what sustainable development is expected to be across Wales, setting out objectives and providing sustainable indicators for this purpose. The SDS is the over-arching document relating to sustainable development and should be at the heart of any work that seeks to address the effect planning has on sustainable development. The SDS sets the basis for what the Strategic Monitoring Framework is purporting to do. Given this the SDS should be a significant consideration in the preparation of this Monitoring Framework.

However, the proposed methodology uses a process model to define the indicators, rather than reflecting the structure set out in the SDS. The procedural model starts with general planning and strategic parameters and works through available information and current resourcing to what outputs these elements can provide and their eventual impacts. The Indicators are then related to the impacts. There are concerns that the results produced by the proposed methodology may conflict with the SDS and may undermine the robustness and validity of this Monitoring Framework. In addition to this concerns are raised in respect of the purpose the identified indicators have. The 18 identified indicators seem to be slanted towards monitoring the implementation of national planning policy rather than providing a meaningful monitoring of the planning system contribution to sustainable development (e.g. Indicators 6, 9, 10, 11).

There is also an increasing body of work being undertaken by local authorities in producing their LDPs that could feed into this process, namely the required LDP and SEA/SA Monitoring Frameworks, which will inform the preparation of their LDP Annual Monitoring Reports. These Frameworks seek to monitor both the planning delivery of the LDP and the state of the environment through the plan period. A review of this work could provide useful information on identifying the best indicators for this Strategic Monitoring Framework.

Overall there are concerns that the methodology will not, and has not, produced a set of indicators that deliver the stated aim of measuring the contribution the planning system makes toward sustainable development. In addition to this there are also concerns that the SDS should be a more significant input in both the structure of the Framework and the identification of the Indicators to ensure that there is conformity and that the Framework is robust and valid.

Do you agree with the strategic groupings of the 19 <i>Planning</i>	Yes	No	
Policy Wales objectives into five categories for the purpose of developing a set of new measures?			
Additional comments:	_		
Significant concerns have been raised over the proposed methodology in Question 2, which would render this question non-applicable or non-answerable (please refer to response to Question 2). However, the following comments have been provided notwithstanding the comments in Question 2.			
Sustainable development has always been taken to have three distinct elements, economic factors, social factors and environmental factors, all of which have equal weighting. It would be more logical to utilise these well-established categories to categorise the objectives, rather than an arbitrary set devised purely for this framework.			
Even if the usual three categories were considered to be inappropriate, it would be better to set categories in line with the structure of the SDS, which would be more likely to be Wales focussed.			
	Yes	No	
Q4.1 Do you agree with the proposed overarching indicator?	<u> </u>		
1 Wales' Ecological Footprint			
Additional comments: This would be a worthwhile indicator for sustainability, although there are concerns over the level to which the planning system can influence it. This authority had intended to use this as an indicator in its SEA/SA monitoring framework, but the information source for this has not been meaningfully updated since 2006. As such it is likely to be withdrawn when the first formal AMR is produced in 2012.			

		Yes	No
Q4.2	Do you agree with the proposed overarching indicator?		
2	Percentage of Biodiversity Action Plan habitats and species or increasing	s recorded a	as stable

Additional comments: This would be a worthwhile indicator for sustainability, although there are concerns over the level to which the planning system can influence it, particularly as planning can only influence development in designated areas.				
This authority has included this indicator in its SEA/SA monitoring framework. However the council does not monitor all of the BAP species and habitats. Consequently the SEA/SA Indicator is restricted to just top 5 species.				
Q4.3	Do you agree with the proposed overarching indicator?	Yes 🖂	No	
3	Gross Value Added (GVA) and GVA per head			
Addition	nal comments:			
Q4.4	Do you agree with the proposed overarching indicator?	Yes	No	
44.4	bo you agree with the proposed overalching indicators			
4	Percentage of the population in low-income households			
Addition	nal comments:			
		Yes	No	
Q4.5	Do you agree with the proposed overarching indicator?			
5	Wellbeing in Wales			

Additional comments: It is difficult to comment on whether this is a useful indicator as it is what "wellbeing" is. The indicator needs to be strictly defined to enamonitored.		00 E31257031
Life expectancy X Life satisfaction		
Ecological Footprint		
This index provides a definitive and quantifiable value for a measure sustainability and could usefully be included in this Stratetgic Monito		ework.
Q4.6 Do you agree with the proposed overarching indicator?	Yes	No 🖂
6 Proportion of LPAs with an up to date adopted LDP		
Additional comments: This is a meaningless indicator over time. Once an LDP is adopted review regime that would see reviews undertaken no later than ever Consequently this only monitors whether local authorities have ado	ry 4 years. pted plans,	not
whether they are up-to-date. When all local authorities have adopted indicator becomes meaningless.	ed LDPs thi	S
	are being re	eviewed

Q4.7	Do you agree with the proposed indicator?	Yes	No	
7	Net change in open space and playing fields			

This indicator seeks to record changes to two types of land, namely playing fields and open space. Whilst playing fields are relatively easy to define, and so could potentially be monitored, the definition of open space contained in TAN16 encompasses a significantly diverse range of land which would be extremely difficult to monitor. In addition the level of one type of land may offset the level of another. In such cases the indicator would not indicate any problem, where in fact a significant deterioration in provision may have occurred. If the indicator is to be maintained it would be better if the indicator was split into two separate parts, one dealing with playing fields and one dealing with open space.

Notwithstanding the difficulties in monitoring the levels of land, it is questionable what useful information the indicator provides. The fact that open space and playing field land is decreasing may be entirely sustainable if there is a surplus of such land. Conversely an increase in land could be an adverse impact where needs are already satisfied.

It is more usual to benchmark open space and playing fields against standards. Playing field provision is benchmarked against the FIT standard whilst open space is benchmarked against the CCW Toolkit. The indicators would provide a much more meaningful indicator if they were benchmarked accordingly.

Whilst, in principle, this indicator could provide a useful and meaningful measure for this Monitoring Framework, the indicator would require significant amendment in order to make it appropriate. The Indicator as written is not considered appropriate.

Q4.8		Yes	No
	Do you agree with the proposed indicator?		
8	Total floor space granted/refused (by type) on greenfield ar	nd brownfiel	d land

Additional comments:

This Indicator would seem to seek to monitor greenfield and brownfield land development. However, the Indicator actually seeks to record the floor area of built development and not the total area of brownfield or greenfield land subject of development. It is questionable what use the floorspace built on brownfield and greenfield land would be. It would seem more appropriate to record the amount of brownfield land brought into beneficial use and the amount of greenfield land lost to development, which would provide a picture of how much land is being lost and brought back to development.

As it stands there are concerns raised over the value of this indicator.

		Yes	No
Q4.9	Do you agree with the proposed indicator?		
9	Number of application submitted with Transport Assessment	nts	
The sul of deve out in F indicate	mal comments: comission of a Transport Assessment is a statutory rquirement lopment. The parameters for developments subject to this in PW4 and TAN 18 - Transport. This indicator can only be contained to the implementation of national planning policy, or to assessments submitted does not relate to the delivery of the order.	requirment a onsidered to as the numb	re set be an er of
would r	r to relate to sustainable development the content of the Tra need to be monitored and benchmarked against an appropri er this would be a lengthy and protracted process that may r t data.	ate standard	
		Yes	No
Q4.10	Do you agree with the proposed indicator?		NO
	Number of applications granted/refused (by type) on the fla	od plain /by	
10	Number of applications granted/refused (by type) on the florisk category)	ou plain (by	iiouu
ANY INTRODUCED INCOME. IN	nal comments:	gr n n	71
This ind	licator also seems to be monitoring the implementation of na	ational policy	/ rather

This indicator also seems to be monitoring the implementation of national policy rather than providing a measure of the planning system's contribution towards sustainable development. The indicator is purely related to the number of applications granted or refused, irrespective of whether they are in accordance with national policy or contribute towards sustainability. The Indicator needs to be benchmarked against a relevent standard or level in order for it to provide information on sustainable development.

includes an indicator on development within flood zones in its LDP Monitoring Framework. However, the indicator seeks to monitor permissions in flood zones C1 and C2 that are contrary to EAW advice, rather than just number of applications. The information for this indicator is being provided by EAW as part of the LDP Monitoring process. The information will identify where the policy is not being applied and therefore monitors the implementation of policy, rather than providing a measure whether the development is sustainable.

04.44	De very come a with the manner of indicate and	Yes	No	
Q4.11	Do you agree with the proposed indicator?			
Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification				
Additional comments: Whilst the principle of monitoring development meeting sustainability standards is welcomed, the indicator seeks to monitor a statutory requirement. It is currently a requirement for all residential dwellings to meet Code for Sustainable Homes Standard level 3 and all non residential development is to accord with BREEAM standards. Consequently all development should realise either Cose for Sustainable Homes or BREEAM Certification. As written the Indicator purely seeks to monitor the implementation of national policy. To be an indicator for sustainable development it needs to be benchmarked. Given that all development is required to meet certain standards it would be better if the indicator sought to monitor development realising levels over and above the statutory level. This would provide information on the number of buildings that are realising higher than required sustainability standards.				
		Vaa	Nia	
Q4.12	Do you agree with the proposed indicator?	Yes 🖂	No	
12 Th	e proportion of local or recycled materials used in new de	evelopmen	ts	
Additional comments: Whilst this indicator would be a useful indicator for the framework the information is not currently being captured and there is no statutory requirement for developers to submit the information. Consequently some of the information, particularly in respect of the sources of materials, may be impossible to collect.				
		Yes	No	
Q4.13	Do you agree with the proposed indicator?			
13 Re	13 Renewable energy generation (mW) granted/refused by type and capacity			

This indicator seeks to monitor whether national planning poicy in respect of renewable generation is being implemented. The indicator does not seek to monitor the more important sustainable development issue of energy generated by sustainable means.

The information for renewable energy generation, in the form of feed in tarriff records, can be obtained through OFGEM and will identify the amount of renewable energy being fed into the national grid from renewable sources.

Even if the indicator as written is maintained it would be beneficial to augment it with the feed in tarriff information.

		Yes	No	
Q4.14	Do you agree with the proposed indicator?			
	tal area of granted/refused development in protected are tional designations)	eas (Europe	ean and	
This Indica and nation such desig	comments: Itor seems to monitor national policy implementation as it al designations. The Indicator does not consider the amountaions, merely accounting for the area of land subject to decisions which is meaningless.	ount of land	•	
		Yes	No	
Q4.15	Do you agree with the proposed indicator?		\boxtimes	
15 Nu	mber of Listed Building and Conservation Area Consent	s granted/r	efused	
This indica only monitor monitor thi reasons wh	comments: tor seems to have little to do with the delivery of sustains oring planning application approvals and refusals. It wou ngs such as buildings at risk brought into beneficial use, ny applications are being refused (such as refusals base ration Area.)	uld be bette or quantify	r to the	
		V	Nie	
Q4.16	Do you agree with the proposed indicator?	Yes 🖂	No 🗆	
16 Nu	mber of new homes (by type) granted permission			
Additional comments: This information is already being collected via the annual JHLAS reports. However the delivery of numbers of dwellings is, in itself, not an indicator of sustainable development. Benchmarking housing delivery against need or utilising the five-year land supply figures would give a better sustainability measurement.				
		Yes	No	

Q4.17

Do you agree with the proposed indicator?

17 Employment land bank (years provided)		
Additional comments: Whilst this would be a worthy indicator for the Strategic Monitoring no set guidance on how employment land availability assessment sundertaken. Consequently local authorities use widely varying met employment land provision and need. Consequently, whilst all LDF background assessments of need and provision, they are not readic comparable. As a result any indicator based upon this information flawed.	should be hods of cal Ps include ly compatib	culating ble or
	Voo	No
Q4.18 Do you agree with the proposed indicator?	Yes	No 🖂
18 Total floor space granted/refused (by type) (combining gree brownfield land) (offices/industry/retail/distribution)	enfield and	
Additional comments: Please refer to response to Question 4.8.		
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 🖂
Additional comments: Concern is raised over the use of the Strategic Monitoring Framework for assessing the influence the planning system has on development. The focus of the methodology on Planning Indicators than the Sustainable Indicators from the SDS, has led to the identify indicators that are more aligned to the delivery of national policy, the contribution that planning makes to sustainable development deliver. The set of indicators require significant amendment to reflect the air Framework and in many cases the indicators need to be benchman relevant standards in order for them to have any real meaning.	sustainable s from PPV ication of a nan measur ery. m of the	y rather set of ing the
Do you agree with the proposed Strategic Monitoring	Yes	No
Q6 Framework structure and measurement of each of the four		\square

stages identified above?

A Strategic Monitoring Framework for the Planning System Measuring progress towards a sustainable Wales

Additional comments:	
Given responses to Questions 2 and 4 above.	

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

Additional comments:

Notwithstanding the concerns raised over the Framework, there would seem to be little justification for phasing of the introduction of an appropriate Strategic Monitoring Framework. It would be better to ensure that the lead-in time for the first monitoring exercise be sufficient to ensure that data collection and analysis processes are already in place.

	Do you agree that we should consolidate/revise the	Yes	No
Q8	existing other output indicators set out in LDP Manual		
	(2006) with the proposed new indicators to measure the		
∧ dditi	outputs of the planning system? onal comments:		
	ssential that the LDP Manual Indicators are revised and replac	red As the	ev stand
	cannot be monitored (of the 12 indicators set out in the LDP I		
	ored whilst another 4 have significant restrictions so that they		
	l picture.)	7 1	
	DP Manual Indicators need to be replaced with a set of well-d	efined, sus	tainable
devel	opment related Indicators.		
00	What would be the impacts on your authority from the new S	trategic Mo	nitoring
Q9	Framework? (Local Planning Authorities)		
Addit	onal comments:		
	itten the Framework includes some indicators where informati		
	recorded and some where there is great variation between au	uthorities in	the way
that in	nformation is gathered and manipulated.		
Thor	levelenment of a new Strategie Manitoring Francework to man		م مناء بطامه
	levelopment of a new Strategic Monitoring Framework to moni anning system makes to sustainable development will undoub		
	g up processes to collect information not collected previously		ve
	ardising some processes to make data consistent and compa		vever it
	d be noted that where new data is to be collected and where p		
	ardisation, this should be done through WGs primary powers		•
	ory requirements rather than be incidental or procedural recor		
	levelopment of the framework will undoubtedly require addition		
or the	local authorities and there are significant resource issues ass	ociated wit	in it.
010	Do you agree with our proposed approach to reporting the	Yes	No

Strategic Monitoring Framework?

Q10

It would be best for the Strategic Monitoring Framework to Report Wales wide findings.

The indicators in the Framework should replace the indicators currently included in the LDP Manual and as such the local information would then be required to be included in each local authorities AMR.

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:

None

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 :	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]	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	Rhian Kyte						
Organisation	LDP Pathfinder Group (South East)						
Address	C/O Ty Pontllanfraith Pontllanfraith Blackwood NP19 0AS						
E-mail address	Kyter@caerphilly.gov.uk						
Type (please select	Businesses						
one from the following)	Local Planning Authority						
	Government Agency/Other Public Sector						
	Professional Bodies/Interest Groups						
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)						
	Other (other groups not listed above)						
Do you saree	with our conclusion that the current Yes	No					
Q1 information is	not sufficient for us measure the contribution						
Additional comments: of additional and more robust information puts local authorities and WG in a batter position to consider and plan for sustainable development.							
Do vou agree	with the proposed approach to use the 'logic- Yes	No					
	appropriate measures of the planning						

Undecided			

The Logic-Chain is an over-complicated approach and it is questioned whether such a process model can actually derive appropriate inidcators.

Emphasis should be on impacts, but it is essential that outputs/outcomes are interpreted at a local level to ensure the results reflect the situation.

	you agree with the strategic groupings of the 19 Planning	Yes	No				
	cy Wales objectives into five categories for the purpose						
	eveloping a set of new measures? Il comments:	_					
Undecide							
On the one hand there are no real concerns over the categorisation (subject to appropriate account being taken of overlaps and inter-relationships between them). On the other hand Sustainable Development is already categorised into Economic, Social and Environmental elements and the WG SD Scheme, which sets out WGs vision for Sustainabale Development, has its own framework and groupings, both of which could be used without resoting to identifying a categorisation specifically for this framework. There is real concern that the methodology for the identificcation fo the SD Indicators diverges too far away from the SD Scheme, which should provide the over-arching framework for them.							
		Yes	No				
Q4.1	Do you agree with the proposed overarching indicator?	i es					
1 V	Vales' Ecological Footprint						
Additional comments: Whilst this is considered to be a suitable and appropriate indicator, it has been noted that the underlying data for this has not been updated since 2006 (although amendments were made in 2008). To be included in this Framework the data will need to be updated regularly. Concern was raised generally that the 5 national SD Indicators in this Framework (Nos							
			•				
1 - 5) will	was raised generally that the 5 hational SD indicators in tr need to be broken down into local authority areas to enab sed at all levels.		•				
1 - 5) will	need to be broken down into local authority areas to enab		,				

or increasing

2

Percentage of Biodiversity Action Plan habitats and species recorded as stable

Whilst it the reso	al comments: was agreed that this was a very useful indicator, concerns urcing for monitoring the BAP habitats and species and the on supplied from outside the council.						
Q4.3	Do you agree with the proposed overarching indicator?	Yes	No				
3 (Gross Value Added (GVA) and GVA per head						
	al comments:						
Q4.4	Do you agree with the proposed overarching indicator?	Yes	No				
4 I	Percentage of the population in low-income households						
Additional comments: Undecided There are concerns over how far planning has an impact upon this measure. and therefor ehow relevant it is to measuring th eplanning systems role in delivering sustainable development.							
sustaina		in delivering	9				
sustaina		in deliverinç					
sustaina							
sustaina Q4.5		Yes	No				

	Δ	do	liti	on	al	CO	m	m	en	te	
į	\neg	uι	มเน	UH	aı	UU				uэ	_

Undecided

There is concern over exactly what "wellbeing" means. It requires very specific definition.

This is a measure taken from the SD Scheme which is currently being monitored on a Wales-wide basis. However there has been little change in this since 2003. Whilst it can be argued that this reflects a position in repsect of planning delivering SD, but it is more likely to indicate other factors that are holding the level constant.

Concern s raise dwhether such a measure is an indicator.

		Yes	No					
Q4.6	Do you agree with the proposed overarching indicator?							
6	6 Proportion of LPAs with an up to date adopted LDP							

Additional comments:

This is an absolute indicator, once all authorities have adopted LDPs they will all be up-to-date and the indicator will be meaningless, especially as the 4-year review programme will ensure all plans are "up-to-date".

It might be better to monitor decisions taken in accordance with adopted LDPs, and departure decisions. This would reflect how LDPs are influencing decisions.

		Yes	No
Q4.7	Do you agree with the proposed indicator?		
7	Net change in open space and playing fields		

Δ	١d	d	if	ıi٥	na	I co	m	me	nts	

There is a particular issue in obtaining a baseline against which this indicator can be considered. The TAN definition of open space is extremely wide and it is a massive task to capture all open space when undertaking an open space assessment.

Notwithstanding this, concerns are also raised in respect of what such an indicator actually shows. Is the loss of small areas of scrubland or highway verge (both considered to be open space under the TAN definition) really unsustainable?

A better measure would be to consider open space and playing field provision/loss against the relevant NPFA or FIt standards as this would provide a quantifiable measure of the value of the provision or loss.

0.10		Yes	No
Q4.8	Do you agree with the proposed indicator?		
8	Total floor space granted/refused (by type) on greenfield ar	nd brownfie	ld land

Additional comments:

As written the indicator is not approrpiate, although the principle of monitoring brownfield and greenfield development is considered useful. Concern is raised over how this indicator will be interpretted. The common perception that brownfield development is good and greenfield development is bad does not hold true, as brownfield land, particularly if regenerated, contains some of the most valuable ecological habitat, whilst much of the greenfield land outside settlements has been improved by agriculture and has low ecoogical value.

Concern is raised in particular that only floorspace, and not site area, is being recorded. Many types of development cover a wider area than the floorspace of its buildings. Employment land includes parking and operational areas that are no included in floorspace calculations. This addition land could be much greater than the total of the florspace and therefore floorspace provides an inaccurate picture of greenfield and brownfield development.

A better indicator might actually be the are aof derelict or contaminated land brought remdiated and reclaimed (and possibly brought back into beneficial use). At least this would show a active improveemnt in the state of the environment.

Q4.9		Yes	No
	Do you agree with the proposed indicator?		

9 Number of application submitted with Transport Assessments

Additional comments:

This indicator is fundamentally flawed as it does not directly relate to the delivery of sustainable development.

A better indicator may be the quantified or anticipated modal shift identified within the TA itself. The TA should address sustainable transport issues, identifying the total number of trips and the number of trips projected by sustainable transport means as part of a travel plan. This would give an active measure of the planning system delivering sustainable transport. It be noted, however, that the implementation of a travel plan is not a certainty and the projected modal sift may not actualy materialise. However the indicator does directly address the planning system delivery in respect of this issue.

			Yes	No
Q4.10		Do you agree with the proposed indicator?		\boxtimes
Number of applications granted/refused (by type) on the flood plain (by flood risk category)				flood

Additional comments:

A definition of "type" of development needs to be provided.

The indicator should be narrowed to reflect development of vulnerable development within the flood areas, as non-vulnerable can take place.

Concern has been raised over the need to monitor refusals and what this information will show.

On balance the indicator in the LDP Manual is considered to be better than this indicator.

		Yes	No	
Q4.11	Do you agree with the proposed indicator?	Tes		
	mber of buildings receiving BREEAM and/or Code for Sitilification	ustainable	Homes	
	comments:			
	raised raised over the value of the indicator, although the if WG want to collect the data.	e re are no		
Q4.12	Do you agree with the proposed indicator?	Yes	No 🖂	
12 Th	e proportion of local or recycled materials used in new d	evelopmen	ts	
Additional comments: Concern is raised over the availability of data that can be captured to enable this indicator to be monitored. Site waste management plans may provide a vehicle for capturing recycyled materials data, but there is not a mechanism for recording th euse of local materials. A defiition of "local" needs to be provided to ensure that any data captured in respect of local materials is consistent and comparable. If this indicatoris retained it should be phased in over time.				
04.40	D	Yes	No	
Q4.13	Do you agree with the proposed indicator?			
13 Renewable energy generation (mW) granted/refused by type and capacity				
Additional	comments:			

Q4.14 Do you agree with the proposed indicator?	Yes	No	
	- ,		
	tal area of granted/refused development in protected are tional designations)	as (Europe	an and
Additional	comments:		
The param	neters of "development" needs to be defined. The indica	tor should a	also
	cal designations (LNRs, SINCs, etc) and should also mo	nitor the ef	fects and
impacts of	mitigation and compensation.		
Q4.15	Do you agree with the proposed indicator?	Yes	No
Q 7.10	Do you agree with the proposed indicator:		
15 Nu	imber of Listed Building and Conservation Area Consent	s granted/r	efused
	comments:		
	raised over the value of the indicator and what useful info		
•	larification is required on the type and scale of developm		
	given the differing levels of development that require pe	rmission to	r listed
buildings a	and conservation areas.		
		T .v	
Q4.16	Do you agree with the proposed indicator?	Yes	No
	Do you agiod mar are proposed marcater.		
	imber of new homes (by type) granted permission		
	comments:		
	sed over the potential for double counting where there a		
	for a single development (outline, Reservd matters or e	ven more t	nan one
scheme ap	pproved).		
		Yes	No
Q4.17	Do you agree with the proposed indicator?		
17 En	nployment land bank (years provided)		

-	Measuring progress towards a sustainable Wales				
	Additional comments: The inidcator monitors the landbank, but does not set it against any identified target level. Consequently indicator is urely a numerical figure without much meaning. It would provide a useful indicator if set against a required landbank level.				
ı			Yes	No	
	Q4.18	Do you agree with the proposed indicator?			
		I floor space granted/refused (by type) (combining green finding and) (offices/industry/retail/distribution)	enfield and		
	Additional comments: Whilst the principle of the indicator is agreed there are a number of areas where the Indicator could be improved. Concern is raised over why floorspace and not site area is being monitored, and it needs to define whether floorspace is net or gross. Concern is also raised over the value of monitoring refusals. Housing should also be included within the scope of this indicator. It might be worth delaying this implementing this indicator until after the CIL Regs are operational.			te area Concern Icluded	
l I	Dovou	agree that these massures should not be taken as	Voo	No	
	Q5 represe system appropri	agree that these measures should not be taken as enting the full picture of the influence of the planning on sustainable development but represent an riate high level framework?	Yes	No 🗆	
	Additional co In part.	omments:			
It is agreed that the Indicators should not be taken to reflect the complete picture of the influence of planning system on Sustainable Development delivery.					
	The level of the Indicators is also appropriate for a High Level Framework. However, given the comments, the Indicators themselves are not completely appropriate and therefor cannot be considered to be an appropriate high level framework.				
		nts are made to the Indicators to address the issues rain I form an approriate high level framework.	sed agains	t them	

OC Do wow composite the ma	ana ana al Otrata sia Maraita sia si	1/	NI-
Q6 Do you agree with the pr	onosea Strategic Monitoring	l Yes	l No
de De yeu agree war are pr	opooca chategio montoning	1 00	140

Framework structure and measurement of each of the four stages identified above?		
Additional comments: As it is written in the Research Document and Report it is very con-	fusing.	
Once explained, however, the approach is onsidered to be appropriate.		
Q7 What are your views on whether the proposed framework sho	uld be pha	sed?

Undecided

There is a difference of opinion between authorities that have Adopted LDPs and those that are preparing their LDPs. Those with Adopted LDPs (and monitoring systems in place) seeing no benefit from phasing, whilst those preparing LDPs seeking as long a phasing time as can be accommodated to enable resources to be focussed on LDP preparation.

There is potential to run pilot tests for the complete Framework, utilising the authorities with Adopted LDPs and monitoring systems in place, to establish any issues with the Framework and data collection.

Do you agree that we should cons		Yes	No	
existing other output indicators set out in LDP Manual (2006) with the proposed new indicators to measure the outputs of the planning system?				
Additional comments: The output indicators in the LDP Manual are poorly defined and difficult to monitor and should not be retained.				
Including revised and well defined Indica LDP Manual, would be welcomed.	tors in this Framework, to i	eplace tho	se in the	
It is noted that the indicators monitor out the potential to be meaningless without i	•	is easier, b	ut has	
What would be the impacts on your Framework? (Local Planning Aut	•	trategic Mo	onitoring	
Additional comments: Time, Resources and Staffing issues				
Availability of the correct data, and its su	bsequent capture, is a maj	or issue		
Do you agree with our proposed a Strategic Monitoring Framework?	pproach to reporting the	Yes	No 🗆	
Additional comments:				
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: None				

Planning Aid Wales consultation response, 27th January 2012

A strategic monitoring framework for the planning system: Measuring progress towards a sustainable Wales

To: <u>planconsultations-e@wales.gsi.gov.uk</u>

1. About Planning Aid Wales

- 1.1 Planning Aid Wales is an independent not-for-profit charity which is core funded by the Welsh Government. We work for a fairer and more transparent planning system which is responsive to community needs and preferences.
- 1.2 We provide information, advice and training services to enable communities to engage more effectively with the planning system. We also work with local planning authorities and the Welsh Government to encourage more and better community involvement in the planning process.
- 1.3 When responding to consultations on emerging national planning policy we aim to identify and hopefully rectify potential policy barriers to meaningful public involvement in planning.

2. Consultation response

- 2.1 This consultation seeks views on a proposed framework for measuring the contribution that the planning system makes to achieving sustainable development.
- 2.2 The consultation document describes the planning system as having the following two key roles:
 - 1) the plan-making process, which seeks to guide the right types of development to the most sustainable locations.
 - 2) the decision taking process, which grants or refuses permission for development.
- 2.3 The planning system is one of precious few regulatory mechanisms offering opportunities for communities to influence decision making. So in

Planning Aid Wales consultation response, 27th January 2012 A strategic monitoring framework for the planning system: Measuring progress towards a sustainable Wales

terms of the planning system's potential contribution to helping achieve sustainable development, we suggest there is a third role as follows:

- the community engagement process, which provides opportunities for people to be actively involved in planmaking and to have an influence on decision taking.
- 2.4 The proposed methodology for measuring the planning system's potential contribution to sustainable development fails to take this third role into account. We observe that this is directly at odds with the core principles expressed in the Welsh Government's sustainability scheme *One Wales; One Planet* as adopted in 2009.
- 2.5 The consultation document describes *One Wales; One Planet* as identifying the planning system as one of four key themes that underpin the approach to reducing our ecological footprint and delivering sustainable development. It goes on to say that the overall aim of the planning system is to provide for homes, infrastructure, investment and jobs in a way that helps reduce our ecological footprint.
- 2.6 We observe that this is the **specific** aim for the planning system as described in Chapter 4 of *One Wales; One Planet*, which is entitled 'Sustainable Resource Use'. However, as is made clear in preceding Chapter 2 'Our Vision of a Sustainable Wales', the Welsh Government's sustainable development scheme is intended as a far more integrated document. This is clearly demonstrated by the following extract (see page 19) under the heading 'Headline indicators of sustainable development':

It is intended that these [sustainable resource use; sustaining the environment; a sustainable economy; a sustainable society; wellbeing] should be considered collectively, and not individually, to give a high level view of our progress towards becoming a sustainable nation. These provide the structure for the chapters within this Scheme. In many cases, the headline indicators represent proxy measures that cannot reflect the breadth of issues within each chapter. Each chapter also notes the relevant supporting indicators of sustainable development. In many cases action referred to in one chapter will contribute to other headline or supporting indicators in other chapters.

2.7 Chapter 3 of *One Wales; One Planet*, entitled 'Sustainable Development - the central organising principle', is even more explicit about the integrated nature of sustainable development and the need for objectives across traditionally distinct policy areas to be interlinked. This is demonstrated by the following extracts:

Planning Aid Wales consultation response, 27th January 2012 A strategic monitoring framework for the planning system: Measuring progress towards a sustainable Wales

Vision

The Welsh Assembly Government is an exemplar organisation in the way that it mainstreams sustainable development as its central organising principle.

Key outcomes

- The Welsh Assembly Government, as an exemplar organisation, demonstrates leadership on sustainable development, and encourages and enables others to embrace sustainable development as the central organising principle.
- Sustainable development considerations are at the core of the evaluation and development of our policies and our new and existing investment proposals.
- There are effective and participative systems of governance in all levels of society.

Sustainable development will be the central organising principle for Government, and we will encourage and enable others in the wider public sector in Wales, to embrace sustainable development as the central organising principle. ... Our approach to policy-making will be underpinned by the following 2 core principles, and 6 supporting principles:

(page 25)

Sustainable development principles of policy making

Core principle 1: Involvement - people and communities are at the heart of sustainable development, so we will be inclusive in our involvement of all our stakeholders in the development of our policies and programmes, and the identification of solutions that meet their needs, promoting innovation in the way that we deliver services.

Core principle 2: Integration - only an approach that makes the connections between, and effectively integrates economic, social and environmental challenges, will achieve sustainable development.

(page 26)

How we will use these principles

Core principles: the 2 core principles - involvement and integration - must be central to all key decisions about an organisation's policies and programmes.

Planning Aid Wales consultation response, 27th January 2012 A strategic monitoring framework for the planning system: Measuring progress towards a sustainable Wales

The Welsh Assembly Government aspires to become an exemplar organisation in terms of its use of sustainable development as the central organising principle of Government. The new corporate management structure will help to strengthen collective implementation of our sustainable development duty. The new Director General for Sustainable Futures, working directly to the Permanent Secretary, will take forward and champion delivery of sustainable development as our central organising principle across all departments.

(page 27)

- 2.8 We conclude that the proposed methodology for measuring the contribution planning makes to sustainable development is unduly restrictive, and encouraging of the conventional view that the planning system is about delivering **for** communities rather than delivering **with** communities.
- 2.9 We suggest that the framework should be substantially amended to reflect the key sustainable development principles of involvement and integration. Qualitative and quantitative indicators for measuring the contribution planning makes to these core principles might embrace notions such as accessibility, community wellbeing, participation, social justice and local accountability. Planning Aid Wales would be more than happy to assist with this work.
- 2.10 Finally, we observe with regret that the consultation paper and associated documentation setting out Welsh Government proposals on this extremely important subject are extremely complicated and likely to be inaccessible to the lay person.

12th February 2012

Andrew Charles
Planning Policy Branch
Planning Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Dear Mr Charles,

A strategic monitoring framework for the planning system: Measuring progress towards a sustainable Wales

Thank you for the opportunity to respond to the consultation dated 4th November 2011.



Please find our response below.

Consultation Questions

1. 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?

We feel that the current information has been adequate but welcome in principle moves to improve the system. However we are concerned that that the focus may shift too much from improving the system itself to one of process. The priority and focus must remain the system itself

2. Do you agree with the proposed approach to use the 'logic-chain' to identify appropriate measures of the planning system?

We agree with this approach.

3. Do you agree with the strategic groupings of the 19 Planning Policy Wales objectives into five categories for the purpose of developing a set of new measures?

This would make the use and analysis of data simpler we support this proposal.

4.1-4.18. Do you agree with the proposed indicator? Note: You will be able to make your comments on each indicator separately on the consultation form. Please see Annex F.

This seems sensible.

5.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.

We feel that new measures should reflect the full picture as far as possible. If it is felt this is not the case then we would recommend review and further consultation.

6. Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?

We have no objection.

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

We feel this is a sensible gradualist approach.

8. 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?

We agree that we should have one monitoring system and make sure it is used properly.

9. What would be the impacts on your authority from the new Strategic Monitoring Framework?

We have no comment.

10. Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?

We agree with it subject to the reservations we express in response to questions 1 and 5. Above all as we say in question 1 the priority was and must remain improving the operation of the system in practice.

Other comments

If you have any queries in respect of this response please do not hesitate to contact me.

Yours sincerely,

