

## Responses to consultation

### Proposals concerning the publication of Sustainable Development Indicators Statistical Outputs

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#### **1. Janet Jones**

Federation of Small Businesses Wales

RE: Proposals concerning the publication of Sustainable Development Indicators statistical outputs

FSB Wales welcomes the opportunity to present its views to the Welsh Government on sustainable development indicators. FSB Wales is the authoritative voice of businesses in Wales. With 10,000 members, a Welsh Policy Unit, two regional committees and twelve branch committees; FSB Wales is in constant contact with business at a grassroots level. It undertakes regular online surveys of its members as well as a biennial membership survey on a wide range of issues and concerns facing small business.

### **Economic Statistics**

FSB Wales is concerned about the current lack of statistics on the Welsh economy published and analysed on a regular basis. This is likely to be exacerbated by the current consultation which seeks to remove existing output and analysis and move towards publishing the statistics on the StatsWales website only. In light of greater fiscal autonomy provided for under the Wales Bill, FSB Wales feels far more capacity is needed as part of a treasury function in order to properly service the decision making process in Wales. There are also specific statistical releases currently under threat, such as the annual business demography release, that serve to undermine Welsh Government's commitment to growth and jobs.

### **Open Data**

The consultation document states that compendia publications are time consuming to produce and are as a result often out of date by the time of publication. While FSB Wales can see the logic of this argument, we are concerned that movements towards 'open data' mean that in practice statistics are still produced for the StatsWales website but are not analysed in any further detail that is subsequently made available to the public. This potentially undermines public scrutiny and engagement with statistical releases and shifts the onus of interpretation away from the public sector towards those that may not have the capacity to deal with the data.

### **Future Generations Bill**

FSB Wales has been closely involved in the progress of the Future Generations Bill, including representation on the Stakeholder Reference Group. As part of this process, we are keen to see indicators set out under the Bill that would track progress on economic, social and environmental measures against a set of properly articulated targets and aspirations. FSB Wales is concerned that a hiatus period between the discontinuation of the current compendium and the indicators being implemented under the Future Generations Bill could lead to a disjuncture in terms of current sustainable development policy and future policy under the Future Generations Bill.

## **2. Meri Huws**

Welsh Language Commissioner

**Cynigion ynghylch cyhoeddi allbynnau ystadegol am Ddangosyddion Datblygu Cynaliadwy**

Mae Comisiynydd y Gymraeg yn croesawu'r cyfle i gyfrannu sylwadau at yr ymgynghoriad.

Prif nod y Comisiynydd yw hybu a hwyluso defnyddio'r Gymraeg. Gwneir hyn drwy ddwyn sylw at y ffaith bod statws swyddogol i'r Gymraeg yng Nghymru a thrwy osod safonau ar sefydliadau. Bydd hyn, yn ei dro, yn arwain at sefydlu hawliau i siaradwyr Cymraeg. Mae dwy egwyddor yn sail i waith y Comisiynydd:

Ni ddylid trin y Gymraeg yn llai ffafriol na'r Saesneg

Dylai personau yng Nghymru allu byw eu bywydau drwy gyfrwng y Gymraeg os ydynt yn dymuno gwneud hynny.

Dros amser fe fydd pwerau newydd i osod a gorfodi safonau ar sefydliadau yn dod i rym trwy is-ddeddfwriaeth. Hyd nes y bydd hynny'n digwydd bydd y Comisiynydd yn parhau i arolygu cynlluniau iaith statudol trwy bwerau y mae wedi eu hetifeddu o dan Ddeddf yr Iaith Gymraeg 1993.

Crëwyd swydd y Comisiynydd gan Fesur y Gymraeg (Cymru) 2011. Caiff y Comisiynydd ymchwilio i fethiant i weithredu cynllun iaith, ymyrraeth â'r rhyddid i ddefnyddio'r Gymraeg yng Nghymru ac, yn y dyfodol, i gwynion ynghylch methiant sefydliadau i gydymffurfio â safonau.

Un o flaenoriaethau'r Comisiynydd yw craffu ar ddatblygiadau polisi o ran y Gymraeg. Felly, prif rôl y Comisiynydd yw darparu sylwadau yn unol â'r cylch gorchwyl hwn gan weithredu fel eiriolwr annibynnol ar ran siaradwyr Cymraeg yng Nghymru y gallai'r diwygiadau arfaethedig effeithio amyn nhw. Mae'r ymagwedd hon yn cael ei harddel er mwyn osgoi unrhyw gyfaddawd posibl ar swyddogaethau'r Comisiynydd ym maes rheoleiddio, a phe bai'r Comisiynydd yn dymuno adolygu'n ffurfiol berfformiad y sefydliad yn unol â darpariaethau'r Mesur.

Mae datblygu cynaliadwy yn faes lle mae Comisiynydd y Gymraeg wedi bod yn pwysleisio pwysigrwydd ystyried y Gymraeg ac mae Llywodraeth Cymru eisoes yn ymwybodol fod y Gymraeg wedi ei chydblethu'n agos â ffactorau economaidd, cymdeithasol ac amgylcheddol.

Pwrpas yr ymgynghoriad yma yw cyfyngu ar allbynnau ystadegol presennol, ac o ganlyniad dim ond ar wefan Ystadegau Cymru bydd data yn ymwneud â'r Gymraeg yng nghyd-destun datblygu cynaliadwy yn ymddangos. Mae hyn i'w gymharu â'r tair ffynhonnell bresennol. Wrth gyfyngu ar yr allbynnau ystadegol, rhaid canolbwyntio ar sicrhau hygyrchedd y wybodaeth, nid yn unig drwy osod y wybodaeth yn glir ar wefan Ystadegau Cymru, ond trwy hysbysu'r rhai â diddordeb yn y maes sut i gyrchu'r wybodaeth.

Mae'r cynnig i gyhoeddi data yn ymwneud â'r pum prif ddangosydd yn unig yn y Datganiad Cyntaf yn amlygu anghysondebau â chwe nod arfaethedig Bil Cenedlaethau'r Dyfodol (Bil datblygu Cynaliadwy gynt). Nid yw'r Gymraeg yn un o'r prif ddangosyddion yn ôl y rhestr yn Atodiad 1, ond un o nodau'r Bil yw *"Mae pobl Cymru yn cymryd rhan yn ein diwylliant, sy'n perthyn i ni i gyd, gydag iaith Gymraeg sy'n ffynnu"*. Gofynnwn oes ystyriaeth wedi ei roi i gyfuno'r dangosyddion â'r nodau arfaethedig er mwyn cyhoeddi ystadegau o fewn cyd-destun y Bil? Credwn ei bod hi'n hollbwysig medru gweld gwybodaeth ystadegol i fesur cynnydd y chwe nod yn y Datganiad Cyntaf.

Diolch am y cyfle i gyfrannu sylwadau ar yr ymgynghoriad hwn.

### **3. Clare Parsons,**

Brecon Beacons National Park Authority

**Question 1 – Do you agree with the proposal to cease publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet?**

Yes

**What impact would ceasing the publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet have on your work?**

Minimal, especially if the data is easily accessible on Statswales

**Questions 2 – Do you receive a hard copy of the SD indicator ‘In Your Pocket’ booklet?**

Yes

**Question 3- Sustainable Development indicators are grouped into six broad themes. Please refer to Annex 1 in the supporting documentation for the list of individual indicators included under each theme.**

**Please indicate which of the following themes you have used, selecting multiple items if appropriate:**

- Sustainable Resource Use
- Sustaining the Environment
- A Sustainable Society
- The Wellbeing of Wales

**Within the theme ‘Headline Indicators’; please give details on the specific indicators used and their application in your work:**

The indicators provide some bench mark comparisons and inform policy development.

**Within the theme ‘The Wellbeing of Wales’; please give details on the specific indicators used and their application in your work.**

BBNPA work contributes to areas covered by these indicators. Indicators provide useful background for this

**Question 4– We publish the data for each indicator on Statswales. Were you aware of this?**

Yes

**Have you used data from Statswales before?**

Yes

**Question 6 – If you have any related issues that we have not considered, please use the space below to let us know.**

Useful to disaggregate air quality indicators to reflect impacts on SACs, and on Wales’ uplands.



#### 4. Clare Sain-ley-Berry

WCVA

**Question 1 – Do you agree with the proposal to cease publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet?**

Yes

**What impact would ceasing the publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet have on your work?**

This would not have any impact on our work.

**Questions 2 – Do you receive a hard copy of the SD indicator ‘In Your Pocket’ booklet?**

Yes

**Question 3- Sustainable Development indicators are grouped into six broad themes. Please refer to Annex 1 in the [Supporting Documentation](#) for the list of individual indicators included under each theme.**

**3.1 Please indicate which of the following themes you have used, selecting multiple items if appropriate:**

- Headline Indicators
  
- Sustainable Resource Use
  
- Sustaining the Environment
  
- A Sustainable Economy
  
- A Sustainable Society
  
- The Wellbeing of Wales

**3.2 Within the theme ‘Headline Indicators’; please give details on the specific indicators used and their application in your work.**

WCVA is the administrative partner of the Environment Wales initiative ([www.environment-wales.org](http://www.environment-wales.org)). Up until and including 2010-11, Environment Wales collected data as to whether its grant recipients were contributing either directly or indirectly to each of the SD Indicators. These contributions were collated and information presented annually to the WG in monitoring reports.

**Question 4– We publish the data for each indicator on Statswales. Were you aware of this?**

Yes

**Have you used data from Statswales before?**

Yes

**Questions 5 – If you have any general comments you wish to make with regards to Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet please include these in the space below.**

The publication of the booklet was an opportunity to draw attention to the progress, or lack of, on the SD Indicators. WCVA would hope that the publication on StatsWales of this information would also be accompanied by similar promotion and publicity to draw attention to the information and encourage discussion and debate.

**Question 6 – If you have any related issues that we have not considered, please use the space below to let us know.**

WCVA welcomes the consideration that will be given to future monitoring of progress on sustainable development following introduction of the Future Generations Bill and hopes that, along with headline indicators, there will be others that third sector organisations of all sizes can contribute to – including very small community groups.

Environment Wales found the current SD indicators too specific (e.g. levels of soil acidity) for the majority of its grant recipients to contribute to. At the same time there is no doubt that these groups, and many other like them across the third sector, are making a huge contribution to sustainable development at a local and sometimes regional level and it is important that this contribution can be recognised and captured.

WCVA also believes there is a strong case for using common indicators across Welsh Government funding and support schemes so that schemes can be properly benchmarked against each other in terms of effectiveness and delivery. These indicators should be based on, or in line with, those emerging from the Future Generations Bill and the shared outcomes of NRW.

## **5. Iwan Wyn Jones**

Cyngor Gwynedd

## **Cwestiwn 1 – A ydych yn cytuno â'r cynnig i roi terfyn ar gyhoeddi'r llyfryn 'Yn Eich Piced' ar Ddangosyddion Datblygu Cynaliadwy Cymru?**

Ydw

### **Pe na bai'r llyfryn 'Yn Eich Piced' ar Ddangosyddion Datblygu Cynaliadwy Cymru yn cael ei gyhoeddi, pa effaith fyddai hynny'n ei gael ar eich gwaith?**

Ni theimlwn y byddai hyn yn cael effaith uniongyrchol ar ein gwaith, gan fod y data yn parhau i fod ar gael drwy wefan StatsCymru.

## **Cwestiwn 2 – Ydych chi'n derbyn copi caled o'r llyfryn 'Yn Eich Piced' ar y dangosyddion Datblygu Cynaliadwy?**

Nac vdw

### **Cwestiwn 3 - Mae'r dangosyddion Datblygu Cynaliadwy yn cael eu gosod gyda'i gilydd dan chwe thema gyffredinol. Cyfeiriwch at Atodiad 1 yn y [Dogfennau Ategol](#) i gael rhestr o'r dangosyddion unigol dan bob thema.**

#### **3.1 Nodwch pa rai o'r themâu canlynol yr ydych wedi'u defnyddio, gan ddewis mwy nag un os yw'n briodol:**

- Defnyddio adnoddau yn gynaliadwy

#### **3.2 Dan y thema 'Prif Ddangosyddion'; rhowch fanylion am y dangosyddion penodol a ddefnyddiwyd a'r ffordd y cawsant eu defnyddio yn eich gwaith.**

Rydym yn defnyddio nifer o ddangosyddion ar gyfer portreadu sefyllfa Gwynedd wrth gynllunio'n strategol ac wrth monitro newid dros amser. Rydym felly yn tueddu i ddefnyddio gwybodaeth sydd ar gael ar lefel sirol / NUTS3, os nad ar lefel is os yn bosib. Fel arall, rydym yn defnyddio rhywfaint o wybodaeth ar lefel Cymru i lenwi bylchau ac i gyfoethogi'r darlun sydd gennym o'r tueddiadau o fewn y sir. Mae'r dangosyddion yr ydym yn eu defnyddio yn cynnwys GVA fesul pen.

#### **3.3 Dan y thema 'Defnyddio adnoddau yn gynaliadwy'; rhowch fanylion am y dangosyddion penodol a ddefnyddiwyd a'r ffordd y cawsant eu defnyddio yn eich gwaith.**

Gweler 3.2 uchod. Rydym yn defnyddio dangosyddion sy'n ymwneud ag allyriadau a gwastraff wrth gynllunio ac wrth monitro.

#### **3.4 Dan y thema 'Cynnal yr amgylchedd'; rhowch fanylion am y dangosyddion penodol a ddefnyddiwyd a'r ffordd y cawsant eu defnyddio yn eich gwaith.**

Gweler 3.2 uchod. Rydym yn defnyddio dangosyddion sy'n ymwneud â bioamrywiaeth wrth gynllunio ac wrth monitro.

#### **3.5 Dan y thema 'Economi gynaliadwy'; rhowch fanylion am y dangosyddion penodol a ddefnyddiwyd a'r ffordd y cawsant eu defnyddio yn eich gwaith.**

Gweler 3.2 uchod. Defnydd o ddangosydd trydan o ffynonellau adnewyddadwy wrth gynllunio a monitro.

#### **3.6 Dan y thema 'Cymdeithas gynaliadwy'; rhowch fanylion am y dangosyddion penodol a ddefnyddiwyd a'r ffordd y cawsant eu defnyddio yn eich gwaith.**



Gweler 3.2 uchod. Defnydd o ddangosyddion anghydraddoldeb iechyd wrth gynllunio a monitro.

### **3.7 Dan y thema 'Lles Cymru'; rhowch fanylion am y dangosyddion penodol a ddefnyddiwyd a'r ffordd y cawsant eu defnyddio yn eich gwaith.**

Gweler 3.2 uchod. Defnydd o ddangosyddion addysg, tlodi a chyfranogaeth wrth gynllunio a monitro.

### **Cwestiwn 4– Rydym yn cyhoeddi data ar gyfer pob dangosydd ar StatsCymru. Oeddech chi'n ymwybodol o hynny?**

Oeddwn

### **Ydych chi wedi defnyddio data StatsCymru o'r blaen?**

Ydw

### **Cwestiwn 5 – Os hoffech wneud unrhyw sylw cyffredinol am y llyfryn 'Yn Eich Poced' ar Ddangosyddion Datblygu Cynaliadwy Cymru, defnyddiwch y gofod isod.**

Teimlwn ei fod yn bwysig fod rheini sydd wedi arfer derbyn y llyfryn yn ymwybodol fod y data ar gael trwy StatsCymru, a bod cymorth iddynt gael at y data os maent ei angen.

### **Cwestiwn 6 - Os oes unrhyw faterion perthnasol eraill nad ydyn ni wedi mynd i'r afael â nhw, mae croeso i chi eu nodi isod.**

Byddai'n hwyluso mynediad i'r data pe byddai wedi'i gyflwyno yn ôl y chwe thema ar StatsCymru, yn hytrach na mewn gwahanol mannau. (Fel cam symlach i chi, o bosib, byddai gwneud y rhestr cyflawn o ddangosyddion – h.y. cynnwys y ddolen '[Dangosyddion datblygu cynaliadwy: Cynnwys](#)' – yn fwy amlwg ar StatsCymru yn gam defnyddiol.)

Gobeithiwn y bydd y data hwn – ac ar lefel mwy lleol pe byddai modd ei ddarparu – o ddefnydd wrth adrodd ar ofynion Bil Cenedlaethau'r Dyfodol.

## **6. Sustrans Cymru**

Sustrans Research and Monitoring Unit

**Question 1 – Do you agree with the proposal to cease publication of the Sustainable Development Indicators for Wales 'In Your Pocket' booklet?**

Yes

**What impact would ceasing the publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet have on your work?**

This would have little effect providing that all the equivalent data are made easily available on Statswales.

**Questions 2 – Do you receive a hard copy of the SD indicator ‘In Your Pocket’ booklet?**

No

**Question 3- Sustainable Development indicators are grouped into six broad themes. Please refer to Annex 1 in the [Supporting Documentation](#) for the list of individual indicators included under each theme.**

**Please indicate which of the following themes you have used, selecting multiple items if appropriate:**

- Headline Indicators
- Sustainable Resource Use
- A Sustainable Economy
- A Sustainable Society

**3.3 Within the theme ‘Sustainable Resource Use’; please give details on the specific indicators used and their application in your work.**

Levels of walking and cycling and main modes of travel to work data provide background information and comparator data for our own research and reporting.

**3.6 Within the theme ‘A Sustainable Society’; please give details on the specific indicators used and their application in your work.**

No. 22 Accessibility which provides data on the percentage of households where the time taken to reach local facilities on foot or by public transport is 15 minutes or less, Wales, 2005/07 and 2008/10 provides useful background information and comparator data for our own research and reporting. This includes our work on Transport Poverty in Wales.

**Question 4– We publish the data for each indicator on Statswales. Were you aware of this?**

Yes

**Have you used data from Statswales before?**

Yes

**Question 6 – If you have any related issues that we have not considered, please use the space below to let us know.**

Data on the main mode of travel to work are provided under No.9 Mobility but it would also be useful to include the main modes of travel to school. It would be useful to include more specific health data, e.g. levels of physical activity and obesity.

## **7. Suzy Richards**

City and County of Swansea

**Question 1 – Do you agree with the proposal to cease publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet?**

Yes

**What impact would ceasing the publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet have on your work?**

The ‘In Your Pocket’ booklet is an accessible tool which can be used to immediately communicate the concept of sustainable development in practical terms.

The scope and range of the ‘in your pocket’ indicators immediately illustrates how sustainable development is fundamental to social economic and environmental wellbeing across Wales and about more than ‘green issues’.

The indicators are a helpful means of demonstrating that sustainability is the responsibility of all services rather than a small group of champions or environmental departments.

The culture particularly within the public sector is currently very much performance orientated so it can be helpful to frame sustainable development within these terms. As long as the indicators are still presented as a basket under sustainable development online the shift from a specific booklet is not problematic and is a step toward integration.

There is no issue with the decision not to publish in hard copy as data is routinely sourced online including the ‘in your pocket data’.

**Questions 2 – Do you receive a hard copy of the SD indicator ‘In Your Pocket’ booklet?**

**Question 3- Sustainable Development indicators are grouped into six broad themes. Please refer to Annex 1 in the [Supporting Documentation](#) for the list of individual indicators included under each theme.**

**3.1 Please indicate which of the following themes you have used, selecting multiple items if appropriate:**

- Headline Indicators
- Sustainable Resource Use
- Sustaining the Environment
- A Sustainable Economy
- A Sustainable Society
- The Wellbeing of Wales

**3.2 Within the theme ‘Headline Indicators’; please give details on the specific indicators used and their application in your work.**

All these indicators have been used at different points in space and time directly and indirectly by employees of the City and County of Swansea in evidencing and informing the planning, development and delivery of services.

The indicators have also been used to inform and frame work on sustainable development reporting and wider work undertaken by the sustainable development team. The document provides a good overview as to the current 'state' of Wales providing a fundamental platform from which we can identify the Wales we want in the longer term and how the local authority forms part of that vision.

**Question 4– We publish the data for each indicator on Statswales. Were you aware of this?**

Yes

**Have you used data from Statswales before?**

Yes

**Questions 5 – If you have any general comments you wish to make with regards to Sustainable Development Indicators for Wales 'In Your Pocket' booklet please include these in the space below.**

At City and County of Swansea we are relatively well advanced in embedding sustainable development as a central organising principle and are moving towards a Single Corporate Plan which will fully integrate sustainable development rather than a report that complements the Annual Statement of Accounts.

However this position was achieved by working through a series of evolutionary phases that helped the Council develop and integrate reporting.

Initially we reported on environmentally focused indicators based on carbon emissions and energy consumption within our Annual Statement of Accounts. We then moved on to the development of an integrated report that complemented the Statement of Accounts and incorporated social, economic and governance indicators.

This stage was an important in demonstrating what was meant by sustainability and in gaining a profile for sustainable development and highlighted the benefits of reporting some otherwise unreported cross cutting information.

The existence of a national set of clearly designated sustainability indicators helped justify and inform the development of sustainable development reporting at a local authority. It also enabled factors such as biodiversity which can be hard to report at a local level to remain centre stage.

The full set of indicators on Stats Wales should continue to be clearly badged as sustainable development indicators and referenced in the headline analysis. This would provide context and support to help inform other local authorities that are at an earlier stage of the sustainable reporting process.

Positioning sustainability as a central organising principle is an on-going process which requires awareness raising and visibility to engage people in the process particularly at the start of the journey. Reporting is a key means of achieving this aim and initially needs to be explicit in linking sustainable development and core business activity.

**Question 6 – If you have any related issues that we have not considered, please use the space below to let us know.**

It is importance that a void is not created as the reporting duty of the Future Generations Bill is worked through and the advisory body and its role established.

The Headline indicators and availability of supporting indicators online need to be given a profile during the interim period to help organisation continue to adopt sustainable development reporting during the shift to potentially more integrated reporting requirements.

**8. Dr Roisin Willmott**

Royal Town Planning Institute

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development. This response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

We have not responded to the questions set out in the consultation, but have a number of general comments to make on the Sustainable Development Indicators. We hope you find our comments useful in considering the use of the sustainable development indicators in the future.

Your reference is drawn to the response provided earlier this year (28th February 2014) to the Welsh Government consultation, 'Proposals concerning publication of official statistics' - ([http://www.rtpi.org.uk/media/877887/rtpi\\_response\\_-\\_proposals\\_concerning\\_the\\_publication\\_of\\_official\\_stats.pdf](http://www.rtpi.org.uk/media/877887/rtpi_response_-_proposals_concerning_the_publication_of_official_stats.pdf)) and the RTPI Cymru response to the Welsh Government consultation 'Draft Planning (Wales) Bill and positive planning: proposals to reform the planning system in Wales'(25th February 2014) ([http://www.rtpi.org.uk/media/941988/rtpi\\_cymru\\_positive\\_planning\\_response\\_feb\\_2014.pdf](http://www.rtpi.org.uk/media/941988/rtpi_cymru_positive_planning_response_feb_2014.pdf))

These responses should help to outline our concerns in relation to the indicators on sustainable development and lack of linkages between draft consultation documents (referred to above), together with Environment Bill and Future Generations Bill. This lack of clarity and the layout of indicators (themed groups and 29 issues) could cause confusion alongside the separate indicators reported by planning. The scope of the indicators appears quite limited and does not adequately reflect the context of sustainable development as a core principle across policy in Welsh Government. To exemplify this point, the proposals do not include a flood risk indicator, and yet there are specific measures within planning relating to flood risk and wider flood risk measures from the National Flood Risk Management Strategy. Flooding is an area which has clear environmental, social and economic consequences.

We believe there is an opportunity to review the indicators on a spatial basis in the future. You may be interested in the RTPI Planning Horizons project which considers how thinking spatially could help policymakers to make better judgments about how individual policy proposals interact with and affect the development of places as a whole. (<http://www.rtpi.org.uk/knowledge/research/planning-horizons/>) If you require further assistance, have any queries or require clarification of any points made, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

## **9. Vicki Hirst**

### Planning Officers Society Wales

**Question 6 – If you have any related issues that we have not considered, please use the space below to let us know.**

We have not responded to the previous questions as we are the professional body for planners in Wales and it would be for individual Local Planning Authorities to respond to questions on the use they make of the indicators.

The Planning Officers Society Wales has been working in partnership with WG Planning Division to define and collect Sustainable Development Indicators. These indicators seek to quantify the contribution the planning service makes to sustainable development.

The wholesale collection of these indicators will commence in April 2015 and publication by WG in October 2016 alongside other planning indicators. The indicators are:

#### **SD1 - Economic Renewal - Economic Development**

The area of land (ha) granted planning permission for new development (by type) on allocated employment sites during the quarter.

#### **SD2 - A Low Carbon Economy - Renewable Energy**

- a) The number of applications granted planning permission for renewable and low carbon energy development (by type) during the quarter.
- b) The amount of renewable and low carbon energy capacity (MW) granted planning permission (by type) during the quarter.

#### **SD3 - Access to Better Homes - New Homes**

The number of affordable and general market dwellings granted planning permission during the quarter.

#### **SD4 - Resilience to Climate Change - Flood Risk**

- a) The amount of development (by type) granted/refused (on flood risk grounds) planning permission in C1 and C2 floodplain areas not meeting all TAN15 tests during the quarter.
- b) The amount of development (by type) granted planning permission in C1 and C2 floodplain areas meeting all TAN15 tests during the quarter.

#### **SD5 - Efficient Land Use - Previously Developed Land**

The area of land (ha) granted planning permission for new development on previously developed land/greenfield land during the quarter.

#### **SD6 - Open Space - Open Space Lost/Gained**

The area of public open space (ha) that would be lost/gained as a result of development granted planning permission during the quarter.



## **SD7 - Community Infrastructure - Contributions Secured for Community Facilities**

The total financial contributions (£) agreed from new development granted planning permission during the quarter for the provision of community infrastructure.

We would suggest that the collection of 2 sets of WG SD indicators with very similar titles is likely to cause confusion and raise questions as to why the 2 datasets cannot be combined. Perhaps the Planning SD indicators could become a subset of the wider SD indicators dataset or added to the set to increase the number and breadth of measurement.

In some cases, indicators are seeking to measure similar outcomes albeit through a different measure. It would seem preferable to find a way to amalgamate both datasets and combine the publication.

When raising this issue with WG Planning we have been informed that:

*“The Sustainable Development Indicators for Wales are different to the planning SD Indicators we are collecting. The key difference is that the planning SD Indicators are specifically aimed at measuring the contribution the planning system makes to sustainable development. In contrast, the Sustainable Indicators for Wales are much broader and don’t relate specifically to planning decisions.*

*As such, the Sustainable Development Indicators for Wales include many indicators that do not specifically relate to the planning system. For example:*

*Percentage of working age adults qualified to National Qualification Framework  
Percentage of children in relative low-income households*

*There are a number of indicators that are related but are measuring different things. For example:*

*Sustainable Development Indicators for Wales - Percentage of electricity generated from renewable sources.  
Planning SD Indicators - The number of applications granted planning permission for renewable and low carbon energy development/The amount of renewable and low carbon energy capacity (MW) granted planning permission.*

*As this example shows the difference is that the planning SD Indicators are measuring the outputs of the planning system (ie. what has been approved).*

*When developing the planning SD Indicators we had regard to the Sustainable Development Indicators for Wales and ensured there was no duplication of data collection”*

We understand that sustainable development encompasses social, economic and environmental factors. Through both development management and the preparation of development plans, the planning function is critical in achieving sustainable development in communities across Wales.

## **10. David Clubb**

Renewable UK Cymru

My only comment is about indicator number 18 – Electricity from renewable sources.

I think that this should be worded:

“Energy from renewable sources” with separate indicators for electricity, heat and transport, which would be compatible with the Renewable Energy Directive and most other international comparator.

## 11. Dr Norma Barry

UK Environmental Law Association

**Question 1 – Do you agree with the proposal to cease publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet?**

Yes

**What impact would ceasing the publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet have on your work?**

UKELA does not currently possess a copy of the publication. However, it would be useful for quick and easy reference purposes if at meetings or events where it is not easy or practical to access the internet to obtain details of the indicators.

**Questions 2 – Do you receive a hard copy of the SD indicator ‘In Your Pocket’ booklet?**

**Question 3- Sustainable Development indicators are grouped into six broad themes. Please refer to Annex 1 in the Supporting Documentation for the list of individual indicators included under each theme.**

**3.1 Please indicate which of the following themes you have used, selecting multiple items if appropriate:**

- Headline Indicators

**3.2 Within the theme ‘Headline Indicators’; please give details on the specific indicators used and their application in your work.**

The UK Environmental Law Association aims to make the law work for a better environment and to improve understanding and awareness of environmental law. UKELA’s members are involved in the practice, study or formulation of Environmental Law in the UK and the European Union. The organisation attracts both lawyers and non-lawyers and has a broad membership from the private and public sectors.

UKELA prepares advice to UK Governments with the help of its specialist working parties, covering a range of environmental law topics. Its interest in the details of Sustainable Development indicators is primarily in ensuring that the legislative framework reflects global best practice; the indicators are compatible with the current and forthcoming legislation; and that they are meaningful in illustrating Wales’ progress to sustainable development.

The indicators are used generally to demonstrate the work that Wales is doing in this field. They are included in academic research papers; presentations and papers to conferences; and general articles delivered to a wide range of audiences.

**Question 4– We publish the data for each indicator on Statswales. Were you aware of this?**

Yes

**Have you used data from Statswales before?**

Yes

**Questions 5 – If you have any general comments you wish to make with regards to Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet please include these in the space below.**

In the interests of efficiency and in the light of increasing use of the internet to access detailed information, it is understood why it is proposed to stop publishing the “In Your Pocket” book. Whilst UKELA has not held a copy of the publication, it is of the view that it could be useful in a number of scenarios.

The focus during the next couple of years will be on developing indicators under the Future Generations Bill and, as part of that, it will be important to consider the wider communication of indicators and their progress to a wide audience, in particular younger generations. That process will need to consider carefully the most effective way of communicating with various sections of society.

## **12. Alan Hare**

Pembrokeshire Coast National Park Authority

**Question 1 – Do you agree with the proposal to cease publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet?**

Yes

**What impact would ceasing the publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet have on your work?**

Minimal, especially if the data is easily accessible on Statswales

**Questions 2 – Do you receive a hard copy of the SD indicator ‘In Your Pocket’ booklet?**

**Question 3- Sustainable Development indicators are grouped into six broad themes. Please refer to Annex 1 in the [Supporting Documentation](#) for the list of individual indicators included under each theme.**

**3.1 Please indicate which of the following themes you have used, selecting multiple items if appropriate:**

- Sustainable Resource Use
- Sustaining the Environment
- A Sustainable Society
- The Wellbeing of Wales

**3.2 Within the theme ‘Headline Indicators’; please give details on the specific indicators used and their application in your work.**

As the Pembrokeshire Coast National Park is a relatively small area of Wales with a population of less than 25,000 the use of any of the indicators is limited, but they do provide some bench mark comparisons where we have our own local data, and provide a background context for policy development.

**3.7 Within the theme ‘The Wellbeing of Wales’; please give details on the specific indicators used and their application in your work.**

The core work of the National Park Authority contributes directly and indirectly to these indicators, often through partnership working. The indicators can be useful to set the context.

**Question 4– We publish the data for each indicator on Statswales. Were you aware of this?**

Yes

**Have you used data from Statswales before?**

## 13. Julie Boswell

Natural Resources Wales.

**Question 1 – Do you agree with the proposal to cease publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet?**

Yes

**What impact would ceasing the publication of the Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet have on your work?**

If the same information is still available via the Sustainable Development Indicators Statistical First Release and StatsWales data tables, ceasing its production will have little impact on our work.

**Questions 2 – Do you receive a hard copy of the SD indicator ‘In Your Pocket’ booklet?**

**3.1 Please indicate which of the following themes you have used, selecting multiple items if appropriate:**

- Headline Indicators
- Sustainable Resource Use
- Sustaining the Environment
- A Sustainable Economy
- A Sustainable Society
- The Wellbeing of Wales

**3.2 Within the theme ‘Headline Indicators’; please give details on the specific indicators used and their application in your work.**

The headline indicators are not looked at in isolation of the sub indicators. As they stand, the headline indicators alone do not truly reflect progress with Sustainable Development in Wales, but are a good approximate.

We look at all the indicators across all themes. Part of our role is to communicate and influence on Sustainable Development and this requires an understanding in an integrated way of the progress and interconnection across all of these issues. We suggest that in future Sustainable Development indicators will need to be aligned to the Goals in the Future Generation Bill and be able to be articulated in a way that can show the interconnections, which will demonstrate sustainability.

We use the trend element of the data when informing and advising on policy to demonstrate or articulate where we are or are not moving towards a more sustainable Wales. In the past we have used many of the indicators for operational planning purposes. We are keen to use the Indicators for planning work we need to do on integrating action and delivering natural resource plans.

**3.3 Within the theme ‘Sustainable Resource Use’; please give details on the specific indicators used and their application in your work.**

A few people in our organisation use the individual indicator data from here. Most will go to internal sources as we provide the data that goes to make up the following Indicators and have these observations:

### **7a & b – waste arisings/disposal by sector Wales**

Municipal waste data is readily available and is comparable between years. It is already published by StatsWales on a quarterly and annual basis in the 'Local Authority municipal waste management' report.

Industry & commerce (I&C) and construction & demolition (C&D) data is not readily available since it is gathered via ad hoc surveys. We have recently published the results of new surveys based on 2012 calendar year. The previous I&C survey was based on the 2007 calendar year and the previous C&D survey was based on 2005/06 data. This highlights the constraints with the ability to plot a time series and update this data.

Where survey methodologies are similar between reporting years, the ability to compare results is constrained by the precision achieved between the surveys. Surveys have a certain margin of error, so differences in results may sometimes be due to sampling error rather than a genuine change in waste generation or management. This must be taken into consideration when comparing results. It is not possible to make the user fully aware of these issues through plotting the headline results on a time series graph as per the sustainable development indicators. Consequently, NRW has included a comparison section in the new NRW 2012 survey reports to clearly outline the issues with comparisons and to outline where statistically significant differences have been identified. We would therefore be in support of removing this indicator.

### **8. Household waste**

Household waste data is published by StatsWales via the annual 'Local Authority municipal waste management report'. However, this is reported in tonnages, not on a per person basis. It would be useful to make this data available via the StatsWales report/website if the sustainable development indicator was removed.

### **3.4 Within the theme 'Sustaining the Environment'; please give details on the specific indicators used and their application in your work**

We provide the data that goes to make up the following Indicators and have these observations:

#### **13 River Quality**

There will be no new updates to this indicator as the monitoring programme which provided the data ceased in 2010. NRW now report river quality based on the Water Framework Directive classifications as described in the State of Environment Report, but note this has not been updated since July 2012

#### **15 Sustainable water resources management**

This is the only place this data is currently published

### **3.7 Within the theme 'The Wellbeing of Wales'; please give details on the specific indicators used and their application in your work.**

All indicators are useful cross-reference material – all quality of life measures can be useful context for our quality of visitor experience information (to our own managed sites – woodland, National Nature Reserves)

**Question 4– We publish the data for each indicator on Statswales. Were you aware of this?**

Yes

**Have you used data from Statswales before?**

Yes

**Questions 5 – If you have any general comments you wish to make with regards to Sustainable Development Indicators for Wales ‘In Your Pocket’ booklet please include these in the space below.**

The booklet is a useful ready reference document of the indicators and sub indicators, particularly where it shows the trends over time. The traffic light approach is also helpful. Having a pocket size booklet is useful to take to meetings

**Question 6 – If you have any related issues that we have not considered, please use the space below to let us know.**

SD Indicators describe individually the sustainability of particular elements. They do not describe the sustainability of Wales. Increasing economic output does not necessarily correlate to sustainable development of Wales. Economic output has to deliver social and environmental benefit in order to demonstrate SD. Such benefits would include, low carbon, resource efficient, biodiversity enhancing as well as supporting social cohesion, social justice and equality of opportunity. It is therefore important when looking at the statistics to not look at them in isolation but at the detail and whole to see if we are truly moving to a more sustainable nation. If the booklet that shows this information altogether is to cease, care must be taken to get this message across on the web based products.

The indicators will need reviewing in light of the Future Generations Bill and proposed Goals. Development of indicators as the measures of progress for the Bill will be central to final Sustainable Development indicators for Wales.

It will also be important to be able to show trends of where Wales has come from as well as being considered alongside or informing future forecasts (future scenarios). Sustainable Development Indicators need to remain comparable within the UK, and with EU and Global SD indicators otherwise Wales will not be able to understand how it is progressing with Sustainable Development.

With the development of State of Natural Resources Reporting we expect to be using the SD Indicators more. This work is currently evolving. Such SD indicators may not form part of the report but will be important to provide context.

Operational Staff are more interested in the information at a local level and having access to the raw data that is used to create the indicator.