

Number: WG16238



Llywodraeth Cymru
Welsh Government

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Consultation - Summary of Responses

A Strategic Monitoring Framework for the Planning System

Date of issue: March 2013

Overview

This document outlines a summary of the responses to the consultation on proposals for a Strategic Monitoring Framework for the planning system held 4 November 2011 - 27 January 2012 (WG13303).

This summary report is published in electronic form only.

Electronic copies of all consultation responses to this consultation can be found on the Welsh Government website.

<http://wales.gov.uk/consultations/planning/planforsusconsultation>

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A BACKGROUND

1. On 4 November 2011 we consulted on a proposed *Strategic Monitoring Framework for the Planning System*. The consultation ended on 27 January 2012. This consultation summary report details the responses to this consultation and the next steps to be taken.

Policy Background

2. The Welsh Government has a legal obligation to promote sustainable development and Welsh Ministers are required under Section 79 of the Government of Wales Act 2006 to make, keep under review, and revise a sustainable development scheme setting out how they propose to promote sustainable development in the exercise of their functions. In 2009 the latest scheme set out the Welsh Government's commitment to sustainable development. At the heart of the approach is the use of the ecological footprint as one of the headline indicators, with the long term aim of stabilising Wales' Ecological Footprint by 2020 and then reducing it to the global average by 2050. The planning system in Wales is one of the four key themes that underpin the approach to delivering sustainable development and reducing the ecological footprint of Wales.
3. The overall aim of the planning system within our sustainable development scheme is to provide for homes, infrastructure, investment and jobs in a way that helps to reduce Wales' ecological footprint. Action 5 from the scheme is for the Welsh Government to initiate a strategic monitoring framework to measure key sustainable development outcomes delivered by the planning system.
4. We commissioned Arup to conduct research into the development of this monitoring framework. The aim of this research was to provide advice to the Welsh Government on a proposed strategic monitoring framework for the planning system. The approach presented in the research report is rooted in a 'logic chain' framework which develops a 'theory of change' to enable measurement of the ways in which planning can encourage, support and facilitate sustainable development.

B DETAILS OF RESPONSES

5. On 4 November 2011 over 200 core and key stakeholders were targeted by email on the publication of the consultation documents. These were drawn from the core consultation list held by the Planning Division of the Welsh Government. This included all local planning authorities in Wales, public bodies, special interest groups and other groups. The consultation document was made available on the Welsh Government consultation website. Responses were invited by 27 January 2012.
6. A total of **33** responses were received. We thank all those who responded to the consultation.
7. A consultation form was provided in the consultation document and separately on the website. Respondents were asked to assign themselves to one of seven broad respondent categories. Table 1 below shows the breakdown of respondents.

Table 1 Breakdown of respondents		
Category	Number	% of total
Businesses	6	18
Planning Consultants	0	0
Local Authorities (including National Park Authorities)	13	39
Government Agencies/Other Public Sector	4	12
Professional Bodies/Interest Groups	4	12
Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	4	12
Other (other groups not listed above)	2	6
Total	33	

8. The consultation document posed 10 specific questions, of which Question 4 sought a response to each of the 18 indicators proposed. A statistical overview of the responses, showing the nature of the response to all questions where a 'Yes' or 'No' (or 'Don't Know') response was sought is presented in Annex B. Where respondents did not complete the consultation form, but in view of the Government their comments related to a specific consultation question, these were considered and recorded as 'Don't Know/Blank'. A list of the consultation questions can be found below.

Table 2: Consultation questions

Q1	Do you agree with our conclusion that the current information is not sufficient for us measure the contribution of the planning system to our vision of a sustainable Wales?
Q2	Do you agree with the proposed approach to use the 'logic-chain' to identify appropriate measures of the planning system?
Q3	Do you agree with the strategic groupings of the 19 <i>Planning Policy Wales</i> objectives into five categories for the purpose of developing a set of new measures?
Q4	Do you agree with the proposed indicator?
4.1	Wales' Ecological Footprint
4.2	Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing
4.3	Gross Value Added (GVA) and GVA per head
4.4	Percentage of the population in low-income households
4.5	Wellbeing in Wales
4.6	Proportion of LPAs with an up to date adopted LDP
4.7	Net change in open space and playing fields
4.8	Total floor space granted/refused (by type) on greenfield and brownfield land
4.9	Number of application submitted with Transport Assessments
4.10	Number of applications granted/refused (by type) on the flood plain (by flood risk category)
4.11	Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification
4.12	The proportion of local or recycled materials used in new developments
4.13	Renewable energy generation (MW) granted/refused by type and capacity
4.14	Total area of granted/refused development in protected areas (European and national designations)
4.15	Number of Listed Building and Conservation Area Consents granted/refused
4.16	Number of new homes (by type) granted permission
4.17	Employment land bank (years provided)
4.18	Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)
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?
Q6	Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?

Q7	What are your views on whether the proposed framework should be phased?
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?
Q9	What would be the impacts on your authority from the new Strategic Monitoring Framework?
Q10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?
Q11	Do you have any other comments?

9. A full list of all respondents and the categories they were assigned to can be found in Appendix A. Copies of the consultation responses received are published in their original form on the consultation pages of our website. These can be found here <http://wales.gov.uk/consultations/planning/monitoringframework>.

C KEY THEMES

10. Several key themes emerged from the written responses, many of which were expressed in the specific questions for each indicator. A summary of these key themes is set out below with further analysis by consultation question in Chapter D. Please note that 'R' denotes the respondent reference number. Please see Appendix A for a full list of respondents.

Structure of the framework

11. Some respondents were supportive of applying the logic chain to identify the appropriate measures of the planning system, due to it making analytical sense. However, some respondents were concerned about the complexity of the overarching framework, and whether this led to the collection of unrelated data across each of the 'logic chain' stages.

"Whole process appears far too complex and will not achieve the aims. Moreover it appears that the proposed assessment process will become overly onerous." (R2)

"... the monitoring framework should be kept as simple and easy to understand as possible, whilst ensuring the collection and reporting of timely, robust and accurate information on the key planning issues that should be monitored." (R8)

"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." (R25)

Resources for data collection

12. Local planning authority responses have raised issues across the consultation concerning the resource implications of the proposed new indicators. They commented that they are already under enough pressure in respect of monitoring and collecting data, and that further monitoring would only increase issues concerning resource implications.

"Will have manpower and cost implications for Councils." (R2)

"...issues of the practicalities of collecting and interpreting this data." (R15)

Output measurements

13. Respondents were concerned that the output measurements for many of the indicators do not measure the outcomes of the planning system. Some respondents were of the view that measuring the outcomes and impacts of the indicators would achieve greater success in measuring Sustainable Development. These concerns were exemplified in responses to specific indicators (See Chapter D).

"It is difficult to see how the presence or absence of an assessment could be a measure of sustainability." (R14)

“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).” (R 16)

Monitoring refusals

14. One focus of some of the respondents was the value of collecting information on refusals, as well as permissions. This included concerns over how the information would be presented and its usefulness. In comparison, some respondents saw the value of collecting refusals in demonstrating the role of the planning system in refusing ‘bad’ development. It was suggested that information on refusals should be accompanied with qualitative data on reasons for refusal.

“Concern has been raised over the need to monitor refusals and what this information will show.” (R31)

“In this context it can also be asked, what is the significance of reporting on refusals, without analysing the reasons given, which might be based on factors which are entirely unrelated to what this measure seeks to identify?” (R16)

“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.” (R15)

Relationship with local monitoring frameworks

15. A number of local planning authorities were of the view that the Strategic Monitoring Framework would create a duplication of work and resources required to collect performance information given that they were already being required to monitor Local Development Plans through Annual Monitoring Reports. Many felt that there needed to be a clearer relationship between the two frameworks.

“Local Planning Authorities are already required... to adopt monitoring frameworks and produce Annual Monitoring Reports giving relevant data as to the performance of their planning policies; most of this performance is measured in a similar way to those indicators included in the framework.” (R3)

“Bridgend CBC considers that it is a duplication of work and resources to require local planning authorities to monitor their planning applications / planning policies in two separate frameworks.” (R3)

Relationship with the Sustainable Development Scheme

16. A small number of respondents were of the view that the framework could be improved by aligning the indicators more closely with the Welsh Government’s Sustainable Development Scheme. From this some respondents had concerns that the indicators would not deliver the stated aim of measuring the

contribution the planning system makes to sustainable development, due to the lack of conformity.

“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.” (R30)

“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.” (R30)

Timescale

17. The introduction of the monitoring framework attracted many comments, with no clear consensus on the phased introduction of the framework. For local planning authorities there was an overwhelming concern that the proposed phasing will not allow enough time for the data collecting techniques or computer systems to be in place to be able collect the data in time.

“Very clear instructions should be provided as soon as possible to allow maximum time to develop mechanisms to capture the data.” (R7)

“...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.” (R30)

“WG propose introducing these in 2012/13, but that does not provide sufficient time for data collection techniques and computer systems may need to be changed, probably involving external suppliers.” (R6)

Definitions and interpretation

18. Respondents posed questions regarding the interpretation and definitions for some indicators. It was identified that some indicators require clarification of terms and phrases to ensure consistent measurements. Comments have also been made regarding the inclusion of qualitative indicators to provide context linked with the measurement.

“Areas would be a clearer measure than numbers and data needs to be provided with a context to clarify year on year variations.” (R15)

“Concern is raised over how this indicator will be interpreted. The common perception that Brownfield development is good and Greenfield development is bad does not hold true...” (R31)

“Assumes same impact of all development. More definition is required about the acceptable forms/ types of development taking into account the future impacts of Climate Change.” (R14)

Additional indicators

19. A number of respondents proposed additional, new or amended indicators in their response. These are listed against each question in chapter D.

Responses not in the scope of the consultation

20. This consultation sought views on our proposed Strategic Monitoring Framework. Comments raised by respondents on matters such as the definition of sustainable development, the Sustainable Development Scheme or planning policy were not in the scope of this consultation. Where appropriate these comments have been passed to officials in the Welsh Government with the appropriate responsibility.

D OVERVIEW OF THE RESPONSES TO EACH QUESTION

Question 1

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?

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	8	2	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	3	0	1
F	Voluntary sector	2	0	2
All respondents		19	2	12
Overall percentage		58%	6%	36%

Overview

21. The responses to this question were mixed; however, the majority of respondents agreed with the proposition that the current information was not sufficient to measure the contribution the planning system makes to our vision of a sustainable Wales.
22. A number of respondents to this question raised concerns about the implications of collecting information that was not based on the quality of the decisions. A large number of respondents were in support of using existing collections to supplement the new data being collected and to reduce the resource implications.

Question 2

Q2

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	4	5	4
D	Others	1	0	2
E	Professional Bodies/Interest Groups	3	0	1
F	Voluntary sector	2	0	2
All respondents		13	6	14
Overall percentage		39%	18%	42%

Overview

23. While a large majority of the responses which indicated a 'Yes' or 'No' answer agreed with the 'logic-chain' approach, the detailed responses demonstrated a mixed view on the presentation and application of the 'logic-chain' into the final monitoring framework.
24. Some respondents were of the view that the approach had some attraction by identifying the steps in the planning process, and subsequently as an analytical tool. Many respondents expressed concern that the approach and diagram presented in the consultation paper was overcomplicated, impractical and impenetrable. Some respondents suggested that Figure 2 in the consultation should be simplified; one respondent went on to suggest that the diagram should reflect the 'Impacts' of the planning system more clearly.
25. One respondent commented that a useful alternative to the approach taken would have been the use of 'SMART' indicators, while another commented on the different objectives that would be seen at the local level. Some respondents also noted that the approach does not recognise what happens in practice and does not fully acknowledge the different elements and factors within the planning process.

Question 3

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?

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	6	4	3
D	Others	1	0	2
E	Professional Bodies/Interest Groups	2	0	2
F	Voluntary sector	1	0	3
All respondents		14	4	15
Overall percentage		42%	12%	45%

Overview

26. Whilst many respondents ticked 'Yes' to this questions, further comments given raised concerns over the categorisation presented. Some respondents stated that the existing Sustainable Development Scheme categorisations of economic, social and environmental elements were considered to be a more logical and well-established approach to take. One respondent suggested the five United Kingdom Sustainable Development principles, being promoted in the proposed Sustainable Development Bill, should be considered. Some respondents also raised concerns that the groupings should not become a hierarchy of importance. It was also noted by a number of respondents that some objectives and activities overlap and, for this reason, clarification would be required.

Question 4

Q4 Do you agree with the proposed indicator?

Question 4.1

Q4.1 Wales' Ecological Footprint

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	9	1	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	0	2
F	Voluntary sector	2	0	2
All respondents		18	1	14
Overall percentage		55%	3%	42%

Overview

27. There was a consensus that this should be used as an overarching indicator, however many respondents expressed concerns as to the role of planning in influencing the Ecological Footprint, and how this provided a context for understanding the planning system's contribution to sustainable development.
28. One respondent was in support of using the Ecological Footprint as it provided a long-term indicator, reflecting the key principles of sustainable development. Some respondents were of the view that the Ecological Footprint data should be represented at the local level as well as a Wales wide figure. However, some respondents suggested that local authorities should not be responsible for collecting and reporting on the Ecological Footprint for their area as part of the framework. Other responses raised concerns as to whether the data was up to date and the need to recognise that there will be difference in rural areas. One respondent commented that planning is at the margins of facilitating sustainable development, including Ecological Footprint.

Suggested alternative indicators

- None

Question 4.2

Q4.2

Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	9	1	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	1	1	2
F	Voluntary sector	2	0	2
All respondents		17	2	14
Overall percentage		52%	6%	42%

Overview

29. The majority of responses were supportive of an indicator on biodiversity and many supported the link to Biodiversity Action Plans. There were however concerns over the reliability of Biodiversity Action Plans, the level at which data is collected, the baseline for data collection and the consistency of Biodiversity Action Plan monitoring. Many respondents also raised concerns as to whether this provided a useful indicator of planning's role, and whether it provided the right context for planning.
30. One respondent suggested that it was not fit for purpose as an indicator to measure the effectiveness of the planning system as not all Biodiversity Action Plan issues were related to planning. Another respondent suggested that there was no direct correlation between the increase in biodiversity in a Biodiversity Action Plan and a building development.
31. Concerns were expressed over the additional resources placed on local authorities and whether the collection and reporting levels should be at the national level rather than at the local level.

Suggested alternative indicators

- Measure the relationship between the outcomes of planning decisions and the extent of habitat loss/change.

Question 4.3

Q4.3 Gross Value Added (GVA) and GVA per head

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	9	1	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	0	2
F	Voluntary sector	0	1	3
All respondents		16	2	15
Overall percentage		48%	6%	45%

Overview

32. There were limited comments on using this as a headline indicator. Some respondents felt it was useful as a contextual and a proxy indicator, while others queried the role of planning in Gross Value Added and how it could be measured. One respondent rejected its use as an indicator of sustainable development. Some respondents felt that the data should be collected at the national level.

Suggested alternative indicators

- None

Question 4.4

Q4.4 Percentage of the population in low-income households

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	9	1	3
D	Others	1	0	2
E	Professional Bodies/Interest Groups	2	0	2
F	Voluntary sector	2	0	2
All respondents		17	1	15
Overall percentage		52%	3%	45%

Overview

33. Only 12 respondents made specific comments on using this as a headline indicator. Four of these suggested that it was not a planning indicator. Others raised issues of who would collect the data and at what level it should be reported at.

Suggested alternative indicators

- None

Question 4.5

Q4.5 Wellbeing in Wales

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	6	4	3
D	Others	1	0	2
E	Professional Bodies/Interest Groups	2	0	2
F	Voluntary sector	2	0	2
All respondents		13	4	16
Overall percentage		39%	12%	48%

Overview

34. Only 16 respondents made specific comments on using this as a headline indicator. A large majority of these stated that it was unclear as to what was being measured, with some suggesting areas that it should include – such as environmental aspects. Some suggested that it was not a planning indicator.

Suggested alternative indicators

- None

Question 4.6

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	6	4	3
D	Others	1	1	1
E	Professional Bodies/Interest Groups	3	0	1
F	Voluntary sector	0	1	3
All respondents		14	6	13
Overall percentage		42%	18%	39%

Overview

35. There was a mixed response to this question. One respondent agreed with the proposed indicator noting that when a Local Development Plan has been adopted it will have been subject to a Sustainability Appraisal to ensure sustainable development is central to the development plan. One respondent, who agreed with the indicator, also suggested that the indicator could be expanded to give a better overview of the delivery of Local Development Plans rather than focusing on just the 'adoption'.
36. A number of respondents queried whether the indicator should refer to extant development plans rather than focusing on Local Development Plans, with one respondent noting that Unitary Development Plans will have also been scrutinised against sustainability principles. One respondent suggested that once Local Development Plans are in place the indicator will become redundant, and that it would be better to focus on the delivery of Local Development Plans too. The issue of 'out-of-date' plans was raised by some respondents. It was also noted that this indicator is already reported on. One respondent suggested that the indicator is inadequate; stating that having a Local Development Plan does not necessarily mean that sustainable development will be achieved.

Suggested alternative indicators

- Decisions which comply with a 'sample' of Local Development Plan policies.
- Indicator should be expanded to cover the content and application of the development plan.

- Measure Local Development Plans against their overall target dates for adoption.
- The proportion of local planning authorities across Wales with a Local Development Plan which has either been in place for, or reviewed within, a preceding three year period.
- Proportion of local planning authorities with an adopted development plan - Unitary Development Plan or Local Development Plan.
- The number or proportion of Local Development Plans that are being reviewed before the required 4 year period.

Question 4.7

Q4.7 Net change in open space and playing fields

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	3	6	4
D	Others	1	1	1
E	Professional Bodies/Interest Groups	1	2	1
F	Voluntary sector	2	0	2
All respondents		10	9	14
Overall percentage		30%	27%	42%

Overview

37. Only 20 respondents made specific comments on using this as a headline indicator. A large majority of these were unclear as to how this indicator would be measured, and the definition it would be derived from. It was noted by a number of respondents that the existing computer software used by local planning authorities would need updating and this would result in additional resources being required in order to undertake the data collection. Another issue raised by two respondents concerned the interpretation of the information, particularly in rural areas. One respondent expressed concerns that the indicator would require a survey of sites on an annual basis and therefore would demand additional resources. Detailed comments were also provided on the definition used and how this would affect the monitoring results. This included how local authorities would need to be set up, through GIS, to monitor this data. One respondent noted that the indicator does not relate to the issue of strategic location (i.e. whether open space and playing field space is more or less accessible). Similarly one respondent noted that the importance of recording the quality of the open space or playing field.

Suggested alternative indicators

- Whether open space and playing field space is more or less accessible.
- Measure the quality and use of open space or playing fields.

Question 4.8

Q4.8

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	2	0	2
C	Local Planning Authorities	4	5	4
D	Others	1	1	1
E	Professional Bodies/Interest Groups	2	0	2
F	Voluntary sector	2	0	2
All respondents		12	6	15
Overall percentage		36%	18%	45%

Overview

38. Comments on the use of this indicator were mixed across all responses; however, a majority of those that responded raised concerns about the time and resource implications of the additional workload and the alterations needed to local planning authority computer software. A number of respondents commented that terms would need defining for consistency to be achieved across all local planning authorities. Interpretation of the indicator was also highlighted as an issue in terms of preference of brownfield land despite accessibility issues and the concern that rural areas information will be misinterpreted as they will inevitably have more greenfield development. Two respondents suggested that site area would give a better indication than the proposed floor space.

Suggested alternative indicators

- Capture completed development floorspace.
- Area of derelict or contaminated land remediated and reclaimed.

Question 4.9

Q4.9 Number of applications submitted with Transport Assessments

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	3	6	4
D	Others	1	1	1
E	Professional Bodies/Interest Groups	2	1	1
F	Voluntary sector	1	1	2
All respondents		9	10	14
Overall percentage		27%	30%	42%

Overview

39. Comments on the use of this indicator were mixed across all responses; however, those responses that were in support of this indicator commented that it was useful to establish the effectiveness of Transport Assessments in deciding planning applications.

Suggested alternative indicators

- The number of applications approved with a Green Travel Plan;
- The quantified or anticipated modal shift identified within the Transport Assessment itself.

Question 4.10

Q4.10

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	4	5	4
D	Others	1	1	1
E	Professional Bodies/Interest Groups	1	1	2
F	Voluntary sector	2	0	2
All respondents		10	8	15
Overall percentage		30%	24%	45%

Overview

40. Comments on the use of this indicator were mixed across all responses. The majority of respondents could see the benefit of monitoring development on a flood plain, however, some respondents considered this to be a measure of national rather than local policy. Concerns raised by one respondent included the issue of double counting where there are several extant permissions on the site and also the value of measuring refused applications. Other respondents suggested that clarification on forms and types of development would be required.

Suggested alternative indicators

- Measuring the quality and appropriateness of development on the flood plain.
- The number of applications approved against the objection of flood risk by the Environment Agency.
- The number of applications where the Environment Agency withdraws its objection based on flooding.
- The number of applications approved with mitigation measures to reduce the risk of flooding.

Question 4.11

Q4.11

Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	0	0	5
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	4	5	4
D	Others	1	0	2
E	Professional Bodies/Interest Groups	1	1	2
F	Voluntary sector	1	0	3
All respondents		8	6	19
Overall percentage		24%	18%	58%

Overview

41. Some respondents suggested that this indicator could be collected by the service providers rather than through local planning authorities. Some respondents were supportive in principle but proposed refinements to the indicator. These included whether the data collects buildings given permission or those actually constructed. One respondent suggested that this indicator needed to clarify whether this referred to the 'Interim Certificate' or 'Post Construction Certificate'.
42. Two respondents suggested that the indicator should monitor what level was being achieved under the Code for Sustainable Homes/BREEAM rather than just the number of buildings being certified. Some local planning authorities stated that this data is not collected at the local level, while one local planning authority stated that they monitored this information as part of their Annual Monitoring Report.
43. One respondent argued that as the policy is a minimum requirement that the indicator should measure those schemes which have achieved a standard higher than the minimum. One respondent suggested that the indicator is monitoring the implementation of national planning policy. Some respondents reiterated the suggestion that qualitative data should also be collected to feed into the monitoring framework.

Suggested alternative indicators

- Monitor what level of the Code for Sustainable Homes/BREEAM is being achieved.

Question 4.12

Q4.12 The proportion of local or recycled materials used in new developments

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	3	7	3
D	Others	1	1	1
E	Professional Bodies/Interest Groups	1	1	2
F	Voluntary sector	2	0	2
All respondents		9	10	14
Overall percentage		27%	30%	42%

Overview

44. The majority of respondents were of the view that this indicator would be difficult to collect and monitor. Respondents noted the difficulty in collecting information from this indicator whether it be through planning or other mechanisms such as Buildings Regulations. Many local planning authorities noted that they do not currently collect this information, with one highlighting that this would require changes to information requirements for planning applications.
45. Further concerns were raised on the definitions of local and recycled materials. Some respondents commented in detail on the use of the terms local and recycled, raising concerns in general about the policy approach. One respondent argued that the indicator should be divided into two, one covering local materials and one to cover recycled materials.
46. One respondent suggest that planning conditions should be measured. On the other hand another respondent noted that planning conditions are not attached to require the use of local or recycled materials.
47. One respondent suggested that the Code for Sustainable Homes and BREEAM covered these issues.
48. One respondent, whilst supportive of the need to measure the use of recycled materials, queried whether this could be more appropriately reported on through Building Regulations. One local planning authority explained that, whilst they had identified a need to monitor this at the local level, it was

impossible to collect this data as neither planning or building control systems recorded this information.

Suggested alternative indicators

- To monitor the number of planning applications where a condition was used to require recycled materials etc.
- The proportion of recycled materials used in new developments and the proportion of these recycled materials sourced locally.
- The proportion of sustainably sourced local or recycled materials used in new developments.
- Measure of embodied energy of construction materials.
- To measure the proportion of new development comprising low carbon industry and resource-efficient development.

Question 4.13

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	10	0	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	1	1
F	Voluntary sector	2	0	2
All respondents		19	2	12
Overall percentage		58%	6%	36%

Overview

49. The majority of responses were supportive of an indicator on renewable energy. There were however concerns raised regarding the time and resource implications, and the issue of small scale renewables and microgeneration being carried out under permitted development and not requiring planning permission. It was suggested that this could result in misrepresentation of data, which could be further complicated by counting permissions that are granted but never implemented.
50. One respondent was of the view that the indicator should include further measures of the time taken to determine applications and other suggested measurements. One respondent suggested that the reason for refusal, if applicable, should also be recorded.
51. One respondent argued that this indicator was not a sound measurement of sustainability as it does not consider what other assets have been changed or used such as the local environment.

Suggested alternative indicators

- Number of projects being refused and consented.
- The MW capacity of consented / refused projects.
- The number / percentage of projects consented/refused.
- Average timescale for determination.
- Number of applications that have not been determined within the statutory time period.

- Reference to local planning authorities' input into consultations on renewable energy projects dealt with under other consenting regimes.
- To measure the extent to which the renewable energy capacity delivered in a local planning authority against the agreed targets in the Local Development Plans.
- Measure of microgeneration technologies under permitted development.

Question 4.14

Q4.14

Total area of granted/refused development in protected areas (European and national designations)

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	5	5	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	1	1
F	Voluntary sector	1	0	3
All respondents		12	7	14
Overall percentage		36%	21%	42%

Overview

52. Comments on the use of this indicator were mixed across all responses. Some respondents were of the view that, although this would be a valuable indicator, it could perhaps be extended to address some of the current limitations. Concerns were raised over the time and resource implications and the lack of consideration given to mitigation. Some respondents suggested that the indicator should be broadened to include local designations and Biodiversity Action Plan habitats.
53. One respondent was of the view that there was a need to monitor the amount of applications that come forward following pre-application advice being given by planning officers, reflecting concerns that applicants are being deterred from making planning applications.
54. One local planning authority provided detailed comments on the ability of the authority to collect data on floor space. It notes that only the area of the whole planning site is recorded, suggesting that application forms would have to be adapted. The response noted the use of GIS to record this information.
55. One respondent noted that the indicator does not take into account impacts on those areas that are not within protected areas. They also suggested that local protected areas be included.
56. A comment was made by one respondent with regards to the different reasons for which these areas are designated, for their ecological importance and natural beauty, which would result in different reasons for allowing/refusing planning permissions.

57. A number of respondents noted that not all planning permissions are negative in a protected area. For example, permission may be granted in order to enable ecological enhancement.
58. The issue of double counting was also raised. One respondent noted that the indicator does not consider the amount of land within such designations but merely accounts for the area of land subject to planning decisions.
59. One respondent stated that the indicator was not sufficient to capture and understand whether development adversely effects the natural environment and how this contributes to achieving sustainable development. Furthermore, another respondent suggested this was a 'negative' indicator and sought amendments to measure positive approaches in line with the ecosystems services approach.

Suggested alternative indicators

- Total net gain in biodiversity improvements (in hectares) as a result of planning permissions granted.
- 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).
- Impact of development given permission by UK Government departments on protected areas (e.g. gas pipes/overhead cables).
- Include local protected areas.
- The number of Environmental Impact Assessments and/or Appropriate Assessments undertaken.
- The number of enforcement proceedings against development, where an Environmental Impact Assessment and/or Appropriate Assessment was required, 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.
- Link indicator to the Habitats Regulations Assessment.

Question 4.15

Q4.15

Number of Listed Building and Conservation Area Consents granted/refused

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	6	2	5
D	Others	1	1	1
E	Professional Bodies/Interest Groups	1	1	2
F	Voluntary sector	1	0	3
All respondents		11	4	18
Overall percentage		33%	12%	55%

Overview

60. The issue of measuring impact was featured strongly in the response to this indicator, with one respondent querying how this indicator will relate to the impact on these sensitive buildings/areas generally and how meaningful the indicator is. Furthermore respondents also commented that a high number of permissions will not necessarily mean a positive indicator.
61. One respondent noted that consents for works to listed buildings and conservation areas may have a positive or a negative impact and that there needs to be a distinction made between the two. One respondent argued that the number of consents/refusals does not clearly outline what is being achieved. One respondent noted that this indicator addresses matters which are already covered by primary legislation. Further clarification was sought on the differing levels of development that require planning permission for listed building and conservation areas.

Suggested alternative indicators

- Number of listed buildings at risk.
- Conservation area appraisals.

Question 4.16

Q4.16 Number of new homes (by type) granted permission

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	9	0	4
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	1	1
F	Voluntary sector	2	0	2
All respondents		17	1	15
Overall percentage		52%	3%	45%

Overview

62. The majority of responses were supportive of an indicator monitoring the number of new homes. It was suggested, to ensure consistency, that a definition of the 'type' would be needed. There were however concerns raised about the possible double counting of extant permissions and the collection of the data. Some respondents suggested this information should be collected using the Joint Housing Land Availability Studies monitoring. Respondents also noted that the data does not measure homes actually constructed. One respondent felt that, while the Joint Housing Land Availability Studies provides a more substantial picture of the housing supply, this indicator could help provide a more comprehensive picture. One respondent noted that benchmarking housing delivery against need, or the five-year land supply figure, would give a better sustainability measurement.

Suggested alternative indicators

- Number of mixed use developments granted or refused.
- Benchmarking against housing need/5 year land supply.

Question 4.17

Q4.17 Employment land bank (years provided)

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	8	2	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	1	1
F	Voluntary sector	0	1	3
All respondents		14	4	15
Overall percentage		42%	12%	45%

Overview

63. Comments on the use of this indicator were mixed across all responses. Some respondents were of the view that, although this would be a valuable indicator, it would need refinement to be meaningful. Local authorities use widely varying methods of calculating employment land provision/need and, therefore, data is not readily compatible or comparable between local planning authorities. A number of respondents also commented that Employment Land Bank Assessment is already undertaken as part of the Local Development Plan process and, for authorities with adopted Local Development Plans, is included in the Annual Monitoring Report process. It was also noted that carrying out an Employment Land Bank Assessment on an annual basis would have potential resource and cost implications. Furthermore, as no guidance is currently available, there would not be a consistent approach to carrying out these studies which may undermine the data collected.

Suggested alternative indicators

- An indicator, which includes consideration of all the various types of approaches (e.g. Local Development Orders, town centre first policies etc).
- Employment Register.

Question 4.18

Q4.18

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	6	4	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	1	1
F	Voluntary sector	0	1	3
All respondents		12	6	15
Overall percentage		36%	18%	45%

Overview

64. Comments on the use of this indicator were mixed across all responses. Many respondents questioned the value of this indicator and also considered it to be a duplication of Question 8. Some respondents also questioned the value of monitoring refusals and highlighted the additional resources implications. The issue of floorspace being an unreliable indicator was raised as a concern and again site area was considered a more appropriate measure. Further clarification was sought on the precise definitions of the indicator, with suggestions to measure the gross floorspace, net floorspace or area. One respondent noted that the granting of additional retail floorspace is not necessarily a good indication of sustainability in this sector. Two respondents also noted the link between this indicator and the Community Infrastructure Levy (CIL).

Suggested alternative indicators

- An additional indicator was requested by one respondent, but they noted that it appears difficult to suggest an appropriate and realistic indicator to measure.

Question 5

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?
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Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	6	3	4
D	Others	1	0	2
E	Professional Bodies/Interest Groups	3	0	1
F	Voluntary sector	0	0	4
All respondents		13	4	16
Overall percentage		39%	12%	48%

Overview

65. Responses to this question covered a variety of issues on the approach taken, the indicators selected and the limits to the monitoring framework. Two respondents were of the view that most of the indicators did not relate to planning but other functions. This contrasted with a number of respondents, who recognised the limits of measuring the role of the planning system, and agreed that it is difficult to get a full picture.
66. One respondent, whilst supportive of a high level approach, suggested that the proposed indicators were so high level that they would not provide any meaning to enable a judgement to be made. This respondent also noted the difficulty in identifying the relationship between the indicator and the desired policy outcome.
67. One respondent suggested that the number of indicators should be restricted to 5 or 6 meaningful indicators.
68. Some respondents commented on gaps in the policy areas covered by the framework. One respondent raised concerns that the indicators did not cover social, cultural and economic wellbeing aspects of planning. They also referred to the lack of indicators on landscape and the Welsh language.
69. There was a general feeling from respondents that further refinement and discussion is needed on the proposed indicators.
70. Other responses raised general points regarding the wider planning system's role in delivering sustainable development.

71. One respondent raised concern that the measures become ends rather than means, noting that these measures should not be at the expense of the efficient and timely operation of the planning system.
72. One respondent raised concern that the framework is too focused on process and not on tangible outcomes and how they perform. This respondent noted that any list of indicators is unlikely to do justice to the full influence of planning on sustainable development. One respondent recognised that the indicators varied on whether they were measuring the output or outcome of the planning system.
73. Two respondents put forward suggestions for the monitoring framework to be reviewed over time. Many respondents suggested further consideration and refinement of the proposed indicators.
74. One respondent noted that the planning application process is about reconciling conflicting interests and producing the right decision at the end, noting that decisions made in accordance with an up to date development plan will be sustainable.
75. Two respondents were of the view that the proposed framework only monitors the effectiveness of national planning policy. One respondent queried how exceptions would be factored into the monitoring process. Some respondents raised concerns that the indicators may be potentially misleading and could be misinterpreted.

Suggested alternative indicators

- Use of Multiples Indices of Deprivation to set the scene.
- Measures relating to waste.
- Accessibility and integration measurement.
- Cycle network measurement.
- Social and cultural.
- Access to core social services.
- Affordable housing.
- Homelessness.
- Ratio of salaries to cost of homes.
- Land designated for small and medium sized enterprises.
- Indicators on small and medium sized enterprises in rural areas.
- Green/social economy.
- Energy performance of buildings once occupied.
- Travel plan monitoring.
- Number of new developments (by type) in Air Quality Management Areas.
- Measure whether sewerage infrastructure is in place to support proposed development.
- Number of hectares of land affected by contamination brought back into beneficial use through the planning process.
- Number of planning permissions granted that include Sustainable Drainage Systems (SuDs).
- Number of planning applications which include enhancement of, or access to, public open space and playing fields.

Question 6

Q6

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	1	0	4
B	Government Agencies/Other Public Sector	1	1	2
C	Local Planning Authorities	6	3	4
D	Others	2	0	1
E	Professional Bodies/Interest Groups	1	2	1
F	Voluntary sector	1	0	3
All respondents		12	6	15
Overall percentage		36%	18%	45%

Overview

76. There was a limited response to this question and many respondents noted that the table required further clarification and was not clear enough. Responses to this question also included wider responses on the proposed set of indicators and the need for further detail. While some reiterated their support for the logic-chain many felt that the table presented did not provide further clarity. Some respondents raised concerns as to how the impacts will be taken into account, with one advocating an outcomes and impacts assessment approach. One respondent reiterated the need to include a time-aspect to the measuring of indicators.

Question 7

Q7

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

Overview

77. There were differences in opinion on whether the indicators should be phased. These were for a variety of reasons - including a preference for a complete package to be rolled out to concerns over the need to allow time for local planning authorities to undertake work on their computer and GIS systems. A number of responses could also see the value of undertaking a pilot programme.

Question 8

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?

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	9	1	3
D	Others	2	0	1
E	Professional Bodies/Interest Groups	2	0	2
F	Voluntary sector	0	1	3
All respondents		16	2	15
Overall percentage		48%	6%	45%

Overview

78. The majority of responses were supportive of the proposal to consolidate or revise the existing output indicators set out in the LDP Manual. Reasons included were that it allows for consistency in the system, and ensures duplication is avoided.

Question 9

Q9

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

Overview

79. Local planning authorities consistently raised concern that the introduction of the Strategic Monitoring Framework, as proposed, would have resource implications. In particular, it was identified that there would be implications on staff needing to collect the data and changes would be required to their computer systems. A number of respondents identified that they would be seeking funding from the Planning Improvement Fund.

Question 10

Q10

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

Statistical summary

Category		Agree	Disagree	Don't know / Blank
A	Businesses	2	0	3
B	Government Agencies/Other Public Sector	1	0	3
C	Local Planning Authorities	5	4	4
D	Others	1	0	2
E	Professional Bodies/Interest Groups	2	1	1
F	Voluntary sector	1	0	3
All respondents		12	5	16
Overall percentage		36%	15%	48%

Overview

80. Of the responses indicating a 'Yes' or 'No' answer, a large majority agreed with the proposed approach to reporting the Strategic Monitoring Framework. However, a number of respondents raised concerns in their comments.
81. Some respondents suggested that the report should be made easily accessible, with the suggestion that the reporting be administered via the Welsh Government website. The addition of graphs, data tables as well as providing contextual information within the report was suggested to ensure the data is fully explained and understood by the wider audience.
82. The written responses highlighted an uncertainty as to whether the proposed reporting approach is to be carried out at a local or national level. There was also concern associated with how this reporting process will be flexible enough to take into account local situations.
83. The overall timescale of reporting on an annual basis was supported.

Question 11

Q11 Do you have any other comments?

Overview

84. A number of issues were raised including the reiteration of concerns about the resource implications on local authorities. One respondent indicated that the majority of information to be collected is held by other organisations.
85. One respondent suggested that the planning system does not deliver sustainable development and that the stages beyond planning should be recorded.
86. One respondent suggested that the proposed Strategic Monitoring Framework will not improve the effectiveness of the planning system.

Suggested alternative indicators

- An overarching indicator on carbon dioxide emissions in Wales.
- An indicator to record the quality of development.
- An indicator for rejected unsustainable development.
- An indicator recording departures from Local Development Plans.
- The loss of environmental and landscape amenity.
- Assessment of decisions made in accordance with the development plan, departures and call-ins.
- Measure whether all material considerations have been taken into account.
- Appeal success rate.

E NEXT STEPS

87. The Welsh Government wishes to carry out further refinement of the proposed indicators addressing the concerns and issues raised by respondents to the consultation. This is to ensure that what is proposed can be effectively measured at the local level without imposing significant burdens on those who will provide the data (mainly local planning authorities). Details of the next steps are detailed in a letter to the chief planning officer's at all local planning authorities in Wales. This can be found on our website at www.wales.gov.uk/planning.

ANNEX A LIST OF RESPONDENTS BY CATEGORY

The table below indicates the categories to which respondents assigned themselves to in completing the consultation form. For data protection purposes the name and address details for those respondents who did not wish to be identified have been removed from the index below and from the published consultation responses.

Business		Gov. Agency/Other Public Sector	
8	National Grid	9	Infrastructure Planning Commission
11	Anon	13	Bwrdd yr Iaith Gymraeg
19	Anon	23	Design Commission for Wales
20	Anon	24	Environment Agency Wales
21	Dwr Cymru/Welsh Water	Others	
27	RenewableUK	1	Evaocati Ltd
Local Planning Authorities		31	LDP Pathfinder Group (South East)
2	Vale of Glamorgan Council	Professional Bodies/Interest Groups	
3	Bridgend County Borough Council	4	Country Land and Business Association
5	Snowdonia National Park	15	Royal Town Planning Institute (RTPI Cymru)
6	Pembrokeshire Coast National Park Authority	18	Institute of Historic Building Conservation
7	Ceredigion County Council	33	Anon
12	Anon	Voluntary Sector	
14	Cardiff Council	10	The Environmental Network for Pembrokeshire
16	Flintshire County Council	17	WWF Cymru
22	Carmarthenshire County Council	25	Wales Environment Link
26	Rhondda Cynon Taf County Borough Council	32	Planning Aid Wales
28	Gwynedd County Council		
29	Powys County Council		
30	Anon		

ANNEX B STATISTICAL OVERVIEW OF ALL RESPONSES

	Question	Response	Business	Government Agencies/ Other Public Sector	Local Planning Authorities	Others	Prof. Bodies/ Interest Groups	Voluntary	Total	% of All	% of 'Yes' or 'No'
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	2	2	8	2	3	2	19	58%	90%
		No	0	0	2	0	0	0	2	6%	10%
		DK	3	2	3	1	1	2	12	36%	-
2	Do you agree with the proposed approach to use the 'logic-chain' to identify appropriate measures of the planning system?	Yes	2	1	4	1	3	2	13	39%	68%
		No	0	1	5	0	0	0	6	18%	32%
		DK	3	2	4	2	1	2	14	42%	-
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?	Yes	2	2	6	1	2	1	14	42%	78%
		No	0	0	4	0	0	0	4	12%	22%
		DK	3	2	3	2	2	3	15	45%	-
4.1	Do you agree with the proposed indicator - Wales' Ecological Footprint	Yes	1	2	9	2	2	2	18	55%	95%
		No	0	0	1	0	0	0	1	3%	5%
		DK	4	2	3	1	2	2	14	42%	-

4.2	Do you agree with the proposed indicator - Percentage of Biodiversity Action Plan habitats and species recorded as stable or increasing	Yes	1	2	9	2	1	2	17	52%	89%
		No	0	0	1	0	1	0	2	6%	11%
		DK	4	2	3	1	2	2	14	42%	-
4.3	Do you agree with the proposed overarching indicator - Gross Value Added (GVA) and GVA per head	Yes	1	2	9	2	2	0	16	48%	89%
		No	0	0	1	0	0	1	2	6%	11%
		DK	4	2	3	1	2	3	15	45%	-
4.4	Do you agree with the proposed indicator - Percentage of the population in low-income households	Yes	1	2	9	1	2	2	17	52%	94%
		No	0	0	1	0	0	0	1	3%	6%
		DK	4	2	3	2	2	2	15	45%	-
4.5	Do you agree with the proposed indicator - Wellbeing in Wales	Yes	1	1	6	1	2	2	13	39%	76%
		No	0	0	4	0	0	0	4	12%	24%
		DK	4	3	3	2	2	2	16	48%	-

4.6	Do you agree with the proposed indicator - Proportion of LPAs with an up to date adopted LDP	Yes	2	2	6	1	3	0	14	42%	70%
		No	0	0	4	1	0	1	6	18%	30%
		DK	3	2	3	1	1	3	13	39%	-
4.7	Do you agree with the proposed indicator - Net change in open space and playing fields	Yes	1	2	3	1	1	2	10	30%	53%
		No	0	0	1	6	2	0	9	27%	47%
		DK	4	2	4	1	1	2	14	42%	-
4.8	Do you agree with the proposed indicator - Total floor space granted/refused (by type) on greenfield and brownfield land	Yes	1	2	4	1	2	2	12	36%	67%
		No	0	0	5	1	0	0	6	18%	33%
		DK	4	2	4	1	2	2	15	45%	-
4.9	Do you agree with the proposed indicator - Number of applications submitted with Transport Assessments	Yes	1	1	3	1	2	1	9	27%	47%
		No	0	1	6	1	1	1	10	30%	30%
		DK	4	2	4	1	1	2	14	42%	-

4.10	Do you agree with the proposed indicator - Number of applications granted/refused (by type) on the flood plain (by flood risk category)	Yes	1	1	4	1	1	2	10	24%	57%
		No	0	1	5	1	1	0	8	18%	43%
		DK	4	2	4	1	2	2	15	58%	-
4.11	Do you agree with the proposed indicator - Number of buildings receiving BREEAM and/or Code for Sustainable Homes certification	Yes	0	1	4	1	1	1	8	24%	57%
		No	0	0	5	0	1	0	6	18%	43%
		DK	5	3	4	2	2	3	19	58%	-
4.12	Do you agree with the proposed indicator - The proportion of local or recycled materials used in new developments	Yes	1	1	3	1	1	2	9	27%	47%
		No	0	1	0	0	1	0	2	30%	53%
		DK	3	2	3	1	1	2	12	42%	-
4.13	Do you agree with the proposed indicator - Renewable energy generation (mW) granted/refused by type and capacity	Yes	2	1	10	2	2	2	19	58%	90%
		No	0	1	0	0	1	0	2	6%	10%
		DK	3	2	3	1	1	2	12	36%	-

4.14	Do you agree with the proposed indicator - Total area of granted/refused development in protected areas (European and national designations)	Yes	1	1	5	2	2	1	12	36%	63%
		No	0	1	5	0	1	0	7	21%	37%
		DK	4	2	3	1	1	3	14	42%	-
4.15	Do you agree with the proposed indicator - Number of Listed Building and Conservation Area Consents granted/refused	Yes	1	1	6	1	1	1	11	33%	73%
		No	0	0	2	1	1	0	4	12%	27%
		DK	4	3	5	1	2	3	18	55%	-
4.16	Do you agree with the proposed indicator - Number of new homes (by type) granted permission	Yes	1	1	9	2	2	2	17	52%	94%
		No	0	0	0	0	1	0	1	3%	6%
		DK	4	3	4	1	1	2	15	45%	-
4.17	Do you agree with the proposed indicator - Employment land bank (years provided)	Yes	1	1	8	2	2	0	14	42%	78%
		No	0	0	2	0	1	1	4	12%	22%
		DK	4	3	3	1	1	3	15	45%	-

4.18	Do you agree with the proposed indicator - Total floor space granted/refused (by type) (combining greenfield and brownfield land) (offices/industry/retail/distribution)	Yes	1	1	6	2	2	0	12	36%	67%
		No	0	0	4	0	1	1	6	18%	33%
		DK	4	3	3	1	1	3	15	45%	-
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	2	1	6	1	3	0	13	39%	76%
		No	0	1	3	0	0	0	4	12%	24%
		DK	3	2	4	2	1	4	16	48%	-
6	Do you agree with the proposed Strategic Monitoring Framework structure and measurement of each of the four stages identified above?	Yes	1	1	6	2	1	1	12	36%	67%
		No	0	1	3	0	2	0	6	18%	33%
		DK	4	2	4	1	1	3	15	45%	-
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	2	1	9	2	2	0	16	48%	89%
		No	0	0	1	0	0	1	2	6%	11%
		DK	3	3	3	1	2	3	15	45%	-

10	Do you agree with our proposed approach to reporting the Strategic Monitoring Framework?	Yes	2	1	5	1	2	1	12	36%	71%
		No	0	0	4	0	1	0	5	15%	29%
		DK	3	3	4	2	1	3	16	48%	-