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9 April 2019

e-mail response sent to: [cabinetoffice@gov.wales](mailto:cabinetoffice@gov.wales)

Dear Sir/Madam,

**Response to: Measuring our Nation's Progress**

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 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.

The 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 welcome the opportunity to comment on these national indicators and milestones. The Well-being of Future Generations (Wales) Act 2015 is now embedded in the Welsh planning system. The updated Planning Policy Wales (PPW) (Edition 10) has been designed to meet the requirements of the Act and the introduction to PPW acknowledges that it will deliver the vision set out in the Act. Town and country planning activities have sustainable development and the long term future at its heart and therefore progress on delivering the Act would benefit from including land use planning links, measures and indicators.

RTPI Cymru's comments on the previous consultation on the Welsh Government's national indicators to track progress in achieving the well-being goals are set out [here](#). The new national milestones are intended to set out the Government's expectation of this progress. Within this context, and a point we raised previously (see above), it is regrettable there is a lack of spatial dimension to the indicators or milestones. It is unfortunate that this has not been addressed over time. For example, if carbon emissions from transport were being successfully reduced in one part of Wales, but were increasing in another area, there needs to be mechanisms by which these variations are monitored and reported, as appropriate policy responses will often need to be spatially specific. Similarly, if there is to

buy in to these processes, there needs to be understanding how each part of Wales is performing against Wales-wide data. A spatial approach would also complement the proposals included in the Planning (Wales) Act 2015, for example the National Development Framework and Strategic Development Plans as well as Local Development Plans and the Well-being Plans promoted in the Well-being of Future Generations Act 2015.

We also have the following general comments to make in relation the consultation.

### **A. Changes to the criteria to select national indicators against which national milestones will be developed**

The principle of having a small group of key headline milestones is noted, but it should not be for reasons of focussing energy or limited resources; they should be the key cross-cutting indicators across different departments and disciplines, recognising that having an effect or making an impact is arguably most effective when there is buy in from different stakeholders.

Overall the principles in each of the five criteria are supported, noting the above point; however, we query whether the criteria for choosing milestones include a requirement that there is a spatial dimension? How the indicators affect and impact on people and places across Wales will vary, and this is a crucial factor that needs to be clearly set out in the overall framework. If the Welsh Government is serious about the indicators and milestones having an impact, then it should be made clear that this applies to all Wales whilst recognising there may be variations across the country.

Given that the planning system is devolved to Wales, there is an opportunity here to bring in more of a spatial dimension to these indicators, recognising there may be differences in the results of these indicators across Wales and that variations need to be identified, reported and understood. The planning system has an important role in shaping the indicators and several are directly related to the system, although this spatial link has not been fully realised in the current document.

### **B. Changes to the small set of national indicators against which national milestones will be developed**

Planning has a particular connection with a number of indicators, in particular employment, greenhouse gas emissions and the Welsh language.

In relation to this section we reiterate the point made above regarding the need for consideration of the spatial dimension in relation to indicators and milestones.

### **C. Changes to the existing 46 national indicators**

The planning system in Wales is evolving with preparation of the National Development Framework, Strategic Development Plans and reviews of the Local Development Plans. These documents are collectively important in spatially delivering on several of the indicators, directly and indirectly. The connection between the land use planning system in Wales and the national indicators/milestones needs to be strengthened along with embedding a spatial dimension into the process.

#### Housing

We note a few housing specific indicators. Housing crosses the seven well-being goals and we believe there should be greater presence given the importance of securing housing for all - the numbers of dwellings relative to needs, the condition of housing, affordability and

tenures. As previously mentioned, there may be spatial differences across Wales and that dimension needs to be acknowledged as well.

#### Towns/High Streets

Reference to property vacancy rates could be included. The vitality and viability of the high street is linked to planning.

#### Active Travel

It is disappointing there is no mention of active travel in the indicators. It is vital to think holistically and recognise the indicators aren't just relevant to one department or field/subject area. For example active travel has positive links with the well-being goals - on health, reducing emissions and congestion etc. Sustainable access to facilities (indicator 24) is an attempt to cover this, but isn't necessarily active-travel related.

Lastly as general comments, the indicators should all be reviewed to ensure they are set out as statements of intent, which we feel would make them clearer and stronger. Effective monitoring and reporting processes are also important if benefits are to be achieved, along with an appropriate policy response where it becomes evident that key indicators are not progressing, or indeed are moving in the wrong direction. Further information on this would be useful.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

Yours sincerely,



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