



## RESPONSE TO WALES SPATIAL PLAN 2008

### 1. INTRODUCTION

1.1 This document provides Cynnal Cymru's response to the Wales Spatial Plan 2008 consultation. It is drawn from a series of workshops carried out in 2007 and 2008 with individual members and member organisations, and also draws from Cynnal Cymru's work "Transformation Nation" to inform the review of the Sustainable Development Scheme.

1.2 Sustainable development (SD) is not just an issue for government and business, but one which all must address together. Individuals must also adopt more sustainable lifestyles, and as the Sustainable Development Forum for Wales, Cynnal Cymru operates at the junction of government, business and civil society. It is a bridge between all these. Together this gives Cynnal Cymru a unique overview and voice of sustainability in Wales.

1.3 Cynnal Cymru's goal is to catalyse a step-change towards SD. As a membership organisation of over 1,000 people we provide a platform for those taking action on sustainability to share information and promote their achievements. The long-term changes that we aim to bring about are:

- Attitude and behaviour change that leads to more sustainable lifestyles;
- Policy and practice change that promotes SD;
- Strengthened leadership and increased action for SD.

1.4 This is a Cynnal Cymru report but not representing the views of our Board members or wider membership. It is based on the following information.

- Comments from members and stakeholders at a workshop on the WSP at our AGM on 19-9-07;
- Feedback from partners at a workshop and via interviews on the WSP between 15-4-08 and 22-4-08. A list of Stakeholders involved is included in [Appendix A](#).

Whilst this report is intended to reflect the outcomes of the various discussions, the views contained herein may not reflect those of every stakeholder.

1.5 We have approached our response from the perspective of Cynnal Cymru's distinctive role by:

- Considering the document from a SD perspective and especially the 5 principles in *One Future Different Paths*

- Providing strategic comments for Wales as a whole, illustrating these with examples from Area work
- Commenting on SD targets and indicators(e.g. 3% CO<sub>2</sub> reduction in One Wales)
- Drawing on our knowledge of future trends (climate change, food security, peak oil, social justice) and analysis on climate change from the Tyndall Centre
- Considering how the WSP can deliver the emerging objectives of the new SD Scheme and Action Plan.

1.6 We have considered our response in the light of the following questions:

- a) Are the actions and outcomes in the 2008 document right?
- b) Are there any other strategic issues to consider (what is missing)?
- c) Do the national and area statements reflect SD principles?
- d) What positive recommendations can we make to improve the Plan?

## **2. STRATEGIC AIMS OF WSP 2008**

2.1 We understand that Wales Spatial Plan (WSP) is unique in its approach. It is an attempt to gather together information at national and area levels, understand external drivers and develop new ways of partnership working on development at a local level, and this approach should be applauded. These are difficult concepts to work with across Wales and within Areas, and much progress has been made, especially in the partnership working at a regional level in Wales. There is real added value in this approach, but there are a number of areas which need to be improved upon if the WSP is to truly integrate the challenges of SD and act as a tool for integration and catalyst to progress SD across Wales. These are explored in the following response and a small number of focused recommendations are made which, if adopted could make a significant difference to achieving more sustainable outcomes through the WSP.

2.2 From a sustainable development perspective, the National Framework and Area statements need to acknowledge the urgency of the twin threats of climate change and peak oil, and to reflect this through evidence and policy intervention. The work of Professor Kevin Anderson at the Tyndall Centre suggests that policy should be courageous and innovative in dealing with:

- our dwindling carbon budget up to 2050,
- Setting meaningful targets of 6-9% annual reductions in carbon emissions
- Setting all CO<sub>2</sub> caps in line with a 2°C increase in temperature.

Despite many references to low carbon and new targets, the Area approaches, need to better reflect and quantify how they are going to help in achieving a low carbon Wales. This needs to be a minimum requirement of the Area and National Frameworks for the WSP, addressing the detail of; climate proofing existing housing stock, micro-generation in the community, and demand management in transport etc. – all areas currently without mention in this document at present.

2.3 We welcome that the document intends to focus on new drivers and areas of work as well as external trends and challenges facing Wales, including climate change. Greater emphasis and analysis needs to be done on the likely constraints to “business as usual” approaches to development, such as peak oil, globalisation, food security and population migration in a world where climate change will affect patterns of growth and economic

development. The Plan needs to be outward facing as well as inwards, and acknowledge these issues with clear evidence, rather than notionally. Analysis of these external factors needs to be strengthened. Suggestions are made later in this response how rigorous, risk based "scenario planning" would help to form a more coherent and realistic context for discussions regarding development at a national and area level.

2.4 There is some confusion about the status and aim of this document. There needs to be a clearer relationship between the aims and aspirations of the original Wales Spatial Plan, which provided a holistic national strategic framework for Wales, and this document which lists a series of aims and outcomes under a number of themes with no sense of the overall strategic direction at a national level. This document does not, at present, as suggested provide the practical "*agenda for SD in Wales over the next 20 years*", nor does it provide an "*integrated tool for decision makers*". In its present form, it does not stand up as a "*stand alone document*" and it is concerning that for the purposes of the Planning and Compulsory Purchase Act 2004 it constitutes the Wales Spatial Plan. Policy makers will have difficulty in using this as an "*integration tool*" as at present – the sections provide a collection of very positive initiatives and proposals but provides no strategic steer or strategic context for Area Groups and other policy formulation.

2.5 There is clearly a timing difficulty in aligning the WSP to the review and possibly remake of the SD Scheme and Action Plan. The WSP at present doesn't have a vision for a sustainable Wales to ground it. However, the relationship and hierarchy between key strategic drivers within Wales is important. The diagram within the WSP on page 3 should provide a hierarchy of plans and not place the SD Scheme on a par with WAG departmental strategies. Cynnal Cymru recommends the model set out in [Appendix B](#) to this report. The revised SD Scheme should provide, along with One Wales, and subsequent political strategies a context for the WSP – a strong vision of what changes are required to meet SD goals and objectives.

2.6 Despite the diagram on page 3, outlining the relationships between strategic documents, there is little evidence in the text that the aims and objectives are "joined up". Greater reference needs to be made to how the Environment Strategy, SD Scheme and Action Plan, the Economic Development and Transport Strategies and work of the Climate Change Commission link to the aims and objectives. Many other strategies are mentioned in passing, but more reference to what they aim to achieve under each theme.

2.7 Many of the outcomes are based on beneficial activity for process, partnerships and plan development and are not outcomes in a spatial context. We acknowledge the new arrangements for local working (LSBs, LSPs) present progress, but listing strategies and partnerships and new ways of working are not outcomes, they are the means to progress towards sustainable development in the WSP. Better articulating what these initiatives are trying to achieve spatially would be very beneficial.

2.8 At present, the actions and outcomes are not strategic enough. The Environment Strategy is a good example which could be drawn on – where clear indicators, outcomes and visions provide a real sense of what needs to be achieved in each policy area. Replicating this approach would be beneficial to provide clarity, direction and a means to measure progress.

2.9 There is obviously a question of governance regarding the level of "prescription" or "direction" given to the Areas from a national framework. However, the objectives and targets of what we are trying to achieve under all of the themes need to be much clearer, and the role of Areas in delivering them should be communicated. Otherwise Area activity will continue to run the risk of being disjointed and unfocused.

2.10 The document and Area statements do provide a clear picture that the WSP process so far has been dominated by the economic development and regeneration agendas. Area focus has been on public and private financial investment and interventions on locations – through Strategic Framework discussions and identification of key settlements; key sectors; locations for economic growth; labour market; transport priorities; ICT connectivity etc. Jobs and homes are fundamental to our communities and well-being, however the document and process needs to provide a more radical debate about limits to growth v conventional economic growth., and the tradeoffs between economic growth and SD. The aim to “*Ensure all investment supports SD objectives*” in Area Plans is welcome and necessary, however at present there is no evidence that the mechanisms or structures have been set up to achieve this, or that the Area Groups have responded to this. Guidance and scrutiny is needed in this area.

2.11 A good example of this is the South East Area approach – identified by the SEA process as having clear negative environmental impacts through its economic development and transport aims. Nowhere is there evidence that alternative development approaches have been considered, or processes which will ensure that these environmental impacts will be mitigated. How meaningful is an SEA process that suggests no significant impacts from 43,000 planned homes in the Swansea Bay Area? A WSP process that is transparent and meeting its objectives should be presenting a clear, coherent argument of why this development needs to take place, acknowledging the impacts on indicators such as the ecological footprint and other targets, and planning how these impacts on emissions, air quality, biodiversity etc are going to be mitigated, and also how much this is going to cost.

2.12 The way ‘policy’ is presented within WSP, it needs to draw on valuable work already undertaken to inform its approach, an example is its approach to the environment. The statement “*Economic growth must be managed within environmental limits*” is very welcome, however, references to the role of the natural environment, including biodiversity interests are limited and marginalised throughout the document. There is currently no indication that the excellent work on Valuing our Environment and Ecosystem Goods and Services in Wales, has been utilised to inform the WSP policies. We feel there is a real need to refocus on considering the environment as an economic asset, including the concept of green infrastructure and its role post peak oil and the part it has to play in climate change resilience. This statement also needs to be re-inforced by reference to targets for the Ecological Footprint within all policy areas (including economy and transport) and the use of the index of Sustainable Economic Welfare.

2.13 Of concern, is the focus on agglomeration rather than localisation of services. In Cynnal Cymru’s response to WAVE, we outlined an alternative vision of a more localised economy in terms of energy, food, local enterprise, production, distribution, leisure and culture and the proximity of home and work. We suggested a focus on ecosystem services and a non-monetised economy and an integrated approach to rural development. This model challenges existing paradigms. Nowhere in the WSP process and 2008 document does it suggest that business as usual approaches to the economy and regeneration are being challenged by other models. Clearly our current approaches result in unsustainable trends (spelt out in the SEA). We need to develop our understanding and capacity to explore alternative approaches at national and Area levels.

2.14 A more informed analysis and objective and target setting is needed under each theme for its audience, and it must have less ‘empty’ messaging. While it is positive that transport policy and carbon reduction are explicitly linked – a stand-alone aim such as “provide real incentives for public transport” tells us nothing of what the national policy interventions are likely to be, nor the mechanism to affect change.

2.15 Similarly, the WSP also needs to articulate, rather than refer to the likely economic impacts of climate change on the national and area level in Wales – which will inevitably

refocus the debate on issues such as changed land values, insurance premiums, health provision costs, agriculture and energy use. Throughout the document, and Area statements, threats and constraints on development are acknowledged but not specified or discussed in detail and there is little evidence cited for alternatives, chosen approaches or of what a more sustainable approach might look like or achieve.

2.16 The actions and outcomes and overview need to be improved in relation to sustainable communities and 'social' sustainability. The document provides no clear vision of what a sustainable community is, or what minimum factors one might expect from a sustainable community, including the development of social networks and social capital. The Sustainable Communities work from English Regions does provide this, and a similar approach in Wales would provide context for Area groups and other key groups in Wales to progress.

2.17 Cynnal Cymru feel that the national, and to some extent, the Area frameworks lacked a reference to some key social factors which are fundamental to spatial planning and social cohesion. These included many issues identified in WSP 2004 such as educational and skills development, maintenance and enhancement of local services, fuel poverty, social enterprise and volunteering. These need to be picked up at an Area level, and the national WSP framework needs to include them.

2.18 There were a number of other natural resource management factors which Cynnal Cymru stakeholders felt were missing or under-emphasised, related to spatial planning, development and land use issues. These included: local ecosystem services; water quality, supply and efficiency; ecological connectivity; the role of derelict and brownfield land; soil resources for the agricultural economy and carbon storage; and the role of designated sites.

2.19 Rather than list activity, the WSP should identify the right policy interventions to improve economic, social and environmental sustainability, and explain why these have been chosen. The WSP can then provide an overall strategic context for partners and act as a policy integration tool. Without this explanation, integration and understanding may prove to be difficult. The WSP should also, with other strategies and plans, including a Sustainable Development Scheme and Action Plan, provide the conditions for those policy interventions to work – guidance, training, auditing and finance.

2.20 The lack of use of an established Sustainable Development Indicator set that drives policy is inhibiting strategic thinking in Wales, including its consideration as part of the WSP. The status of the Shared UK Framework Indicators (see [Appendix C](#)) and 2007 SDI set from the National Office of Statistics should be clarified in relation to the WSP. SDIs could be applied at the national and area level, measured, monitored and applied as part of the SEA process, to give us a clear picture of whether WSP activity is moving us towards or away from both SD and WSP objectives. It is welcome that the Ecological Footprint is being measured at an Area level, but activity and plans need to consider this and measure their influence on footprint components. A "*sharp reduction*" would be welcome, but mechanisms need to be established and referenced in order to slow the growth of the footprint in component areas.

2.21 It is welcome that 5 SD principles are given high profile in the document, however they are not consistent with how these principles are set out in One Future Different Paths – this should be amended to provide a clear indication of where delivering a sustainable economy sits within the principles (see [Appendix D](#)).

2.22 Of more concern is the lack of guidance/requirements/mechanisms to ensure that principles are reflected through the WSP, Area Statements, LSB structures and Community Strategies. In order to make this meaningful, both the SD Scheme and WSP need to outline how this will be demonstrated, scrutinised and reported, so we can evidence how our policy and objectives are aligned with SD.

### 3. PROCESS OF DEVELOPMENT OF WSP 2008

3.1 We understand that Area activity came before this document and the development of the WSP is an iterative process, trying out new approaches and partnerships. However, we feel that there is a lack of an overarching vision and strategic overview and broad objectives to embed the Area work – LDPs, Community Strategies *et al.*

3.2 It seems that the national framework has to some extent been led by the Area approaches, which although issued with some guidance on SD, seem to have marginalised SD in their discussions and work on interim statements. It is acknowledged that the SEA process not begun early enough related to alternative options. Many involved in the WSP process have felt that existing “shopping lists” or aims around economic development and transport have been brought to the discussions by partners with no clear exploration of alternatives in the context of SD. There is little to tell us of what evidence or models have been used to inform these discussions. The experience of some stakeholders is that SD has been seen in many of the Area groups as an “add on” - a hoop to jump through, rather than a serious issue to consider in their discussions, There are clearly some things missing from this process resulting in insufficient leadership and challenge on SD for example:

- Guidance which requires a serious consideration of alternative approaches to progress SD
- The confidence and skills base to challenging existing unsustainable approaches within partnership fora, and understand the consequences of business as usual approaches
- The evidence base and skill to articulate what ‘sustainable’ might look like and achieve to develop alternative approaches
- Toolkits to inform discussions on SD at a National and Area level
- (despite the SEA) a process of scrutiny and appraisal which ‘tests’ whether alternative SD approaches have been considered – and provides sound reasoning for the chosen approach .

3.3 For both the sections and the area plans, those involved need to not only focus on what is good and desirable in their areas, but also acknowledge patterns of development and behaviour which are unsustainable in their approach. If these developments are unavoidable, what alternative approaches could make them more sustainable? The WSP process needs to have people involved with the skills and understanding to address these questions.

3.4 There has been missed opportunities to embed SD at the heart of the WSP process and structures post-Beecham. SD is absent from much of the documentation – including the “Delivering Beyond the Boundaries” suite of documents and “A Shared Responsibility: Local Government's contribution to improving people's lives. A Policy Statement from the Welsh Assembly Government (2007) – with no clear drivers from LSBs to address SD. This needs to be rectified if these partnerships are to deliver on this agenda via the WSP. A closer working relationship between the WSP, SD and Local Government teams within WAG should focus on the following areas:

- Clear guidance is required and capacity and understanding needs to be built into these kinds of fora and structures, if SD is to be not going to continue to marginalised. LDP guidance provides clear requirements of actors, process, targets and monitoring for SD and this could be used as a model approach.
- Advocacy work is required throughout the WSP process to provide those involved with the ‘means’ to consider SD issues – this should include AMs, Area Groups, Co-ordinators as well as the WSP group within WAG to ensure a consistent approach and interpretation.

3.5 Despite involvement of key groups such as WCVA in the WSP process, there is a clear perception from some consultees that the process and documentation is being dominated by the civil service, local authorities and AGSBs with little linkage to the third sector and communities. Whether this is true of all of the partnerships and discussions, WAG and other partners need to address this perception and find alternative ways to engage with these groups and communities – approaches which are meaningful, planned inclusively and feed back to those involved. The message and language of the documents and process need to be focused on:

- Firstly making the aims and objectives relevant to the changes required in the behaviours of citizens and their communities,
- Secondly learning from successful approaches of citizen engagement in spatial planning, such as the transition towns movement; Ymlaen Ceredigion; and Carmarthenshire Council's approach to sustainable communities.

3.6 The purposes, aims and objectives of the WSP need to be better understood by those that are being asked to take part in its process and implementation. Clarity of message, a clear direction and aims and objectives based on good evidence need to be better communicated by those involved at an Area level, including AMs and at a national level so there is integration and understanding across the policy landscape. We recognise that this will be difficult, and Cynnal Cymru is able to act as a conduit to help to communicate this complexity to civil society and help them to engage in future WSP processes.

#### 4. RECOMMENDATIONS

In addition to the recommendations made above we suggest the following steps are implemented to make the Wales Spatial Plan reflect the challenges of sustainable development, and to progress our understanding and delivery of sustainable development through spatial planning and partnerships:

1. WSP should provide an overall **national framework** for development – informed by One Wales and the SD Scheme, providing clear objectives, evidence and direction – to enable it to become the “policy integration tool” it aspires to be. A proofing mechanism should be established for alignment to the WSP. REWORD int
2. Use the WSP as framework for long-term **Scenario Planning** using a clear evidence base and modelling (REAP, UK Climate Impacts Programme, Futures and Horizon Scanning) to inform the National Framework and Areas of the constraints on economic and social development within environmental limits. Partners can then prepare together for challenges in a constructive way – considering risks to both communities and their visions for development and enable them to identify what policy interventions will be required to ensure resilience and to meet their objectives. Target setting should take this scenario planning into account, with an understanding of limits and thresholds, as well as using “backcasting” ie. if our objective is to reduce emissions by 60% by 2050, what is required by 2010, 2020, 2030 etc. and how can the WSP help to achieve this?
3. We use the next 5 years to be better informed about the likelihood of **external factors** impacting on WSP aspirations – and consider how these affect land use issues in Wales. We get our house in order up to 2020 while considering the likely changes to our economy, environment, communities and population post 2020. The international agenda needs to inform this picture – both in terms of external pressures, but also in terms of Wales' impact on those pressures both positive and negative - increasing our contribution to achieving the Millennium Development Goals. Clearly, Wales has a role in terms of climate change

mitigation, to reduce impacts on the developing world, but the nature of Wales' economic development may also influence quality of life in other countries, in both positive and negative ways. The spatial approach to economic development needs to factor this in.

4. We use performance compacts, LSBs and LSPs to explore scenarios with Area Groups to understand and interpret the balance required and actions for SD at a local level. **Guidance, toolkits and training** are required to achieve this.
5. We need to state what a **Sustainable Community** looks like and what elements underpin this concept – what rights and expectations people can have? This information would make the debate relevant to the electorate and civil society. This could then be articulated at an Area level. The *Sustainable Communities* agenda in England provides a template to learn from.
6. One of the aims of the Areas should be the provision of the **infrastructure** to enable people to change their current unsustainable behaviours and live more sustainable lifestyles. e.g. what services and 'environment' do key settlements need to provide to encourage sustainable development and behaviours.
7. We need to state what a **Sustainable Economy** looks like and what elements underpin this concept – what rights do citizens and businesses have? This information would make the debate relevant to stakeholders, and provide context for debate at an Area level. A Sustainable Economy can mean all things to all people, and in a business/economy context is often used to suggest longevity/robustness without considering social and environmental factors.
8. Analysis of **economic costs and benefits of climate change** is needed at the national level and the implications of this considered at the area level, in terms of approaches to economic development, land value, flood risk management, water resources, insurance and provision of services etc. . Scenario planning and research is required, to increase understanding for appropriate responses and increasing resilience of the local economy and communities.
9. The WSP should spell out how development should progress a **Low Carbon Economy** (-60%), with additional scenarios for 80% and 100% reductions in 20 years, in sufficient detail for the people of Wales to see their place in a sustainable future. This should include transport solutions required in a low carbon, low oil economy and action to transform construction in Wales to make Zero-carbon buildings the norm.
10. Through the Wales Spatial Plan, each Area should report to WAG on how they will help meet a minimum of **3% CO2 savings per annum**, reduce their carbon footprint and to draw up a list of sites where micro-generation and community renewable energy projects can be sited, and how they will promote local food production and consumption.
11. We need to develop our understanding and capacity to explore alternative approaches to economic development and focus on **localisation** –in terms of energy, ecosystem services, local enterprise, production, distribution, leisure and culture and the proximity of home and work. This approach should be applied at an Area level to challenge existing approaches to economic development and regeneration.
12. We need to map **Green Infrastructure**, considering ecosystems contribution and functionality to SD and WSP aims, and provide guidance on our

13. Impacts and the consequences of development need to be linked back to annual reduction targets for reducing the growth of the **Ecological Footprint** and its component parts, across each policy area or theme. Scenario Planning should help this process to feed assumptions into the REAP tool.
14. The WSP should help to transform the production, consumption and **distribution of food** in Wales to create improvements in our health, economic prospects and environment. This should take into account food security issues and the issues between the production and sourcing of biofuels and water resources, biodiversity and Millennium Development goals.

## 5. CONCLUSION

The recommendations made in this document are based on the opinions of a range of Cynnal Cymru stakeholders, many of whom are experts in their own field, who have strategic, business and community experience and have experience of working within the WSP process from many different perspectives. What is common is that everyone involved has a desire to ensure SD is driven into the strategy, debates, projects, financial systems and practical delivery in Wales' communities.

WSP is an opportunity for a mature, high value, evidence based, inclusive and well thought through Plan to physically deliver SD in Wales. It needs to work for, not against sustainable development. In order to achieve this, the above recommendations suggest a shift in emphasis in the urgency, level and direction of discussion, planning and implementation. Cynnal Cymru is committed to help in this process.

**ENDS.**

**Cynnal Cymru – Sustain Wales, 24<sup>th</sup> April 2008**

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## **Appendix A- Stakeholders who participated in discussions on this topic**

### **Stakeholders at the WSP Workshop, Cynnal Cymru's AGM and Members Conference, 19<sup>th</sup> September 2007, Abergavenny**

Rob Sully, Carmarthenshire County Council and CC Board Member

Robin Cragg, Welsh Youth Forum on SD

Alex Badley, Sustainable Gwynedd Gynladwy

Dr Einir Young, University of Wales Bangor

Nick Miller

Cassandra Lishmann, People's Enabling Co-operative

Lucy Hoggins, Arena Network

Peter Jones, RSPB Cymru

Margaret Lloyd

Barbara Anglezark, Forestry Commission – Talybont Energy Project

David Williams

Steve Lloyd, Welsh Assembly Government

Brendan Burke, Welsh Assembly Government

### **Partners who attended the WSP Workshop 15<sup>th</sup> April 2008, Cardiff**

Jonathan Tench, Oxfam Cymru

Pete Jorgan, EAW

Peter Jones, RSPB-Cymru

Ruth Lovell, RSPB-Cymru

Sue Essex, Cynnal Cymru

Dr. Richard Jarvis, Cynnal Cymru

Helen Nelson, Cynnal Cymru

Dr. Alan Netherwood, Netherwood Sustainable Futures

### **Telephone Interviews**

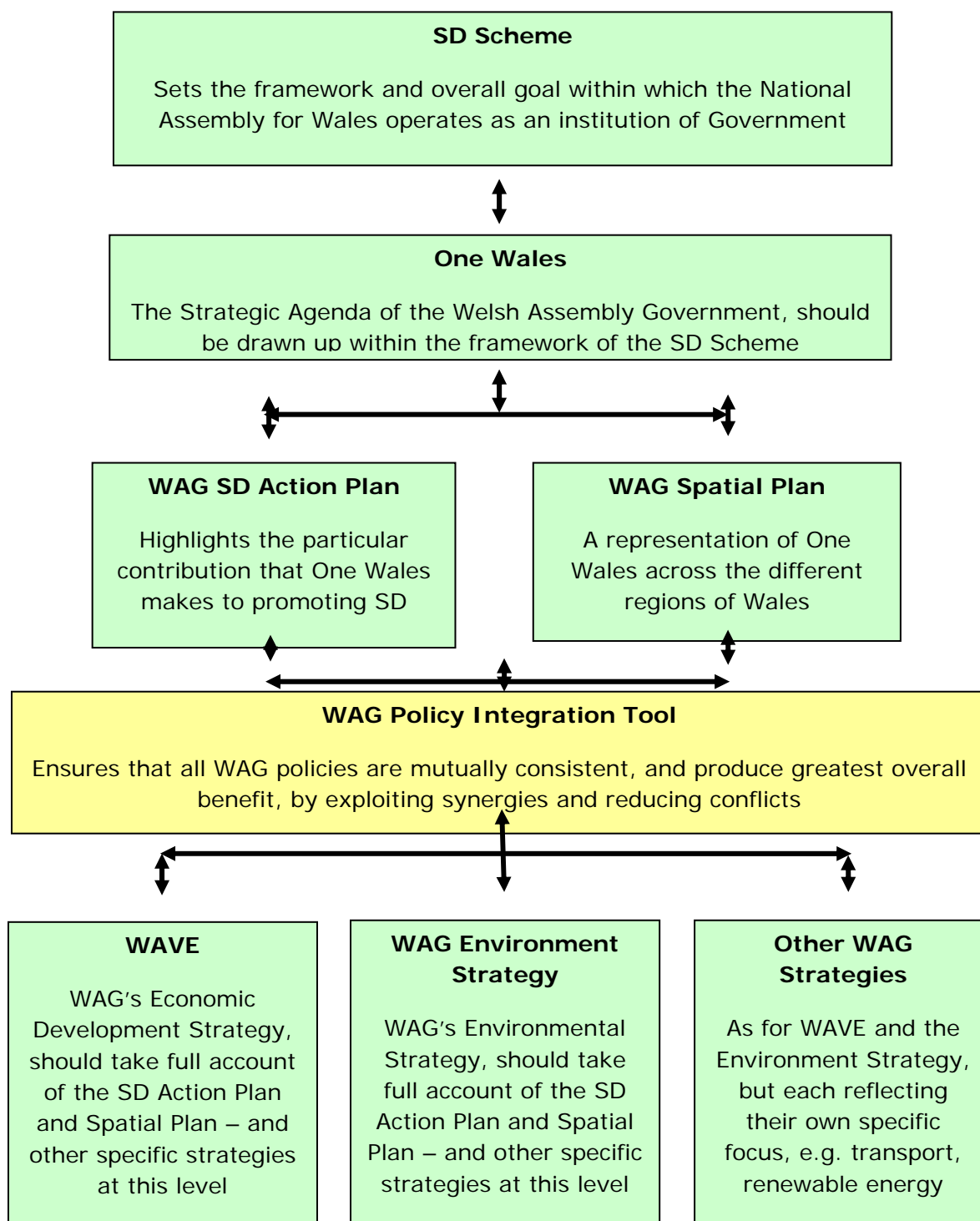
Andy Middleton, Cynnal Cymru and TFY

Anne Mickle, WWF Cymru

Dr. Andrew Flynn, Cardiff University (Centre for City and Regional Planning and BRASS Research Centre)

Whilst this report is intended to reflect the outcomes of the various discussions, the views contained herein may not reflect those of every stakeholder.

**Appendix B - How the SD Scheme and Action Plan should fit within the policy framework**



## Appendix C – Shared UK Indicators from “One Future Different Paths” 2005

### UK FRAMEWORK INDICATORS

1. **Greenhouse gas emissions:** Kyoto target and CO2 emissions
2. **Resource use:** Domestic Material Consumption and GDP
3. **Waste:** arisings by (a) sector (b) method of disposal
4. **Bird populations:** bird population indices (a) farmland birds (b) woodland birds (c) birds of coasts and estuaries
5. **Fish stocks:** fish stocks around the UK within sustainable limits
6. **Ecological impacts of air pollution:** area of UK habitat sensitive to acidification and eutrophication with critical load exceedences
7. **River quality:** rivers of good (a) biological (b) chemical quality
8. **Economic output:** Gross Domestic Product
9. **Active community participation:** civic participation, informal and formal volunteering at least once a month
10. **Crime:** crime survey and recorded crime for (a) vehicles (b) domestic burglary (c) violence
11. **Employment:** people of working age in employment
12. **Workless households:** population living in workless households (a) children (b) working age
13. **Childhood poverty:** children in relative low-income households (a) before housing costs (b) after housing costs
14. **Pensioner poverty:** pensioners in relative low-income households (a) before housing costs (b) after housing costs
15. **Education:** 19 year olds with level 2 qualifications and above
16. **Health inequality:** (a) infant mortality (by socio-economic group) (b) life expectancy (by area) for men and women
17. **Mobility:** (a) number of trips per person by mode (b) distance travelled per person per year by broad trip purpose
18. **Social justice:** *(social measures to be developed)*
19. **Environmental equality:** *(environmental measures to be developed)*
20. **Well being:** *(well being measures to be developed if supported by the evidence)*

**Appendix D – The UK’s Framework’s 5 Guiding Principles of SD**

