



**South East Wales
Regional Housing Apportionment Seminar
Thursday 11 January 2007
Workshop Notes
Prepared by
Cardiff University School of City &
Regional Planning**

South East Wales Strategic Planning Group

Housing Apportionment Seminar – January 2007

Green Group – Neil Harris

- (1) Are the apportionments compatible with the Wales Spatial Plan's main strategic objectives for the south-east Wales region and how realistic are they in terms of the market?
- The Wales Spatial Plan was noted as establishing inconsistent objectives for the coastal belt;
 - Key issue of providing for housing in the Heads of the Valleys area;
 - Importance of understanding the concept of 'the city-region' – defining what it means for planning and understanding its implications for growth in south-east Wales is 'crucial' – it is a concept that encourages planners and others to think differently about future growth and activity patterns – implies a spreading of prosperity and growth within the region – change from past trends and patterns;
 - The networked city-region needs to be supported by a genuine network or linked places;
 - Concerns expressed that housing issues being considered in relative isolation from other, significant issues such as transport – expecting more integration from the Wales Spatial Plan;
 - Some authorities working within different Wales Spatial Plan areas – e.g. Rhondda Cynon Taff working within context of 3 different areas;
 - Clear overheating of the area in terms of traffic congestion;
 - Emphasised that the view expressed in plenary is a Business Panel view and is not simply a HBF view – wider, organisational support for that view;
 - Concerns for misalignment between housing and employment growth – some arguments for encouraging an employment-led strategy rather than one that is housing-led;
 - Concerns expressed that local planning authorities have approached the task on a 'what can we accommodate' basis alone and does not account for trends and patterns in appropriate ways;
 - Key issue of addressing the upper Valleys and the question of real regeneration of these communities – the need to establish them as desirable places to live and work;
 - Some agreement that priority of developing on brownfield land can be overstated in ensuring more suitable and sustainable patterns of development – brownfield sites not always sustainable or appropriate when other issues factored in (e.g. flood risk).
 - Discussion on why Business Panel view focuses so heavily on 'Cardiff' rather than the 'city-region';
 - Identification of 'Greater Cardiff' within the Cardiff city-region – areas within adjacent authorities that are effectively within a Greater Cardiff (e.g. lower reaches of valley authorities, adjacent parts of Newport/Vale etc) – reality may be that significant proportions of housing allocations will be within this area and that boundaries overstate some aspects of the apportionment;
 - Preliminary conclusion that the apportionments are in accordance with the strategic objectives of the Wales Spatial Plan for south-east

Wales, yet those objectives are framed in a way that leaves this open to other interpretations – are objectives of the Wales Spatial Plan in accordance with each other?

- Discussion on how local planning authorities interpret the Wales Spatial Plan and how its status and impact emerges in relation to Local Development Plans – some feeling that the Wales Spatial Plan needs to be more robust, and local planning authorities also to be 'braver' in interpreting it.
- On market realism of the proposals/apportionments, generally felt to be realistic if proper and effective planning strategy and guidance was in place and implemented.
- Felt to be industry capacity for implementing housing, but realism is effectively a market issue; concerns for possible long-term under-supply of housing

(2) How do the apportionments relate to the Wales Spatial Plan's transport proposals for the south-east Wales region and the possible mechanisms for implementing these proposals?

- Discussion on the dualling of the Heads of the Valleys;
- Debated whether this would have an M4 corridor effect (e.g. promoting a growth corridor and regeneration of the area) or act as a 'Valleys by-pass; linking places further apart (Midlands/Birmingham, Swansea etc);
- Environmental sensitivities of certain sections of that corridor;
- Transport infrastructure already over-stretched;
- Congestion charging in future for greater Cardiff area;
- Questions on whether the housing apportionment exercise had been adequately linked to or informed by transport infrastructure;
- Greater input needed on housing/transport interface;
- The networked city-region needs a 'network' – many places not well connected to each other in the form of a genuine network of places;

(3) What are the environmental opportunities and constraints affecting the apportionments?

- The need to consider brownfield land development opportunities and their relationship to other environmental factors – key brownfield sites in south-east Wales have some significant flood risk issues and other environmental considerations that need to be taken into account (Cardiff/Newport/southern areas of Rhondda Cynon Taff) – also concerns about the transport implications of some of these potential sites;
- Strategic Environmental Assessment and Sustainability Appraisal processes in relation to Local Development Plans will be the mechanisms that will identify environmental constraints – these are essentially local processes and may re-open certain questions on strategic apportionment of housing figures;
- Key issues to address on environmental quality and trading off against commuting times – increasing propensity to travel/commute to secure improved environmental and recreational opportunities;
- But increases in commuting also an affordability issue and being driven to access more affordable housing markets at distance from place of employment;
- Quality of housing in valleys areas improving, with increasing choice and range of housing;

- (4) Do the apportionments comply with the Wales Spatial Plan's national vision and objectives?
- Limited discussion on this particular question – assumption that consideration of Wales Spatial Plan issues for The Capital Network in question (1) addresses many of the issues of national vision and objectives;
 - Nevertheless, sustainability considered the key issue in relation to complying with the Wales Spatial Plan and its key objectives;
 - Very clear that 'business as usual' is not an option and that Wales Spatial Plan and other mechanisms need to ensure that patterns of growth and development change;
 - Some proposals for needing more radical change than proposed if sustainability objectives are to be achieved;

Key points identified at close of session by the green group:

- The identification of a 'Greater Cardiff' within The Capital Network – a 'scale' between Cardiff and the wider region that is significant in terms of housing apportionment – apportionment within/to local planning authority areas obscures some important considerations on the location of housing development – thinking needed on issues without 'distortion' by authority boundaries;
- Housing apportionment exercise needs to be better integrated with other considerations – it does not appear to be very well integrated with issues of employment/transport/strategic environmental issues at present; however, the exercise does provide a baseline/starting point from which to raise such issues;
- Some concerns on the adequacy of the apportionment exercise/process and its fitness for purpose – very wide support within the group from across the sectors for a more formal examination and testing of the housing apportionment figures, such as Examination in Public and scrutiny of evidence etc;
- The need to better address the economy/housing interface – potential misalignment between housing and employment (without suitable transport infrastructure) will increase private commuting and congestion; improved alignment can reduce need to travel; key issues of adequate infrastructure provision;
- Econometric modelling – to be treated with some scepticism;
- The need to undertake proper assessment of the evidence being presented for various options and the apportionment of housing; various pieces of information and evidence being presented, which requires sensible assessment and analysis;
- The need to prioritise sustainable development in strategic housing provision;
- The regeneration of the upper Valleys areas is essential – housing apportionment must support that regeneration;

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Blue Group - Bob Smith

- (1) Are the apportionments compatible with the Wales Spatial Plan's main strategic objectives for the south-east Wales region and how realistic are they in terms of the market?
 - The Wales Spatial Plan represents an adapted vision, but for some problems of aligning the proposed apportionments by local authority with this broad vision. It will be important for the Wales Spatial Plan to evolve over time.
 - Concerns about the lack of a means of formally testing the apportionments and adjudicating on them. Recognised that these figures will be challenged at local public inquiries in relation to local development plans. However, also recognised that there is no political appetite for a regional tier of land use planning in Wales.
 - Some arguments in favour of greater strategic regional planning guidance from the Assembly.
 - Concern expressed about deliverability of additional housing. Will depend upon wider policies. Also concerns as to how the different housing sub markets within the region will operate. Where affordable and accessible housing is provided will shape demand and housing choice!
 - Issues raised about the balance between investing in new provision and existing housing. Need to continue to address regeneration, particularly in parts of the Valleys.
 - Concerns about some recent "overprovision" in particular localities (parts of Rhondda Cynon Taff?) and serious "shortages" in other areas. Problems of aligning plans with new investment (both private and public).
 - Concern about provision of affordable housing. Recognised that level of new public investment is limited and unlikely to increase significantly in the short-medium term. Issues about affordable housing being accessible (for employment/public services) by influence the provision of social/affordable housing, emphasising needs in Cardiff/South of M4.
 - Recognition of different housing markets within the south-east Wales region, which cut across LA boundaries. Need to ensure that we are not creating non-viable communities in Heads of Valleys area (link provision to wider economic/environmental regeneration).
 - Importance of developing a better understanding of sub regional housing markets, how they work, and how they are changing. Also to understand the relationships between different housing markets within the region. City region concept seen as important in understanding relationships between different areas/LAs.

(2) How do the apportionments relate to the Wales Spatial Plan's transport proposal for the south-east Wales region and the possible mechanisms for implementing these proposals?

- Need to tie in apportionments to Regional Transport Plan (questioned whether this has been done).
- Integrated transport strategy will be key to delivery of housing - and some questioned whether the resources are sufficient to deliver the Regional Transport Plan.
- Timing issues may be important in relation to linking different plans and strategies.

(3) What are the environmental opportunities and constraints affecting the apportionments?

- Group recognised the importance of recognising environment issues (and constraints) in the apportionments.
- Questioned whether particular environmental risks (e.g. flooding) had been taken account of in the apportionments. Suggested that such factors had been allowed for.
- Argued that environmental groups may challenge apportionments, for example in parts of the Heads of the Valleys sub region.
- Discussion about the environmental issues which may impinge upon the potential for development in some areas, particularly on brownfield sites.

(4) Do the apportionments comply with the Wales Spatial Plan's national vision and objectives?

- Group didn't really get on to this issue – though to some extent picked up under first question.
- Brief discussions of the agreed importance of the city-region concept in relation to south east Wales. Importance of "Greater Cardiff" sub region recognised, and acceptance of concerns about apportionments potentially constraining growth (and adding to housing pressures). Views expressed that the "Business Panel" presentation overemphasised the importance of Cardiff as the city/capital rather than the links between "Greater Cardiff" and its region.
- Agreement that achieving sustainability needs to drive housing development.

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Red Group – Alan Hooper

- (1) Are the apportionments compatible with the WSP's main strategic objectives for the SE Wales region and how realistic are they?
 - The Regional Transportation Plan (RTP) indicates that, if current trends are projected forward, there will be an unacceptable level of road congestion throughout the sub-region.
 - The only sustainable strategy, therefore, is to constrain demand
 - Location is key, especially employment/housing relationships, which currently are largely based upon excessive in-commuting to the con-urban core. The location of both new housing and new employment must be sustainable.
 - Avoid a predict-and –provide approach which relies exclusively on network capacity increases, mainly to the road network.
 - RTP will replace Unitary Plans/Local Plans in 2/3 years. Will LDPs take on board RTP strategic provisions?
 - Need a more concentrated pattern of development, providing this is sustainable (much present concentration –e.g. apartments in Central Cardiff – not environmentally [or socially and economically?] sustainable).
 - As they stand, there is no flexibility built into proposed apportionments – this aspect heavily criticised in Barker Reports – need to build in flexibility to market and needs.
 - In analysing the functional Cardiff sub-region, need to distinguish between LA/TTWA/LHMA/city region. AND interconnections with other sub-regions and regions.
 - Need to consider apportionments against land allocations and land availability – need more detailed info on land banks and options, as well as major infrastructure commitments/proposals (eg new M4; additions to Cardiff PDR (the Cardiff Corniche)
 - Need Land Protocol from ex-WDA re:
 - a) land in WDA/WAG ownership (Public Land Register for Wales?)
 - b) facilitating private sector/RSL housing development in partnership (cf Housing Corp/English Estates)
 - Changes in local political representation/policies could change trends – an unpredictable factor – what might be the impact of Community Strategies/Plans? Could pit WAG against various coalitions of LAs – ‘Divide and Rule’?
 - Some LAs will develop own projections and challenge WAG – what is reconciliation mechanism?
 - If apportionment accepted consensually, could be disrupted subsequently by large ‘windfall’ (ie unplanned allocation – eg Methyr Village; new settlement at Rhoose/Llandow to accommodate DARA?)
 - Abandoned UDPs represent missed opportunities, but the outline RTP provides an interim land-use/transportation strategic plan until ‘regional’ parts of WSP finalised.

FUNDAMENTAL ISSUES:

- Will LAs each try to maximise vis-à-vis WAG, or will WAG and the LAs **genuinely** collaborate (early signs in SEWSPG and SEWRHF looking good?)
- What is the **status** of the apportionment exercise – it must provide opportunities for constructive challenge by stakeholders and the public, or it will fall into disrepute and disuse. As it stands, the Apportionment Exercise may be open to challenge under Human Rights legislation?
- The strategy underlying the apportionment exercise needs to be related to strategic implementation vehicles, especially in relation to major Secn 106 agreements, and possibly planning gain supplements in the future (the latter not controlled by WAG).

2) How do the apportionments relate to the WSP's transport proposals for the SE Wales region and possible mechanisms for implementing these proposals?

- See above under 1)!
- A car-based regional/sub-regional settlement pattern is not sustainable.
- Requires major behavioural change (road pricing/congestion charging/fiscal change e.g. as proposed currently by Cardiff CCC).
- Existing and proposed rail investment, though usefully increased recently (c. £150m), still woefully inadequate.
- The challenge is very great, but the realistic scenario is transportation meltdown (a more immediate threat than climate change, which it is itself contributing towards).
- Must change work/home/play patterns (e.g. stagger working day; encourage home working using ICT etc)
- Need to consider metropolitan transportation patterns (urban/rural; commuting; migration; passenger/freight etc) , for example by conducting a study of Cardiff/Bristol (Sevenside?) region. (And perhaps levying a charge on the Severn Bridges in both directions!). Is the M4 to be a corridor of movement or a corridor of settlement?
- Need to build a CONSENSUAL transportation strategy which delivers international/national/regional economic goals **AND** simultaneously recognises and plans strategically for diversity and distinctiveness (“A Small Country With A Hundred Voices From a Thousand Places”).
- **FUNDAMENTAL ISSUES:**
- Predict and provide discredited in transportation planning and misrepresented in planning for housing – need to avoid exclusive emphasis upon demographics, and relate employment/housing markets through a land-use transportation strategy which downgrades a predominant emphasis upon facilitating car use.

- Need to make **equal** provision for the pedestrian and cyclist – and inclusive strategy should positively discriminate in favour of ‘transport poor’ (young; elderly; disabled; poor; unemployed; BME communities; refugees etc). As it stands, the Apportionment exercise does not seem to advance the social cohesion and social inclusion objectives of the WSP?

3) What are the environmental opportunities and constraints affecting the apportionments?

- (1) Need an **OPERATIONAL** definition of sustainable development in WSP within which apportionment exercise can operate to assess economic, social and environmental impacts.
- (2) Need to establish what is distinctive about SE Wales region **environmentally** –THIS IS ITS MAIN ECONOMIC, SOCIAL AND ECOLOGICAL RESOURCE.
- (3) Need to strategically relate main employment, residential and ‘green’ areas to facilitate ecological processes which sustain the built and unbuilt environments.
- (4) What is distinctive about the Cardiff conurbation? If its compactness is valued, then peripheral growth needs to be urgently regulated – need a strategy for the management of the rural/urban fringe – ‘Smart Growth’.
- (5) Should consider strategic physical impact of roads on residential environment and quality of life in general – ‘tranquil’ areas (“What is this life if, full of care, we have no time to stand and stare?”).
- (6) What will be the strategic environmental consequences of, for example, linking Newport to a new M4? Or of 15,000 new dwellings to the East of Newport?
- (7) What will be the consequences for nationally unique and internationally recognised habitats (Wentloog and Magor?) – what strategic opportunities are there for Sustainable Urban Drainage Schemes (bearing in mind anticipated climate change and flood risks?)
- (8) Do the apportionments have regard to the possibility of the Severn Barrage (or of alternative sustainable wave technologies) on the projected settlement pattern?
- (9) Have the strategic alternatives in terms of ‘brownfield’/ ‘greenfield’ major development sites been taken account of in the apportionments?

FUNDAMENTAL ISSUES:

- There appears to have been no SUSTAINABILITY APPRAISAL of the apportionment exercise, which would appear to be in conflict with EU Directives?
- The Apportionment exercise must provide a test of the soundness of the underlying strategy(ies), both environmental, social and economic.
- The Apportionment exercise should be informed by an environmental/sustainable development VISION as coherent as the Sustainable Development Scheme for Wales, reflecting the Government of Wales Act’s commitment to sustainable development. This does not presently come through sufficiently strongly in the draft Apportionment Exercise, despite what is acknowledged to be the best efforts of the officers involved.

4) Do the apportionments comply with the WSP's national vision and objectives?

- At present, no, in very significant respects (please see Fundamental Issues above).
- The WSP's national vision and objectives are undeveloped at present, especially at the regional/sub-regional level within Wales. In some cases, these visions/objectives are potentially in conflict.
- More regard should be had to:
 - a) the Sustainable Development Scheme for Wales (and Action Plans);
 - b) The National Housing Strategy for Wales (and Action Plans) and Communities First strategies;
 - c) In relation to WAVE, more regard should be had to rural and urban regeneration objectives of the WSP;
 - d) WSP should adopt a more radical approach to settlement restructuring strategy, particularly in the light of the emerging Regional Transport Plan (dim problem!).
 - e) More priority needs to be given to acknowledging the natural environment as the key resource (with its people) of Wales, and to developing an approach to Apportionment which prioritises this over a narrow vision of economic growth based upon a Vision or Visions which might lack an evidence base?
- Urgent regard should be had to the LEGITIMATION of the exercise. The last exercise in 2000, despite the best efforts of officers involved, had little if any strategic impact upon either local development plans or outcomes in terms of the built/unbuilt environment. It remains an interesting (and valuable) planning exercise. If the present Apportionment exercise is not to go the same way, attention must be given to the 'democratic deficit.'

APPORTIONMENT MUST RELATE TO RTP AS WSP