

Summary Critique of The Halcrow Reports (The Report) on Environment, Landscape, Transport and Employment of the Eco-town for Leicestershire submitted by The Co-operative Group and the Homes and Communities Agency (the promoters)

The Co-operative Group and Homes and Communities Agency welcome the overall recognition that the eco-town could bring potential benefits to the sub-region. It is clear that if the eco-town is delivered in the way in which the Masterplan Vision describes then it represents a unique opportunity to help solve existing housing and sustainability challenges that other proposals have so far failed to address. We also welcome the view that further assessment work needs to be undertaken should the eco-town progress beyond shortlisting and through the normal democratic planning process.

Serious and fundamental flaws are revealed, however, through further analysis of the Report, in both the scope and the methodology used to produce key recommendations for the commissioning local authorities. The sheer number of inaccuracies, inconsistencies and knowledge gaps means that without the steer of a formal response from the promoters, local authorities will be unable to produce reliable submissions to the Department for Communities and Local Government in response to the draft Eco-towns Planning Policy Statement (PPS) and Sustainability Appraisal (SA). A need for road widening to accommodate the proposed Rapid Transit route is wrongly identified when no road widening would be required, the wrong Rapid Transit route is also wrongly identified, the role of the Smarter Choices company ignored, non-desk based survey work dismissed and superseded reports are used upon which recommendations are made for employment projections – all of which are integral to the deliverability of the proposals.

The remit given to the Report's authors included restraints on the timing and the focus of their research including, surprisingly, a ban on any contact with the promoters and any members of their team. This lack of engagement has led to many of the main failings in the report – accurate information could have been provided by simply writing to the promoters in advance of report publication to check core facts and references. As such, the promoters have written a summary response to aid local authorities in their considerations.

The report is riddled with basic misunderstandings of the eco-town process, ignores clear guidance provided by CLG and even suggests ways to approach key assessments, which are in direct contradiction to established practice. The report assumes that the housing to be delivered through the eco-town would be in addition to existing projected requirements. CLG has previously explained to local authorities that this is not the case and the draft Eco-towns Planning Policy Statement indicates that eco-towns should ideally be dealt with through the strategic planning process. Claims in the report that such additional housing would put pressure on services, impact on business and mean jobs were taken from existing residents are all therefore erroneous and misleading. Recommendations that a sub-housing market area review be undertaken to consider the appropriate make up of housing in the town run contrary to published guidance and established practice supported by Inspector decisions at planning inquiry, all of which confirm that housing market areas should be considered as a single unit. While an apparently minor technical

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point, this recommendation shows a lack of basic experience in the creation and application of planning policy.

It is also important to note that the Report has considered 5 of the 9 key development themes that form the eco-town proposal and which are set out in the Masterplan Vision Document. It is, therefore, an incomplete assessment of the eco-town proposal. The report ignores the eco-town proposals on education and skills, health and wellbeing, food and farming, governance and management, energy and climate change. As each element is directly connected to the delivery of other elements in the vision, considering issues in isolation fundamentally misunderstands the approach to the masterplan and the breadth and depth of the proposal's vision. What makes the assessment in the Report unreliable is a clear acknowledgement of the importance of the interrelated themes and how they contribute to each other but a failure to give due weight to each and how this ensures the deliverability of the eco-town proposals.

The Report claims that there is a lack of detailed information on the eco-town proposals at this stage of the planning process. However, this conclusion appears to have been made on the basis of assessing the scheme as a planning application and not a Masterplan 'Vision', which demonstrates a lack of understanding on the part of the authors of the stage the proposal has reached in the planning process. This would give local authorities the impression that missing information is a reason to oppose the eco-town being on the government's shortlist when in reality shortlisting is about ensuring the Vision can meet sustainability criteria. Ultimately the test of the eco-town compared to alternatives proposed through the RSS would be at planning application stage when all of the supporting work has been undertaken.

The Report appears to directly question the validity of the existing approved regional and sub regional policy frameworks, policies that we support through our proposals. Our proposal, in particular our employment strategy, is directly based on the key policy frameworks established in the new Regional Spatial Strategy and Regional Economic Strategy, as well as directly relating to sub-regional economic policy objectives. Different sections of the Report draw conflicting conclusions as to whether the scheme vision is compatible with economic policy. The Report goes even further, questioning key policy foundations, including the regional economic strategy to move to a higher skilled, post carbon manufacturing economic base. We support the existing policy framework and find the Report's dismissal of such confusing and directly in conflict with national, regional and local established policy objectives.

The Report recognises the author's lack of experience in assessing exemplar environmental schemes and the consequential difficulty in making any reasonable judgements on the scheme. It justifies this by arguing that since no eco-towns exist in the UK, there is no comparable available to test against. While this is obviously strictly true, given that the government's initiative is specifically designed to deliver a fundamental step change in the way sustainable communities are created in England, there are numerous international examples and UK pilot projects which have a direct relevance to the eco-town process. A substantial body of academic study and analysis has been built up, which considers both the fundamental elements of new settlement development and the value and benefits of specific

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environmental initiatives and programmes. Ignoring this body of evidence and instead choosing to consider the eco-town proposal in isolation fundamentally undermines the validity of the report and inevitably leads to a tone of assessment which supports a continuation of 'business as usual' rather than realising the potential of innovation and new approaches which lie at the heart of the eco-town initiative.

Even at this 'vision' stage the promoters would maintain that its work on the eco-town far surpasses that normally undertaken for a site prior to entry into the Regional Spatial Planning Process. The conclusion that insufficient detail has been made available on the Eco-town for Leicestershire proposal implies that more information should have been provided at this stage in the shortlisting process. However, there is no expectation from the Department for Communities and Local Government that our bid should be more detailed than it is at this stage. It is misleading to conclude that key studies, such as Environmental Impact Assessment and Retail Impact Assessment, have not been undertaken when such studies would only be done in support of a planning application. We await the completion of the Eco-towns Planning Policy Statement consultation and shortlisting before further work is undertaken to progress the scheme through the normal planning process, concluding in a planning application. It is inaccurate to report that the Masterplan Vision is already a final 'Masterplan'. Indeed the Report's Executive Summary repeatedly refers to the Masterplan and this is an unfortunate oversight that undermines much of the constructive work that is sought to be achieved.

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This summary paper sets out a response to some key inaccuracies contained within the report in order to help local authorities make informed submissions to government and those that they represent.

Transport Report

Rapid Transit Route

The Transport Report has incorrect details of the proposed rapid transit route

A rapid transit route forms part of the transport infrastructure solution for the Eco-town for Leicestershire and this is set out in the Eco-town for Leicestershire Masterplan Vision Document and Transport Assessment. The Report has failed to demonstrate a basic understanding of these rapid transit route proposals. It describes the rapid transit route as via Stoughton Road whereas both the tram and bus options are clearly shown on the plans as going via Manor Road.

In addition, the Report considers that the rapid transit route will necessitate road widening which could possibly affect 'hundreds of properties'. However the rapid transit route is deliverable without the need for road widening and the Eco-town for Leicestershire Transport Assessment refers to 'respecting the character of the conservation area' along London Road through which the rapid transit route will pass.

Transport Modelling Work

The Report, despite being published months after the completion of the transport modelling work, has been completed whilst the transport modelling work was only part complete and has failed to understand the nature of the modelling inputs.

The Report appears to have been written before the transport modelling work was complete and in this respect can only offer a very thin strategic assessment of the transport solution proposed for the eco-town. The modelling work was undertaken to assess whether the proposed transport solution was viable and demonstrated that it offered a potentially viable way forward for achieving an eco-town (Appendix C, Eco-town for Leicestershire Transport Assessment, October 2008).

The critical assessment offered within the report appears also to be based on a complete lack of understanding of the nature of the transport modelling work. The report suggest that TRICS data was used in the PTOLEMY model, however, this model does not use TRICS and nor is it based on 'containment levels'. The author's conclusions are therefore invalid.

Smarter Choices

The report has failed to review Smarter Choices innovations, which are a key element of the Eco-town for Leicestershire transport solution. The report does not appear to offer any critical assessment of the Smarter Choices innovations proposed for the eco-town. This must either reflect a tacit support for this element of the proposals or a complete inability to understand the nature and importance of the Smarter Choices concept, which is proven to achieve significant modal shift away from car use (**DfT (2005) *Smarter Choices – Changing the Way We Travel*, Department for Transport, London**).

Environment and Landscape

Environmental Impact Assessment

The report requires information equivalent to that contained within an Environmental Impact Assessment, which would only normally be required at a planning application stage: we are not yet at this stage in the process.

The Summary Report states that the Pennbury proposals are not supported by detailed site surveys and assessments and an Environmental Impact Assessment (EIA) (this is now more commonly known as an Environmental Statement (ES)).

The Report would appear to demonstrate a lack of understanding regarding the nature of eco-town shortlisting process and the level of detail which is appropriate at this stage. An ES has not been undertaken to date and would not normally be expected until a planning application was to be submitted for the eco-town. The preparation of an ES was not a requirement of Government as part of the eco-town shortlisting process and it would not be prudent for an EIA to have been undertaken to inform the production of the Planning Policy Statement. The promoters are, however, committed to the preparation of an ES if the proposal is included on the final shortlist at the appropriate time and at the appropriate point in the process, which would be at the planning application stage .

Ecology

The report incorrectly states that the Eco-town Masterplan is based on desk-based analysis of the main environmental assets of the site, however, survey work has been undertaken. This will be supplemented by further survey work, including protected species surveys if the proposal goes forward to the planning application stage.

The Summary Report states that the Masterplan is based on desk based analysis of the main environmental assets of the site. This is incorrect: in 2008 the Promoters undertook a series of ecological surveys at the site which included a survey in May and June 2008 to determine the likely size and relative importance of Great Crested Newt populations within the study area and a broad appraisal of the habitats and potential ecological constraints at the site and bat surveys. All of the results from these surveys fed into the masterplanning process. If the promoters submit a planning application then further protected species surveys would need to be undertaken including otter/water vole surveys, badger surveys, further botanical surveys, further Great Crested Newt Surveys and bird surveys, all of which would be undertaken at the appropriate time of year. The results from these surveys would be incorporated into an ecology chapter of an Environmental Statement (ES) and impacts mitigated as necessary through iterative working with the masterplanners and design process. This would ensure a comprehensive mitigation and biodiversity strategy for the site which could include environmental enhancements where appropriate.

With regards to affects on nearby statutory protected sites and the non-statutory sites, effects on all of these sites would be assessed in an ES but have already been recognised as part of the masterplanning process.

Landscape and Design

The report makes unsubstantiated statements about the potential landscape impacts of the eco-town and these should be withdrawn in the absence of any independent technical work by the report's authors.

The Report makes a number of sweeping statements about the potential landscape impacts of the eco-town development, however, these comments are not supported by any independent technical work by the report's authors, such as a landscape and visual impact assessment. There is, therefore, no professional basis for these comments and they should be retracted. The report states that *'the prominent location of the site, at an elevated height and the high densities proposed, will create a very urbanised, dense form which will be difficult to assimilate into the surrounding countryside'*. This statement is misleading and over-emphasises the prominence of the site, as it is not the highest point within the surrounding environment and is not a plateau location. Similarly, comments made in the Summary Report in relation to *'effects on rural tranquillity'* cannot be justified in the absence of further assessment work.

The report also makes statements about the settlements that could potentially have prominent views of the site, suggesting that Houghton on the Hill, Kings Norton and Illston on the Hill would be affected. It is considered that Kings Norton and Illston on the Hill are unlikely to experience prominent views, owing to intervening topography and vegetation between these settlements and the Eco-town.

If the eco-town proposal is on the final shortlist and then progresses through the normal planning process, a Landscape and Visual Impact Assessment would be undertaken as part of the Environmental Statement that would accompany a planning application.

Employment**Source of Employment Strategy Information**

The Report uses an out-of-date report as the basis for a critique of the eco-town employment strategy and therefore its findings are invalid.

The report uses the Interim Employment and Economics Technical Report (June 2008) as the basis for its critique. This report was superseded by the Eco-town for Leicestershire Masterplan Vision Document in September 2008, which sets out a strategy for employment within the town, which is closely aligned to regional and sub-regional priorities, including a focus on high knowledge based sectors. The Interim Report included a detailed breakdown of employment within the eco-town by sector and looked at data which has now been withdrawn. It is recognised that further work is required to identify demand for employment space within the eco-town and how employment may be phased to complement development within the sub-region.

Regional and Sub-regional policy alignment

The report fails to identify the alignment between the economic strategy for the eco-town set out in the Masterplan Vision document and regional and sub-regional economic policy. Regional and sub-regional economic policy focuses on the need for high knowledge based sectors, including construction, technology and environment. The focus on sustainable construction technologies in the eco-town is directly aligned with this approach.

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The reports claims that 'the co-op provide no clear economic rational or strategy which demonstrates how Pennbury will support existing economic strategies or how it links to existing efforts to regenerate Leicester city, Oadby and Wigston town centres or the wider sub-region'.

Whilst briefly mentioning the Regional Economic Strategy and the Leicestershire Economic Strategy 2020 Vision, the report fails to identify that the economic strategy set out in the Masterplan Vision document is very closely aligned with both strategies. For example, the RES identifies four Priority Sectors for future employment growth in the region, of which Construction is included in the form of sustainable construction technologies as a target employment sector for the eco-town. *Vision 2020*, developed by the Leicestershire Strategic Economic Partnership, who have taken the lead on employment at a sub-regional level, identifies Leicestershire's economic objectives to include the development of local innovative and creative talent and the promotion of enterprise, innovation and creativity through the education system and identifies high knowledge sectors including high-tech manufacturing, technology and environment as target sectors for growth in the Leicestershire sub-region. It specifically states that Leicestershire should be promoted as a centre for innovative environmental businesses and encourages business start ups in the environmental field. It is noted that representatives from Leicestershire County Council, Leicester City Council and Harborough Council are on the LSEP Board and must therefore endorse the Vision 2020 strategy. The Leicestershire Sustainable Community Strategy, which was approved by Leicestershire County Council as the accountable body in May 2008, also reiterates the need to focus on innovation and high knowledge based sectors.

Questioning policy

The Report questions the deliverability of jobs in sustainable and environmental technologies due to the lack of skills in the sub-region. This appears to question the sub-regional strategy set out in Vision 2020 and the Leicestershire Sustainable Community Strategy which focuses on the need to increase skill levels in order to attract high knowledge based sectors.

The Report questions the deliverability of jobs in sustainable and environmental technologies (Economic Role, pages 8 -11) due to the lack of skills, although this high knowledge sector is a regional and subregional target. The questioning of these policies which would appear to be beyond the remit of the report but also fails to consider the education and local procurement strategies for the eco-town, which are designed to promote the necessary skills and ensure that new business and labour is contracted locally . It also fails to recognise the need to retain graduates from Leicestershire's universities, which is recognised as an issue in the Leicestershire Sustainable Community Strategy 2008.

Complementarity with Leicester City Regeneration

The Report contradicts itself as to how the scheme will impact on regeneration initiatives in Leicester city. The Strategic Sites Review element of the Report is clear that there will not be a fundamental risk to regeneration in Leicester city whilst the Policy Review finds the eco-town vision incompatible with policies which support the regeneration of Leicester city, for example RSS policy SR4 which supports the

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regeneration of city centres and the need to provide for the regeneration of deprived communities in the Three Cities sub-region.

The Employment section of the Report fails to understand how the eco-town economic strategy would complement regeneration in Leicester city. Whilst the Leicester city science park will focus on the biotechnology sector, the focus in the city centre will be on Class A offices. The eco-town will not focus on either of these sectors, with office space in the eco-town focused on local services for the eco-town itself. This information has been presented to officers of Leicestershire County, Leicester City, Harborough and Oadby and Wigston Councils and to members of Leicestershire County Council Scrutiny Committee).

The report fails to understand how the eco-town economic strategy would complement regeneration in Leicester city. Whilst the Leicester city science park will focus on the biotechnology sector, the focus in the city centre will be on Class A offices, such as public administration office space and backroom facilities for Class A2 retail such as banks and estate agents. It should also be noted that the eco-town would be constructed over a 15-20 year time period and there is ample scope to phase its development to enable progress on city centre developments to progress first. This information has been presented to officers of Leicestershire County, Leicester City, Harborough and Oadby and Wigston Councils and to members of Leicestershire County Council Scrutiny Committee).