

The Co-operative Group
Response

Draft Planning Policy
Statement: Eco-towns

Document 1

**The Co-operative Group Response to the Draft
Planning Policy Statement: Eco-towns Consultation**

April 2009

an **ECO-TOWN**
for **LEICESTERSHIRE**

Q1. Does the draft Planning Policy Statement provide sufficient guidance on the consideration of eco-towns through the plan making process?

Principle of an EPPS

The Co-operative Group (the Group) considers that a Planning Policy Statement for eco-towns (EPPS) is essential in order to establish the fundamental principles and standards which define eco towns and to provide guidance on how they are to be considered through the plan making process. The Group is of the view that the guidance is sufficient although DCLG may want to clarify that other non freestanding viable developments (i.e. urban extension) that meet the rigorous standards for eco towns in other respects will normally be given equal consideration in the plan making process, notwithstanding that they do not strictly meet the definition of eco towns.

It is recognised that whilst broad locations suitable for eco-towns are to be set out in the EPPS, it is right that these locations are further tested in a fair and open way alongside alternatives where the level of detail provided for eco-towns proposals is matched by those of alternatives, ensuring a level playing field for assessments and the most appropriate outcome for communities in the relevant Housing Market Area.

Regional Spatial Strategies

Paragraph 2.2 should make it clear that eco-towns identified in the Eco-Towns Programme should be formally considered as locations within RSS reviews where possible. This would give regional planning bodies clarity that eco-towns locations should be considered as Options in RSS development and therefore the subject of public consultation when Options are published. The EPPS should also be clear that eco-town locations should be assessed against alternatives in a fair and open way, with the level of detail provided for eco-town proposals recognised as the benchmark by which all options should be assessed.

Local Development Frameworks

Paragraph 2.4 specifies that where an eco-town is set out in the Eco-town Programme, local planning authorities should consider the eco-town as an option in their Core Strategies. This would enable local authorities that are at the early stages in the preparation of their Core Strategies to include eco-towns as options. This may lead to a scenario where emerging Core Strategies are not in conformity with adopted Regional Spatial Strategy (RSS): better alignment with emerging RSS would, however, be anticipated due to the requirement for RSS to also consider eco-towns in the Eco-town Programme. Guidance is required for local authorities that their Core Strategies would not be deemed unsound in this scenario.

In addition, the PPS should be clear that the development of an eco-town can represent a long-term strategy which may span across a series of Local Development Frameworks. For example, a Core Strategy may make provision for the development of an eco-town but indicate that only the first phase would be delivered within the plan period, with subsequent phases forming part of the housing provision in future Core Strategies.

Q2. Are the locational principles for eco-towns sufficiently clear and workable?

Definition of an eco-town and locational principles

Paragraph 2.1 states that

Eco-towns are a specialised type of new settlement which are separate and distinct but well linked to higher order centres.

The definition of a new settlement in the draft EPPS should align with that in PPS 3: Housing, where they are described as 'new free-standing settlements'. The first sentence of paragraph 2.2 should be amended to read,

Eco-towns are new free-standing settlements.

The remainder of the paragraph is sufficient to describe the nature of eco-towns and is adequately supplemented by paragraphs 3.1 and 3.2 in relation to locational principle. The Group supports the four criteria for identifying suitable locations given in paragraph 3.2. Recognition should be given that eco-towns will grow in stages to their final 'vision' form but that the initial stage or neighbourhood should aim to be independently viable.

Q3. Taking overall the standards set out in the draft PPS do you think that they achieve a viable eco-towns concept?

Independent financial assessments undertaken by PwC on behalf of the Government have indicated that viable eco-towns have the potential to be delivered on the basis of the standards set out in the draft EPPS.

Q4.1. Do you consider that the standards provide a clear basis on which to make decisions on planning applications for eco-towns?

The standards are clear. The EPPS should recognise that these standards may be amended to accommodate technological advancement, response to climate change and other as yet unforeseen changes in circumstances and requirements of eco-town and neighbouring communities that will emerge as these towns are developed. As schemes are tested through the planning system, the delivery of eco-town standards should be seen as materially better than the equivalent 'business as usual' options.

Q4.2. Do you consider that the cost of implementing the standards will undermine the viability of eco-towns?

The financial viability assessment undertaken by PwC indicates that there is potential to deliver eco-towns which meet the standards. Any subsequent alteration in standards would also need to consider the impact on the viability of future phases of schemes.

Q4.3. Are there any standards that you feel are missing?

No

Q4.4. Are any of the standards not essential?

It is important that a new benchmark for high quality development is established and this makes inclusion of the standards within the EPPS essential, however, the guidance should also encourage continuing innovation and should avoid promotion of a simple box ticking exercise.

Q 4.5. Have we specified the calculation of net emissions clearly in a way that avoids perverse incentives and loopholes? Is this standard the most cost effective way to do this?

The standard is supported, however, there is an opportunity to test pilot approaches to carbon trading in eco-towns, so the guidance should allow for innovation in this respect.

Q 4.6. The climate change adaptation standard, alongside existing planning guidance, aims to ensure that eco-towns will be more future-proof. Is it sufficiently clear and workable?

The standard is supported based on existing knowledge but given the length of the development period for eco-towns, there must be recognition that this standard will need to change over time.

Q 4.7. Should the PPS be more prescriptive than set out in paragraph 4.9 (e) in relation to energy efficiency? Do you agree that 70 percent is an appropriate level of carbon mitigation through on-site means?

The standard should be in line with the most up-to-date targets set by the European Union.

Q 4.8. Is this employment standard sufficiently clear and workable?

In addition to demonstrating how access to work will be achieved, the EPPS should require economic strategies for eco-towns to consider how they will support economic development objectives within the Region. Work on the economic strategy should commence from scheme inception and be submitted with the planning application for the scheme. There should be a two-way working relationship between scheme promoters and local authorities in order to ensure that eco-towns optimise the economic opportunities within their Region.

Q4.9. The transport standard attempts to support people's desire for mobility whilst enabling low carbon living. Is it sufficiently clear and workable?

Transport standards should be kept sufficiently flexible to allow for innovation and choice. For example, paragraph 4.16 should be amended to allow for innovative ideas in primary school location.

Eco-towns should be designed in a way that supports children walking or cycling to school safely and easily. There should be a maximum walking distance of 800m from homes to the nearest school for children aged under 11, except where this is not a viable option due to natural water features or other physical landscape restrictions or where equivalent or additional health and educational benefits can be demonstrated from an alternative locational scenario.

Similarly, parking standards should not be unduly rigid: they should allow for scenarios where the availability and quality of sustainable transport choices together with fiscal incentives for using them means that everyday trips are made by non-car modes but where eco-town residents still have the opportunity to own a car to provide for off-peak journeys which need to be made by car but do not have an undue impact on the highway network, such as weekend trips or journeys late at night. The emphasis should be on modal split and use and not just on car ownership.

Q4.10. The local services standard allows flexibility to reflect existing local provision and the size of the development. Does it cover the essential services which will be needed in eco-towns?

The range of local services identified covers essential services and gives sufficient scope to reflect local conditions. The EPPS should also require an analysis of existing provision, in order to prevent over-provision within the eco-town and to give scope for those living and working near the eco-town to access new facilities within the eco-town where there is an existing level of under provision of a particular service. Scheme proposers should also be encouraged to investigate opportunities for the location of facilities of sub-regional, regional and national importance

Q4.11. The standards proposed on green infrastructure and biodiversity aims to ensure that development is undertaken in such a way that it protects and enhances the best features of local landscapes for the benefit of both people and wildlife. Are the standard proposed clear and deliverable?

The proposed standards are supported

Q4.12. The water and flood risk standards aim to ensure that eco-town developments are planned so that they will minimize water use and flood risk, and raise quality. Are the standards proposed clear and deliverable?

The proposed standards are supported

Q4.13 The waste standard aims to ensure that eco-towns manage their waste effectively, from their construction onwards. Is the proposed waste standard a clear and workable way of doing this?

The proposed standard is supported

Q4.14. The transition and development standard should ensure that initial residents will not live in un-serviced and isolating building sites. Does it get the balance right between supporting initial residents and enabling developers the flexibility they need to build and grow the town?

Paragraph 4.31 should be amended to recognise that subsequent planning applications may seek to improve on the original consent by adapting and attempting to rectify or improve on issues which have arisen from the original consented scheme: subsequent planning applications would not necessarily be an attempt to lower standards in the original consent.

It is right that a masterplan should be submitted with the planning application for the scheme. Where eco-town schemes have been included within Local Development Framework Core Strategy documents, further SPD or LDD should not be required to be in place prior to the submission of the planning application, although there should be scope for masterplans to be adopted as SPD or LDD prior to the submission of a planning application.

Q4.15. The community and governance standard attempts to ensure that eco-towns will be successful communities, that residents will have a say in how their town is run, and that standards are maintained. Is this standard clear and workable?

The Co-operative Group would support sustainability metrics related to employment and social elements of sustainability in addition to carbon neutrality, transport, water and waste. A clear set of environmental, social and economic indicators should be identified for each scheme as part of the scheme development to complement Sustainability Appraisal work and provide benchmarks for phase by phase Environmental Impact Assessment work.

Sustainability Appraisal

- 4. Do you have any comment on the accompanying SA/HRA or the IA?**
- 5. Do you have any comments on the issues identified in the SA/HRA of the locations for eco-towns?**