

The Co-operative Group
Response

Draft Planning Policy
Statement: Eco-towns

Document 2

**The Co-operative Group Response to Pennbury
Strategy Assessment (Halcrow Report)**

April 2009

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

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Appendix 3 Assessment of the Eco-town for Leicestershire Masterplan Vision Document against the Leicestershire Sustainable Community Strategy (2008).

1.0 Introduction

- 1.1 The paper has been prepared by The Co-operative Group (the promoter) and is a response to the Pennbury Strategic Assessment (2008) (the Report) undertaken by Halcrow Group Limited on behalf of Harborough District Council, Leicester City Council, Leicestershire County Council and Oadby & Wigston Borough Council.**
- 1.2 The response is intended to assist local authorities in making informed submissions to government on the draft Eco-towns Planning Policy Statement. The main body of the response sets out the promoter's main areas of concern with examples. A full commentary on each of the topic papers that make up the Report is set out in Appendices 1-3.
- 1.3 The promoter welcomes the Report's overall recognition that the eco-town could bring potential benefits to the sub-region. The Report recognises that, if the eco-town is delivered in the way in which the Masterplan Vision Document¹ (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.
- 1.4 The promoter also supports the view that further assessment work needs to be undertaken should the eco-town progress beyond shortlisting and through the normal planning process, despite the fact that work undertaken to date far exceeds that which would be normal at this stage.
- 1.5 Serious and fundamental flaws have however been revealed through an analysis of the Report in terms of the scope, content and the methodology used to produce key recommendations for the commissioning local authorities. The Report contains a number of factual inaccuracies about the promoter's proposals and does not assess all aspects of the proposal – something which is fundamental to the development of a successful eco-town. It demonstrates a lack of understanding as to the status of the Masterplan Vision and the eco-town assessment process; it contradicts both itself and a number of agreed local policies, and makes a series of assertions with no supporting evidence base.
- 1.6 The Report's authors have not consulted with the promoter in the process of preparing the Report and it would appear that readily available information, in the public domain, has not been accessed or has been ignored when formulating the Report's conclusions.
- 1.7 This lack of consultation and resultant errors means that the Report can be afforded very little weight. Consequently, the Report cannot be relied upon fully in the production of submissions to the Department for Communities and Local Government in response to the draft Eco-towns Planning Policy Statement (PPS) and Sustainability Appraisal (SA). It is regrettable that this should be the case.

¹ Eco-town for Leicestershire Masterplan Vision Document, The Co-operative Group and English Partnerships (October 2008)

2.0 Factual inaccuracies

The report contains factual inaccuracies relating to the proposals

2.1 The Report, despite being published months after the completion of the transport modelling work, appears to have been written 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 when only evidence from the SATURN model (a localised, Central Leicestershire Transport Model) was available. It therefore offers a very limited strategic assessment of the transport solution proposed for the eco-town. The full modelling work using PTOLEMY, a strategic model covering the Three Cities Sub-region, was undertaken to assess whether the proposed transport solution was viable and ultimately 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 therefore to be based on a lack of understanding of the nature and extent of the transport modelling work. Whilst the report makes reference to the PTOLEMY model, it suggests that TRICS (Trip Rate Information Computer System) data was used. However, this model does not use TRICS and nor is it based on 'containment levels'. It would not therefore be safe to rely on the author's conclusions.

2.2 The Report is based on incorrect assumptions about 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 Transport Assessment which forms part of the Masterplan Vision. The Report has failed to demonstrate a basic understanding of these rapid transit route proposals. It describes the rapid transit route as going via Stoughton Road whereas both the tram and bus options are clearly shown in the Eco-town for Leicestershire Transport Assessment as going via Manor Road (connecting to Manor Road via a dedicated new route from the eco-town).

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.

2.3 The Report incorrectly states that the Masterplan Vision is based on desk-based analysis of the main environmental assets of the site. This is incorrect – considerable site based survey work has been undertaken and 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 Vision is based on desk based analysis of the main environmental assets of the site. However, in 2008 the promoter 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 promoter submits 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.

2.4 The Report uses an out-of-date report as the basis for a critique of the eco-town employment strategy.

The Report uses the Interim Employment and Economics Technical Report (June 2008) as the basis for its critique. This report was superseded by the Masterplan Vision in October 2008, which sets out a strategy for employment within the town, 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 superseded. This report was clearly marked as although still publically available for reasons of completeness. 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. In the meantime reliance by the authors of the Report on the Interim Employment report suggests that the findings cannot be relied upon.

3.0 Incompleteness

Key aspects of the promoters' eco-town proposals, critical to its delivery, have not formed part of the analysis in the Report

3.1 The Report has considered only 5 of the 9 key integrated development themes forming the eco-town proposal and which are set out in the Masterplan Vision. 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. There is no clear acknowledgement of the importance of the interrelated themes and how they contribute to each other; nor does it give due weight to each and how this ensures the deliverability of the eco-town proposals.

This directly contrasts with the approach required in CLG's "Living a Greener Future" document, to which this eco-town is a response.

A specific example of how this has led to unreliable conclusions follows below.

3.2 The Report questions the deliverability of jobs in sustainable and environmental technologies due to the lack of skills in the sub-region, without consideration of all the proposed enablers.

The Report questions the deliverability of jobs in sustainable and environmental technologies (Economic Role, pages 8 -11) due to the lack of available skills, although this high knowledge sector is a regional and sub regional target. Through

limiting the review to only 5 of the 9 key themes, it 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.

3.3 The Report has omitted to review Smarter Choices innovations, which are an innovative and critical 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. The Smarter Choices concept, has been proven to achieve significant modal shift away from car use, and is perceived to be an exemplar aspect of the promoter's eco-town transport approach. (*DfT (2005) Smarter Choices – Changing the Way We Travel, Department for Transport, London*).

4.0 Eco-town assessment process and Status of Masterplan Vision Document.

The Report demonstrates a misunderstanding of the status of the existing Masterplan Vision and the eco-town assessment process

4.1 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 list of locations emerging from the Eco towns programme when in reality this shortlisting is about ensuring the Vision has the potential to viably meet sustainability criteria. Ultimately the test of the eco-town would be at planning application stage when all of the supporting work has been undertaken and the RSS and LDF Plan reviews have been completed.

4.2 The Report criticises the proposals for a lack of information equivalent to that contained within an Environmental Impact Assessment. This would only normally be required at a planning application stage: we are not yet at this stage in the process.

The Report states that the Pennbury proposals are not supported by detailed site surveys and assessments and an Environmental Impact Assessment (EIA) (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 programme and it would not be prudent for an EIA to have been undertaken to inform the production of the Planning Policy Statement. The promoter is, 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.

4.3 Even at this ‘vision’ stage the promoter 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 produced 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.

4.4 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 the scheme against. While this is 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 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.

4.5 The Report contains some 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 result in jobs being taken from existing residents are all therefore erroneous and misleading. Recommendations that a mini 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. This approach demonstrates a lack of familiarity with these planning policy issues and therefore reliance upon the Report is questioned.

5.0 Contradictions

The Report makes contradictory assertions to existing agreed local Policy positions

5.1 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

5.2 The Report fails to identify the alignment between the economic strategy for the eco-town set out in the Masterplan Vision 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.

The Report 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 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. *Vision 2020* also 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.

5.3 The Report contradicts itself as to how the scheme will impact on regeneration initiatives in Leicester city and fails to understand how the economic strategy will complement regeneration 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 regeneration of city

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

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 and the city centre will focus on Class A offices, the eco-town will focus on sustainable construction technologies and office space relating to public administration and backroom facilities for Class A2 retail such as banks and estate agents intended to support the eco-town. It should also be noted that the eco-town would be constructed over a 20-30 year time period and there is ample scope to phase its development to match and compliment progress on viable city centre developments. (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).

6.0 Unsubstantiated claims

The Report contains assertions without any supporting evidence

6.1 The Report makes unsubstantiated statements about the potential landscape impacts of the eco-town and these statements can not be relied upon 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, little professional basis for these comments. 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. Given the length of the potential development period, significant up front investment in extensive landscaping would help to mitigate potential visual impacts before key areas were developed.

6.2 The Report comments that Leicester airport would be lost if the eco-town goes ahead and makes an unsubstantiated statement regarding the difficulty of establishing new airfields.

The promoter has consistently stated that they are in discussion with Leicester Aeroclub; but that the nature of those discussions are confidential to respect their position. The phasing proposals for the town take full amount of the contractual arrangements between the promoter and the Aeroclub.

7.0 Conclusion

- 7.1 This response has demonstrated a series of flaws in the Report which unfortunately casts doubt on its reliability as a source of information and advice about the Eco-town for Leicestershire. It should therefore be given very little weight by the Leicestershire authorities in considering their response to Government in respect of the draft Eco-towns Planning Policy Statement.

Appendix 1

Detailed critique of the Pennbury Strategic Assessment

Detailed Critique of the Pennbury Strategic Assessment (the Report)

This appendix contains 7 sections which relate to the seven papers contained within the Pennbury Strategic Assessment.

- Section 1 Employment**
- Section 2 Housing**
- Section 3 Major Sites Review**
- Section 4 Policy Review**
- Section 5 Transport**
- Section 6 Environment**
- Section 7 Landscape and Design**

Section 1

Employment Paper

Paragraph	Promoter Response
<p>2.1</p> <p>Background</p>	<p>The Report uses the Interim Employment and Economics Technical Report (June 2008) as the basis for its critique. This report was superseded by the Vision Document in 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. The Co-operative Group is committed to working with local businesses, education establishments and delivery bodies to ensure the benefits of the eco-town deliver high quality jobs</p>
<p>3.1</p> <p>Key assumptions</p>	<p>The Report uses The Interim Employment and Economics Technical Report as the basis for its critique of the employment aspects of the eco-town. This document is superseded by The Masterplan Vision although Key assumptions (i) – (iv) within both documents remain correct. The Masterplan Vision document states that 14,000 jobs will be provided in the eco-town, enabling 60% of residents to access employment within the town. Presentations to the Leicestershire County Council Scrutiny Committee confirmed that there would be 1.2 economically active persons per dwelling in the eco-town, generating 18,000 economically active people. Guidance from Government set out in the draft Planning Policy Statement on Eco-towns suggests a lower target figure of 15,000 economically active people.</p> <p>However, key assumptions (iv) and (v) are incorrect. The Masterplan Vision provides for 38 hectares of employment land and not 46 hectares in the Interim Report and does not provide a breakdown by B-class. A presentation by the promoters to Leicestershire County Council Scrutiny Committee indicated that approximately two thirds of the jobs within the town would be generated by the town itself and the remaining third would be generated in sustainable technologies.</p>
<p>3.2</p> <p>Economic Baseline</p>	<p>The Report considers that there is no clear economic rationale or strategy which demonstrates how Pennbury must support existing economic strategies or how it links to efforts to regenerate Leicester city, Oadby and Wigston town centres or the wider sub-region.</p> <p>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. The Regional Economic Strategy (RES) ‘A Flourishing Region’ (2006) 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. The eco-town strategy is also aligned with the East Midlands Regional Spatial Strategy (RSS), which specifies that high value manufacturing and creative</p>

	<p>innovative businesses should be provided for. The Leicestershire Economic Strategy <i>Vision 2020</i>, 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.</p> <p>See Appendix 2 for an assessment of the alignment between the Vision Masterplan Document and the Regional Economic Strategy and Appendix 3 for an assessment of the alignment between the Vision Masterplan Document and the Leicestershire Sustainable Community Strategy.</p>
<p>3.3 Economic Role</p>	<p>The Report questions the deliverability of jobs in sustainable and environmental technologies due to the lack of skills, although this high knowledge sector is a regional and sub regional target in the Regional Economic Strategy, Vision 2020 and the Leicestershire Sustainable Community Strategy. The questioning of these policies which would appear to be beyond the remit of the Report, 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.</p> <p>The Report 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.</p> <p>The Report considers that a focus on knowledge-based industries would put the eco-town in competition with Leicester city science park. The science park will focus on biotechnology industries whilst the eco-town will focus on sustainable construction technologies, therefore, there is not a conflict here. The science park is already underway with the eco-town unlikely to begin construction before 2013, therefore, phasing can also be used as a means of ensuring that inward investment opportunities are not diverted from the science park (Presentation to Leicestershire County Council Scrutiny Committee).</p> <p>The promoter does, however, recognise the need to do further work in identifying the demand for sustainable technology floorspace in Leicestershire and its job creation impacts and further work on the number and type of jobs required to service the eco-town. More work will also be required if we are shortlisted to identify linkages between the research base in local universities and the inward investment demand for sustainable construction technologies.</p>

<p>3.4 Regeneration</p>	<p>The Report claims that Pennbury will divert much needed investment and jobs from priority regeneration areas.</p> <p>This issue is addressed in the Masterplan Vision Document (Section 3.1). The promoters aims to adopt an integrated and joint working approach with Leicester City Council and the Leicester and Leicestershire Economic Development Company to ensure that the eco-town scheme complement and support regeneration within Leicester city as well as delivering education and transport infrastructure which benefit the wider city region.</p> <p>The Report claims that the eco-town would conflict with the development of Leicester city science park. This issues has been addressed under Section 3.3 (above).</p> <p>The Report questions the scale of office development within the eco-town using a superseded document – the Interim Economics and Employment paper. This document has been withdrawn and the detail relating to office floor space within the eco-town has not been specified in the Masterplan Vision Document. However, it is important to note that the focus in Leicester city centre will be on Class A offices, whilst the focus in the eco-town will be on office space required to serve the eco-town itself, 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 20-30 year time period and there is ample scope to phase its development to enable progress on city centre developments to come forward in a complimentary fashion. It is unhelpful to compare the level of floorspace proposed in the eco-town on its completion which is likely to be in 20-30 years time with current floorspace within the city. (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).</p>
<p>3.5 Commuting and Self Containment</p>	<p>This section again suggests that the eco-town is not aligned with existing employment and land strategies of the Leicestershire authorities. This matter has been addressed in the response to Section 3.2 of the Report.</p> <p>The Report states that the 60% containment rate for the eco-town is not achievable. In coming to this conclusion, the Report makes selective use of the findings of the Leicester and Leicestershire HMA Employment Land Study, stating that only 2 of the 8 Leicestershire HMA districts have a positive net-in commuting balance and ignoring the skewed nature of these results due to the arbitrary nature of local authority boundaries, which can disguise relatively short trips across boundaries and conversely long trips within boundaries.</p> <p>The Report contradicts itself because under the Section 3.2 and 3.4 on Economic Role and Regeneration, it expresses concern that the eco-town will attract employment sectors which will impede inward investment into Leicester city. However in this section, it expresses concern that parking restraint within the eco-town will act as a barrier to inward investment.</p>

<p>3.7 Scale of Job Growth</p>	<p>The Report refers to the breakdown of jobs by economic sector contained within the Interim Economics and Employment Paper. This paper has been superseded by the Masterplan Vision document and there is currently no published up to date breakdown of jobs by economic sector.</p> <p>The Report again claims that there is no direct link between the employment strategy for the eco-town and economic policies, strategies and objectives for the area. This conclusion is flawed and has been addressed in the response to Section 3.2 of the Report.</p>
<p>3.9 Airport</p>	<p>The Report assesses the employment impacts of the eco-town on Leicester aerodrome. The Report, however, fails to explain how the aerodrome complies with the regional and sub-regional economic strategy and offers only a subjective analysis of the likely impacts of the eco-town. Whilst stating that jobs associated with the aerodrome will be lost, it fails to quantify how many and makes an unsubstantiated statement regarding the difficulty of establishing new airfields.</p>
<p>4 Retail</p>	<p>The Report uses the Interim Retail Technical Report as the basis for its critique. It fails to note that this report has been superseded by the Masterplan Vision Document.</p>
<p>4.2 Household size And 4.3 Expenditure Profile</p>	<p>The Report notes that further work is required to model the socio-economic profile of the eco-town residents. We recognise that this will be an area of additional work if the scheme proceeds further through the planning process and would need to underpin a retail impact assessment at the planning application stage. At this stage in the process, prior to final shortlisting, it would not be appropriate to undertake this detailed level of assessment which would be more appropriate at a planning application stage.</p>
<p>4.4 Expenditure Projections</p>	<p>The Report suggests that retail expenditure projections should be subject to more rigorous sensitivity testing. At this stage in the process, prior to final shortlisting, it would not be appropriate to undertake this detailed level of assessment which would be more appropriate at a planning application stage as part of a retail impact assessment. The figures used are however reasonable, taken from nationally recognised and independent sources (MapInfo and Experian).</p>
<p>4.6 Configuration of the town centre</p>	<p>The Report suggests that the final configuration of the town centre should be subject to more rigorous sensitivity testing. The Report appears to consider that the final configuration of the town centre is set out in the Masterplan Vision proposals, however, it is important to note that we are at an early stage in the process and the town centre configuration is not finalised. At this stage in the process, prior to final shortlisting, it would not be appropriate to undertake further sensitivity analysis and this would be more appropriate at a planning application stage as part of a retail impact assessment.</p>

<p>4.8 Comparators</p>	<p>The Report criticises the choice of comparator towns. It is recognised that further work could be done to identify appropriate comparators. Additional work done by Leicester Regeneration Company has revealed further comparators that will form the basis of more detailed analysis.</p>
<p>4.9 Impact on neighbouring retail centres</p>	<p>The Report criticises the lack of a retail impact assessment. We recognise that this will be an area of further work if the scheme proceeds further through the planning process, with a retail impact assessment being submitted as part of the planning application for the site. At this stage in the process, prior to final shortlisting, it would not be appropriate to undertake this detailed level of assessment.</p> <p>The Report compares the projected total retail floorspace for the eco-town against the existing floorspace within retail centres in Oadby and Wigston, Harborough and Leicester. This is a misleading analysis as it must be noted that the total retail floorspace for the eco-town will firstly be subject to further analysis to determine the appropriate amount and secondly will be phased and not delivered in its entirety until towards the end of the build period. It is inappropriate to compare existing retail floor space figures with those projected for 20-30 years hence.</p>

Section 2

HOUSING PAPER

Paragraph	Promoter Response
<p>2.1</p> <p>Amount and Phasing of Housing</p>	<p>The Report uses a superseded housing report, the Interim Housing Technical Report (June, 2008) as the basis for its critique. The eco-town scheme has evolved since the production of this, meaning that this document was superseded by the Masterplan Vision Document in October 2008. This has resulted in inaccurate representation of the promoters' eco-town proposal and flawed assessment of the housing element of its proposals.</p> <p>The Report incorrectly states that 60% of the site would remain undeveloped and be used for agricultural purposes or as open countryside and that the total site is 1700 hectares. Section 4.3 of the Masterplan Vision document states that the undeveloped area outside the town, forming the Great Park amounts to 68% of the land area and that the total land area is 1886 hectares.</p>
<p>3.3 Assumptions and Critical Assessment</p>	<p>The Report states that the eco-town proposal has used the draft 2008 Strategic Housing Market Assessment as the basis for determining the proposed housing mix and has failed to consider the specific and different housing needs of local communities in south east Leicestershire. The Housing Market Area is an appropriate scale to consider because it is recognised that the area of search for most households in the housing market is broader than their immediate local area. An HMA based approach is set out in PPS3: Housing and in its accompanying best practice guidance, 'Strategic Housing Market Assessments – Practice Guidance, 2007 and has been taken by the East Midlands Regional Assembly in the production of RSS and this approach will continue as set out in the draft Project Plan (October 2008).</p> <p>It is recognised, however, that further work will need to be undertaken, if the eco-town proposal is shortlisted and progressed through the planning process, on the projected socio-economic profile of eco-town residents in order to inform masterplan development, including housing mix and design and to develop a proxy community which will also assist in informing masterplan development. This would involve a consideration of demand within the Housing Market Area and would by default address the issue of the extent to which the eco-town would be populated by in-migration from the immediate area of Leicester city and Oadby and Wigston. This work would need to drill down to a finer level of detail in terms of the specific requirements of new eco-town residents.</p>
<p>3.6 Household Size and Composition</p>	<p>The Report contradicts itself in respect of its conclusions on household size and composition. It criticises the promoters for producing an age profile and subsequent household size and composition which reflects national and sub-regional averages (page 11) instead of reflecting the trend for new towns to have a younger age profile but subsequently acknowledges that the promoters do make allowance for the fact that</p>

	<p>the eco-town will attract young families and that the housing mix reflects this.</p> <p>The Report states that an average of national, East Midlands, Leicestershire and Harborough average household size is an inappropriate figure to use as an estimate of projected household size, claiming this skews the figure to below average for the locality. The promoter acknowledges that work will be done on this topic if the eco-town progresses through the planning process, however, it must also be noted that the eco-town will be delivered over a period of 20-30 years and this will afford a good deal of opportunity to monitor emerging trends and adapt provision within the town to adjust to these trends. For example, in the event that household size is larger than originally projected, there will be an opportunity to alter school provision in order to adjust for demand.</p>																																																
<p>3.7 Migration</p>	<p>The Report states that there is no evidence to suggest that Pennbury would be well located to accommodate in-migration into Leicestershire, arguing that historically in-ward migration has been highest in north and west Leicestershire.</p> <p>Whilst household formation forms the bulk of the increase in the demand for new homes, migration is a factor but, the Report fails to consider that migration patterns are likely to be linked in part to the availability and affordability of housing stock. For example structure plan allocations skewed towards north and west Leicestershire will have influenced the supply of housing.</p> <p>Adopted Structure Plan 2005</p> <p>Housing Policy 1 Quantity of Housing Land 1996-2016</p> <table border="1" data-bbox="496 1182 1353 1984"> <thead> <tr> <th></th> <th colspan="3">Dwellings (figures rounded)</th> </tr> <tr> <th>Local Authority Area.</th> <th>Central Leics.</th> <th>Rest of Plan Area</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Blaby</td> <td>4,200</td> <td>450</td> <td>4,650</td> </tr> <tr> <td>Charnwood</td> <td>2,950</td> <td>6,450</td> <td>9,400</td> </tr> <tr> <td>Harborough</td> <td>2,700</td> <td>4,850</td> <td>7,550</td> </tr> <tr> <td>Hinckley & Bosworth</td> <td>950</td> <td>5,850</td> <td>6,800</td> </tr> <tr> <td>Leicester</td> <td>19,000</td> <td>0</td> <td>19,000</td> </tr> <tr> <td>Melton</td> <td>0</td> <td>4,200</td> <td>4,200</td> </tr> <tr> <td>NW Leicestershire.</td> <td>0</td> <td>7,350</td> <td>7,350</td> </tr> <tr> <td>Oadby & Wigston</td> <td>1,700</td> <td>0</td> <td>1,700</td> </tr> <tr> <td>Rutland</td> <td>0</td> <td>2,350</td> <td>2,350</td> </tr> <tr> <td>Total Plan Area</td> <td>31,500</td> <td>31,500</td> <td>63,000</td> </tr> </tbody> </table>		Dwellings (figures rounded)			Local Authority Area.	Central Leics.	Rest of Plan Area	Total	Blaby	4,200	450	4,650	Charnwood	2,950	6,450	9,400	Harborough	2,700	4,850	7,550	Hinckley & Bosworth	950	5,850	6,800	Leicester	19,000	0	19,000	Melton	0	4,200	4,200	NW Leicestershire.	0	7,350	7,350	Oadby & Wigston	1,700	0	1,700	Rutland	0	2,350	2,350	Total Plan Area	31,500	31,500	63,000
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3.8 Population projections, 3.9 Housing Demand and 3.10 Northamptonshire Factor

The Report questions the reliability of the 2006-based population projections used in the Housing Interim Paper by selecting comments from a TCPA Tomorrow Series Paper 10 'New and Higher Projections of Future Population in England – Implications for Households and Housing'. It also questions the estimated shortfall in homes contained within the draft RSS at the time of publication in June 2008 (Housing demand and the Northamptonshire Factor). It fails to acknowledge that the Interim paper has been superseded by the Masterplan Vision document and cross references details in relation to East Midlands RSS that were up-to-date in the Interim Report with the RSS Proposed Modifications which were published after the Interim Report. This would appear to demonstrate a lack of understanding of the chronology and nature of the Eco-town for Leicestershire documents.

The 2006-based populations and 2004-based household projections used in the Interim Report were the most up to date population projections available for the sub-region at the time of its publication and therefore the most appropriate to refer to. The promoter has made it very clear on its Eco-town for Leicestershire website that this document has been superseded by the Masterplan Vision document.

The focus in the Report on a critique of the population projections and housing demand demonstrates a lack of understanding of the eco-town process and the way in which they are proposed to be dealt with in RSS reviews in addition to a failure to refer to Policy 13 in the Proposed Change to the draft RSS.

The partial review of the East Midlands Regional Spatial Strategy has commenced and will consider implications for the region of the recently published 2006-based household projections. Government has specified that eco-towns should be considered through the planning process. Paragraph 2.5 of the draft Eco-towns PPS states that "Eco-towns should be considered in the same way as any other major development proposal. Government remains committed to the plan-led system, and the preference is that the broad options for how best to meet housing need are explored in regional and local plans". The draft Project Plan for the East Midlands RSS Partial Review along with the RSS Proposed Changes both indicate that eco-towns will be considered as part of the RSS Partial Review. Consequently, if shortlisted, the Eco-town for Leicestershire will be considered as part of the Leicestershire housing provision within the RSS. This will inevitably involve an examination of the merits of a new settlement within the sub-region, potentially in combination with sustainable urban extensions or instead of several urban extensions. Policy 13a in the East Midlands Regional Plan is sufficiently broad to allow for an alteration in housing provision amongst the Leicestershire districts. It is the debate regarding the merits of a new settlement which is key, whilst the discussion of the accuracy of population projections is a more general point and relevant to the overall RSS allocation to Leicestershire but not particularly pertinent to the specific consideration of the eco-town proposal. i.e. an eco-town might accommodate anticipated additional growth in the sub-region but it may also accommodate previously anticipated growth that was originally proposed to be accommodated by sustainable urban extensions because it is considered to offer a more sustainable planning solution. This has been explained by the promoter in a presentation to Leicestershire County Council Scrutiny Committee. It should also be noted that the RSS Partial Review will look to 2031, five years beyond the current RSS, so inevitably, there will be additional projected

	<p>household growth, which has not yet been accounted for in any strategic planning document for the region and the eco-town could potentially accommodate a proportion of this growth.</p>
<p>3.11 Housing Mix and Housing Need</p>	<p>Housing Mix</p> <p>The Report states that the eco-town proposal has used the draft 2008 Strategic Housing Market Assessment as the basis for determining the proposed housing mix and has failed to consider the specific and different housing needs of local communities in south east Leicestershire. The Housing Market Area is an appropriate scale to consider as discussed in the response to paragraph 3.3 of the Report, reflecting recommended and best practice and in line with the approach taken by the East Midlands Regional Assembly in the production of RSS:</p> <p>The promoter recognises that further work will need to be undertaken, if the eco-town proposal is shortlisted and progressed through the planning process, on the projected socio-economic profile of eco-town residents in order to inform masterplan development, including housing mix and design and to develop a proxy community which will also assist in informing masterplan development. This would involve a consideration of demand within the Housing Market Area and would by default address the issue of the extent to which the eco-town would be populated by in-migration from the immediate area of Leicester city and Oadby and Wigston. This work would need to drill down to a finer level of detail in terms of the specific requirements of new eco-town residents in order to inform a detailed masterplan for the site.</p> <p>The Report notes that there has been an increase in the numbers on waiting lists for Harborough District and Oadby and Wigston Borough Councils, noting that the greatest increases in need have been in North West Leicestershire. This is misleading. It fails to state that the proposed 4,500 affordable homes in the eco-town would address the identified housing need of 1,571 households in Harborough, 1,604 households in Oadby and Wigston and a proportion of the 10,451 households in neighbouring Leicester city and that a single eco-town could not on its own deliver a solution to the total housing need for Leicestershire of 22,178.</p>
<p>3.11 Housing Mix and Housing Need</p>	<p>The Report suggests that Pennbury should contribute to fulfilling the needs of existing communities and where new development is provided to a higher standard than neighbouring existing communities, consideration should be given to upgrading facilities in these areas, so that they do not become 'poor relations'.</p> <p>The suggestion that Pennbury should provide an upgrade of facilities outside of the eco-town goes somewhat beyond the requirements of Circular test for the provision of planning obligations, which are intended to address the needs directly arising from development.</p> <p>The Masterplan Vision document does however explain that it is intended that the eco-town would act as a catalyst and benchmark for high quality development elsewhere in the Leicester city region. It will also bring wider benefits such as improved transport infrastructure and education provision through federation with eco-town schools and the potential provision of an academy in Leicester city.</p>

<p>3.12 The Spatial Requirements for Growth</p>	<p>The Report states that there is no justification for the promoter’s contention that there is any requirement for major growth in the south east quadrant of the city, citing historic higher growth levels in north and west Leicestershire.</p> <p>This appears to demonstrate a lack of understanding of the planning process and an over-reliance on historic trends.</p> <p>The planning process aims to identify the most sustainable locations for housing growth and the ability to deliver that growth, taking the most up to date policy guidance into account. For example, PPS3 states that Local Development Documents should set out a strategy for the planned location of new housing which addresses a broad range of factors and contributes to the achievement of sustainable development, including cutting carbon emissions, physical and environmental constraints, accessibility to infrastructure such as public transport and investment constraints. Assessment of sustainability must consider a broad range of social, economic and environmental factors and will not therefore simply reflect past trends in population growth or past locations for growth, which may, for example if they are based on previous RSS, used a road-based transport solution. The purpose of RSS is to determine the broad distribution of housing growth within each Housing Market Area and to determine the most appropriate pattern for delivering that growth. The purpose of the Partial Review will be to revisit the current RSS in the light of revised household figures extending to 2031 instead of 2026.</p> <p>For example, the recently adopted RSS allocates 350 new homes per year to Harborough District, of which at least 40 homes each year will be in the Leicester PUA. The Partial Review has the scope to specifically redistribute this housing provision, resulting in a greater allocation within the PUA and a less onerous allocation to the remainder of the district, much of which is currently expected to be accommodated in substantial sustainable urban extension to Market Harborough.</p>
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Section 3

MAJOR SITES REVIEW PAPER

Paragraph	Promoter Response
<p>1.1 Background</p>	<p>The Report states that the intention of eco-towns was to tackle a major shortage in housing. The Report fails to note that the other main purpose of eco-towns was to achieve zero carbon development and more sustainable ways of living. The Eco-town Prospectus Executive Summary states that the purpose of eco-towns is <i>'to exploit the potential to create a complete new settlement to achieve a zero carbon development and more sustainable living using the best new design'</i>.</p>
<p>2 The Co-operative Group's proposals</p>	<p>The Report uses a superseded housing report, the Interim Housing Technical Report (June, 2008) as the basis for its critique. The eco-town proposals have evolved since the production of this, meaning that this document was superseded by the Masterplan Vision Document in October 2008. This has resulted in inaccurate representation of The Co-operative Group's eco-town proposal and flawed assessment of the housing element of its proposals.</p> <p>The Report incorrectly states that 60% of the site would remain undeveloped and be used for agricultural purposes or as open countryside and that the total site is 1700 hectares. Section 4.3 of the Masterplan Vision document states that the undeveloped area outside the town, forming the Great Park amounts to 68% of the land area and that the total land area is 1886 hectares.</p> <p>The breakdown of B Class employment floorspace is also incorrect as it quotes from a superseded Interim Employment and Economics Technical Report. The Masterplan Vision Document states that employment land is 38 hectares and not 46 hectares and does not provide a breakdown by B-class.</p>
<p>4.4 Pennbury Delivery</p>	<p>The Report criticises the three 5-year delivery phases identified for the scheme and the lack of rationale for this approach. The three 5-year delivery phases were proposed in the Housing and Employment Interim Technical Papers. These were superseded by the Masterplan Vision document, which does not contain this phasing plan. It is recognised that if the scheme is progressed to a more detailed LDF and planning application stage, further work will be required on this matter.</p> <p>Notwithstanding this point, more detail on phasing has been included in commercially confidential work presented to CLG and has formed part of an independent financial assessment by the Government's advisors, PWC. This level of work is far in excess of that normally required at this stage in the planning process.</p> <p>The Report states that there is no explanation of the 'delivery vehicle Co-op and English Partnerships are intending to use to take the development forward', by which it would appear to mean that no assessment of financial deliverability of the scheme has been produced. Government has commissioned a consultant team to assess the financial viability of eco-town proposals and information has been provided to this team by the promoter on a commercially confidential basis. The consultant team has</p>

	<p>published an independent report of their findings which confirm that the Pennbury scheme is viable.</p> <p>The Report states that Northstowe new settlement has taken a traditional route through the planning process and that the Government has advised that this is not appropriate for eco-towns. This is not the case, Government has specified that eco-towns should be considered through the planning process. Paragraph 2.5 of the draft Eco-towns PPS states that 'Eco-towns should be considered in the same way as any other major development proposal. Government remains committed to the plan-led system, and the preference is that the broad options for how best to meet housing need are explored in regional and local plans'.</p> <p>The Report suggests that housing delivery could 'gear up rapidly' if the scheme goes ahead and consequently there will be 'an inevitable time lag for facilities required for a "sustainable" development'. This would appear to suggest that social and community infrastructure provision will not keep pace with housing development. The Masterplan Vision document is clear that the scheme will provide the full range of community facilities and that community facilities will be provided in the town from the outset (page 73, Masterplan Vision document).</p>
<p>4.5 Agency Funding</p>	<p>The Report refers to English Partnerships and The Housing Corporation but fails to note that these were combined on 1 December 2008 into the Homes and Communities Agency.</p>
<p>6.0 Conclusions</p>	<p>The Report states that the eco-town would not present a fundamental risk to Leicester city's regeneration programme. This is directly contradicted in the Policy Review paper, which specifies that the eco-town would be incompatible with RSS Proposed Changes Policy 12 as it would impact on areas in need of regeneration.</p>

Section 4

POLICY REVIEW

Paragraph	Promoter Response
<p>Chapter 2, Table 2.1</p>	<p>The Report sets out incorrect housing figures. The table sets out the proposed number of homes in the eco-town by tenure and by phase. The data has been taken from The Co-operative Group Interim Housing Technical Report. It fails to note that this report has been superseded by The Eco-town for Leicestershire Masterplan Vision Document, which does not contain phasing information.</p>
<p>Chapter 2</p>	<p>The Report uses incorrect employment land figures</p> <p>Employment land is detailed as 11 hectares of B1, 15 hectares of B2 and 19 hectares of B8: a total of 45 ha. The source of this information is not specified but is likely to be from the Interim Employment and Economics Technical Report. This document is superseded by The Eco-town for Leicestershire Masterplan Vision Document, which shows employment land as a total of 38 hectares.</p>
<p>4 Policy Review</p>	<p>The Policy Review section of the Report assesses the scheme against a selection of regional and local planning, housing, employment and community strategy policy documents. It should be noted that the promoter's commitment to progression through the RSS and LDF review processes means that existing policies are likely to have been superseded by the time a future planning application for an eco-town is submitted. Whilst the fundamental principles behind these policies is unlikely to change significantly over this period, for example commitment to achieving sustainable development, locational strategies may change and consequently, the assessment of the eco-town against such these policies, should be treated with caution.</p>
<p>4 Policy Review</p> <p>East Midlands Regional Plan Proposed Changes</p>	<p>Policy 3 Concentrating Development in Urban Areas</p> <p>The Report states that the eco-town is incompatible with this policy because it is freestanding and not directly adjacent to the PUA. The Report fails to recognise that the eco-town will be considered within the Partial Review of RSS that commenced in October 2008, as set out in the East Midlands Regional Plan Draft Project Plan October 2008 and it is not therefore appropriate to compare it against policy developed as part of the previous RSS review. By their nature, new settlements or eco-towns will have a different relationship with the urban edge than sustainable urban extensions.</p> <p>The Report states that the eco-town will fail to deliver 60% of the development on brownfield land. Firstly, the Report has misunderstood the RSS Policy. 60% is an overall regional target for brownfield development and is not required on each development. If this was the case, the Sustainable Urban Extensions proposed in the RSS would fail to be compliant with Policy 3.</p> <p>Previously developed (brownfield) land on the site amounts to 127.19 hectares. The gross development area for the eco-town in the Masterplan Vision Document is 600 ha, of which 30% will be public</p>

	<p>open space. Brownfield land, therefore, amounts to 21% of the gross development area and 30% of the developed area of the town.</p>
	<p>Policy 12 Development in the Three Cities Sub-Area</p> <p>The Report states that the eco-town would not support the regeneration of Derby, Leicester and Nottingham. However, the Report contradicts itself by concluding that Pennbury would not present a fundamental risk to Leicester city's regeneration programme.</p> <p>The Report concludes that the eco-town is not located within an existing settlement, so fails to comply with policy. Again, the Report's authors fail to acknowledge the eco-town will be considered within the Partial Review of RSS that commenced in October 2008, as set out in the East Midlands Regional Plan Draft Project Plan October 2008 and it is not therefore appropriate to compare it against policy developed as part of the previous RSS review. By their nature, new settlements or eco-towns will have a different relationship with existing urban areas than sustainable urban extensions.</p>
	<p>Sub-regional Strategic Context</p> <p>It is unclear which RSS policy the authors are using to assess this, as no policy is referenced.</p> <p>The Report states that the eco-town would be incompatible with a strengthening of the roles of Coalville, Melton Mowbray, Loughborough, Hinckley and Market Harborough. This is a direct contradiction of the findings of the Major Sites paper, which states that it is not considered likely that Pennbury would have a major adverse impact on the delivery of SUE's in these locations as they would service substantially different sub-regional and local markets, (Major Sites Review, page 10).</p> <p>The Report states that affordable housing provision in the eco-town would not promote a more sustainable pattern of development as it fails to comply with the policy of urban concentration set out in RSS. As specified in the response to Policy 12 comments, the Report's authors have failed to acknowledge that the eco-town will be considered within the Partial Review of RSS that commenced in October 2008, as set out in the East Midlands Regional Plan Draft Project Plan October 2008 and it is not therefore appropriate to compare it against policy developed as part of the previous RSS review.</p>
	<p>Policy 13 Regional Housing Provision</p> <p>The Report states that Government guidance is unclear whether the eco-town's housing provision will contribute to regional targets.</p> <p>Government has specified that eco-towns should be considered through the planning process. Paragraph 2.5 of the draft Eco-towns PPS states that "Eco-towns should be considered in the same way as any other major development proposal. Government remains committed to the plan-led system, and the preference is that the broad options for how best to meet housing need are explored in regional and local plans".</p>

	<p>The draft Project Plan for the East Midlands RSS Partial Review along with the adopted RSS both indicate that eco-towns will be considered as part of the RSS Partial Review.</p> <p>Consequently, if shortlisted, the Eco-town for Leicestershire will be considered as part of the Leicestershire housing provision within the RSS. This will inevitably involve an examination of the merits of a new settlement within the sub-region, potentially in combination with sustainable urban extensions or instead of several urban extensions.</p> <p>Policy 13 in the RSS was sufficiently broad to allow for an alteration in housing provision amongst the Leicestershire districts, as it provides the scope for local planning authorities to redistribute housing provision within a Housing Market Area. It states</p> <p>'A redistribution of District and County apportionments to meet the HMA minima via sound joint core strategies will be acceptable'.</p> <p>This has been explained by the promoter in a presentation to Leicestershire County Council Scrutiny Committee. It should also be noted that the RSS Partial Review will look to 2031, five years beyond the current draft RSS, so inevitably, there will be additional projected household growth, which has not yet been accounted for in any strategic planning document for the region and the eco-town could potentially accommodate a proportion of this growth.</p> <p>It should also be noted that since the Report was published, the RSS has been adopted and provision for the redistribution of apportionments via sound joint core strategies has been carried through into adopted Policy 13a.</p>
	<p>Policy 14 Regional Priorities for Affordable Housing</p> <p>The Report states the Government guidance is unclear whether the eco-town's housing provision will contribute to regional targets. This inaccuracy has been dealt with in the response to Policy 13 Regional Housing Provision.</p>
	<p>Policy 20 Regional Priorities for Employment Land</p> <p>The Report states the eco-town may divert resources from areas in need of regeneration. This is a direct contradiction of the Policy Review paper which concludes that Pennbury would not present a fundamental risk to Leicester city's regeneration programme.</p> <p>The Report states that the proposed sustainable technology industry in the eco-town may compete with planned Science Parks, however, Leicester City Science Park focuses on biotechnology which does not conflict with sustainable technology industries.</p>

	<p>Policy 42 Regional Transport Objectives</p> <p>The Report states that the eco-town is not properly integrated with the adjacent PUA. The Report fails to note the proposed transport links for the eco-town and again fails to acknowledge that the concept of eco-towns will be considered within the Partial Review of RSS that commenced in October 2008, as set out in the East Midlands Regional Plan Draft Project Plan October 2008 and it is not therefore appropriate to compare it against policy developed as part of the previous RSS review.</p> <p>The Report also fails to note that the Regional Transport Strategy contained within the RSS was seen to be too heavily reliant on road-based solutions and found unsound by the EIP Panel. Transport consequently forms an element of the Partial RSS Review which commenced in October 2008. The Panel concluded it needed a 'comprehensive reappraisal' based on 'sounder evidence and sounder analytical underpinning' (Chapter 12, Panel Report, East Midlands Regional Spatial Strategy</p>
	<p>Policy 43 Sub-area Transport Objectives</p> <p>The Report states that the implications for traffic generation on the M1 corridor and wider highway network are still unclear. It fails to refer to the Eco-town for Leicestershire Transport Assessment which details the results of modelling undertaken by Leicestershire County Council, Leicester City Council, Highways Agency and The Co-operative Group and which concluded that the proposed transport interventions offer a viable transport solution.</p>
	<p>Policy 50 Regional Priorities for Bus and Light Rail Services</p> <p>The Report specifies that there is no firm commitment to a tram system.</p> <p>Firstly, the Report fails to recognise that modelling work has indicated that a bus-based transport intervention provides an appropriate and viable transport solution(Eco-town for Leicestershire Transport Assessment): a tram is not therefore a pre-requisite for the delivery of the eco-town. However, as stated in the promoters' Transport Assessment, the promoters recognise that a tram has the potential to bring even wider benefits and has committed to investing £5 million in a sub-regional transport study, which would explore the feasibility of a tram. The existing Leicester and Leicestershire Local Transport Plans are dependant on bus-based solutions: The transport strategy for the eco-town reflects this but seeks to bring about a step change in innovation and to be a catalyst for a strategy that will address the challenge of increasing congestion in the Leicester city region,</p>
	<p>Policy SRS4 Three Cities Employment Land</p> <p>This policy seeks to ensure that employment land allocations take account of the housing distribution. The Report concludes that the eco-town is incompatible with it, as it is not located near or within any proposed sustainable urban extensions. It is considered that this is an incorrect conclusion, as the eco-town will involve the co-location of both</p>

	<p>housing and employment land.</p> <p>The Report concludes that the eco-town will not support the regeneration of city centres. This is in conflict with the Policy Review paper which concludes that Pennbury would not present a fundamental risk to Leicester city's regeneration programme.</p> <p>The Report states that the proposed sustainable technology industry in the eco-town may compete with planned Science Parks, however, Leicester City Science Park focuses on biotechnology which does not conflict with sustainable technology industries.</p>
<p>Regional Housing Strategy</p>	<p>Objective Three</p> <p>The Report states that the promoter has not yet adequately demonstrated whether the eco-town will raise the quality and sustainability of housing. The Report again fails to recognise that the scheme is at a vision stage and that detailed design is not a requirement at this stage in the eco-town process. It also ignores one of the key drivers for the eco-towns initiative: to raise the quality and sustainability of new development to a new level.</p>
	<p>Objective Seven</p> <p>The Report states that the Masterplan Vision document does not make any references to meeting the needs of an ageing population. This is incorrect. The Masterplan Vision document does make a commitment that all of the homes in the eco-town will meet the Lifetime Homes Standards, aimed at designing houses and flats that can be adapted to meet people's needs throughout of their lives from childhood to old age. The promoters do however recognise that if the scheme is shortlisted further work should be done to model the socio-economic profile of the eco-town and to address the specific requirements of this profile.</p>
	<p>Policy 5: To make more effective use of the region's housing stock across all tenures</p> <p>The Report claims that the eco-town will make it less likely that schemes to re-use vacant properties will be successful. It fails to document the relatively low level of long-term vacant properties within the HMA and hence the limited impact on the overall delivery of housing in comparison with the delivery of 15,000 homes within the eco-town. For example, the Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) (December 2008) states that there are few properties which are vacant in the long term. Only 1,115 homes, amounting to less than 1% of the housing stock, have been vacant for two years or more.</p>
	<p>Policy 6: To maximise the opportunities through Section 106 Agreements to increase the supply of affordable housing in the region</p> <p>The Report states that the level of new infrastructure needed in the eco-town will impact on the ability of the promoters to provide high levels of affordable housing. The Report fails to note that the promoters have committed to providing 30% of the housing in the eco-town as</p>

	<p>affordable homes, which is in line with regional requirements.</p> <p>The Report also states that the provision of affordable housing in the eco-town is not accounted for in the RSS and could create an over-supply. The Leicester and Leicestershire Strategic Housing Market Assessment states that the shortfall of affordable housing provision in the housing market area is 2,654 homes per year, which is equivalent to over two thirds of the current annual RSS requirement. As discussed in the response to RSS Policy 13, the authors have failed to understand that the eco-town proposal will, if shortlisted, be pursued through the current RSS Partial Review: any affordable housing provision would therefore be taken into account in RSS.</p>
	<p>Policy 7: to make best use of Low Cost Home Ownership products</p> <p>The Report states that the proposals do not include evidence to justify the location of key worker housing and may direct funding away from key worker housing in other locations.</p> <p>The proposals do not currently contain details of key worker housing provision, as such detailed work is not necessary at this early stage. .</p>
<p>Oadby and Wigston Housing Strategy 2006-2011</p>	<p>Addressing the needs of the Black and Ethnic Population</p> <p>The Report concludes that is unclear as to whether the proposals have paid sufficient attention to the specific needs of BME communities.</p> <p>The authors' comments demonstrate a lack of understanding with regard to the level of detail required at this stage of the eco-town process - that proposals are at a vision stage not a detailed planning application stage. The promoters recognise that further work should be done, if the schemes progresses to a planning application, on the socio-economic profile of the eco-town and specific requirements of this profile.</p>
<p>A Flourishing Region: Regional Economic Strategy for the East Midlands 2006-2020</p>	<p>The Report compares the scheme against the key aims of the Regional Economic Strategy (RES) and concludes that there is potential for the schemes to meet 4 out of 5 of its strategic priorities, the exception being the protection and enhancement of the region's environment through sustainable economic growth due to concerns that the eco-town could divert investment from Leicester city and sustainable urban extensions.</p> <p>This Policy Review section of the Report appears to contradict the findings of the Major Sites Review, which concludes that there is no fundamental risk to regeneration in Leicester city and that most of the Sustainable Urban Extensions will not be impacted by the eco-town.</p> <p>The Report appears to have taken a very light touch approach to RES, although it is the key economic strategy document in the region. It has been used only selectively, mentioning only 5 of its 10 strategic aims, ignoring the identified economic drivers of skills: innovation; enterprise and investment and the three main themes of raising productivity; ensuring sustainability and achieving equality. These are presented below with extracts from the Masterplan Vision document which demonstrates how these priorities will be met: Appendix 2 gives a more detailed assessment of alignment between the Masterplan Vision and the RES Strategic Objectives</p>

Strategic Priorities:

To move people into better jobs in growing businesses: in addition to providing employment to serve the needs of the town itself, the eco-town economic strategy focuses on attracting a high knowledge based economic sector - sustainable construction technologies – with a view to securing better quality jobs in the industrial sector. The town’s education strategy also seeks to make links between schools and businesses to equip school and college leavers with the skills that businesses require and provide further and higher education opportunities for the adult population.

To become a region of highly productive, globally competitive businesses: the eco-town’s focus on the sustainable construction technology sector will assist with achieving this aim. The RES specifically notes that construction is one of four sectors which will be targeted as a means of delivering this aim (page 11, RES).

To develop a dynamic region founded upon innovative and knowledge focused businesses competing successfully in a global economy: the eco-town economic strategy focuses on attracting a high knowledge based economic sector - sustainable construction technologies – with a view to securing better quality jobs in the industrial sector

To improve the quality of regional infrastructure to enable better connectivity within and outside the region: the eco-town’s transport strategy aims to achieve a modal shift towards public transport, walking and cycling and if shortlisted, a sub-regional transport study will be undertaken with a view to identifying how to increase connectivity within the Leicester city region.

To transform the way we use resources and use and generate energy to ensure a sustainable economy, a high quality environment and lessen the impact on climate change: - the eco-town proposal is intended to be self sufficient in terms of energy generation using renewable resources, provide a high quality built and natural environment, minimise water use and waste generation.

To ensure that the quality and supply of development land, and balance between competing land uses, contributes towards sustainable growth of the regional economy: the economic strategy for the eco-town is closely aligned with the Regional Economic Strategy in order to ensure that it contributes towards the sustainable growth of the regional economy. The key elements of the eco-town economic strategy are: encouraging high knowledge based industry through construction and inward investment by sustainable construction technology industries, local procurement, innovation and entrepreneurship.

To increase life chances for all leading to stronger and more cohesive communities, a dynamic society and a strong economy: the eco-town employment and education strategies set out in the Vision document seek to provide access to training opportunities and priority for the local procurement of labour along with a governance model for the town which enables all residents to play an active part in their community, incentivising people to take part in voluntary activities and giving every resident, including children, a voice in the running of the

	<p>town.</p> <p>To ensure that all people and communities have the opportunity to create new and sustainable economic futures: the eco-town employment and education strategies set out in the Vision document seek to provide access to training opportunities and priority for the local procurement of labour. This will impact on those living in the eco-town but the creation of a cluster of sustainable construction technologies has the potential to stretch wider than the eco-town itself, providing employment opportunities for those within the Leicester city region.</p> <p>To help overcome the barriers, or market failures, that prevent people from participating fully in the regional and local economy: - the eco-town education strategy sets out the opportunity for all eco-town residents to participate in education from pre-school through to higher and further education, seeking to make stronger linkages between centres of learning and employers, involving local universities .</p>
<p>Leicestershire Economic Strategy</p>	<p>The Report concludes that the eco-town is compatible or has the potential to be compatible with the aims of this strategy. In respect of the creation of high quality jobs, promotion of a culture of innovation, extending and developing science parks, engaging universities and business in terms of environmental technology and ensuring all new developments take into account environmental issues, the Report claims that there is no clear strategy or a lack of detail in the proposals. The Report fails to recognise that the proposals are at an early stage and provide a vision for the delivery of an eco-town and therefore are not required to provide a fine level of detail. It also fails to recognise that Section 5.8 and 5.9 of the Masterplan Vision document set out strategies for employment and education.</p>
<p>Leicestershire Sustainable Communities Strategy 2008</p>	<p>The Report highlights the need for the eco-town to work towards the relevant goals set out in this document, concluding that the scheme could be compatible or incompatible with the LSCS.</p> <p>The promoters consider that the Report has not fully considered the Priority Outcomes in the LSCS against the eco-town proposal and that the eco-town proposal does comply with many of these Outcomes. A full assessment is presented in Appendix 3.</p>
<p>District Community Strategies</p>	<p>The Report states that no strategy has been provided for building cohesive communities. This is incorrect. The Masterplan Vision document sections 5.4 and 6 set out the strategy for delivery of a model of community governance which is intended to build community</p>

Section 5

Transport Paper

Paragraph	Promoter Response
<p>2.2</p> <p>Key Transport Proposals</p>	<p>It is incorrect to say that a tram will no longer be implemented as part of the Eco-town proposals. The Co-operative Group is committed to providing £5 million to assess the viability of delivering a tram system for the city. If a viable scheme is identified and procured, The Co-operative Group will transfer the funding it currently has committed to run a high quality express bus rapid transit system in the later phases of the development to support the delivery of the tram, effectively providing a multi million pound injection which will act as a catalyst for delivery of a wider tram network for Leicester. It would be inappropriate to commit firmly to delivery of a tram when there is considerable work that needs to be conducted to ensure proposals are the right solution for the wider area.</p> <p>The current proposed tram route is not via Gartree Road, Stoughton Road and London Road. It is via Gartree Road, Manor Road and London Road.</p> <p>Please see the Eco-town for Leicestershire Transport Assessment (October 2008) for more information.</p>
<p>2.3</p> <p>Road Layout</p>	<p>This section refers to the Transport Update Report prepared in June 2008 as part of transport modelling work undertaken by Leicestershire County Council in consultation with Leicester City Council, the Highways Agency and The Co-operative Group. Since this report was written a considerable amount of further work and consultation has taken place.</p> <p>The option of completing the final section of the EDDR was considered and was discussed with local councillors, transport professionals, members of the public and other stakeholders. The views that were received and technical work that was carried out demonstrated a strong preference not to complete the EDDR and so the proposals put forward do not require completion of this road.</p>
<p>2.4</p> <p>Traffic Impact Assessment</p>	<p>This section refers to the Stage 1 SATURN modelling undertaken very early on in the process. This work has now been superseded by the now complete Stage 2 PTOLEMY modelling which is more robust and is detailed in the Eco-town for Leicestershire Transport Assessment (October 2008). The key inputs listed seem to be a mixture of those assumed at the time of the Stage 1 modelling work (e.g. bullets 1 to 3) and those included in the Stage 2 PTOLEMY modelling work (4 and 5). Some of these points have now been superseded e.g. the modal share targets reported in the Transport Assessment are now:</p> <ul style="list-style-type: none"> • 20% Cycling; • 55% Public Transport; • 25% Car.

<p>3 Critical Assessment</p>	<p>This section refers to the Stage 1 SATURN modelling undertaken very early on in the process. This has now been superseded by the now completed Stage 2 PTOLEMY modelling which is more robust and is detailed in the Eco-town for Leicestershire Transport Assessment (October 2008).</p> <p>It is important to note that documents from which the modelling information is taken to inform the Report were produced by White Young Green (WYG) on behalf of Leicestershire County Council.</p> <p>The promoters agree with much of the critique of the Anytown scenario and these were documented in an unpublished note produced in June 2008 which identifies many of the same flaws. This document was not released by the promoters as it was agreed with the local authorities that the modelling process would consider two scenarios (Anytown and Eco-town). The Anytown information was supplied by the WYG (the consultants for Leicestershire County Council) and the eco-town information was supplied by Waterman Boreham (on behalf of the promoters).</p> <p>The promoters believe the containment rate assumed in the Stage 1 modelling work for the Eco-town scenario was and still is appropriate, particularly as the Eco-town will be unlike any existing settlement. Work has been undertaken to examine the self containment levels of a number of comparable towns. This follows on from work done by Nathaniel Lichfield and Partners (NLP) identifying comparable settlements based on employment levels, levels of economically active persons and proximity to major urban areas. Two New Towns (Skelmersdale and Redditch) have been added to those considered by NLP.</p> <p>Table 1 details the towns considered, and describes why these towns have similar characteristics to a town located four miles to the east of Leicester city centre. For the purposes of comparison, an assumption has been made of a town supporting 15,000 dwellings with a population of 36,000 (2.4 people per dwelling).</p> <p>Table 1 Towns studied by NLP</p>
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Town	District	Population	Reasons why broadly comparable
Witney	West Oxfordshire	35,000	Town with range of employment uses about 18 km outside sub-regional centre of Oxford (popn. 150,000)
Melton Mowbray	Melton, Leicestershire	25,000	Town with range of employment uses about 15 km outside Leicester
Christchurch	Christchurch, Dorset	45,000	Town of comparable size on edge of Bournemouth/Poole conurbation (popn. 340,000)
Wellingborough	Wellingborough	48,000	Town of comparable size about 10 km outside Northampton (popn. 200,000)
Letchworth	North Hertfordshire	34,000	Town of comparable size about 8-15 km from larger towns of Luton and Stevenage
Loughborough	Charnwood	57,000	Leicestershire town about 12 km from Leicester although larger than eco-town and with wider range of facilities e.g. university
Harlow	Harlow	79,000	New town about 15 km from edge of London although larger than eco-town
Skelmersdale	West Lancashire	41,000	New town 18 km from Liverpool
Redditch	Redditch	60,000	New town 18km from Birmingham
<p>The self containment levels of each town are: Witney (50%), Melton Mowbray (61%), Christchurch (44%), Wellingborough (72%), Letchworth (47%), Loughborough (62%), Harlow (61%), Skelmersdale (53%) and Redditch (40%). The average self containment level, for comparable towns, is therefore 54%.</p> <p>It is important to note that in the Stage 2 PTOLEMY work no trip rates</p>			

	<p>nor containment rates are utilised. These are calculated internally by the PTOLEMY model.</p> <p>It should also be noted that the number of economically active people is also calculated by the PTOLEMY model. However, it should be noted that as work progressed after the Stage 1 SATURN modelling, other calculations (outside of the PTOLEMY work) utilised a figure of 1.2 economically active per household.</p>
<p>3.3</p> <p>Modal Share and Practicalities</p>	<p>The modal share targets reported in the Transport Assessment are now:</p> <ul style="list-style-type: none"> • 20% Cycling; • 55% Public Transport; • 25% Car. <p>The rapid transit (express bus and tram) frequencies and capacities are clearly set out in the Eco-town for Leicestershire Transport Assessment (October 2008) in Tables 8.1 and 9.1. These tables indicate that in Phase 3 of the development the express bus would run every 3 minutes (assuming a capacity of 114 passengers per bus) and the tram would run every 5 minutes (assuming a capacity of 191 passengers per tram). A summary of public transport provision is given in Table 12.1. It should be acknowledged that the public transport services proposed deliver enough capacity for all employment trips from the Eco-town to be conducted during the peak periods when in fact this is unlikely. As such there is likely to be additional capacity for non Eco-town residents or employees. It should also be acknowledged that whilst residents will use the rapid transit to leave the Eco-town in the morning and enter the Eco-town in the evening the employees will do the opposite hence balancing demands.</p>
<p>3.4</p> <p>Off-site Implications</p>	<p>The A6 bus priority proposals have been designed to ensure that they do not require substantial land take or affect '<i>hundreds of properties</i>'. Plans will be made available on request in the near future. There is some uncertainty over verges impacted but these are likely to be within the public highway.</p> <p>Two junctions have been designed for access to the A47 and A6 and are included in Appendices A and B of the Eco-town for Leicestershire Transport Assessment (October 2008). A further junction giving access to the A6 is being considered and still needs to be worked up in detail.</p> <p>As stated in the Transport Assessment a provisional design for the A6 park and ride site has been prepared.</p> <p>As highlighted above there are no plans to link directly with the A563 ring road – as discussed in the response to Section 2.3 Road Layout, the proposed EDDR has not been considered appropriate.</p>
<p>3.5</p> <p>Cycling</p>	<p>Plans of the proposed cycle network are included in the Eco-town for Leicestershire Transport Assessment (October 2008) in Figure 7.1. Some initial plans of the infrastructure were released to Leicestershire County Council and Leicester City Council in a report in July 2008.</p>

	<p>Initial comments on these designs have been received from the local authorities and it is acknowledged in the Transport Assessment that further design of these routes needs to be undertaken with the local authorities and Sustrans.</p> <p>It is believed that many destinations including Leicester City Centre are within an acceptable cycling distance. According to Local Transport Note 2/08 Cycle Infrastructure Design (DfT, October 2008, Page 25) “Around 60 per cent of car trips are typically under five miles and, given the right conditions, a significant proportion of motorists could transfer to cycling”.</p>
<p>3.6 Parking</p>	<p>The level of parking provision proposed (an average of 0.5 per dwelling) is in line with eco-settlements in Europe and the advice set out in the document <i>Building Sustainable Transport into New Developments: A menu of Options for Growth Points and Eco-towns</i> (DfT, April 2008) which recommends ratios of 0.4-0.7 spaces per unit.</p> <p>Elements of the PTOLEMY modelling work indicated that high parking restraint could potentially affect the demand for residential and commercial premises. However, it should be noted that in these model tests the PTOLEMY model assumed conventional relationships between land use planning and travel demand based on existing data sources. Furthermore, these model tests ignored the impact of the Smarter Choices Company (SCC) in managing and providing sustainable travel alternatives to override the negative impacts of parking restraint.</p> <p>The SCC is a fundamental component of the proposals that appears to not be fully understood within the Report. The SCC will be a responsive, performance orientated, accessible delivery vehicle providing Smarter Choices services and co-ordinated combinations of services to an extent that has not been achieved elsewhere. It will be the natural place for new residents, workers, developers and other stakeholders to manage their mobility and will deliver the target modal split.</p> <p>It has already been acknowledged in the Eco-town for Leicestershire Transport Assessment (October 2008) that further work could usefully be undertaken to identify residents and employers who would consider relocating to the eco-town. The promoters are confident there is an appetite for people to make the lifestyle choice to move to take up homes and jobs within the town. There is also evidence from Europe that developments like the proposed Eco-town are successful in attracting new residents e.g. Freiburg.</p>

Section 6

Environment Paper

Paragraph	Critique
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<p>2</p> <p>Ecology</p>	<p>The Ecology Section of this Technical Paper comprises a large amount of text which has been taken directly from the Hyder Interim Ecology Baseline Report². There are, therefore, no specific comments on this text.</p> <p>The Environment Technical Paper produced by Halcrow contains additional desk-based assessment data for locally-designated sites within the site, and makes specific reference to a number of sites being affected by the Scheme. Further survey work and desk-based information would, of course, be obtained by the promoters as the scheme is progressed through the normal planning process to a planning application.</p> <p>The size of the total landholding (only 32% of which would be required for the town and 30% of that being open space) allows for flexibility in design to avoid sensitive sites, habitats and migration routes.</p>
<p>Section 2.3</p>	<p>This section relates to protected species across the site. Although text in this section appears to be almost entirely taken from Hyder's Baseline Report, it omits summary text in relation to great crested newts; the presence of great crested newts was confirmed in two of the ponds surveyed in May/June 2008.</p> <p>Additional ecological information relating to the site has been gathered since Hyder's Baseline Report was produced; this has increased knowledge of the distribution of protected species across the site beyond that previously reported. The need for a detailed suite of further surveys was identified following completion of the walkover surveys of the site in late-June/early-July 2008. This included detailed botanical surveys, (principally woodlands, hedgerows and potentially arable field margins), and further surveys for aquatic invertebrates, amphibians, reptiles, breeding birds, bats, badgers, water voles, and otters. The scope and methodology for bird and bats surveys would be reviewed in particular, given that these species may be affected by the installation of wind turbines at the site. The scope of further surveys would be reviewed with the statutory consultees if the scheme is shortlisted and can then be progressed through the normal planning process.</p>
<p>3</p> <p>Land Contamination</p>	<p>This section 3 of the Paper presents a summary of Hyder's Contaminated Land Report and is an accurate reproduction. Section 6 of the Technical Paper presents a summary of Section 3 and also highlights the absence of any discussion with respect to impact on habitat and species. This aspect was not included as part of Hyder's Contaminated Land Report, as it was not necessary at this stage of the Masterplan's preparation. However, such issues would be addressed if the scheme is shortlisted and progressed through the normal planning process.</p>
<p>4.3</p>	<p>Paragraph 4.3 states '<i>The villages of Houghton on the Hill, Stoughton, Gaulby and Kings Norton all contain Conservation Areas and Listed</i></p>

² Hyder Consulting (UK) Limited (June, 2008) Interim Ecology Baseline Report

Indirect Effects	<p><i>Buildings. The wider landscape setting and tranquillity of these may be adversely affected by the Eco-town. In addition there are four Conservation Areas within Leicester adjacent to the A6, London Road, Stoneysgate, Evington Footpath, South Highfields and New Walk. These will all be affected by increased traffic flows from private and public transport, as well as physical alterations to the streetscape to accommodate long term tram movements.</i> Highways, public transport and access issues will be considered as part of the wider masterplanning and design process as the scheme is progressed through the normal planning process. As the transport and access strategy evolves, it will be possible to quantitatively evaluate the effects of proposals, upon conservation areas and other cultural heritage resources. Once again, cultural heritage assessments would form an integral part of the detailed assessment and design process and would be undertaken in consultation with the Commission for Architecture and the Built Environment (CABE), English Heritage, local conservation officers and other interested parties.</p>
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Section 7

Landscape and Design Paper

Paragraph	Critique
<p>2.3</p> <p>Site Location</p>	<p>The Report describes the landscape to the south of Great Glen is described as a <i>'rural agricultural landscape'</i> and also says it has no major built development. The latter point is misleading in that there is development in this area which has a local influencing effect on its character, which includes residential expansion on the west side of Kibworth Harcourt and the Great Glen A6 bypass itself, which are considered to be significant development.</p> <p>This section also makes assumptions on the effects of the employment area to the south of Great Glen. It suggests the site is visually intrusive from the rural villages of Newton Harcourt and Wistow to the west and Fleckney to the south as well as recreational users of the Grand Union Canal and the numerous public footpaths. It is unclear how this conclusion has been drawn. With regard to the two closest settlements, Newton Harcourt and Wistow, they sit within local slopes with a typically southerly aspect. These settlements are also associated with mature vegetation. This combination of landform and vegetation restricts views to the east and to the potential development area. Fleckney is situated at a greater distance to the south, with intervening landform and mature vegetation. Again northerly views from this settlement to the potential development area would be limited.</p> <p>It is accepted that users of the Grand Union Canal have some views across to the southern edge of the potential development area, although these views are restricted by local topography and mature vegetation. However, the promoters consider that the development of this area could be designed to take account of the canal setting to minimise potential impacts.</p>
<p>2.4</p> <p>Landscape and Visual Impacts</p>	<p>The Report makes reference to views out from the airfield site and in particular the description of views being more open to the north and east. It is accepted that some residential properties at the edge of the settlement at Houghton on the Hill are likely to have views to the scheme. However, an assumption in the Report has been made that these open views <i>'confirm'</i> the residents at the settlements at Kings Norton and Illston on the Hill would be exposed to the site and as such the Report states that the development would be highly visible from these settlements. This would not be the case, as both settlements are located beyond local ridgelines. Topography and associated blocks of mature vegetation mean these settlements at present have no consistent view to the airfield. Even when taking account of possible building heights, if there are effects, it is unlikely these new features would have a major influence on the view composition.</p> <p>The Report makes reference to distances between the various aspects of the development and existing development, which it describes as <i>"rural settlements"</i> including Pipistrelle Way, Oadby. A more</p>

	<p>appropriate description for this location would be suburban urban edge.</p> <p>The Report states <i>‘The development of Pennbury will radically alter the character of the landscapes well as the setting of, and views from, a number of surrounding towns and villages’</i> (page 5). It is not possible at this stage to make such a statement based on just the measurement of distances between the development and existing settlements as it does not follow any recognised methodology for undertaking landscape and visual impact assessment.</p> <p>The Report also suggests that the promoters are at fault for not providing a Zone of Visual Influence, which should have been provided as part of Hyder’s visual assessment. With reference to Section 2.1, the Hyder Report referred to is an interim landscape baseline report³ and along with other environmental baseline data, has been used to help develop a constraints plan for the study area. The constraints plan has then informed the development of the Vision Masterplan in terms of suggesting areas where development could either be appropriate or not. The various baseline reports prepared for the Co-Op are not environmental assessment documents. If the scheme is shortlisted and progresses through the normal planning system to the planning application stage, the baseline studies would continue and a landscape and visual assessment would be undertaken to inform detailed design and siting criteria.</p>
<p>2.5</p> <p>Relationship to landscape contours</p>	<p>Section 2.5 suggests that there is no evidence presented for the proposed grid pattern of streets. However, the emphasis on contours as the guiding factor for this is misleading. It is recognised that the existing airfield site, which sits on a broad ridge will form the heart of the new community. The centre is, therefore, sited on a relatively level area which would be appropriate for a grid pattern of streets. Other factors such as the axis of the Roman Road and the airfield layout, which are considered to be of cultural heritage importance have also be taken into account.</p> <p>The Report also identifies, in the historic pattern of the villages, the main road often follows the contours of the landscape. A point missed here is that the historic settlement pattern generally relates to areas of higher ground and which is reflected in place names such as Houghton on the Hill and Illston on the Hill.</p> <p>With reference to the statement that the promoters’ Masterplan Vision does not follow any aspects of the process proposed by CABI in their publication “Creating Successful Masterplanning – A Guide for Clients”, the promoters consider to be inaccurate given the detailed level of research and surveys, workshops and exhibitions they have undertaken.</p> <p>With regard to the following CABI document identified in the report “What Makes an Eco-town? published in September 2008 and in particular the ten point plan “Putting It all in its Place”, this report is</p>

³ Hyder Consulting (UK) Limited (June 2008) Interim Landscape Baseline Report

	<p>recognised by all partners as the way forward in the delivery of the Eco-town. The Report states: <i>'As it stands we do not believe the Co-Op Masterplan Vision currently puts Pennbury in its place nor responds to the significant spatial issues required to make informed decisions about the quality of design, place making and its complex social, environmental and economic considerations (page 7)'</i>. The promoters consider this statement to be premature bearing in mind the limited nature of the Report and the documents covered in it.</p>
<p>2.7 Identity</p>	<p>In Section 2.7 the Report doubts that the development will have a clearly separate identity because it is close to Leicester, Oadby and surrounding villages, as it will not meet the objective of having strong physical boundaries which physically separate it from adjacent areas. As the Report identifies, the Eco-town prospectus requires developments to be <i>'places with a separate and distinct identity but with good links to surrounding towns and cities in terms of jobs, transport and services'</i>. The Report suggests that as the Eco-town is in close proximity to existing development, it is not, therefore, possible to create a separate and distinct identity. This is not the case, as there are plenty of examples, even within urban areas, where it is possible to create a sense of place and a separate and distinct identity from the adjoining area, for example the suburban edge at Oadby has a separate and distinct identity to nearby Evington and Thurnby has a separate and distinct identity to North Evington. It is not appropriate to suggest that a measure of distance is needed to achieve a separate and distinct identity.</p>

Appendix 1

Eco-town compatibility with A Flourishing Region East Midlands Regional Economic Strategy 2006-2020

Strategic Priority 1	Sub Priority	Priority Action	Eco-town Vision Document	Eco-town Vision compliance with RES
<p>Employment learning and skills</p>	<p>Developing the skill levels of the current and future workforce</p>	<p>Engaging schools and colleges with business</p> <p>Equip school and college leavers with the skills and knowledge that businesses require</p>	<p>Linkages between educational facilities and local businesses within the eco-town will be encouraged to foster job skills, educational training and innovation within business (page 103).</p> <p>Schools in the eco-town will also commit to exceeding the goal that every young person over the age of 14 will have access to one week's work experience every year (Links with Business, page 103).</p> <p>Schools will pioneer innovative approaches to learning, such as learning in the community and using the town and its development as a living lab equipping students with skills that will be required by employers, such as problem solving, communication and risk management (Links with Business, page 103).</p>	<p>Yes</p>
		<p>Developing adult workforce skills</p>	<p>It will be essential that adult learners have access to academic and vocational qualifications whilst still remaining in the workforce. This will involve fostering links between local businesses and</p>	<p>Yes</p>

			<p>existing further education institutions. The need for higher and further education will also be explored in the delivery of the eco-academy and ICT provision in the form of a Community Window interactive screen in every home will enable adult learners to tap into lessons in their own homes (Higher and Further Education, Information and Communication Technologies, page 103).</p> <p>Firms benefiting from local procurement arrangements would be expected to adopt exemplar training and employee management practices, raising skill levels and bringing excluded communities into work (Local Procurement, page 105)</p>	
	<p>Stimulating business demand for skills</p>	<p>Stimulating skills demand</p>	<p>The location of an eco-town within Leicestershire creates the opportunity to create a cluster of sustainable construction technology industries within the area, stimulating a requirement for high knowledge skills. Construction contracts will include local procurement requirements, specific training and apprenticeship schemes in order to ensure that inward investment stimulates a skills demand in the local economy (Construction and</p>	<p>Yes</p>

			Inward Investment, page 105)	
	Improving the infrastructure and responsiveness of skills supply	<p>Matching skills provision to employer demand</p> <p>Ensure that training providers prioritise resources and develop the capacity to deliver the skills required by employers in a growing economy</p>	<p>Fostering closer links between schools and businesses in the eco-town will assist with ensuring that school leavers are equipped with the skills required by employers (Links with Business, page 103)</p> <p>Fostering links with higher education institutions and business will also serve to achieve a good match of skills with employer demand (Higher and Further Education, page 103).</p> <p>Firms benefiting from local procurement arrangements would be expected to adopt exemplar training and employee management practices, raising skill levels and bringing excluded communities into work (Local Procurement, page 105)</p>	Yes
	Improving the infrastructure and responsiveness of skills supply	Exploiting the opportunity of Higher Education	<p>It will be essential that adult learners have access to academic and vocational qualifications whilst still remaining in the workforce. This will involve fostering links between local businesses and existing further education institutions.</p> <p>Links will be fostered with local university and further education institutions and provision for a further/</p>	Yes

			<p>higher education facility would also form a resource/networking centre for local businesses (Summary of Strategies, page 103).</p> <p>The need for higher and further education will also be explored in the delivery of the eco-academy and ICT provision in the form of a Community Window interactive screen in every home will enable adult learners to tap into lessons in their own homes (Higher and Further Education, Information and Communication Technologies, page 103).</p>	
Enterprise and business support	Building an enterprise culture	Harness a culture of enterprise	<p>The eco-town, as a new settlement and a catalyst for new ideas, is a natural location for entrepreneurs. The anticipated housing mix of the town, with a high proportion of homes for young couples and new families, is well matched to attract the typical demographic of the entrepreneur wanting to start up a new business. The eco-town will provide opportunities for new business to invest, and foster enterprise linked to start-up business support and advice (Entrepreneurship, page 107)</p>	Yes
	Creating a dynamic SME base	Targeted provision to improve business creation	<p>The eco-town, as a new settlement and a catalyst for new ideas, is a natural location for entrepreneurs. The anticipated housing</p>	Yes

			<p>mix of the town, with a high proportion of homes for young couples and new families, is well matched to attract the typical demographic of the entrepreneur wanting to start up a new business. The eco-town will provide opportunities for new business to invest, and foster enterprise linked to start-up business support and advice (Entrepreneurship, page 107)</p>	
		<p>Increase business survival</p> <p>Consistent high quality advice prior to setting up their businesses</p> <p>Ongoing business support as their business grows</p>	<p>The eco-town, as a new settlement and a catalyst for new ideas, is a natural location for entrepreneurs. The anticipated housing mix of the town, with a high proportion of homes for young couples and new families, is well matched to attract the typical demographic of the entrepreneur wanting to start up a new business. The eco-town will provide opportunities for new business to invest, and foster enterprise linked to start-up business support and advice (Entrepreneurship, page 107)</p>	Yes
	Supporting innovation and diversification in manufacturing	Supporting innovation and diversification in manufacturing	<p>The eco-town is fundamentally an innovation in itself. As a concept, eco-towns open opportunities for new thinking and solutions, and the promoters 'are committed to providing the necessary framework for businesses and</p>	Yes

			individuals to benefit from the platform the eco-town provides for new ideas' (Innovation, page 106).	
	Overcoming barriers to SME growth	Providing high quality business support	The eco-town will provide opportunities for new business to invest, and foster enterprise linked to start-up business support and advice (Entrepreneurship, page 107)	Yes
		Improving access to finance		No
	Supporting firms to become internationally competitive and attracting inward investment	Increasing international trade		No
		Targeting foreign direct investment	<p>From the outset the eco-town offers a range of employment and business opportunities that can directly support the RES. The scale of the project provides substantial inward investment opportunities.</p> <p>To date, significant investment from these businesses has not been realised in the UK due to the lack of a clear market supply, making the financial commitment of building new manufacturing plants and recruiting new staff too high risk. By offering construction and development contracts in the eco-town for five, ten or</p>	Yes

			more years, such companies would be attracted to the sub-region to establish their UK centres (Construction and Inward Investment, page 105).	
	Building the visitor economy	<p>Increasing visitor spend:</p> <p>Target regional and sub-regional marketing and promotion</p> <p>Develop a co-ordinated campaign to encourage investment in public realm, conferencing and business tourism facilities</p>	This sector is not specifically targeted in the eco-town vision.	No
	Harnessing culture in the East Midlands	Targeting growth of creative and cultural industries	This sector is not specifically targeted in the eco-town vision.	No
	Supporting SMEs to harness business opportunities such as public procurement	Maximising the benefits of public procurement	Public procurement strategies are not within the control of the promoters, however local procurement strategies will be used in the delivery of the eco-town, stimulating new markets by providing guaranteed contracts. Firms benefiting from local procurement arrangements would be expected to adopt exemplar training and employee management practices, raising skill levels and bringing excluded communities into work (Local Procurement, page 105).	Yes

		Maximising the benefits of the London 2012 Olympic and Paralympic games	Not specifically addressed	No
Innovation	Increasing investment in R&D	Increasing research and development	From the outset the eco-town offers a range of employment and business opportunities that can directly support the RES. The scale of the project provides substantial inward investment opportunities.	Yes
		Developing research excellence	It is intended to develop a regional cluster of excellence in education for sustainable development. This will involve the promoters and subsequently the Eco-town Community Company, collaborating with regional higher education institutions with expertise in this field to establish strong working linkages and potentially a facility within the eco-town (Links with Business, page 103).	Yes
	Helping existing businesses deploy technologies and processes	Developing and applying new technologies	The local procurement strategy for the eco-town is designed to give local businesses the financial confidence to invest in new technologies (Local Procurement, page 105)	Yes
	Resource efficiency through effective use of technology and	Providing business support on resource efficiency	Not specifically addressed	No

	management practices			
	Translating scientific excellent into business success	Maximising the impact of Science City Nottingham		No
		Commercialising scientific excellence through facilitated business collaboration	It is intended to develop a regional cluster of excellence in education for sustainable development. This will involve the promoters and subsequently the Eco-town Community Company, collaborating with regional higher education institutions with expertise in this field to establish strong working linkages and potentially a facility within the eco-town (Links with Business, page 103).	Yes
		Development of land and property	The eco-town economic strategy is linked to the RES priority sectors, aims to maximise clustering benefits by encouraging inward investment and local innovation in sustainable construction technologies, fostering strong links between business and higher education institutions and incorporating sustainable building design through the town (pages 103-105).	Yes
	Growing the region's key sectors	Growing the region's key sectors Ensuring that priority sectors (transport	The eco-town economic strategy seeks in particular to promote the sustainable construction sector, one of the RES priority	Yes

		equipment, construction, food and drink and healthcare) are considered in the implementation of other actions in the RES to support growth, address skills needs and focus on efficiency and excellence	sectors (Construction and Inward Investment, page 105)	
Ensuring sustainability	Infrastructure, accessibility and connectivity	Improve transport connectivity and accessibility	The eco-town transport strategy aims to provide high quality public transport, walking and cycling links for those accessing jobs within the eco-town and for those travelling out of the town to Leicester city, to provide good connectivity to the wider rail network, and to contribute to environmental, quality of life and wellbeing indicators by increasing the opportunities for public transport use, walking and cycling and reducing the need for eco-town residents to use their cars in order to access community and recreation facilities – a combination of parking restraint, financial incentive and Smarter Choices transport innovations are proposed to facilitate a modal shift away from car use. (Transport and Movement, pages 64-67 and Eco-town for Leicestershire Transport Assessment).	Yes
		Maximise benefits of Nottingham East Midlands	Not addressed	No

		Airport, and Robin Hood Airport		
		Travel demand management	a combination of Smarter Choices transport innovations, parking restraint and financial incentives are proposed to facilitate a modal shift away from car use. (Transport and Movement, pages 64-67 and Eco-town for Leicestershire Transport Assessment).	Yes
Energy and resources	Responding to the challenge of climate change	Adaption to climate change	The eco-town is intended to respond to the impacts of climate change. The objective is to create an energy efficient town, where carbon emissions during its entire lifecycle are minimised, with the capacity to grow into a zero-carbon settlement through the use of renewable energy and on-site generation, and the ability to adapt to a changing climate and reduce flood and other climate risks (Energy and Climate Change, page 108).	Yes
		Reducing the demand for energy and resources	The eco-town is intended to respond to the impacts of climate change. The objective is to create an energy efficient town, where carbon emissions during its entire lifecycle are minimised, with the capacity to grow into a zero-carbon settlement through the use of renewable energy and on-site generation, and the ability to adapt to a changing climate and	Yes

			reduce flood and other climate risks (Energy and Climate Change, page 108).	
	Exploitation of new and growing low carbon markets	Utilising renewable energy technologies	The eco-town will incorporate on-site renewable energy generation, involving CHP, wind and anaerobic digestion. There is the capacity to generate more heat and power than the town needs, creating the potential to provide energy to the wider area.	Yes
		Exploiting low carbon technologies	The eco-town's economic strategy focuses on the sustainable construction technology sector, exploiting low carbon technologies (Construction and Inward investment, page 105)	Yes
	Ensuring an infrastructure for a low carbon economy	<p>Energy and waste capacity</p> <p>Promote the development of a more secure, diverse and sustainable energy and waste infrastructure and innovative approaches to providing energy and waste services within our economy</p>	<p>The eco-town energy and waste strategies will provide innovative approaches to providing energy and waste services</p> <p>Energy provision will involve CHP, wind and anaerobic digestion (Energy Strategy, page 109).</p> <p>Waste services will involve waste storage and collection, third sectors organisations will be assisted to develop community-based waste minimisation, recycling and re-use schemes e.g. re-usable boxes for local grocery deliveries. Construction will aim to be waste neutral</p>	Yes

			and resource efficient, which will be facilitated by waste segregation strategies, appropriate training provision and the setting of appropriate tender and contract requirements. (Sustainable Construction of the Eco-town and Achieving Zero Waste to Landfill, page 91).	
Environmental protection	Protecting and enhancing our environmental infrastructure to ensure sustainable economic growth	Environmental infrastructure Promote innovative approaches to supply and demand management		Yes
		Sustainable construction Ensure that investments in the built environment integrate climate change considerations	The eco-town is intended to reduce the impact of development on the environment: strategies for water, waste, energy, building design and transport are intended to reduce the demand for resources and improve resource efficiency (See Water page 88, Waste page 90, Energy and Climate Change page 116 and Transport page 66).	Yes
		Cleaner production processes Encourage the development and adoption of cleaner production processes and shift consumption towards good and services with lower environmental impacts	The eco-town vision promotes the use of cleaner renewable energy generation (Energy and Climate Change page 116) The eco-town will encourage the uses of goods and services with lower environmental impacts, for example, through the delivery of sustainable construction	Yes

			technologies industry, buildings which require lower energy and waste consumption and the use of public transport.	
	Protecting and enhancing Green Infrastructure through environmental stewardship	Improve damaged environments	<p>The eco-town design criteria for ecology and biodiversity aim to:</p> <p>Reconnect fragmented eco-systems</p> <p>Capture carbon through habitat creation</p> <p>Protect and conserve existing important habitats and species</p> <p>Enhance existing habitats and create new areas for nature conservation</p> <p>(Environment Design Criteria, page 76)</p>	Yes
		Protect and enhance green infrastructure	<p>The eco-town vision document states that a hierarchy of open spaces and green corridors will be created, maximising the opportunities for recreation, visual amenity and biodiversity, and providing safe and convenient links to the Great Park around the town and the wider countryside</p> <p>(Environment Design Criteria, 76).</p>	Yes
Land and Development	Development land	Secure the supply of quality employment land	Adequate employment land would be provided within the eco-town	Yes
		Infrastructure for employment related schemes	Infrastructure, including public transport, energy, water and ICT will be	Yes

		Ensure appropriate levels of infrastructure including transport, utilities, green and ICT for employment-related schemes	provided within the eco-town.	
		Previously developed land and buildings Increase the re-use of previously developed land	Previously developed land amounts to 127.19 hectares of the 600 hectares gross developed area of the eco-town.	Yes
	Housing	Supporting infrastructure for housing growth	Infrastructure required to support the eco-town will be provided from the outset (Community, page 73)	Yes
		Regeneration in areas of low housing demand		Yes
		Range of housing provision	Housing provision in the eco-town is intended to reflect the demand and need identified within the Housing Market Area by the draft Strategic Housing Market Assessment. This will involve 30% affordable housing. (Delivery of Housing and Dwellings, Type and Size, page 69)	Yes
Cohesive communities	none	Promoting social capital Support initiatives which mobilise existing social capital and create bridges and links between different groups including volunteering opportunities	A co-operative governance model is proposed for the eco-town, which encourages and empowers people to get together around areas of mutual interest. Through the eco-town community company, people will be incentivised to get involved with volunteering activities (How it might work,	Yes

			page 125).	
	none	<p>Collaboration to encourage participation</p> <p>Encourage collaboration between cultural, leisure and tourist bodies to encourage community participation, build social capital and contribute to community cohesion</p>	Not specifically addressed in the vision document. Eco-town Community Company and the Community Window could provide a format for such organisations to collaborate within the eco-town	No
		Develop cohesive communities	A co-operative governance model is proposed for the eco-town, which encourages and empowers people to get together around areas of mutual interest, enabling strong communities to develop	Yes
Economic renewal	Building local capacity, resources and support	Effective engagement and involvement of local businesses and residents	The co-operative governance model would enable members of the eco-town community company to have a voice in the running of the town (How it might work, page 125).	Yes
		Inclusive business support	Not specifically addressed	No
	Reviving local infrastructure and environments	<p>Built and green environments</p> <p>Improve the quality of the built and green environments to enhance local economic prospects</p>	All homes will be built to Code for Sustainable Homes Code 4 (and Code 6 for Energy), Lifetime Homes compliant, Building for Life Silver Standard compliant and English Partnerships Space	Yes

			<p>Standards compliant (page 71)</p> <p>Public open space will amount to 30% of the gross development area of the eco-town and the town will be surrounded by a Great Park, amounting to 1,286 hectares (page 56).</p> <p>The eco-town vision document states that a hierarchy of open spaces and green corridors will be created, maximising the opportunities for recreation, visual amenity and biodiversity, and providing safe and convenient links to the Great Park around the town and the wider countryside</p> <p>(Environment Design Criteria, 76).</p>	
		Addressing crime	<p>Community safety will be addressed through provision of a good range of community facilities and services as well as designing out crime in the town's development. The promoters will actively engage with the Leicestershire constabulary to look at ways of improving liaison between the police and people living in the town. Ideas could include:</p> <p>Neighbourhood focus groups to liaise with Community Support Officers</p> <p>Community safety</p>	Yes

			<p>strategies for community organisations</p> <p>Engagement of police representatives on the Design and Development Advisory Panel and Eco-town Community Company</p> <p>Police communication through the Community Window</p> <p>Community mentoring</p>	
	Stimulating new markets and investment	<p>New markets and enterprise opportunities</p> <p>Stimulate new local markets and enterprise opportunities by unlocking the potential of local procurement</p>	Not specifically addressed	No
		Improve access to finance	Not specifically addressed	No
Economic inclusion	Employability	Enhance employability of the most disadvantaged	Local procurement strategy is intended to bring excluded communities into work (Local procurement, page 105)	Yes
		Address worklessness	Local procurement strategy is intended to bring excluded communities into work (Local procurement, page 105)	Yes
		Improving the diversity of the workforce	Local procurement strategy is intended to bring excluded communities into work (Local procurement, page 105)	Yes
	Achieving a healthy workforce	Working with employers to improve the health of the region's	Not specifically addressed	No

		<p>workforce:</p> <p>Ensure that employers are informed on the detrimental effects of poor health on business performance and take steps to improve and protect the health of their employees</p>		
		<p>Address ill health as a barrier to employability:</p> <p>Ensure that those who experience poor health as a barrier to employment are supported in entering the labour market in positions consistent with their personal circumstances</p>	Not specifically addressed	No
	Enterprising people	Develop entrepreneurship skills		Yes

Appendix 2

Eco-town Vision compatibility with Leicestershire Sustainable Community Strategy 2008

LSCS Outcomes (and sub-outcomes)	Eco-town Masterplan Vision
<p>Improved life chances for vulnerable people and places</p>	
<p>Improved life chances for individuals and families</p>	<p>The sustainability approach adopted in the eco-town will seek to improve life chances for individuals and families</p> <p>Housing: the eco-town is designed to provide a highly sustainable community, helping to meet the existing and forecast housing needs for the Housing Market Area and providing all members of the community with access to housing in one of the most desirable locations in the County (Housing Delivery, page 69).</p> <p>Transport: effective transport systems and genuine transport choice for all residents</p> <p>Community: every resident will be a member of the Eco-town Community Company with the opportunity to influence the running of the town and access to a wealth of communities of interest through the Community Window</p> <p>Environment: the eco-town and Great Park will provide a high quality natural environment for residents and those in neighbouring areas to enjoy (Environment, page 74)</p> <p>Health: eco-town residents will have opportunities for physical activity and social interaction in a high quality and safe environment as well as access to health care facilities</p> <p>Food and farming: eco-town residents will have access to fresh, local and healthy food</p> <p>Education: children and adults will have access to education</p> <p>Employment: a range of jobs will be provided in the town and local procurement strategies will ensure that opportunities for local people are optimised</p>
<p>Improved quality of life for people living in the most disadvantaged neighbourhoods</p>	<p>Improved public transport connections into Leicester city from the eco-town will benefit existing residents as well as those living in the</p>

	<p>eco-town (Transport, page 22).</p> <p>Education provision may involve federation with existing schools and the creation of additional academies in Leicester city (Education and skills, page 22).</p> <p>The local procurement strategy is intended to assist with bringing excluded communities into work (local procurement page 105).</p>
<p>The lives of offenders and those at risk of offending are improved so they are less likely to offend</p>	<p>This will be addressed through working closely with the police, including their engagement on the Design and Development Advisory Panel and will involve community mentoring schemes (Community, page 73).</p>
<p>An increase in the provision of affordable housing</p>	<p>30% of the homes in the eco-town will be affordable. This amounts to 4,500 homes</p>
<p>Children in Leicestershire stay safe</p>	<p>Community safety will be addressed through provision of a good range of community facilities and services as well as designing out crime in the town's development. The promoters will actively engage with the Leicestershire constabulary to look at ways of improving liaison between the police and people living in the town. Ideas could include:</p> <ul style="list-style-type: none"> Neighbourhood focus groups to liaise with Community Support Officers Community safety strategies for community organisations Engagement of police representatives on the Design and Development Advisory Panel and Eco-town Community Company Police communication through the Community Window Community mentoring <p>(Community, pages 72-73)</p>
<p>Children and young people achieve economic well-being</p>	<p>Linkages between educational facilities and local businesses within the eco-town will be encouraged to foster job skills, educational training and innovation within business (page 103).</p> <p>Schools in the eco-town will also commit to exceeding the goal that every young person over the age of 14 will have access to one week's work experience every year (Links with Business, page 103).</p>

	<p>Schools will pioneer innovative approaches to learning, such as learning in the community and using the town and its development as a living lab equipping students with skills that will be required by employers, such as problem solving, communication and risk management (Links with Business, page 103).</p>
<p>More older people are able to live independent lives</p>	<p>Homes will be designed to be Lifetime Homes compliant, accommodating the needs of children and the elderly and capable of adaptation as a response to life events.</p>
<p>Stronger more cohesive communities</p>	
<p>Stronger communities where people are involved, engage and play a role in decision making</p>	<p>A co-operative governance model is proposed for the eco-town, which encourages and empowers people to get together around areas of mutual interest, enabling strong communities to develop</p> <p>The co-operative governance model would enable members of the eco-town community company to have a voice in the running of the town. Every resident, including children, would be eligible to be a member of the community company and entitled to a vote. (How it might work, page 125).</p>
<p>There is a positive view of diversity and equalities</p>	<p>Part of the Community Objective for the eco-town states</p> <p>To engender a sense of community spirit and ownership and attract, nurture and retain a cohesive and inclusive community which empowers sustainable choices and active citizenship through participation and accountability mechanisms in the decision making process'(Community Objective, page 72).</p>
<p>Leicestershire is integrated, cohesive and inclusive</p>	<p>Part of the Community Objective for the eco-town states</p> <p>To engender a sense of community spirit and ownership and attract, nurture and retain a cohesive and inclusive community which empowers sustainable choices and active citizenship through participation and accountability mechanisms in the decision making process' (Community Objective, page 72).</p>
<p>Equality of access to life opportunities</p>	<p>The co-operative governance model would enable members of the eco-town community company to have a voice in the running of the</p>

	town. Every resident, including children, would be eligible to be a member of the community company and entitled to a vote. (How it might work, page 125).
All sections of the community are empowered to influence local decision making	The co-operative governance model would enable members of the eco-town community company to have a voice in the running of the town. Every resident, including children, would be eligible to be a member of the community company and entitled to a vote. (How it might work, page 125).
Improved community cohesion through shared learning and recreation	Federation will be sought between eco-town schools and existing schools in the wider Leicestershire area, sharing the benefits of educational resources within the eco-town. It is also an aspiration to develop a second academy in Leicester city, closely federated with the eco-town academy (Federation with the Leicester city region, page 103).
Well-supported volunteering opportunities are provided within and by the community	Through the eco-town community company, people will be incentivised to get involved with volunteering activities.
Children and young people make a positive contribution	Children will be eligible to be members of the eco-town community company and to vote on issues of interest to them, influencing the running of the town. Children will also be eligible to become members of their school, with a voice in how the school is run. (Values and Principles of Schools in the Eco-town page 102, Community Governance in the Eco-town for Leicestershire, page 122 and How it might work, page 125).
Older people are empowered to play an active part in the community	The Community Governance structure for the town will enable everyone to become involved and engaged in the community.
A safe and attractive place to live and work	
People feel (and are) safer from violence	Community safety will be addressed through provision of a good range of community facilities and services as well as designing out crime in the town's development. The promoters will actively engage with the Leicestershire constabulary to look at ways of improving liaison between the police and people living in the town. Ideas could include: Neighbourhood focus groups to liaise with Community Support Officers

	<p>Community safety strategies for community organisations</p> <p>Engagement of police representatives on the Design and Development Advisory Panel and Eco-town Community Company</p> <p>Police communication through the Community Window</p> <p>Community mentoring</p>
<p>Disorder and anti-social behaviour is low compared to comparable areas and is being tackled effectively</p>	<p>Community safety will be addressed through provision of a good range of community facilities and services as well as designing out crime in the town's development. The promoters will actively engage with the Leicestershire constabulary to look at ways of improving liaison between the police and people living in the town. Ideas could include:</p> <p>Neighbourhood focus groups to liaise with Community Support Officers</p> <p>Community safety strategies for community organisations</p> <p>Engagement of police representatives on the Design and Development Advisory Panel and Eco-town Community Company</p> <p>Police communication through the Community Window</p> <p>Community mentoring</p>
<p>Increased resident satisfaction with the built environment and improved green infrastructure</p>	<p>Homes in the eco-town will be built to high design standards, including English Partnerships Space Standards and Code 4 for Sustainable Homes (Design and Environmental Standards page 70 and 71).</p> <p>30% of the town will be public open space (page 56)</p> <p>A hierarchy of open spaces and green corridors will be created, maximising the opportunities for recreation, visual amenity and biodiversity, and providing safe and convenient links to the Great Park around the town and the wider countryside (Environment Design Criteria, page 76).</p>
<p>Quality of employment sites and premises are more widely available</p>	<p>38.8 hectares of employment land is proposed</p> <p>Enterprise linked to start-up business will be fostered (page 105).</p>

<p>The impact of traffic on communities and individuals is reduced</p>	<p>An area wide travel plan will be established to ensure significantly more journeys are made on foot, by bicycle and by public transport and to reduce the need to travel, compared with other settlements of a similar size. High quality public transport links and stops will be planned in to minimise car dependency, appropriate transport infrastructure will be in place before people move in; any adverse impact on the existing transport network is minimised and mitigated against (Transport and Movement, page 65).</p>
<p>Transport assets such as road and footways are well managed and maintained</p>	<p>The method for road and footway management has not been specified but there is a commitment to their maintenance.</p>
<p>The housing needs of the people of Leicestershire are met</p>	<p>Housing provision in the eco-town is intended to reflect the demand and need identified within the Housing Market Area by the draft Strategic Housing Market Assessment. This will involve 30% affordable housing. (Delivery of Housing and Dwellings, Type and Size, page 69).</p>
<p>New developments are built to higher design, security and environmental standards and are better supported by services and infrastructure</p>	<p>All homes will be built to Code for Sustainable Homes Code 4 (and Code 6 for Energy), Lifetime Homes compliant, Building for Life Silver Standard compliant and English Partnerships Space Standards compliant (page 71)</p> <p>Community facilities and infrastructure will be provided from the outset and the town will contain the full range of community facilities required to support a growing community, including shops, schools, shops and restaurants, a community hub, faith buildings and civic buildings. Community facilities will be supported by a Community Window, available in every eco-town home, providing residents with information about what is happening in the town (Community pages 72 and 73).</p> <p>Public open space will amount to 30% of the gross development area of the eco-town and the town will be surrounded by a Great Park, amounting to 1,286 hectares (page 56).</p> <p>Transport infrastructure will be provided along with a Smarter Choices Travel Company which will facilitate use of public transport, walking and cycling. Transport infrastructure will include: a rapid transit route into Leicester city, local bus services, community bus services, secure cycle parking, local walking routes, car park and ride</p>

	<p>The eco-town vision document states that a hierarchy of open spaces and green corridors will be created, maximising the opportunities for recreation, visual amenity and biodiversity, and providing safe and convenient links to the Great Park around the town and the wider countryside</p> <p>(Environment Design Criteria, page 76).</p>
A more effective response to climate change	
Our contribution to climate change is reduced	<p>The eco-town is intended to respond to the impacts of climate change. The objective is to create an energy efficient town, where carbon emissions during its entire lifecycle are minimised, with the capacity to grow into a zero-carbon settlement through the use of renewable energy and on-site generation, and the ability to adapt to a changing climate and reduce flood and other climate risks (Energy and Climate Change, page 108). As an example, all homes in the eco-town will comply with Code 6 of the Code for Sustainable Homes energy ratings, the highest ratings possible under the Code (Code for Sustainable Homes, page 70)</p>
There is high resilience to the effects of climate change	<p>The eco-town is intended to respond to the impacts of climate change. The objective is to create an energy efficient town, where carbon emissions during its entire lifecycle are minimised, with the capacity to grow into a zero-carbon settlement through the use of renewable energy and on-site generation, and the ability to adapt to a changing climate and reduce flood and other climate risks (Energy and Climate Change, page 108). For example, landscaping would be provided in the town, which would act as shelter but could also play a role in future climate change mitigation through the absorption of carbon and provision of shade for cooling (Masterplanning for Energy, page 111).</p>
Less waste is produced and a reduced proportion of this goes to landfill	<p>The waste strategy for the town aims to reduce waste produced and increase its re-use and recycling, for example, through assisting third sector organisations to develop local community-based waste minimisation, re-use and recycling initiatives such as re-usable boxes for local grocery deliveries. Anaerobic digestion would be used to treat biomass</p>

	<p>waste from the eco-town and the Great Park. It is recognised that there is likely to be an element of waste to landfill but this will be significantly reduced. (Waste, pages 90-91).</p>
<p>An enhanced, accessible natural environment with improved protection</p>	<p>30% of land within the eco-town will be public open space, including a network of parks, and 1286 hectares of land around the town will form a Great Park. The Great Park will include farmland and land dedicated as a setting for outdoor leisure. (The Great Park, page 36 and Land Use Schedule, page 56)</p> <p>This will provide many opportunities for protecting and enhancing biodiversity. (Ecology and Biodiversity, pages 76 and 77).</p>
<p>Growth of road congestion is reduced</p>	<p>The Eco-town for Leicestershire Transport Assessment sets out the results of transport modelling work undertaken jointly between the promoters, Leicestershire County Council, Leicester City Council and the Highways Agency. This study concluded that the proposed transport solution for the eco-town would appear to be a potentially viable way forward for achieving a successful development with only modest impacts on highway travel conditions.</p>
<p>A prosperous, innovative and dynamic economy</p>	
<p>A prosperous and dynamic economy driven by innovation</p>	<p>From the outset the eco-town offers a range of employment and business opportunities that can directly support regional and sub-regional economic strategies. The scale of the project provides substantial inward investment opportunities. To date, significant investment from these businesses has not been realised in the UK due to the lack of a clear market supply, making the financial commitment of building new manufacturing plants and recruiting new staff too high risk. By offering construction and development contracts in the eco-town for five, ten or more years, such companies would be attracted to the sub-region to establish their UK centres (Construction and Inward Investment, page 105).</p> <p>The eco-town as a new settlement and catalyst for new ideas is a natural location for entrepreneurs. The anticipated housing mix of the town, with a high proportion of homes for young couples and new families, is well matched to attract the typical demographic of</p>

	<p>the entrepreneur wanting to start-up a new business. The eco-town will provide opportunities for new business to invest, and foster enterprise linked to start-up business support and advice (Entrepreneurship, page 107).</p> <p>The eco-town is fundamentally an innovation in itself. As a concept eco-towns open opportunities for new thinking and solutions, and the promoters are committed to providing the necessary framework for businesses and individuals to benefit from the platform the eco-town provides for new ideas (Innovation, page 106).</p>
<p>An improved range for business and tourism and recognition as a centre for innovation</p>	<p>It is intended to develop a regional cluster of excellence in education for sustainable development. This will involve the promoters and subsequently the Eco-town Community Company, collaborating with regional higher education institutions with expertise in this field to establish strong working linkages and potentially a facility within the eco-town (Links with Business, page 103).</p> <p>From the outset the eco-town offers a range of employment and business opportunities that can directly support regional and sub-regional economic strategies. The scale of the project provides substantial inward investment opportunities for sustainable construction technologies.</p>
<p>A highly skilled motivated and innovative population and more people in high value jobs</p>	<p>The eco-town will attract high value jobs in the form of sustainable construction technologies (Construction and Inward Investment, page 105).</p> <p>It will be essential that adult learners have access to academic and vocational qualifications whilst still remaining in the workforce. This will involve fostering links between local businesses and existing further education institutions. The need for higher and further education will also be explored in the delivery of the eco-academy and ICT provision in the form of a Community Window interactive screen in every home will enable adult learners to tap into lessons in their own homes (Higher and Further Education, Information and Communication Technologies, page 103).</p> <p>Firms benefiting from local procurement arrangements would be expected to adopt exemplar training and employee management practices, raising skill levels and bringing excluded communities into work (Local</p>

	Procurement, page 105)
Children and young people enjoy and achieve	<p>Linkages between educational facilities and local businesses within the eco-town will be encouraged to foster job skills, educational training and innovation within business (page 103).</p> <p>Schools in the eco-town will also commit to exceeding the goal that every young person over the age of 14 will have access to one week's work experience every year (Links with Business, page 103).</p> <p>Schools will pioneer innovative approaches to learning, such as learning in the community and using the town and its development as a living lab equipping students with skills that will be required by employers, such as problem solving, communication and risk management (Links with Business, page 103).</p>
A healthier Leicestershire	
Improved physical health, well-being and community cohesion through enhanced access to sport, recreation and cultural activities	<p>The eco-town will provide opportunities for exercise through the incorporation of walking and cycling into everyday life along safe and legible walking and cycling routes and spatial planning to ensure facilities are within walking distance of residential areas. Active recreation will be facilitated by the provision of high quality outdoor space, including the Great Park and a hierarchy of urban open spaces and high quality formal sport facilities co-located with schools and other services.</p> <p>Good mental health and wellbeing will be promoted by the provision of a good quality environment and opportunities for exercise and social networks (Health and Wellbeing, pages 96 and 97).</p>
The harm caused by drug and alcohol misuse is reduced in local communities	Involvement of the third sector and projects intended to bring people back into work will indirectly target this issue.
The number of local casualties is reduced	The promotion of safe walking and cycling routes and the use of public transport will serve to reduce the number of local casualties.
Air quality is improved	The environmental asset of clean air will be safeguarded (Introduction to Environment, page 74).
Children and young people in Leicestershire	The eco-town will provide opportunities for

<p>are healthy</p>	<p>exercise through the incorporation of walking and cycling into everyday life along safe and legible walking and cycling routes and spatial planning to ensure facilities are within walking distance of residential areas. Active recreation will be facilitated by the provision of high quality outdoor space, including the Great Park and a hierarchy of urban open spaces and high quality formal sport facilities co-located with schools and other services.</p> <p>Good mental health and wellbeing will be promoted by the provision of a good quality environment and opportunities for exercise and social networks (Health and Wellbeing, pages 96 and 97).</p>
<p>The health and well-being of older people is increased</p>	<p>The eco-town will provide opportunities for exercise through the incorporation of walking and cycling into everyday life along safe and legible walking and cycling routes and spatial planning to ensure facilities are within walking distance of residential areas. Active recreation will be facilitated by the provision of high quality outdoor space, including the Great Park and a hierarchy of urban open spaces and high quality formal sport facilities co-located with schools and other services.</p> <p>Good mental health and wellbeing will be promoted by the provision of a good quality environment and opportunities for exercise and social networks (Health and Wellbeing, pages 96 and 97).</p>
<p>Improved health outcomes for people in Leicestershire, including a reduction in health inequalities</p>	<p>The eco-town will provide opportunities for exercise through the incorporation of walking and cycling into everyday life along safe and legible walking and cycling routes and spatial planning to ensure facilities are within walking distance of residential areas (Health and Wellbeing, pages 96 and 97)</p>
<p>Improved mental health and wellbeing</p>	<p>Good mental health and wellbeing will be promoted by the provision of a good quality environment and opportunities for exercise and social networks (Health and Wellbeing, pages 96 and 97)</p>
<p>More people are physically active at a level which makes them healthy</p>	<p>The eco-town will provide opportunities for exercise through the incorporation of walking and cycling into everyday life along safe and legible walking and cycling routes and spatial planning to ensure facilities are within walking distance of residential areas (Health and</p>

	Wellbeing, pages 96 and 97)
Obesity is reduced and there has been an increase in health eating in all age groups	<p>The eco-town will provide opportunities for exercise through the incorporation of walking and cycling into everyday life along safe and legible walking and cycling routes and spatial planning to ensure facilities are within walking distance of residential areas (Health and Wellbeing, pages 96 and 97)</p> <p>The food and farming strategy aims to supply fresh, local, healthy food to the town and involve the community in food production (Food and Farming, page 98)</p>
Fewer people smoke	Not specifically addressed
Improved sexual health, particularly for young people	Not specifically addressed
There are fewer accidents in the home	Not specifically addressed
More effective and efficient service delivery	
Access to facilities and services is enhanced across the County	Community facilities will be provided from day one with options for virtual access also provided, which will contribute towards this objective.
High quality and accessible services and facilities in rural areas	There is an opportunity for eco-town facilities to be shared with existing communities
Public services are provided in the most efficient and effective way	The proposed governance structure for the eco-town seeks to provide services in a high quality, efficient and effective way.