

**Regional Planning and Environment Executive**

**30 January 2009**

**Consultation on Draft Planning Policy Statement on Eco-towns and Sustainability Appraisal and Habitats Regulations Assessment of Middle Quinton**

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**1. Purpose of Report**

- 1.1 To provide a draft WMRA response to the Government's consultation on the Draft Planning Policy Statement (PPS) on Eco-towns for joint endorsement with the Regional Housing Executive (which meets on 18<sup>th</sup> February).

**2. Recommendation**

- 2.1 That the RPEE:
- (a) Endorse the draft WMRA response to the consultation on the Draft PPS on Eco-towns and
  - (b) Commend the RHE to endorse the draft response at its meeting on 18<sup>th</sup> February.

**3. Background**

- 3.1 On 4 November 2008, the Minister of State for Housing, Margaret Beckett MP, launched the second stage of the eco-town consultation programme with the publication of a number of key documents aimed at ensuring that the proposed eco-towns are well designed and built to the highest possible environmental standards.
- 3.2 The PPS on eco-towns, when finalized, will supplement PPS1 Delivering Sustainable Development. CLG are also proposing to make a consequential change to PPS 3: Housing to add eco-towns to the list of options regions and local planning authorities should consider when planning the distribution of needed housing. PPS3 (paragraph 37, 1st sub-bullet of the 4th bullet) requires the consideration of new settlements as part of this process, so the change would be to add "(including eco-towns)" as an example of a type of new settlement.
- 3.3 The draft PPS sets out the green standards for development in eco-towns. The PPS also pledges that individual eco-towns will need to

submit planning applications in the same way as any other major development proposal.

3.4 The sustainability standards proposed in the Planning Policy Statement include:

- Achieving **zero carbon status** across all the town's buildings, including commercial and public buildings as well as homes.
- Allocating **40 per cent of the area within the town to be green space**, at least half of which should be open to the public as parks or recreation areas.
- Requiring individual homes to reach the Building for Life silver standard and also achieve **70% carbon savings** above current building regulations in terms of heating, hot water and lighting.
- Providing a minimum of **30 per cent affordable housing** to provide more homes for social rent and assist those struggling to get on the housing ladder.
- Creating more options for travel so that residents are able to make the **majority of their journeys without a car**, such as by public transport, walking and cycling.
- Ensuring a minimum of one **job per house** can be reached by walking, cycling or public transport to reduce dependence on the car.
- Locating homes **within 10 minutes walk** of frequent public transport and everyday neighbourhood services.
- Raising the threshold for individual homes so that they must all **achieve at least level 4 of the Code for Sustainable Homes**, which includes standards for household waste recycling, construction waste, water efficiency measures and reduced pollution.

3.5 In comparison with CLG's April 2008 consultation on the principles of eco-towns and proposed process for taking the concept forward (Eco-towns: Living A Greener Future), there now appears to be a slightly greater emphasis in the draft PPS on the opportunity to trial green technologies rather than the contribution that eco-towns can play to meeting housing need. The full draft PPS can be found at: [www.communities.gov.uk/publications/planningandbuilding/ppsecotowns](http://www.communities.gov.uk/publications/planningandbuilding/ppsecotowns)

3.6 A Sustainability Appraisal on each of the 12 short-listed eco-town locations was also published which identifies and evaluates the likely impact of the proposals on the local economy, community and environment. The short-listed locations include "Middle Quinton" (6 miles SW of Stratford upon Avon).

- 3.7 Sustainability Appraisals were undertaken for three further locations which had originally been short-listed (including Curborough near Lichfield) but these sites are not being taken forward in CLG's Eco-town Programme as a result of the promoters withdrawing schemes from the programme. In the Leeds City Region, CLG have agreed to pursue separately the local authorities' proposal for an urban "eco-community" which would pilot eco-town standards.
- 3.8 The Sustainability Appraisals assessed 10 of the 12 short-listed locations (including Middle Quinton) as Grade B sites, which would "be suitable for eco-towns subject to meeting specific planning and design objectives". One location (Rackheath in Greater Norwich) has been rated as Grade A, which is considered generally suitable for an eco-town, and one location as Grade C, which is only likely to be suitable for an eco-town with substantial and exceptional innovation. The individual Sustainability Appraisals are available from: [www.communities.gov.uk/ecotowns](http://www.communities.gov.uk/ecotowns)
- 3.9 The current shortlist of 12 potential eco-town locations, together with their CLG Sustainability Appraisal grading is as follows:
- Rackheath, Greater Norwich: Grade A
  - Middle Quinton, Warwickshire: Grade B
  - Newton-Bingham (Rushcliffe), Nottinghamshire: Grade B
  - Ford, West Sussex: Grade B
  - Bordon-Whitehill, Hampshire: Grade B
  - St Austell (China Clay Community), Cornwall: Grade B
  - Rossington, South Yorkshire: Grade B
  - North East Elsenham, Essex: Grade B
  - Pennbury, Leicestershire: Grade B
  - Marston Vale, Bedfordshire: Grade B
  - Weston Otmoor, Oxfordshire: Grade C
  - North West Bicester (Cherwell) - alternative to Weston Otmoor: Grade B
- 3.10 A judicial review has been granted to opponents of the Middle Quinton scheme (the BARD - Better Accessible Responsible Development - Campaign) and the Court has now listed this for hearing on 22 and 23 January 2009. In line with commitments which the Secretary of State made to the claimants and to other interested parties in the case, the deadline for responses on the draft Planning Policy Statement and the accompanying Sustainability Appraisal on Eco-Towns has been extended from 19th February 2009 to 6th March 2009.
- 3.11 Following the end of the consultation, the Government will announce a final shortlist of locations with the potential to site an

eco-town. Government has said that schemes in those locations will then need to apply for planning permission and go through the local planning process. The eco-town standards set out in the PPS, and the assessment work on locations, will be a material consideration for decision makers.

- 3.12 CLG have advised, in a letter to Stratford-on-Avon District Council, that if the Middle Quinton location were to be endorsed in the eco-towns process then Government would expect it to be considered in the current West Midlands RSS Phase 2 Revision together with the NLP options for delivering higher housing growth. CLG have advised that “within that context, the forthcoming RSS Examination will need to consider the strategic implications of this general location and the role which it might play in the final RSS”. In the absence of an indicative date when the Government is likely to publish the final PPS and final list of locations in the Eco-towns Programme, the implications for the West Midlands RSS EiP, which commences in April 2009, are currently unclear to all parties.

#### **4. Developing A Regional Assembly Response**

- 4.1 To develop the Assembly response, views and comments have been sought from the Middle Quinton Eco-town Joint Officer Group comprising officers from the County and District Council areas potentially directly affected (Warwickshire, Worcestershire, Stratford-on-Avon, Wychavon, and Gloucestershire), the RSS Coordination Group, Policy Leads, Regional Planning Officers Group, Regional Housing Advisory Forum and the Regional Assembly. In the light of comments received a draft Assembly response to the draft PPS consultation has been prepared and is attached as Appendix A for endorsement.
- 4.2 The draft response will be updated in the light of any RPEE comments and submitted to the Regional Housing Executive (on 18<sup>th</sup> February) for joint endorsement.

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## Appendix A

Eco-towns Team  
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xx xxxxx 2009

Dear Sir / Madam,

**DRAFT**  
**Consultation Response on**  
**Draft Planning Statement: Eco-towns and**  
**Sustainability Appraisal and Habitats Regulations**  
**Assessment of Middle Quinton**

The West Midlands Regional Assembly (WMRA) welcomes the opportunity to respond to the Government's consultation on the Draft Planning Policy Statement (PPS) on Eco-towns. The WMRA also wish to comment on the draft Sustainability Appraisal and Habitats Regulations Assessment for the "Middle Quinton" site in the West Midlands region.

The WMRA acts as both the Regional Planning Body (RPB) and the Regional Housing Board for the West Midlands and is responsible for developing the Regional Spatial Strategy (RSS). The WMRA promotes the interests of the West Midlands by speaking out on important issues and events affecting the Region and speaking up for the social, environmental, cultural and economic interests of the Region. The WMRA has a membership of 100 and is made up of representatives from the Region's local authorities, business community and other interest groups including health, trade unions, environment, community and voluntary organisations.

The WMRA support the general principle of putting affordable housing, lower carbon emissions, environmental sustainability and good design at the core of the eco-towns concept. These principles already underpin the draft overarching policies in draft revisions to the West Midlands RSS which would ensure the wider application of eco-standards across all new developments in the region.

In relation to the "Middle Quinton" eco-town proposal in the West Midlands, the WMRA wish to highlight that an eco-town at this location would not align with the objectives and policies of the West Midlands Regional Spatial Strategy.

In response to the consultation questions, the WMRA have the following comments:

### **Consultation questions**

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

The WMRA welcomes the Government's stated commitment (para 2.5 of the draft PPS) to the plan-led system and statements in paras 2.2 and 2.3 that eco-towns are one of a range of options that should be considered through RSS's and Local Development Frameworks (LDF's).

However, paras 2.6 to 2.9 of the draft PPS would enable the approval of an eco-town that is not supported by the development plan and this is unacceptable. The WMRA is particularly concerned that the current short-listed locations are being considered in the absence of both a regional and local plan context for them. Many of the eco-town locations identified in Annex A of the Draft PPS are in conflict with approved RSS's and LDF's and the process for short-listing locations effectively overrides and undermines regional and local plan-making to date.

Paragraph 1.2 of the Draft PPS indicates that applicants for planning permission on eco-towns should consider how well their proposals for development contribute to the Government's ambition of meeting the need for housing and to achieve a low-carbon economy, and how well adapted they are for the expected effects of climate change. The WMRA recommend that the final PPS should also make clear that developers should also be required to consider how well their proposals align with RSS's and LDF's.

The Draft PPS consultation is being undertaken against a background of uncertainty about national and regional housing figures and the Draft PPS is unclear whether eco-town households will deliver houses *in addition* to the RSS targets or will *contribute* to meeting those targets. The WMRA recommend that the final PPS clarifies *that any eco-town homes will count towards RSS and local authority housing targets, and not be in addition to them.*

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

The WMRA consider some of the proposed locational principles in para 3.2 to be workable, but not others.

The WMRA support the principle that any eco-towns should:

- (a) Be in close proximity to higher order centre(s) where there is clear capacity for public transport links to that centre,
- (b) Close proximity to existing and planned employment opportunities, and
- (c) Play an important role in delivering other planning, development and regeneration objectives.

The WMRA also agree with the principle outlined in para 4.1 that eco-towns would be most appropriate when they are near to and well-connected to existing settlements, particularly major centres of employment, retail and leisure.

However, the WMRA do not support the principle that eco-towns should be new settlements which are separate and distinct from existing towns (albeit well linked to higher order centres) because this may not lead to sustainable development. The WMRA is particularly concerned that eco-towns which are separate and distinct from existing towns would draw people out of the major urban areas (MUAs) which would undermine the objective of urban renaissance and be contrary to the RSS for the West Midlands.

The WMRA do not support the proposed principle that in identifying suitable locations for eco-towns, consideration should be given to the "Eco-towns Programme" because many of the locations identified in Annex A of the Draft PPS (including Middle Quinton) may not be in sustainable locations.

Further, the WMRA consider it difficult to see how new, separate and distinct eco-town sites of 5,000 homes could have sufficient mass to support the necessary community infrastructure (including schools and health facilities) and public transport to achieve the self-sustaining aspiration.

To address the above issues and further concerns relating to questions 4.2, 4.7, 4.8, 4.9, 4.10 and 4.14 (see below) the WMRA recommend that the final PPS include consideration of smaller (less than 5,000 homes) eco-communities within or adjacent to existing urban areas which link opportunities and utilize existing infrastructure more

efficiently. The WMRA note that a proposal for one or more eco-communities in the Leeds City Region is being encouraged.

The WMRA is also concerned that para 3.1 appears to offer the prospect that the proposed "eco-standards" could be watered down to reflect "local opportunities and interests". The WMRA recommend that the PPS should include a clear requirement that any eco-town proposal should meet all the eco-standards.

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

The WMRA consider that a more viable eco-town concept would be achieved if the locational principles included consideration of sites within or adjacent to existing urban areas which link opportunities and utilize existing infrastructure more efficiently.

## **ECO-TOWN STANDARDS**

[Q4. We would like your views on the Government's proposed standards for eco-towns, in particular:](#)

As a general point, the WMRA wish to stress that if an eco-town was in an unsustainable location compliance with the eco-standards alone would not make it sustainable.

The statement in para 4.1 that "there are other circumstances where a small new settlement in more remote locations may be suitable" potentially contradicts the locational principles in para 3.2 and requires clarification.

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

[Q4.2 Do you consider that the cost of implementing the standards will undermine the viability of eco-towns?](#)

The WMRA is very concerned that some of the promises made in eco-town prospectuses and proposals may not be economically viable or deliverable. To help address the issue of uncertainty about the feasibility and viability of aspects of eco-towns being promoted, the WMRA recommend that the final PPS require 'performance phasing' whereby schemes seeking approval in principle (development plan or outline application) be phased such that the next stage cannot proceed until the previous stage meets all the required targets in terms of carbon savings, jobs per house, journeys without a car etc.

It is recognised that providing high levels of infrastructure, zero carbon buildings and affordable housing is unlikely to be financially viable to developers without Government support. There is considerable concern that any public sector funding towards delivering eco-towns would divert private and public investment away from delivering other housing and transport priorities elsewhere in the region. The WMRA therefore recommend that any funding to deliver eco-towns should either be secured from the developer or, where this is not possible, be funded from additional national resources.

There is also concern that the consequences of not meeting the required eco-town standards in terms of affordability, provision of jobs, infrastructure and essential services could fall on local government. To address these concerns, the WMRA recommend that the final PPS on eco-towns provides clear guidelines on what financial guarantees or commitments could be expected from landowners / developers or Government to ensure that eco-town standards are achieved.

#### [Q4.3 Are there any standards that you feel are missing? \(That are not covered in other Government policy or guidance\)](#)

The Sustainability Appraisal recommends (para 3.9.5) inclusion within the PPS of a section on Landscape and the Historic Environment. It is understood that a draft PPS on the Historic Environment, replacing PPGs 15 and 16, will shortly be issued for consultation. The European Landscape Convention and its Implementation Framework underscore the need to integrate landscape into policy (Article 5d - 'integrate landscape into regional and town planning policies... as well as any other policies with possible direct or indirect impact on landscape'). The WMRA therefore suggest that the development of eco-town proposals should incorporate a full understanding of the character, context, significance and vulnerability of landscape and historic environment and a commitment to this principle should be included in the Eco-towns PPS.

#### [Q4.4 Are any of the standards not essential?](#)

### **Zero carbon (paragraphs 4.3 to 4.6)**

[Q4.5 The zero carbon standard attempts to ensure that carbon emissions related to the built environment in eco-towns are zero or below. Have we specified the calculation of net emissions clearly in a way that avoids perverse incentives and loopholes? Is this standard the most cost effective way to do this?](#)

Para 4 of the draft PPS states that eco towns “will have sustainability standards significantly above equivalent levels of development in existing towns and cities.” Given the Government’s intention (through the Code for Sustainable Homes) that all new homes will be zero carbon from 2016, and its ambition that all new non-domestic buildings will be zero carbon from 2018, it is unclear what value the eco-towns concept adds to what is already enshrined within the statutory planning framework.

The WMRA note that the draft PPS definition of zero carbon excludes transport and consider that where eco-towns are proposed in remote locations the carbon emissions from transport would offset some of the carbon neutrality achieved within the built environment.

### **Climate change adaptation (paragraphs 4.7 to 4.8)**

[Q4.6 The climate change adaptation standard, alongside existing planning guidance, aims to ensure that eco-towns will be more future-proof. Is it sufficiently clear and workable?](#)

### **Homes (paragraphs 4.9 to 4.10)**

[Q4.7 Should the PPS be more prescriptive than set out in paragraph 4.9 \(e\) in relation to energy efficiency? Do you agree that 70 per cent is an appropriate level of carbon mitigation through on-site means?](#)

The commitment to additional affordable homes (para 4.9(d)) that eco-towns could deliver is welcomed in principle.

The amount and location of new affordable housing is an issue of considerable regional importance in the West Midlands. However, to achieve balanced communities, which are a fundamental objective of the West Midlands Regional Housing Strategy (2005), it is essential that there is a mix of housing types and tenures related to demography and the local emerging economy. It is also essential that affordable housing is to meet local needs. Affordable housing in excess of local needs can lead to unbalanced communities and inadvertently draw households out of the MUAs and undermine the objective of urban renaissance.

There is concern that the potential problem of unbalanced communities could be exacerbated by concentrating so many affordable houses in ‘separate and distinct’ towns where the public transport infrastructure, initially at least, is not developed enough to link people (particularly those on lower incomes) to jobs and other facilities.

## **Employment (paragraph 4.11)**

### [Q4.8 Is this employment standard sufficiently clear and workable?](#)

The aspiration for mixed-use communities and keeping commuter trips to a minimum is welcomed in principle.

However, the Draft PPS is not sufficiently clear about how a balance of employment opportunities is to be delivered or how the access to work objective will be achieved. In the absence of clearer and workable standards, eco-towns may become little more than dormitory settlements.

It is assumed that the requirement to provide one 'accessible' employment opportunity per new dwelling, means that the employment opportunity should be provided within the proposed eco-town itself. The wording of para 4.11 should be absolutely clear in this respect.

## **Transport (paragraphs 4.12 to 4.16)**

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

Transport is a key element of the sustainability of any eco-town proposal but the draft PPS is relatively weak in this area.

The WMRA is concerned that the development of new settlements which are separate and distinct from existing towns will result in longer trips to other services and facilities. Development in relatively inaccessible locations would create travel demand that would be difficult to manage through sustainable transport measures and may lead to external transport eroding any "eco" benefit secured through other means such as carbon neutral building design.

The WMRA recommend that the PPS place greater emphasis on eco-towns being exemplars in the design and operation of their transport systems. The PPS should set out clear and ambitious targets for the modal split of journeys and for the overall CO2 emissions associated with transport. It should also set out the mechanism for ensuring that these targets are met and that sustainable transport outcomes are delivered.

## **Local services (paragraph 4.17)**

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

The principle of providing a good level of facilities and services within an eco-town is welcomed in principle.

However, the draft proposal of “a good level of provision of services .. that is proportionate to the size of the development” is too flexible and needs greater clarity to ensure that adequate facilities and services are planned for and delivered.

If eco-towns do not have the necessary community infrastructure and local services (including schools and health facilities) and public transport then they will not meet the proposed targets for percentage of trips made by non-car means.

It is also important that the phasing of eco-towns is geared towards the early provision of facilities and services (including schools, health facilities and public transport) to avoid additional pressures being placed on local service provision before planned eco-town facilities come on-stream.

Whilst it is acknowledged that the local context for eco-town proposals will vary, the WMRA recommend that the PPS attempt to establish a minimum level of service provision that all proposals would be expected to meet.

## **Green infrastructure and biodiversity (paragraphs 4.18 to 4.21)**

[Q4.11 The standards proposed on green infrastructure and biodiversity aim to ensure that development is undertaken in such a way that it protects and enhances the best features of local landscapes for the benefit of both people and wildlife. Are these standards reasonable and deliverable?](#)

## **Water and flood risk management (paragraphs 4.22 to 4.28)**

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

Eco-towns should not be located in areas where they have the potential to increase the risk of flooding. Paras 4.27 and 4.28 should make stronger statements in this respect. The words 'wherever practicable' should be deleted from the first sentence of para 4.27. The words 'as far as possible' should be deleted from the second sentence of para 4.28.

### **Waste (paragraph 4.29)**

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

### **Transition and development (paragraphs 4.32)**

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

If new settlements are to be created, then phasing will be a critical factor to ensure that the necessary transport and community infrastructure is in place at the beginning of development.

### **Community and governance (paragraphs 4.33 to 4.34)**

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

### **Sustainability Appraisal, Habitats Regulations Assessment and Impact Assessment**

[Q5. Do you have any comments on the accompanying Sustainability Appraisal/Habitats Regulations Assessment or the Impact Assessment?](#)

[Q6. Do you have any comments on the issues identified in the Sustainability Appraisal/Habitats Regulations Assessment of the locations for eco-towns?](#)

### **[Q6.2 Middle Quinton](#)**

In relation to the Sustainability Appraisal for Middle Quinton, the WMRA wish to highlight the following issues:

### Nature of the Proposal

The majority of the proposed site is within Stratford-on-Avon District (Warwickshire), but about one-third of the site is also within Wychavon District (Worcestershire). The site also abuts the boundary with Cotswold District (Gloucestershire). Any eco-town proposal at Middle Quinton therefore needs to be appraised for its impact on not only Stratford-on-Avon but also potentially affected areas within Wychavon and Cotswold Districts.

Paragraph 2.2 identifies the Middle Quinton location as a Brownfield site. Further investigation is required to establish whether the development proposal will require uptake of some greenfield land, in which case, the location would more appropriately be classified as 'largely' Brownfield.

### Policy Context

A key objective of the West Midlands RSS is to make the major urban areas (MUA's) of the West Midlands increasingly attractive places where people want to live, work and invest. Beyond the MUAs, the provision for housing will generally be concentrated in Settlements of Significant Development (namely Worcester, Telford, Shrewsbury, Hereford, Rugby, Burton upon Trent, Stafford, Nuneaton/Bedworth, Warwick/Leamington Spa and Redditch) although some peripheral development of other settlements may need to be considered in LDDs, as part of an overall approach to the development of sustainable communities, provided this does not undermine the renaissance of the MUAs (Para 3.12(a)). Housing development outside these areas is primarily to meet locally generated needs.

The above policy principles are reflected primarily in policies CF2 and RR1 of the West Midlands RSS Phase Two Revision Draft Preferred Option (December 2007).

The West Midlands RSS Phase Two Revision – Draft Preferred Option also emphasises need to reverse the movement of people and jobs away from the Major Urban Areas. For the Coventry, Warwickshire and Worcestershire sub-regions, the WMRSS Phase Two Revision emphasises (Para 3.45 and 3.65) that housing growth in Stratford-on-Avon and Evesham should be limited to local needs.

Draft Policy CF3 identifies 5,600 net additional dwellings in Stratford-on-Avon District 2006 – 2026. The 6000+ dwellings associated with the Middle Quinton proposal would exceed the RSS housing target for the District yet may fail to meet local needs of several small towns in the district such as Alcester, Shipston-on-Stour and Southam.

Draft Policy CF3 also identifies 9,100 net additional dwellings for Wychavon. Whilst 6,000 dwellings clearly does not exceed this target it may not leave sufficient numbers to meet local needs within the District.

In light of the above, the WMRA wishes to advise Government that a "Middle Quinton" eco-town does not align with the above objectives and policies of the West Midlands Regional Spatial Strategy.

#### Decent and Affordable Homes

The Regional Housing Strategy identified serious affordability issues in the South Sub-Regional Housing Market Area within which the Middle Quinton proposal is located. Additional market housing in an eco-town would do little to help this. The provision of more affordable housing would be welcome but only if it provided the right type and size with a clear role in meeting the demographic needs of the Housing Market Area and those of the emerging local economy.

#### Transport and Accessibility

Middle Quinton is remote from major centres of employment and lacks public transport and major road connections. The lack of public transport infrastructure would make it difficult to achieve an increased proportion of journeys by public transport.

The WMRA has doubts that adequate public transport to a variety of destinations could be viably provided in the long-term. In particular, the re-instatement of the railway line between Honeybourne and Middle Quinton is an aspiration which has little prospect of being delivered in the short-term.

An eco-town at Middle Quinton may, therefore, increase car dependency and undermine policies intended to reduce the need to travel.

#### Landscape and Heritage

The WMRA note that Middle Quinton is overlooked by Meon Hill within the Cotswolds Area of Outstanding Natural Beauty and the area is one of high landscape quality.

### Climate Change Adaptation and Flood Risk

The WMRA note that Stratford-on-Avon's Strategic Flood Risk Assessment shows that parts of the site are in Flood Zone 3a (high probability) and some are in Flood Zone 2 (medium probability).

### Waste

The nature of, and claims for, a waste facility at Middle Quinton seem highly improbable and require close scrutiny.

### Spatial Issues

The WMRA note that due to previous uses of the site, there is a high likelihood of contamination from a number of sources.

The WMRA have concerns that the capacity of the Middle Quinton location will not be able to accommodate 6,000 dwellings, employment opportunities, schools, shops and community services and facilities, adequate green infrastructure and open space, sustainable drainage, and still present the attractive living environment described in CLG's Eco-towns prospectus.

### Conclusions of the Sustainability Appraisal

The Sustainability Appraisal concludes that Middle Quinton is a Grade B site which 'might be suitable for an eco-town subject to meeting specific planning and design objectives'. Further explanation of the 'specific planning and design objectives to be met' is required.

Further, para 2.8.5 of the Sustainability Appraisal provides a list of matters which require further consideration. The WMRA consider that all of these matters need to be satisfactorily resolved before Middle Quinton is included within an Eco-towns programme.

## **Conclusion**

In conclusion, the WMRA supports the general principle of putting environmental sustainability and responding to climate change at the core of the eco-towns concept – these principles already underpin draft overarching policies SR1, 2 and 3 in the submitted WMRSS Phase Two

which will support making all new development in the region have an eco approach. The WMRA consider that these principles should be the norm, not the exception.

The WMRA do, however, have strong concerns about the following issues in relation to the draft PPS:

- Lack of regional and local planning context for many of the existing short-listed eco-town locations (including Middle Quinton).
- Unsustainable location of many eco-town proposals which are separate and unlinked to higher order centres (including Middle Quinton).
- Potential lack of viability and deliverability of new eco-towns which are separate and distinct from existing settlements.

To address the above concerns, the WMRA recommend that the final PPS on eco-towns should:

- Recognise the need for eco-towns to be consistent with, or identified through, Regional Spatial Strategies and developed in alignment with and through the Development Plan process.
- Apply the principles of eco-towns more widely to include opportunities for smaller eco-communities in or adjacent to existing urban areas which link opportunities and utilise existing infrastructure more efficiently.
- Ensure that eco-towns do not divert resources away from other regional priorities by clarifying what funding for eco-towns would be secured from the developers or from additional national resources.
- Clarify that housing associated with eco-town proposals would contribute (rather than be in addition) to RSS and local authority housing targets.

Finally, in terms of the short-listed sites in the West Midlands, the WMRA considers that the Middle Quinton location would not be in alignment with the West Midlands Regional Spatial Strategy or the submitted Phase Two Revisions Draft Preferred Option.

We trust that our comments are helpful and that they will be considered by Government when finalizing the PPS on eco-towns.

Yours faithfully,

Chair of Regional Planning and Environment Executive

Chair of Regional Housing Executive