

Eco-towns Team
Housing and Growth Programmes
Department for Communities and Local Government
2/H9 Eland House
Bressenden Place
London
SW1E 5DU

27th June 2008

Dear Sir / Madam,

Consultation on Eco-towns: Living A Greener Future

The West Midlands Regional Assembly (WMRA) welcomes the opportunity to respond to the Government's consultation on Eco-towns: Living A Greener Future.

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 response to the eco-towns consultation was approved by Members of the Regional Planning Partnership (which acts as the RPB) on behalf of the Regional Assembly at its meeting on 25th June.

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. The WMRA consider that eco-homes should be the norm rather than the exception. Equally important is that all new development should be sustainably located.

The WMRA have strong concerns about the following issues in relation to the eco-towns consultation:

- Lack of strategic context and bypassing of proper planning processes
- Sustainability of eco-town locations and lack of consideration for smaller eco-developments in and adjacent to existing urban areas
- Contribution of eco-towns to regional and local housing targets

- Viability and deliverability of eco-town infrastructure
- Sustainability appraisals and other technical assessments
- Suitability of short-listed sites in the West Midlands in respect of RSS Strategy.

The WMRA considers it premature to consider details about how eco-town developments could be implemented at this stage when there are significant issues of principle that remain to be addressed.

Lack of Strategic Context and Bypassing of Proper Planning Processes

The WMRA is concerned that the eco-towns initiative is being progressed outside of the proper planning processes. The national consultation on eco-towns is being conducted in advance of a new Planning Policy Statement (PPS) on eco-towns and therefore lacks a coherent spatial policy context.

Whilst the WMRA notes recent reassurances from the Housing and Planning Minister that eco-town proposals would be subject to the proper local planning process the Assembly remains concerned that the eco-towns consultation totally disregards the RSS process.

Eco-town proposals are being considered in the absence of both a regional and local plan context for them. The proposed process for progressing eco-towns effectively overrides and undermines regional and local plan-making to date and there is a real concern that the forthcoming Planning Policy Statement (PPS) on eco-towns could identify sites which are actually in conflict with approved RSSs and Local Development Documents (LDDs).

Further, given that the Code for Sustainable Homes and draft revisions to the West Midlands RSS propose that environmental sustainability underpins all new housing, the extent to which the eco-towns concept adds value to what is already enshrined within the statutory planning framework is unclear.

In light of the above, the WMRA recommend that any new or expanded settlements should be identified as broad locations through the RSS and developed through the LDD process within a proper national context rather than as an ad hoc initiative.

Sustainability of Eco-towns and Lack of Consideration for Smaller Eco-Developments In And Adjacent to Existing Urban Areas

The approach of proposing new settlements which are separate and distinct from existing towns does not reflect PPS 3 guidance and may not lead to sustainable development. The WMRA's concerns relate to a number of factors which are summarised below.

(a) Undermining Urban Renaissance

The WMRA is concerned that the proposed eco-towns could 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.

(b) Increasing the Need for External Travel

The WMRA is concerned that whilst new separate settlements may provide an opportunity to plan for internal sustainable travel, they would 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.

(c) Affordable Housing and Balanced Communities

The amount and location of new affordable housing is an issue of considerable regional importance. The additional affordable homes that eco-towns could deliver is in principle welcomed.

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, which would again 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.

(d) Employment Land

The consultation document gives very little consideration as to how employment opportunities, including the balance of employment premises which would be critical to the success of the eco-town concept, will be realised. In the absence of such considerations, the currently proposed eco-towns may become little more than dormitory settlements.

(e) Self-sufficiency of Eco-towns and Impact on Neighbouring Areas

It is hard to see how the intention that eco-towns should be properly self-sustaining and have sufficient mass to support the necessary community infrastructure (including schools and health facilities) and public transport can be achieved at sites of 5,000 homes. For example, whilst a town of 5,000 households may warrant a secondary school as it is building up to capacity, the wider effect, given the Building Schools for the Future agenda, may be that a school in a neighbouring village or market town would have to close. However, the larger a free standing eco-town becomes the more it is likely to challenge the Regional Spatial Strategy. This, along with the other issues identified above, would seem to support the case for allowing smaller eco-developments within urban areas where the critical mass already exists. In any case any proposal must be viewed within the wider strategy for the area rather than being viewed as an isolated community in its own right. Its sustainability must be judged on all the facilities it will need to use including, for example, its relationship to education, health and waste facilities.

To achieve balanced and sustainable communities *the WMRA recommends that the Government widen the opportunities for eco-settlements to include suitable sites in and adjacent to existing urban areas which are accessible by a range of transport modes.*

Contribution of Eco-towns to Regional and Local Housing Targets

The eco-town consultation is being undertaken against a background of uncertainty about national and regional housing figures. The Eco-towns Prospectus is unclear whether eco-town households will deliver houses *in addition* to the RSS targets for the period 2006 - 2026 or will *contribute* to meeting those targets. Clarification on this issue is essential.

If the Government is minded to continue with the eco-town concept despite WMRA concerns, it is *strongly recommended that any eco-town homes must count towards RSS and local authority housing targets, and not be in addition to them.*

In relation to housing targets, the Government Office for the West Midlands (GOWM) has recently commissioned a Study to examine options for further housing supply in the West Midlands.

The WMRA recommend that the GOWM Study explicitly takes account of the Government's eco-town proposals to ensure that any eco-settlements in the West Midlands count towards meeting the regions and local authorities RSS housing targets and are not in addition to them. The Study should also test eco-town proposals, alongside all other options for accommodating housing, for strategic fit with wider RSS objectives.

Deliverability and Economic Viability

The WMRA has concerns that some of the promises made in support of eco-town proposals may not be economically viable or deliverable.

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 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 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 any Government guidance on eco-towns provides clarification on what financial guarantees or commitments could be expected from landowners / developers or Government to ensure that sustainability standards are achieved.*

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

It is also understood that the construction industry is already struggling to deliver the required levels of new housing because of skills shortages. There are concerns that eco-towns could exacerbate these skills shortages and have a detrimental impact on the delivery of housing programmes elsewhere in the region.

Sustainability Appraisals and Other Technical Assessments

The consultation document outlines further assessment and technical work which will be undertaken for each of the eco-town proposals including a sustainability appraisal, transport assessment and a financial / viability assessment.

The WMRA has concerns about the independence and rigour of the appraisal and assessments process. It is also unclear how alternative options for development (a requirement of both the Sustainability Appraisal and Strategic Environmental Assessment procedures) can be incorporated satisfactorily.

Given the complexity of these exercises it is also difficult to see how satisfactory appraisals and assessments can be undertaken in order to enable reasoned judgements to be made about the suitability of specific eco-town proposals in time for consultation on the Draft PPS in summer 2008 and in time to inform the final PPS later in the year.

The WMRA recommends that eco-town proposals (not just the locations) undergo Sustainability Appraisals / Strategic Environmental Assessments and habitat assessments as robust as those required for sub-regional and local Core Strategies, Development Plan Documents and other major planning applications.

The WMRA recommends that the costs associated with providing green infrastructure, decentralised energy, sustainable drainage, public transport and other community facilities are properly assessed in the feasibility and viability of eco-town proposals.

The WMRA also recommends that the timetable for developing the PPS on eco-towns be extended to enable reasoned judgements based on independent and rigorous sustainability appraisals and other technical assessments.

The WMRA notes that the two eco-town proposals in the West Midlands - Curborough and Middle Quinton – contain insufficient information to assess whether the proposed sites would:

- Meet local (as opposed to national or regional) housing needs,
- Be of a sufficient size to accommodate housing, employment and infrastructure needs sustainably or viably,
- Achieve zero carbon standards, or
- Create additional green infrastructure.

The WMRA recommends that the above issues are properly considered through independent Sustainability Appraisals for the sites.

Suitability of Short-listed Sites in the West Midlands

A key objective of the WMRSS 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 WMRSS Phase Two Revision Draft Preferred Option (December 2007) – attached as Appendix A.

The WMRA wishes to advise Government that the location of the two short-listed proposals in the West Midlands – Curborough and Middle Quinton - do not align with the above objectives and policies of the West Midlands Regional Spatial Strategy.

A planning application for a new settlement of 5,000 houses has already been received for the Curborough site. If granted permission, the development would be built to existing standards rather than those expected as part of an eco-town settlement. As a statutory consultee, the WMRA has provided advice to Lichfield District Council that the application to be determined is not in general conformity with the RSS as it is premature and inconsistent with policies RR1, CF2 and CF3. The WMRA advice also states that the suitability of a new settlement should be evaluated through the formal processes of the preparation of a Local Development Framework compatible with the revision of the RSS.

Curborough

Relating specifically to Curborough, the WMRSS Phase Two Revision – Draft Preferred Option – emphasises the need to reverse the movement of people and jobs away from the Major Urban Areas. Draft Policy CF3 identifies 8,000 net additional dwellings in Lichfield District 2006 – 2026. Of the figure of 8,000 for Lichfield, dependant upon the outcome of further studies, some of the allocations could be made relating to the towns of Tamworth and Rugeley. The 5,000 dwellings associated with the Curborough eco-town proposal could potentially therefore go a long way towards meeting the draft RSS housing target for Lichfield but much of the new housing would be on one site.

The Regional Housing Strategy identified affordability issues in the Central Sub-Regional Housing Market Area within which the Curborough proposal is located. The provision of more affordable housing would be welcome but only if it provided housing of 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.

The WMRA notes that the southern boundary of the Curborough proposal is approximately 1 kilometre from the northern boundary of Lichfield. The proposal may not, therefore, meet the Government's own criteria of being separate and distinct from existing towns. Of particular concern, however, is that the relatively small gap between Lichfield and the proposed eco-town would lead to pressure for further development and result in urban sprawl.

The lack of public transport infrastructure at Curborough would make it difficult to achieve an increased proportion of journeys by public transport. Further, the WMRA has doubts that adequate public transport to a variety of destinations could be viably provided in the long-term. The proposal may, therefore, increase car dependency and undermine policies intended to reduce the need to travel.

In terms of road transport, the proposed site is currently served by narrow lanes which would not cope with the increased traffic that a new settlement would bring. The A38 would require a strategy to deal with the considerable additional traffic that would be created and this is likely to require public funding, that may be better invested elsewhere.

The proposal does not include an economic strategy for the site and there are concerns that the proposal would not deliver significant new business space due to the proximity of the proposed site to the nearby Fradley business park.

The WMRA notes that much of the Curborough site was part of the old Fradley airfield yet only 13% of the proposed site is on brownfield land. Development would involve the loss of significant areas of agricultural land and woodland. It is understood from the recent planning application at Curborough that the agricultural land quality at the site is Grade 3a or 2 if irrigation is available. The WMRA also notes the flooding and water quality issues related to the site which were identified in the consultation document and the need to upgrade waste water treatment infrastructure at Lichfield.

Middle Quinton

In relation to Middle Quinton, the WMRA note that 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). The extent to which any eco-town homes would relate to the administrative areas of Stratford or Wychavon would therefore require Government clarification.

Again, the WMRSS Phase Two Revision – Draft Preferred Option 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.

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.

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. Further, the WMRA has doubts that adequate public transport to a variety of destinations could be viably provided in the long-term. The proposal may, therefore, increase car dependency and undermine policies intended to reduce the need to travel.

The proposal does not indicate in what area it would be an exemplar of environmental sustainability.

The proposal does not include an economic strategy relating business potential in the settlement to nearby towns.

The WMRA notes that Middle Quinton is also a former Ministry of Defence site. Stratford-on-Avon's Strategic Flood Risk Assessment also shows that parts of the site are in Flood Zone 3a (high probability) and some are in Flood Zone 2 (medium probability). Due to previous uses of the site, there is also a high likelihood of contamination from a number of sources. There are concerns that the size of the site 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. Middle Quinton is also overlooked by Meon Hill within the Cotswolds Area of Outstanding Natural Beauty and the area is one of high landscape quality.

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 suggest that lessons are learnt from past mistakes of developing new isolated settlements. It is therefore important that eco-towns have a clear national, regional and local context. They need to be consistent with, or identified through, Regional Spatial Strategies and developed in alignment with and through the Development Plan process.

There is an urgent need for the government to clarify whether the housing associated with eco-town proposals would contribute, or be in addition, to RSS and local authority housing targets.

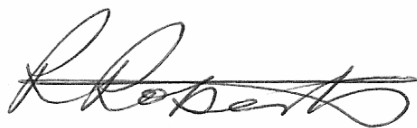
The WMRA consider that restricting potential eco-towns to new settlements separate and distinct from existing towns (focusing particularly around redundant MoD sites) has restricted the range of submitted proposals and could lead to development in unsustainable locations. The WMRA considers that the principles of eco-towns should be applied more widely, including opportunities for smaller eco-developments in or adjacent to existing urban areas which link opportunities and needs and utilise existing infrastructure more efficiently.

There are concerns about the economic viability and deliverability of the infrastructure associated with eco-town proposals. To ensure that the principles of eco-towns are deliverable there is a need for robust and independent financial, sustainability and transport assessments of the proposals. To ensure that eco-towns do not divert resources away from other regional priorities the WMRA requests assurances from the Government that funding would be secured from the developers or from additional national resources

In terms of the two short-listed sites identified in the West Midlands, the Regional Assembly considers that the Curborough and Middle Quinton proposals 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 in its deliberations on eco-towns.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R Roberts', with a large, stylized flourish at the end.

Councillor Rex Roberts, OBE
Chair
West Midlands Regional Planning Partnership

**Extracts from West Midlands Regional Spatial Strategy
Phase Two Revision – Draft Preferred Option
December 2007**

CF2**Housing beyond Major Urban Areas**

A. Beyond the MUAs, strategic housing development should be concentrated in and adjacent to towns which are capable of balanced and sustainable growth. These are the Settlements of Significant Development, namely Worcester, Telford, Shrewsbury, Hereford, Rugby, Burton upon Trent, Stafford, Nuneaton/Bedworth, Warwick/Leamington Spa and Redditch. These Settlements of Significant Development:

- i) act as sub-regional service centres
- ii) have the capacity to accommodate additional development without significant harm to local communities and in sustainable locations
- iii) are able to balance housing and employment opportunities and provide social infrastructure and services to meet the needs of expanded settlements
- iv) are able to deliver local regeneration priorities through new development
- v) either already have or are capable of developing good accessibility by public transport and through increased provision for walking and cycling.

B. Areas for new housing development, on a smaller scale, will also be accommodated within and adjacent to other urban areas, and market towns of the Region. These settlements, which need to be capable of creating balanced opportunities for housing and employment and which should already have a range of local services, will be identified through LDDs.

C. Development in villages should support the need to meet local housing requirements, particularly needs for affordable housing; and promote local regeneration or support the retention or creation of local services.

Development should be prioritised in villages which still have a range of services and within these, priority should be given to the reuse of previously developed land and the conversion of existing buildings.

Policy RR1
Rural Renaissance

A. Rural areas of the West Midlands will be regenerated through the improvement of choice in housing; the diversification of the rural economy; better transport links both within rural areas and between urban and rural areas; improving health, education, skills training, social, shopping, community facilities and other services, the sustainable use of environmental assets, and the prudent use of natural resources.

B. Policy priorities will vary according to a number of factors, including the quality of the environment, local character and distinctiveness, need for new employment, need for additional housing, including affordable housing, to meet local needs and stem population decline, and access to services and facilities.

C. In preparing their development plans, local authorities will need to have regard to the inter-relationship between urban and rural areas and to draw a general distinction between:

- i) rural areas which are subject to strong influences from the MUAs and which are relatively prosperous and have generally good access to services. For these, the main priority will be to manage the rate and nature of further development to that required to meet local needs, whilst ensuring that local character is protected and enhanced
- ii) rural areas which may be remote from the MUAs, with generally sparse and in some cases declining population, poor access to jobs and services. Here the main priorities should be economic diversification (PA14-15), affordable housing, better services and improved public transport.

D. Significant incidences of low income and social exclusion occur throughout the rural areas and should be addressed wherever they occur, although the most severe problems tend to be in the most remote areas.