

<b>Committee:</b>	Environment Committee	<b>Agenda Item</b>
<b>Date:</b>	17 June 2008	<b>6</b>
<b>Title:</b>	<b>Response to DCLG's Eco Towns – Living a Greener Future consultation</b>	
<b>Author:</b>	<b>Roger Harborough, Head of Planning and Housing Strategy, 01799 510457</b>	Item for decision

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## Summary

The Government is currently consulting on its proposals to take forward a programme of eco-towns including a shortlist of 15 locations which will be subject of a more detailed assessment. It is seeking views on the way in which the concept is being developed and the different potential benefits that an eco town could offer; how particular features can best be delivered; and preliminary views on the 15 locations. One of the locations is North East Elsenham in Uttlesford and another at Hinxton, Hanley Grange, abuts the district boundary north of Great Chesterford. The Government is proposing to publish a Planning Policy Statement (PPS) on eco-towns which would include the locations it would be prepared to support. Proposals would need to be submitted as planning applications to the local planning authority, which would determine them on the basis of the development plan any other material considerations including the PPS.

At the Full Council meeting on 22 April, it was resolved that “this Council is totally opposed to the development of an Eco Town north east of Elsenham, as proposed in the Department of Communities and Local Government’s consultative paper, “Eco Towns – Living a greener future” published on Thursday 3 April and will campaign to have this proposal removed from the shortlist. We will also support objectors to other locations that would be detrimental to our District.”

The recommended response has been guided by that resolution. It focuses on the inappropriateness of a national policy providing for development proposals with specific locations when the government put in place a revised development plan system in 2004/5 to settle such issues. A key component of that revised system is community involvement and stakeholder engagement with integrated spatial strategies reflecting a community led vision for the local area at county and district levels.

## Recommendations

That the Committee resolve the Council’s response to the Government.

## Background Papers

Eco-towns Living a Greener Future DCLG April 2008, which can be viewed at <http://www.communities.gov.uk/publications/housing/ecotownsgreenerfuture>

Eco towns: scoping report, Town and Country Planning Association, July 2007, which can be viewed at [http://www.tcpa.org.uk/downloads/20070727\\_TCPA\\_ecotowns.pdf](http://www.tcpa.org.uk/downloads/20070727_TCPA_ecotowns.pdf)

New eco-towns could help tackle climate change, DCLG news release 7 March 2007, which can be viewed at <http://www.communities.gov.uk/news/planningandbuilding/401185>

## Impact

Communication/Consultation	<p>The Council has carried out consultation on a smaller new settlement in the same location, as an element in its LDF Core Strategy Preferred Options. A summary of this consultation response will be included in the Council's representations to the Government.</p> <p>The Government expects promoters to consult on their proposals. The Fairfield Partnership is understood to be about to unveil a consultation website which will provide background and technical material to support its proposals with a feedback facility. The promoters are developing further elements to their consultation strategy.</p> <p>Cambridgeshire CC, Cambridge City council, South Cambs DC and Cambridgeshire Horizons are jointly conducting an awareness raising campaign leafleting households about the Hanley Grange proposals, including north Uttlesford.</p> <p>The Government proposes to consult on a draft national planning policy statement on eco towns supported by a sustainability appraisal in July. It also points to the environmental statement, community consultation and consideration of alternatives that would be part of the necessary planning application for any eco town development, which it expects would be determined by the local planning</p>
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	authority.
Community Safety	
Equalities	
Finance	
Human Rights	
Legal implications	
Sustainability	
Ward-specific impacts	Elsenham with potential transportation impacts over wider area; transportation and retail impacts in the North area.
Workforce/Workplace	

## Situation

### Basis on which the Government initially launched the Eco-towns initiative

In March 2007, the then Housing Minister Yvette Cooper announced that “new small zero carbon 'eco-towns' built on brownfield land could lead the way in cutting carbon emissions and building affordable homes”. The Government would consider plans for eco-towns put forward by local authorities as part of the New Growth Points scheme, stating that “forty-five councils had already come forward with plans for new homes and jobs to respond to serious housing pressures in their areas, and some authorities are also looking at plans for 'new settlements'.” Ministers would now consider these plans within the Growth Points scheme, “insisting on proposals for zero- or low carbon developments which make the best use of brownfield land. New eco-towns, of between 5,000 - 10, 000 homes, would have strong public transport links to nearby towns and cities. They would make the best use of brownfield land and could be built on public sector surplus land such as former MoD or NHS sites.” “Ministers believe these new developments could help drive the environmental technologies needed to ensure all new homes are zero carbon within a decade.”

### Relationship to the Uttlesford Local Development Framework Core Strategy

#### Preferred Options

The North East Elsenham location is the same as that identified in the Council’s Local Development Framework Core Strategy November 2007 Preferred Options consultation for a smaller new settlement of 3,000 homes, shops, community facilities, open space and workplaces, focused on Elsenham railway station and served by a frequent and high quality bus service. Those preferred options also included policies that 40% of such housing should be affordable, should provide a range of infrastructure including greenspace, development should meets the needs

of all users, reduce consumption of energy and water, minimise the production of pollution and waste, and incorporate facilities for recycling water and waste. Renewable energy and low carbon technologies would generally be supported for single buildings and neighbourhoods. However, it does not involve any brownfield land (redundant agricultural buildings do not qualify), or surplus public sector land, and the Council does not support a development on the scale sought by the Government.

#### Advice from the Town and Country Planning Association and Professor David Lock

In July 2007, the Town and Country Planning Association (TCPA) and Professor David Lock published practical advice to help bidders, local authorities and others on how the eco towns initiative could be taken forward. It was commissioned by the Government but was intended by the authors to be interpreted as “independent practitioner advice”. The advice saw local authorities wishing to participate submitting proposals in response to the government’s prospectus to gain “eco-town status”. In return for local authorities committing to “the creation of real sustainable communities” the advice saw the government providing resources “to increase the speed of the planning system, contribute financially to up front expenditure on comprehensive and contextual planning and infrastructure, and commit to steer all publicly funded programmes in the area to support the delivery of the scheme.” It saw different forms of partnerships being formed between landowners/ developers, local authorities or other public agencies to submit eco town bids, the schemes being for major new settlement projects brought forward through the mainstream planning system. The TCPA’s review of good practice produced a number of conclusions. These included:

- “The need for regional and sub regional planning rather than national specification – The lesson from our modern history is that the choice of new town or major urban extension is one that should be made through strategic design at the regional or sub regional level, not by application of fixed theory or sequence set out at national level.”
- “Longer time horizons – there needs to be a long lead time. It is not possible for a major urban extension or new town to yield completed homes or other development for a number of years, and implementation is almost certain to continue beyond current statutory development plan periods.”
- “The need for consensus – the project needs cross party support. The implementation will last longer than several electoral cycles.”

#### Issues raised by the North East Elsenham proposal

The Council’s community involvement on the LDF Core Strategy has identified substantial opposition to its Preferred Options including a 3,000 home new settlement at Elsenham. It may be anticipated that opposition to the eco town proposal for “a minimum of 5,000 homes and possibly more in the longer term” will be expressed on broadly similar grounds. At this stage in the government consultation, the DCLG sees the eco-town proposal in this location as bringing the following benefits:

- Good use of existing transport infrastructure (the London to Cambridge railway and road links to the M11);
- Provide additional housing in one of the most stressed housing markets in the region;
- It would build on existing local eco-initiatives, and comprehensive low carbon and renewable energy plans.

The Department of Communities and Local Government (DCLG)'s initial summary analysis of challenges and constraints has identified the following points:

- The small size of the watercourses means that there is limited capacity to discharge additional waste water;
- The location is one of high water stress and sustainable approaches to meeting demand will need to be demonstrated.
- Mitigation of potential for increased recreation in and around Hatfield Forest National Nature Reserve and Site of Special Scientific Interest;
- Need to resolve issue of access and capacity of local road network if up to 8,000 homes in this area are proposed, particularly in relation to access to Hall Road. Connections with the strategic road network also need to be considered, as does the relationship with any decisions that might be made about Stansted Airport.
- The scheme will include a range of new business sites with the aim of achieving 50% employment within the development. Stansted Airport is already a major employer.
- Nearby settlements include a number of listed buildings and other historic features including Elsenham railway station.

Officers have already raised with DCLG and Department for Transport civil servants, the Highways Agency and the respective promoters of the Elsenham and Hanley Grange eco-town proposals that the Transport Assessments (TAs) must include a sub regional perspective and consider the potential cumulative impacts of the growth now included in the recently approved Regional Spatial Strategy, particularly in the Cambridge sub region and at Harlow, the G2 development proposals at Stansted and either of the two eco towns and, as a worse case, both eco-towns. It has been accepted that this will be done. The TA must also involve Network Rail, train operating companies and bus operators to ensure that transport plans are viable.

Officers have also pointed out that the information published by DCLG on the social housing waiting list for Uttlesford is incorrect and the list for such housing is actually much shorter, comprising 1200 households, not 3,594. DCLG has accepted that this is the case.

### General process issues

Officers expect to meet the consultants commissioned by DCLG to carry out a sustainability appraisal which essentially must include a Strategic Environmental Assessment (SEA) complying with the EU SEA Directive. Whilst it is acknowledged

that this would not be as comprehensive as an Environmental Impact Assessment to accompany a planning application, it must include information which can reasonably be provided on the likely significant effects of the proposals and alternatives to them. Those alternatives must be any reasonable strategic alternatives to fulfilling the objectives of the eco towns PPS. Whilst it is possible that the consideration of alternatives will include those bids for other eco towns that were not included in the Minister's April announcement, it is not clear, for example, if the SEA will consider ways of reducing domestic emissions other than promoting the delivery of a proportion of new build homes as eco towns: this might be through urban regeneration and/or extension opportunities, and measures to secure better energy efficiency of the existing housing stock. The Government's objectives of the eco town initiative appear to be a speeding up of the delivery of market and affordable housing to meet needs and at the same time provide outstanding quality of built environment and green space, respect for environmental constraints and cutting carbon emissions.

There is a lack of clarity as to whether the Government is seeking to identify locations for eco towns and the right policies to secure its objectives, or whether it is considering specific proposals from promoters. It talks about eco towns being a set of national demonstrator projects to pilot new approaches involving design for zero carbon and more sustainable development at a whole town scale; to explore the potential of well designed new settlements as one element in increasing housing supply alongside growth in existing towns and cities; and to use the opportunities of large scale construction to improve the design and deliverability of affordable housing. Its assessment process seems to focus, therefore, on proposals.

The DCLG has set an extremely tight timescale for financial and technical assessments to look at the feasibility and viability of proposals, infrastructure requirements, their cost and the potential for these to be paid for by the development; transport assessments and sustainability appraisals and other assessments covering flood risk, water, land contamination and bio-diversity. Whilst some work has been done for the Fairfield Partnership on the Elsenham proposals at the 3,000 home scale and made available, further information on a higher level of development is awaited. It is not clear how much will be available to inform the sustainability appraisal, which needs to be complete by the end of June. There will be questions consequently about the robustness of the appraisal that will support the consultation draft PPS to be published in July. The transport assessment and water cycle study for Elsenham are requested by the end of September to inform the decisions on the final PPS in October, but will not be subject to public consultation because of the pressure to reach a national policy decision in October. The technical work to support the Hanley Grange proposals seems no further advanced than that for Elsenham.

#### Lack of clarity about ultimate size, lead times and phasing

The Elsenham proposals are described being for a minimum of 5,000 homes and possibly more in the longer term. Whilst it is stated that the Hanley Grange site would accommodate 8,000 homes, it is understood that there are potential phasing issues. The promoters have not resolved how many homes would be expected to be

delivered in particular periods. Lack of clarity for both proposals over lead times, development programmes and ultimate size would have significant implications for service provision planning (primary and secondary schools for example), housing strategies, transport strategies, and viability. The TCPA practitioner advice pointed to the need for long lead times. It is difficult to see eco-towns making a positive contribution to the Government's national aim of delivering 240,000 homes a year by 2016. That aim itself appears not to be feasible and subject to revision in the light of the current state of the housing market.

#### Issues raised by the Hanley Grange proposals

In addition to landscape impact, two key issues for Uttlesford arising from the Hanley Grange proposals are expected to be potential transport impacts and retail impacts. The scheme represents a significant departure from the spatial strategy that has now been developed for the Cambridge sub region. This has sought to locate strategic scale development in urban extensions to the city and at Northstowe where it will be served by high quality public transport and there is potential to reduce commuting and other trips by car. A new settlement larger than Saffron Walden (6291 households in 2001) 5 miles and 15 minutes travel north of the existing town centre would inevitably result in changes to consumer expenditure patterns.

#### Additionality

The requirement that eco-towns would deliver additional homes to those provided in existing plans but would count towards revised housing targets determined through partial regional spatial strategy reviews creates a significant problem for authorities like Uttlesford that have not yet reached adoption of an LDF core strategy. South Cambridgeshire has adopted its strategy and Hanley Grange is not included. That proposal would clearly be wholly additional to (and inconsistent with) that strategy. In Uttlesford's case, DCLG has suggested in discussions that the North East Elsenham proposal would deliver 2,000 homes in addition to the 3,000 proposed for the same location in the core strategy preferred options. However, this is no more than one interpretation of the potential implications of the proposed national eco-town PPS. It is more than likely that if the final version were to confirm the position as it currently stands at the pre-draft consultation stage, at the public examination of its core strategy, the Council will be faced with claims from those promoting alternative strategies that all 5,000 plus proposed at Elsenham should be regarded as an additional contribution and that provision in the core strategy should still be made for 4,200 homes elsewhere.

#### Summary

Local Development Frameworks are the appropriate mechanism for achieving integration of spatial and other strategies. If higher levels of housing provision are justified then this should be tested through the development plan process. An attempt to reduce lead times by PPS could be counterproductive in terms of achieving the exemplar schemes sought by the government.

**RECOMMENDED that**

The following points be made in the Council's response to government on the Eco-towns – living a greener future consultation document.

The Council is opposed to North East Elsenham, Hanley Grange or any substitute location in the sub regions in which it sits being identified in a national planning policy statement as locations that have the potential to be an eco town;

Local planning authorities should determine through their Local Development Frameworks whether there are local circumstances that would favour an eco-town as an appropriate way of delivering housing to meet identified needs and achieve quality in the built and natural environment, a sustainable form of development with jobs, services, facilities, public transport links, the opportunity to make trips by walking and cycling and reduce carbon emissions. Where there is the potential and need for a strategic scale development this should be identified through the Regional Spatial Strategy review process. The ultimate size of any eco-town should be established through the development plan process. The local development framework route would avoid the ambiguity about additionality.

The process of preparing a national Planning Policy Statement on eco-towns and encouraging the submission of planning applications is being rushed. It prevents the development plan system from testing the inter-relationships between new and existing settlements, the implications for transport planning and fit with integrated spatial strategies and community strategies. It risks inadequate assessment of all the implications and prejudices the ability to secure the community involvement that is meant to be at the heart of the new planning system.

**Risk Analysis**

Risk	Likelihood	Impact	Mitigating actions
The proposed national PPS on eco towns would undermine the Council's corporate priority of protecting and enhancing the environment by	2/3 The Government's consultation document indicates that it is planning a draft PPS in July and a final PPS in	3 The local communities most affected by the shortlisted North East Elsenham proposal have been	Respond to the Government expressing opposition to the proposed PPS, and the identification of North East Elsenham, Hanley Grange or any alternative locations that would have a detrimental impact on the district.

<p>managing development and delivering affordable housing through the local development framework.</p>	<p>October</p>	<p>overwhelmingly negative about a similar but smaller development in this location. Their concerns are likely to be greater in most respects about a larger development. The prospects of existing residents positively engaging with an eco town proposal seem remote. The Hanley Grange proposals are strongly opposed by Cambridgeshire authorities, GCP and Cambridgeshire Horizons.</p>	<p>Liaise through the Local Government Association and other networks with similarly minded authorities to inform respective responses and achieve a coordinated response.</p>
<p>Deficiencies in information.</p>	<p>4. Further work is required: Technical assessment on environment, transport and community aspects of schemes is ongoing</p>	<p>3. Environmental impacts, deliverability and affordability of proposals need to be fully assessed.</p>	<p>Officers to track DCLG assessment process</p>