



Campaign to Protect
Rural England

Eco-towns: living a greener future

A response by CPRE to the DCLG consultation paper

June 2008

Introduction and summary

1. CPRE welcomes the opportunity to respond to this consultation. We support the Government's aspirations for more sustainable, affordable housing. For eco-towns to be truly sustainable, and exemplar schemes for others to follow, they must be built and planned in the right way. As well as achieving the highest standards on site, their relationship with surrounding areas, communities and the existing built and natural environment will be crucial. To succeed, the towns will need to win the support and commitment of local communities.

2. Through our network of county branches, regions and district groups, CPRE volunteers play an active role in local planning matters, scrutinise thousands of planning applications a year and respond to consultations on local development plans and regional planning guidance/spatial strategies. We have consulted our branches and regional groups in responding to this consultation and ran a day long seminar on eco-towns for our volunteers on 10 June. Notes from this event are attached as an annex to this response.

3. Our response to this consultation focuses mainly on general principles underpinning the eco-towns programme. We have not commented in detail on the provisional shortlist, leaving this to our branches and regional groups who are submitting their own responses. A summary of our concerns and recommendations is given below. This is followed by more detailed comments.

Key points:

- due to their location most of the shortlisted eco-towns are unlikely to achieve sustainable transport arrangements: instead they are likely to be car dependent commuter towns;
- sites are mainly greenfield and include some farmland including, in some cases, the highest grade agricultural land; two sites lie in the Green Belt;
- four schemes are proposed in the East of England, a region where water supply and sewerage are already at maximum capacity;
- the approach to site selection has not been plan-led, goes against established plans agreed with local communities and is based on random bids rather than sound planning;
- an unwarranted level of secrecy and uncertainty has surrounded the initiative since it was announced;
- communities are being asked their views on schemes about which little information has been made available;

- there is a worrying lack of evidence demonstrating that schemes will offer truly sustainable models of living and working;
- it is misleading for ‘zero carbon’ to be defined as being ‘across the whole development’ and then to qualify this by saying the measure only applies to buildings since transport accounts for a significant proportion of carbon emissions;
- the insistence that eco-towns should be ‘freestanding’ makes no sense since most new development should be in and around towns where infrastructure is already in place or is more easy to provide.

Recommendations

CPRE makes the following recommendations as a basis for moving forward with this initiative:

- the process should be plan-led – the Government should reject all eco-towns proposals which conflict with local and regional development plans;
- the Government should focus on doing one or two eco-towns properly, and reject sub-standard proposals;
- the Government should initiate a programme of eco quarters, inviting existing neighbourhood, towns and cities to submit proposals to become ‘eco-towns’ or to develop eco-quarters or neighbourhoods;
- a ‘zero-carbon’ approach should apply to the settlement as a whole, and cover transport as well as buildings;
- all new developments, regardless of size, should be required to meet stringent environmental standards, for example, the DfT should adopt the transport worksheet as policy;
- an integrated approach to transport, across a district as a whole, should be taken to maximise potential for journeys to and from eco-towns to be made in a sustainable fashion, rather than relying on unproven technologies such as Personal Rapid Transit;
- consideration should be given to pioneering “Sustainable Transport Demonstration Districts”, the logical next step beyond Sustainable Transport Demonstration Towns;
- each eco-town should have a car-free centre at its core as well as car free residential areas; and
- the forthcoming planning policy statement on eco-towns should reinforce the plan-led approach and focus on principles that apply in a wide range of circumstances, such as within existing settlements. The PPS should avoid being site or location specific.

Detailed comments

Overview

4. CPRE supports many of the aspirations behind the Government's eco-towns programme. In particular, the aim of achieving between 30-50 per cent affordable housing, a range of facilities and zero carbon development (although we believe this should also cover transport related CO2 emissions), and exemplar technologies.

5. With one or two exceptions we are, however, disappointed with the shortlist. Many of the schemes on the provisional shortlist are in remote, unsustainable locations and conflict with established development plan policies as set out in Regional Spatial Strategies (RSSs), local plans and Local Development Frameworks (LDFs). At the same time better locations, such as Carrington in the North West, where an opportunity existed to clean up land and provide local services failed to make the shortlist.

6. Leading transport experts, including Sustrans, Campaign for Better Transport and Car Free UK have deemed nine of the shortlisted locations as unsuitable on transport grounds (*Joint letter from 6 NGOs to Caroline Flint*, May 2007). Evidence suggests that due to their location the majority of shortlisted schemes would, if built, become car dependent dormitory towns. This has turned out to be the case at Cambourne, a new settlement commended for its environmental credentials. 95% of Cambourne's households have a car (the national average is 75%), 56% have two or more cars, 81% of working residents drive to work while the national average is 55% (*Lessons from Cambourne*, Stephen Platt, Cambridge Architectural Research Limited, 2008).

7. We believe the majority of locations should be rejected on social as well as environmental grounds. Due to their location it will be hard for them to offer the right conditions for sustainable communities to thrive. Should fuel become scarce or prohibitively expensive, these communities may become stranded and the towns risk becoming urban wastelands, deserted and abandoned in future.

The way in which the eco-towns concept is being developed

8. CPRE supports many of the aspirations behind the eco-towns programme and endorses the criteria in the prospectus, with the exception that eco-towns should be freestanding settlements. In our view, the process and development of the eco-towns concept go hand in hand. We believe the approach the Government has taken with this initiative to date, however, has been unfair on communities and damaging to the statutory planning system.

9. The secrecy surrounding much of the process has been unhelpful and has caused much worry and speculation among potentially affected communities. This could largely have been avoided had a more open approach been adopted from the outset and more attempt made to follow statutory planning procedures by calling, for example, for expressions of interest on sites that are already coming through the planning pipeline. The lack of concrete information available for many proposals makes it very difficult to know exactly what we are being consulted about. This is particularly the case with regard to Pennbury in Leicestershire, for example. Here, the Co-Op did not make information available until a late stage in the consultation process. The information they released was vague and lacking in specific detail, thereby limiting the value of the consultation. In Cambridgeshire, for example, we understand local authorities are being asked to devote time and effort to consider poorly worked up proposals when their planning staff already have a full workload dealing with growth plans at Northstowe and around Cambridge.

10. CPRE welcomes the production of eco-town worksheets produced to guide the development of eco-towns. We commend the transport worksheet, in particular, and recommend the Government consider adopting this as policy. On the evidence so far, however, we question the extent to which worksheet principles will be taken forward in the development of the towns. Northstowe, for example, was originally intended to be a prototype eco-town, but we understand that earlier plans have been watered down. Cambourne, commended for its green credentials, has above average levels of car use and ownership. There appears to be a gap between rhetoric and reality, i.e. between what ministers say, the requirements in the eco-town prospectus, the eco-town worksheets, and the consultation paper; and what is happening in practice.

11. Caving into pressure from housebuilders by no longer requiring homes in eco-towns to meet Sustainable Code Level Six is a further example of this watering down and failure to ensure eco-towns are genuinely environmentally sustainable communities. At least three shortlisted schemes fail to meet the Government's own criteria that eco-towns should be freestanding settlements; two would be on Green Belt (despite Government claims to the contrary) and claims about reusing brownfield land appear wildly exaggerated.

12. With regard to the relationship between the planning system and eco-towns the Government seems to be making up rules as it goes along. The method whereby sites have been selected, inviting bids from developers, is alien to the planning system, while the Government did not announce that it intended to publish a draft planning policy statement on eco-towns next month until this April. We were initially told that homes built in eco-towns would be on top of planned provision. Recent, albeit welcome, statements by officials and ministers suggest that homes provided in eco-towns will now count towards current development plan targets. There remains some ambiguity since the consultation paper (page 8, paragraph 3i) referring to eco-towns, rather than homes, says 'they need to be additional to existing plans'. This begs the question of whether an eco-town is the most sustainable option for providing new homes compared with what is set out in the plan. Or does this mean that an eco-town location is to take priority over development on sites which are already planned in LDFs?

13. Several shortlisted locations have previously been assessed through the planning process and rejected as unsuitable. For example, proposals have been put forward in the past at Curburough, Bordon, Rossington, Ford Airfield, Marston Vale, Pennbury and Hanley Grange. Particularly where sites have been rejected as unsuitable, it seems unfair to ask planning authorities to repeat a process they have recently gone through.

14. From the outset CPRE questioned the criteria for eco-towns set out in the prospectus, which stipulates standalone new settlements. New towns are not always the most sustainable option for accommodating housing growth. While CPRE has always accepted the need for some greenfield development, we believe a sequential approach should be taken. This should look first at opportunities to reuse buildings and brownfield land and then at urban extensions and only at new settlements after these more sustainable alternatives have been considered and none are found to be available. It is notable that the case studies shown in the Eco-towns Prospectus are not stand-alone settlements, such as Freiburg and Vauban. These are both successful schemes within existing towns. This raises the fundamental question of why the requirement was created for sites to be stand-alone in the first place.

15. Many of the shortlisted sites lie in areas prone to flooding. Four eco-towns are proposed in the East of England, a region which faces severe water and sewerage capacity constraints. According to Defra, the Coltishall scheme in north Norfolk lies in 'an extremely sensitive catchment, directly upstream of the Broads'. They note that the 'environment may not be able to accommodate this level of development (*Eco towns: Review assessment summary*, March 2008 – cross departmental assessment by DfT, CLG, Defra and statutory agencies).

Relationship to the planning system

16. CPRE is an advocate of the plan-led system. We played a key role in the inception of the modern day system which led to the passing of the 1947 Act and subsequent legislation, including the 1991 Planning and Compensation Act. The 2004 Planning and Compulsory Purchase Act reaffirmed the plan-led system. We are dismayed by the apparent ease with which the Government seems to be casting to one side the system it has played a large part in shaping. We believe the Government has made a big mistake in pursuing the eco-towns programme in the way it has done, ie. following procedures which are completely alien to and which undermine the statutory planning process.

17. Well prepared local and regional plans provide certainty to decision makers, investors business and the wider community and reduce delay. They enable proposals to be tested in the light of evidence, local circumstances and concerns and foster consensus over the scale, nature and location of new development. Development plans are the basis for sound, transparent decisions and achieving good outcomes on the ground. Far from being an obstacle to development, planning is the key to its successful delivery. Well crafted plans minimise the need to travel and foster accessibility, eg. through mixed use and measures to achieve a broader range of land uses in an area.

18. Development plans inform the plans of others, such as those providing education, health, utilities and transport services. The fact that the eco-towns initiative has been pursued outside the statutory planning process poses a challenge for anyone working to ensure development and related services are properly planned and co-ordinated to achieve sustainable outcomes.

19. According to the eco-towns prospectus, the interdepartmental review of schemes by DEFRA, DfT and the statutory agencies will in no way 'prejudge the role of the planning process', yet this seems to describe exactly what is happening. We understand that all eco-town proposals will be subject to a planning application. Yet the starting point for agreeing where development should take place is the development plan, not a planning application. The plan enshrines the principle of whether development is acceptable. Most of the shortlisted proposals are contrary to local and regional plans and would jeopardise their delivery. Planning authorities can rightly be expected to reject proposals that are contrary to their development plan.

20. We believe it is draconian, anti-planning and against the spirit of recent planning reforms to require development plan reviews to 'retrofit' shortlisted eco-town proposals and planning authorities to approve applications for new towns which go against their development plan. We doubt this approach is consistent with EU procedures with regard to Strategic Environmental Assessment which requires alternatives to be tested in the light of sustainability implications. We urge the Government to make clear in forthcoming eco-towns guidance or PPS, that development plan reviews should consider a range of options for meeting housing and other needs and adopt a sequential approach which gives priority first to re-using buildings and brownfield land within settlements and second to urban extensions. New settlements should only be considered where more sustainable alternatives are not available to meet identified needs.

Effect of eco-town proposals on existing plans and polices

21. CPRE believes that building a new settlement at the majority of the shortlisted locations would jeopardise the achievement of current plans, including plans the Government has endorsed. This would make it harder to secure new housing and other development on planned sites (eg. at Northstowe, and Cambridge sub-region). Developing a new town at Pennbury would undermine the East Midlands Regional Assembly's strategy of urban

concentration which allows for urban extensions but not freestanding settlements. Similar issues arise with regard to schemes proposed in the West Midlands (Curborough and Middle Quinton) and in the South East (Ford and Weston Otmoor).

22. The East of England and South East regional assemblies have voiced concern about the impact developing an eco-town at Marston Vale would have on existing growth plans for the Milton Keynes sub-region, commenting on 'the potential implications for other major developments that are part of this strategy (in terms of diverting resources)'.

23. In the West Midlands the Regional Assembly believes both sites in the region are inconsistent with the Regional Spatial Strategy (RSS 11). Their main concerns are that the proposals would encourage unsustainable migration into the Shires thereby exacerbating environmental and affordability problems in the countryside and undermining the focus in the regional strategy on regenerating urban areas.

24. Planning Policy Statement 3 *Housing* (PPS 3) requires local planning authorities and Regional Planning Bodies to apply the principles of 'Plan, Monitor, Manage'. Local planning authorities are expected to prepare a housing trajectory and a previously developed land trajectory, including strategies for bringing back derelict land and buildings into use. Most of the eco-towns shortlisted will make it harder for LPAs and RPBs to apply these principles.

25. Eco-towns may make a relatively modest contribution towards overall housing supply, but their ramifications are significant. It is vital that eco-town proposals are consistent with agreed levels of development set out in regional and local plans – indeed they should be a means of delivering these plans not of undermining them. We strongly welcome the minister's recent statement that the towns will count towards current housing targets set out in development plans. As well as determining the number of homes that should be built, the development plan usually determines the location of new development. We urge the Government to look again at this issue. The planning system relies on a clear, consistent policy framework and, as a quasi judicial system, case law. What are the consequences of approving development on this scale, contrary to and which could jeopardise the achievement of regional and local plans, including plans for new housing, regeneration and other development?

26. It is unclear whether the proposed PPS will include site or location specific information. Should this be the case, the PPS will almost certainly require a Strategic Environmental Assessment under EU regulations. So as not to undermine the statutory local and regional planning process we recommend that the PPS focuses on general principles only and is not site or location specific.

27. We urge the Government, to consider as part of the sustainability appraisal, sites and schemes that are already enshrined in plans as possible alternatives where eco-town principles could be applied, whether in a neighbourhood, urban extension or urban quarter.

Urban regeneration

28. There is a danger that eco-towns will distract from urban regeneration, given current market conditions, limited resources and developers' preference for green fields (Kate Barker acknowledged this in her review of housing supply, referring to brownfield land market failure). A number of bodies have voiced concerns, including those charged with delivering housing growth. Cambridgeshire Horizons, the organisation responsible for growth in the Cambridge Sub-region, has warned that a new settlement at Hanley Grange could make it harder to deliver on existing planned sites, including Northstowe, by diverting resources away from these areas. The Leicester Regeneration Company and City Council have both expressed concern about the effect that building a new town at Pennbury would have on the

city's regeneration plans. A new settlement at Ford, West Sussex will divert resources away from Bognor Regis and Littlehampton thereby undermining regeneration plans for these towns.

Brownfield?

29. The eco-towns prospectus gives the impression that eco-towns will make extensive use of brownfield land. This does not appear to be the case in practice. An assessment of sites on the ground reveals that they are predominantly greenfield. Some sites contain the highest grade agricultural land (see Annex 1). 12 of the 14 proposed eco-towns may be building on 60% or more greenfield land (see Annex 2). This in our view is unnecessary, given the significant opportunities that exist on brownfield urban land to meet development needs and the need to conserve productive agricultural land. PPS7 indicates that the presence of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (e.g. biodiversity and the quality and character of the landscape) in development decisions. A substantial proportion of land at the former Ford airfield although described by the developer as 'brownfield', is Grade I agricultural land.

30. Last year, Yvette Cooper, then planning minister, in her answer to a parliamentary question on whether airfields should be treated as brownfield, said 'airfields are treated in exactly the same way under PPS3 as under the previous PPG3. Whether airfields, or former airfields, are considered as previously developed land will depend on local circumstances. It is for local authorities to judge in individual cases whether an airfield or former airfield should be treated as previously developed land' (Hansard, 8 February 2007). Several of the shortlisted locations are airfields.

31. There is no case for a major programme of greenfield development given that the National Land Use Database identifies around 27,000 hectares of brownfield land suitable for housing, enough for more than a million homes (*Previously Developed Land that may be available for development*, CLG, 2007). Evidence suggests this potential is far greater since NLUD does not accurately reflect availability of small sites under 0.25 hectares and relies on local authority returns. Research by CPRE found that local authorities seriously underestimate the availability of brownfield land in their area and in particular the potential from small sites (*Untapped Potential*, 2007). We understand this greenfield option for eco-towns may have been a deliberate choice on the part of the Government on the basis that the uplift value would pay for affordable housing, services and infrastructure. In our view this approach is shortsighted and will not deliver the sustainable outcomes the Government seeks.

32. Rising food and fuel costs, together with increasing competition highlight the importance of issues such as food security. This suggests that every effort should be made to retain our ability to grow food in future by conserving productive land.

33. A comprehensive assessment of the likely consequences of allocating so much greenfield land for development will be vital given current weak housing market conditions. We fear there is a danger that having more land allocated than the market requires will lead to developers cherry picking greenfield sites in preference to less profitable brownfield locations. Kate Barker in her report to HM Treasury on housing supply and affordability (*Final report*, 2004) acknowledged that developers prefer greenfield sites, referring to 'brownfield land market failure'. This assessment should be made as part of the sustainability appraisal.

How will eco-towns be different?

34. For the eco-towns initiative to have credibility, schemes should be subject to the same rigorous tests as any other new settlement proposal. In addition, they will need to achieve exemplary environmental standards and create conditions for sustainable lifestyles. Rejected development proposals - those that failed to win planning approval in the past - should only be considered where concerns that led to their being rejected in the first place have been satisfactorily addressed.

35. On the subject of zero carbon, we agree with the consultation paper that this should apply to all buildings, not just homes. We believe, however, that consideration should be given to reducing all transport related carbon emissions. The Eco-towns challenge panel highlighted the need to reduce our carbon emissions by 80-90 per cent and our ecological footprint by two-thirds if we are to be sustainable.

36. We recommend that any measure of zero carbon should apply to the settlement as a whole and take a lifecycle/whole life approach, in particular, to energy used by vehicles, whether road or rail based, as well as buildings. If this is not the case savings made through better building design stand to be lost through increased emissions as a result of an increase in travel by car, long distance commuting (irrespective of mode) and transportation of goods, construction and demolition material via motorised transport.

37. Consideration should also be given to assessing the carbon impact where an eco-town is to be built on agricultural land capable of growing food crops and which would therefore require more food imports or more energy intensive agriculture on less suitable land nearby.

38. CPRE would expect eco-towns to pioneer innovative approaches to energy, water, waste and transport as a matter of course. Given the urgency with which we need to respond to climate change and increasingly expensive and scarce energy resources, we believe consideration should be given to piloting 'carbon quotas' in eco-towns. These could play an important role in securing behavioural change among households and businesses: eco towns would seem an ideal opportunity to pilot these. Action is urgently needed to promote the take-up of benign technologies such as photovoltaics (pv). We lag far behind our European counterparts, Freiburg has more pv installed than the whole of the UK. The main constraint is the absence of feed-in tariffs which enable surplus electricity to be sold back to the grid at an attractive price for householders. As well as making the technology cost competitive, the introduction of feed-in tariffs would bring wider benefits, eg. job creation and increased fuel security.

39. CPRE broadly supports the proposed approach to the provision of green space set out in the consultation paper and associated TCPA worksheet. We recommend that consideration be given to creating new Green Belt where appropriate.

40. Much of the debate and eco-towns material focuses on the built footprint of the new towns. It is vital that eco-towns are developed in a way that takes into account the wider development 'shadow'. This extends far beyond the developed footprint of the site and can be minimised where building occurs on urban brownfield sites where infrastructure and public transport are already in place. We would draw your attention to safeguarding qualities such as dark skies and tranquillity which are hugely beneficial but all too often dismissed as soft features which are difficult to value in policy making and operationalise in practice.

41. The link between eco-towns and the surrounding landscape and communities is poorly addressed in the consultation paper. Measures to foster diverse local economies which place a high value on distinctiveness, stewardship of the land and landscape, local skills and sourcing

of local food and produce are needed. CPRE is currently working on a major project which is looking at local food supply networks.

More sustainable travel?

42. While we welcome the aspirations expressed towards continental best practice, there remains a significant credibility gap in light of the number of schemes which are predicated on substantial increases in highway capacity. Further there are two fundamental transport issues that have hardly been examined let alone resolved; first the relationship between eco-towns and their surrounding districts and second how sustainable transport can be maintained over time as developer support runs down.

43. Unfavourable press coverage has both parodied eco-towns as “eco-prisons” and raised the issue of gridlock. CPRE believes that the failure to positively integrate the transport of eco-towns into the surrounding districts is largely to blame. So far new bus services have been suggested or vague promises for new train services or reopened lines. Rail connections are crucial as people are much less likely to give up their cars if they are not within easy reach of a rail station, i.e. a short bus or cycle ride away. However major new infrastructure would leave limited developer funds for other aspects of sustainable transport, while potentially taking funds away from more regionally important projects, another reason why CPRE would prefer eco-developments in existing settlements.

44. Designating the areas up to 10 miles around new eco-settlements into *Sustainable Transport Demonstration Districts* (STDDs) would help integrate transport, while piloting initiatives which could be copied elsewhere; it would be the logical next step after the success of the Sustainable Transport Demonstration Towns. The possibility of a tie-in with rural regional Integrated Transport Authorities (as an alternative to the city-region model) should feature in at least one eco-settlement, perhaps particularly suitable for a site close to an authority boundary.

45. CPRE recommends that all eco-towns should have ITSO smartcards on local public transport and provide the means of accessing a car club. As well as giving eco-town residents a discount on local public transport along the lines of the German ecocards “Umweltkarten”, such smartcards should show the carbon footprint from travelling whether by bus or car club. All bus services in the district should have GPS to allow real-time information, whether from home or via mobile phones while on the move. Surrounding villages should also have car club bays, both to encourage their residents to use car clubs as well as providing flexibility for eco-town residents. All residents in the district should be offered Individualised Travel Marketing, which would be ongoing to encourage people to keep travelling sustainably as their lives change, so as to reduce the burden on existing highway networks and free up space for bus, cycle and pedestrian priority measures.

46. We believe that Community Transport Trusts (CTT) could form the core of the STDDs, operating a Demand Responsive Transport (e.g. taxibus) service from the eco-town out into the surrounding area and vice versa. The size of the proposed eco-towns are likely to be too small to support regular bus services in all directions so this would be a useful compliment. The CTT could also operate the car club, hire out bicycles and trailers plus offer a freight/delivery version of a taxibus, i.e. a Demand Responsive Freight Transport, to assist carfree households with larger deliveries. By being locally based the CTTs could offer local employment while using vehicles powered by locally produced electricity or biogas.

47. Rights of Way Implementation Plans (ROWIP) need to be updated in the area surrounding the eco-towns to provide a better network of paths into surrounding countryside both to provide for leisure trips, whether a quiet stroll or jogging, and also for utility trips, whether to work, a farm shop or local pub, away from busier local roads. Because Northstowe

was considered as part of the planning process, Cambridgeshire planned its needs into the county's ROWIP in advance. The process should start early to ensure potential conflicts with landowners can be resolved by consent rather than lengthy procedures. Securing additional staff and resources will be essential.

48. Besides waymarking, status and surface upgrades of paths, there will be the need for some on-road measures such as use of the Quiet Lanes designation, reduced speed limits as part of a Rural Road Hierarchy including 40mph as default where a separate path for those walking and cycling cannot be provided. Some motor vehicle access restrictions may be needed, for example at peak hours on lanes subject to rat-running. There also needs to be a credible strategy as to how funding is to be continued after the initial two to five year period after which s106 contributions from the developer are likely to end. This will be vital given the current financial squeeze and the risk that developers may prefer schemes that achieve headlines and are capital based, such as PRT, rather than ongoing subsidy for things proven to work such as ITM.

49. Ways to provide ongoing revenue funding need further exploration. Vauban in Germany has pioneered the principle that any resident who owns a car should be expected to pay a significant fee. This is reinvested in the community and helps discourage private car ownership. Existing parking fees barely cover administration costs for Controlled Parking Zones and do not represent the market value for the space taken up or other externalities.

50. The commitment to low modal share for private motor transport should be backed up with a strategy to explain what would happen if target modal shares were not achieved. Suggested ideas include financial penalties for the developers (such funds to be used to improve public transport) and greater restraints on motor traffic. What happens though if the new community is simply not popular and half empty?

51. Funding requirements are likely to differ for each eco-town, as potential for different modes may vary depending on the site. The incentive of free public transport may be unaffordable, though it may make sense at least when the settlement is only partly built and there are limited inhabitants. Long term funding arrangements are essential. For example, it would be better for funding to subsidise public transport for eco-town inhabitants after the initial period rather than to try to extend the initial period.

52. Research from the Sustainable Transport Demonstration Towns has shown that cycles have almost twice the potential to substitute car trips than public transport. So every eco-settlement should offer vouchers towards a free cycle along with incentives such as free cycle training and servicing for a couple of years. Besides being good value for money, a Health Impact Assessment of such support for cycling would be likely to show high benefits.

53. Ideas based on continental norms such as 15mph speed limits and greater priority for walking and cycling have been suggested for eco-towns and would be welcome. However non-standard speed limits and signs will require individual site specific authorisation from the DfT. Information obtained in May 2008 by CPRE has shown that it has taken the DfT up to three years to approve such signs in individual cases.

54. The DfT needs to update the Traffic Signs Regulations urgently to include signs which have already been successfully trialled for a decade, such as two-way cycling on one-way streets, restricted parking zones and elephant's footprints. The DfT also needs to ensure it has sufficient staff resources to consider the authorisation of pilot signage otherwise developers will not be able to innovate given the tight timescales involved. The liability of drivers towards the safety of vulnerable road users is much less onerous in English civil and criminal law than on the continent and we have concerns that this may affect the priority likely to be given to those walking and cycling.

55. There will need to be a specific commitment from local police to provide a high standard of enforcement, in particular against breaching speed limits and careless / inconsiderate driving, and maximum use made of Civil Enforcement powers (decriminalisation), both within and in areas around the eco-settlement, including car parking and access restrictions on surrounding rural roads.

56. Finally, there needs to be a plan to provide for alternatives to the car and local services when the first residents move in at a time when the site is still being completed, something that can take years. This is not just relevant for public transport options but also the issue of severance for vulnerable road users as high flows of construction vehicles may make local roads unsuitable if not unsafe for them. In Cambourne, for example, new residents found themselves separated from the centre by a large construction site. It will be important that contractors commit to the highest training and safety policies to protect vulnerable road users.

Transferable lessons?

57. Lessons from eco-towns will be of limited relevance elsewhere unless they address seemingly intractable challenges, such as land remediation and car dependency. This is one reason why we are so disappointed that the proposal for an eco-town in Carrington in Cheshire was not shortlisted. We understand that circumstances here have become much more favourable to development than when the initial bid was made with an area of land subsequently becoming available. We urge the Department to look again at this option.

58. Eco-towns represent at most 7 per cent of the 3 million new homes the Government is seeking to build by 2020. To keep the impacts of climate change within manageable parameters requires at least an 80% reduction in carbon emissions (on 1990 levels) by 2050. 70% of today's homes will still be with us in 2050 therefore gains to be achieved from raising environmental standards in existing homes are greater than what can be achieved from new development, including new eco-towns.

59. We believe that regenerating derelict land and bringing back into use empty buildings should take priority over creating new settlements from scratch. Most new development will, or should continue to take place within and around existing settlements, while the greatest environmental gains can be made by measures to 'green' existing property. It is in these areas that we urgently need exemplar schemes, not in remote rural locations. Criteria for eco-towns currently requires them to be stand-alone settlements, yet there is a compelling case for schemes to be based around urban renaissance, such as 'eco-extensions' or 'eco-quarters'. Such a programme based around sites which are already allocated in plans, combined with measures to 'green' existing buildings and neighbourhoods is likely to win the support of planners and communities. Since the majority of new development will continue to take place in and around towns, the potential for transferable lessons would be far greater. We recommend the Government initiate a programme of eco-quarters and give serious consideration to these when considering alternatives as part of the Sustainability Appraisal (SA) process.

Views on locations

60. On the basis of information currently available we have considered these locations in the light of our ten tests for eco-towns (February 2008). Our preliminary views are set out in Annex 1.

61. In general, we are more sympathetic towards eco-towns proposals which are consistent with established development plans. Provisionally, CPRE supports the development of an eco-town at Bordon, subject to safeguards to address landscape, transport and ecological

effects, in particular. We are sympathetic towards the principle of eco development at some of the proposed sites around St Austell in recognition of the acute regeneration needs of this area.

Alternatives

62. We recommend that as part of the sustainability appraisal a wide range of options should be tested for meeting development and meeting housing needs. We believe it is vital that this is not restricted to freestanding settlements or to sites capable of accommodating 5,000 homes. With regard to the latter, eco-town proposals shortlisted for Rossington and St Austell do not appear to include a single site capable of delivering this many homes, and both propose development on several separate sites. Most new development will or should take place in and around urban areas on sites of varying sizes. To ensure lessons learnt are relevant to a wide range of circumstances we recommend consideration be given to identifying potential eco-developments of different sizes in a range of circumstances, but with a strong emphasis on re-using urban brownfield land and buildings. Evidence suggests the potential on small brownfield sites is seriously underestimated (*Untapped Potential*, CPRE, 2007). We believe smaller, local housebuilders will have a key role to play in providing new homes which are responsive to communities' concerns. We suggest more emphasis should be placed on the potential contribution they could make in terms of innovation and exemplar schemes.

63. We recommend the Government reconsider an eco-town for Carrington (Cheshire) as the situation has improved since the original bid was rejected and the idea of an eco-town has considerable support among local communities. With nearby communities facing declining services, developing this site would both clean up damaged land while providing badly needed local services. Existing services would become more viable given the increased size of the community overall.

64. In Cambridgeshire, a better alternative to Hanley Grange, against which there is almost unanimous opposition, would be to develop Northstowe as an eco-town as was the original intention. Since the principle of a new settlement at Northstowe is enshrined in the local development framework, Northstowe has a democratic mandate. This is largely lacking in most of the eco-towns shortlisted. Alternatives have also been identified in Norfolk (on sites already allocated in plans, particularly around Norwich) and the West Midlands (eg. at Longbridge).

65. As an alternative to stand alone settlements, the West Midlands Regional Assembly has called for eco quarters in the major urban areas. Individual sites may be smaller than the eco-towns suggested by the Government, but taken together could deliver a significant amount of low-carbon, ecologically-designed development. CPRE supports this approach. There is a compelling case for consideration to be given to housing opportunities identified in the recent Black Country Core Strategy resulting from Phase 1 of the RSS revision. The Tipton Corridor is one area where a critical mass should be achievable, ie. to deliver the equivalent number of homes and related development as an eco-town. We believe an excellent opportunity for an exemplary 'eco-development' exists at Longbridge. Here, we recommend that consideration be given to the anticipated 2,000 homes and other development, to be designed to high ecological principles. The principle of development is already enshrined in the planning system, since Longbridge has been identified as a mixed use, sustainable site within the urban area.

66. We believe that it is vital that the sustainability appraisal should consider the scope for re-using brownfield land and buildings within and on the edge of towns. We suggest, in particular, that the appraisal assesses the potential of smaller projects, as endorsed by the Federation of Master Builders, and the extent to which these might offer more sustainable alternatives, rather than assume alternatives should be freestanding settlements.

67. CPRE fears that proponents of sub-standard proposals that do not make the final shortlist may put their schemes forward for consideration via a planning application in future. We are worried by the possible precedent that may have been set by virtue of schemes appearing on the provisional shortlist. It will be essential that ministers make it clear that inclusion on the initial shortlist for eco-towns should carry no weight in decision making should proposals which are rejected proceed to a planning application in future.

Conclusion

68. CPRE supports development which is carried out in the right way in the right place. A plan-led and sequential approach in our view are both essential. We do not believe it makes sense to ignore what has already been agreed in development plans. For a new settlement to be genuinely environmentally sustainable it must be based around walking, cycling and public transport and, crucially, designing out car use, while offering a range of local facilities. Where cars are used, they should be subservient, with car sharing and car hire the norm, rather than private ownership.

69. Schemes should enhance, not spoil, the surrounding area and landscape and should win the support of the local community. All these things are far more likely to occur where schemes are agreed via local and regional plans. In pursuing the eco-towns initiative in the manner which it has done so far, the Government would appear to be tearing up its own planning system. This approach is short-sighted since it creates uncertainty and risks losing public trust and confidence in planning.

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Annex I

CPRE's view on potential locations

June 2008

CPRE supports the idea of exemplary development that achieves high environmental standards but this development must be carried out in the right way in the right place. The majority of eco-town proposals on the provisional shortlist we believe to be in unsuitable, unsustainable locations and conflict with established plans and strategies.

In most cases, more sustainable alternatives exist nearby for providing development, including affordable homes, that communities need. We think it makes no sense to pursue a programme of new towns on greenfield sites that competes directly, for resources, investment and occupants, with agreed, established plans for growth and development.

A summary of our concerns for each location is given below. This is based on discussions with local CPRE branches and regional groups and draws on CPRE's ten tests for eco-towns. With one or two exceptions, for most proposals lack of consultation, a lack of transparent procedures for selecting sites, and the disregard for statutory planning procedures are key concerns. For more information, please refer to individual CPRE branch responses.

BORDON-WHITEHILL, HAMPSHIRE

CPRE offers conditional support to the development of an eco-town at Bordon-Whitehill subject to landscape, biodiversity and transport implications being satisfactorily addressed. Development at this site complies with local and regional plans and the area would benefit from regeneration and a better mix of uses to reduce out-commuting and promote more self sufficiency. However, several challenges will need to be overcome in order to develop an eco-town here. One of the biggest challenges will be securing sustainable transport. We believe this challenge should be viewed as an opportunity to put in place radical measures to cut car use and promote alternative forms of travel. In line with the eco-towns prospectus that every scheme should be an exemplar in one technology we suggest that that Bordon-Whitehall be developed as an exemplar in reducing car use.

Issues

- site already allocated 2,500 houses in the SE Plan (provided the Army move out).
- site contains considerable brownfield land ripe for redevelopment
- an opportunity to secure a more attractive and sustainable settlement than currently exists
- no current railway connection - one could be restored
- great care will need to be taken to ensure that ecological and landscape implications are addressed on nearby heathland, SPAs SACs, SSSIs, SINC

IMERYS CHINA CLAY COMMUNITY, CORNWALL

CPRE is sympathetic towards the principle of eco development at sites around St Austell in recognition of the acute regeneration needs of this area, subject to the following concerns being addressed.

Issues

- development should minimise the use of greenfield land
- careful attention will need to be paid to securing sustainable transport
- the area suffers from a poor image therefore positive measures will be needed to attract investment and high quality employers to the area
- genuinely mixed use and mixed tenure development will be needed, including affordable homes on all sites, to contribute to the creation of sustainable communities and ensure development meets identified local needs
- eco village rather than town may be more appropriate

PENNBURY, LEICESTERSHIRE

Issues

- beautiful, mainly greenfield site in rural countryside
- loss of good quality agricultural land
- conflicts with the regional strategy of urban concentration and building on previously developed land. Alternative, more sustainable locations for new housing available and identified
- locating a new town here would undermine the regeneration of Leicester, a key area listed in the 2004 *Revised English Indices of Deprivation* (ODPM)
- lack of consultation
- loss of valuable green space – the proposal will infill the ‘Green Wedge’ (Leicester’s equivalent to Green Belt) between Oadby and Thurnby, possibly extending eastwards to Houghton-on-the-Hill
- increased road congestion
- part of the site is technically brownfield – the aerodrome and hospital estate – but contains extensive areas of grassland
- contrary to the development plan: assessments by the county council and EiP (Examination in Public) panel into the East Midlands regional plan (RSS) deemed extensions north and west of Leicester to be the most sustainable option for new housing. By contrast, the Co-op’s proposed eco-town at Stoughton lies to the east of the city.

MANBY AND STRUBBY, LINCOLNSHIRE

Issues

- an extremely inaccessible site in what is generally regarded as the least accessible part of the East Midlands
- a long way from any substantive employment and service centre
- conflicts with the agreed regional strategy to focus on much-needed regeneration of established centres
- a sparsely populated area on the periphery of the Lincolnshire Marsh, with little labour supply except in the coastal towns
- would compete with and divert resources from more deserving parts of the district, such as the seaside resort of Skegness, an area in need of regeneration and investment with a large retired population
- lack of rail
- effect on the character and rural appearance of villages of Grimoldby and Manby,

- sewerage, water supply constraints

CPRE is pleased that East Lindsey District Council has listened to communities' concerns and withdrawn their bid in recognition of the insurmountable challenges that developing in this remote, rural location would present.

CURBOROUGH, STAFFORDSHIRE

Issues

- part greenfield site
- loss of valuable farmland
- conflicts with the development plan – location deemed unsuitable for development in district and regional plans; site previously rejected by Lichfield Council
- a new town here would be heavily dependent on facilities, jobs and services in Lichfield
- water quality and flooding concerns (raised by DEFRA in the cross-departmental *Review Assessment*)
- landscape implications: according to English Heritage 'the submission fails to address the local and wider impacts on the historic environment, particularly the landscape setting (cross-departmental *Review Assessment*)

MIDDLE QUINTON / LONG MARSTON, WARWICKSHIRE

Issues

- a sensitive landscape, adjacent to the Cotswolds AONB and overlooked by Meon Hill - northernmost viewpoint in the AONB
- an eco-town would urbanise the area between the new woodland planting scheme around Dorsington and the AONB
- the site's isolated location means it would be difficult to secure high quality public transport. There is a high risk that a new town here would be car-dependent
- harmful effect of additional traffic and congestion on country lanes and historic villages
- an area prone to flooding; insufficient sewerage capacity (noted by the Environment Agency in the cross-departmental *Review Assessment*)
- site mainly grassland
- potential harm to the historic town and setting of Stratford – the nearest service centre

WESTON OTMOOR, OXFORDSHIRE

Issues

- mainly greenfield site. Of the 16 per cent of the site that is technically brownfield, most of the land is grassland and therefore in practice should be treated as greenfield
- contrary to the development plan – new settlements consistently rejected in structure plan enquiries, not part of SE Plan; not supported by the emerging LDF
- a risk that the settlement will be car based in a district with the highest level of commuting in the county
- ¼ of the site is on Green Belt land
- Bicester is one of the fastest growing towns in Europe and there are concerns whether the infrastructure will be able to cope
- impact on nearby SSSI
- effect on beauty and character of historic villages
- Cherwell Basin is an area of serious 'water stress'
- site prone to flooding
- harmful impact on regeneration plans for Bicester by diverting resources and investment away from this town

FORD, WEST SUSSEX

Issues

- set in the Arun valley close to the National Park and adjacent to the only lowland undeveloped coastline at Climping
- conflicts with development plan policies
- the proposal would harm regeneration in Bognor Regis and Littlehampton
- accommodating an extra 5,000 homes on top of 11,000 allocated in SE plan, would lead to unacceptably high levels of housebuilding, harming the character of the surrounding rural area and leaving local infrastructure unable to cope
- although part of the site may be technically brownfield – concrete runways are visible – the site is largely undeveloped open land of the highest agricultural quality much of it currently arable farmland
- the site, by virtue of being undeveloped, open land, performs a vital strategic gap in an otherwise extensive and continuous 30 mile coastal urbanisation reaching from Bognor in the west to Brighton in the east
- an area prone to flooding

ROSSINGTON, SOUTH YORKSHIRE

Issues

- contrary to the development plan – an old scheme rejected for inclusion in plans in the past, an Inspector at the inquiry into the local plan (UDP) observed ‘the release of substantial areas in the Green Belt would be contrary to long standing policies to protect the Green Belt and open countryside and do little to sustain the character of the countryside or directly revitalise the urban area’
- would undermine regeneration in the nearby urban area
- the 15,000 homes proposed represent a 64% increase on planned levels
- site includes a former colliery, but brownfield land represents a small proportion (one ninth) of the overall site area
- mainly greenfield site on Green Belt – development here would conflict with Government planning policy set out in PPS2
- poor access to rail and road network
- concerns about water quality and effect on hydrology and nearby Site of Special Scientific Interest
- a town here would triple the size of Rossington

COLTISHALL, NORFOLK

Issues

- contrary to the development plan – the proposal would double the district’s housing allocation to 2021, by adding a further 10,000 on top of the current 8,000 in the local plan
- geographically remote area poorly served by road, no rail
- part of the site is greenfield
- lack of employment
- according to Defra this is ‘an extremely sensitive catchment, directly upstream of the Broads’ and that the ‘environment may not be able to accommodate this level of development (cross-departmental assessment of eco-towns)
- potential harm to landscape and wildlife, including sites of national and international importance
- better alternative are available within Norwich and the immediately surrounding area

HANLEY GRANGE, CAMBRIDGESHIRE

Issues

- contrary to the development plan
- risks jeopardising agreed plans for growth in the Cambridge sub-region and at Northstowe by diverting resources and investment away from these areas
- location on aquifer of national importance: implications for water quality, supply and overabstraction causing potential harm to the river Cam and nearby SSSI
- risk of flooding downstream
- greenfield site – possibly 100%
- previous proposals for a mixed use new settlement near Hinxton were rejected
- harm to landscape – designated as part of the Area of Best Landscape in the Structure Plan.

MARSTON VALE AND NEW MARSTON, BEDFORDSHIRE

Issues

- unnecessary - emerging Local Development Frameworks already provide for significant growth and development in the area
- a huge mainly greenfield site in the Marston Vale area spanning seven miles stretching from Kempston as far as the M1 near Brogborough – environmental implications of developing on such a massive scale
- loss of valuable recreation and amenity space and countryside separating major towns of Milton Keynes and Bedford
- described in the consultation paper as a series of interconnected, low-density settlements within the forest of Marston Vale – this suggests sprawling, car based greenfield development, the opposite of compact sustainable development
- potential threat to ancient wood, Marston Thrift
- loss of productive agricultural land – including traditional farmland with species rich hedgerow
- loss of beautiful, tranquil countryside around Lidlington
- proposal makes a mockery of the Milton Keynes and South Midlands sub-regional strategy

ELSENHAM, ESSEX

Issues

- mainly greenfield site
- loss of agricultural land
- landscape implications
- a water scarce area
- waste water issues - ecological implications for the River Cam
- concerns about the impact this scale of development would have on the district, which English Heritage describe as being of ‘exceptional historic interest’ (*cross-departmental Review Assessment*)
- concerns about impact on regeneration initiatives and growth plans for the area

RUSHCLIFFE, NOTTINGHAMSHIRE

CPRE was pleased that the Government decided not to pursue the original proposal submitted for Kingston on Soar and to look for more sustainable alternatives instead. We do not believe that there is a case for a new settlement in this district. In our view, affordable housing in Rushcliffe would be far more effectively met by investing money directly in providing affordable homes within existing settlements, in line with the approach set out in the East Midlands RSS.

Issues

- beyond West Bridgford, Rushcliffe is a very rural area
- existing roads are already at or above capacity;
- contrary to the established strategy for Rushcliffe, as for the rest of the Three Cities Sub-Area of the East Midlands, of concentrating development in and around existing urban areas
- of sites considered, that we are aware of, only RAF Newton is brownfield. This is in Green Belt. Development of an eco-town here would necessitate the development of far more greenfield than brownfield land.

LEEDS CITY REGION

CPRE believes the best way to provide affordable homes for the region would be to support local authorities to provide these within existing settlements and to secure eco-developments on existing sites that are coming through the planning process.

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Annex II

This table shows the estimated proportion of brownfield and greenfield land on proposed eco-town sites, based on publicly available information. Please note calculations are not based on final or definitive statements of site outlines, or 'technical definitions' of brownfield. Instead they reflect a common-sense approach – land used for crops and pasture (excluding obvious curtilage) has been counted as greenfield. For example, Weston Otmoor may be technically 16 per cent brownfield, but a large part of the brownfield area is grassland. Similarly, much of the former airfield at Ford (disused since 1947) is now used for growing crops.

Eco town	Site area (hectares)	S2	Total BF	Total GF	% BF	% GF	Notes
Bordon Whitehill	291		72	219	25	75	
Cotishall	287		240	47	84	16	Note: All curtilage surrounding the runway was included in BF area. Fields and wooded areas in GF.
Curborough	265		19	246	7	93	
Ford	500		25	475	5	95	
Hanley Grange	362	168	7	355	2	98	Note: site has second potential area (S2) not yet included in % shown here (S2 is 100% GF)
Imerys China Clay Community	290		218	72	75	25	Note: % on individual sites varies
Marston	4334		1393	2941	32	68	Note: GF calculated as literally green fields on this site, any disturbed land was included in BF
Middle Quinton	259		86	173	33	67	
NE Elsenham	157		14.85	142.15	9	91	Note: BF estimate includes existing housing/gardens north of the site and some extra green around grazing fields
Pennbury	1669		68	1601	4	96	
RAF Manby*	218		32	186	15	85	
RAF Strubby*	181		56	125	31	69	
Rossington	267	187	83	184	31	69	Note: S2 is a potential rail-freight logistics site ('inland port') not included in % calculations (S2 is 100% GF)
Weston Otmoor	855		17	838	2	98	Note: BF area does not include the grass runway area to the north of the site

* = site not yet clear

Note: Site areas are in hectares