

Shelter's response to the
Department for Communities
and Local Government
Consultation – Draft Planning
Policy Statement: Eco-towns
consultation

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Shelter

Shelter is a national campaigning charity that provides practical advice, support and innovative services to over 170,000 homeless or badly housed people every year. This work gives us direct experience of the various problems caused by the shortage of affordable housing across all tenures. Our services include:

- A national network of over 20 advice centres
- Shelter's free advice helpline which runs from 8am-8pm
- Shelter's website which provides advice online
- The Government-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, which are approached by people seeking housing advice
- A number of specialist projects promoting innovative solutions to particular homelessness and housing problems. These include housing support services, which work with formerly homeless families, and the Shelter Inclusion Project, which works with families, couples and single people who are alleged to have been involved in anti-social behavior. The aim of these services is to sustain tenancies and ensure people live successfully in the community.
- A number of children's services aimed at preventing child and youth homelessness and mitigating the impacts on children and young people experiencing housing problems. These include pilot support projects, peer education services and specialist training and consultancy aimed at children's service practitioners.
- We also campaign for new laws and policies - as well as more investment - to improve the lives of homeless and badly housed people, now and in the future.

Summary and recommendations

- Shelter supports the eco-town concept as one of a range of approaches to addressing two critical issues facing this country: the desperate need for new housing, specifically affordable housing, and the challenge of climate change.
- Overall the draft eco-town Planning Policy Statement (PPS) provides a sound framework of guidance, covering the unique planning issues and considerations for eco-towns. However, it will be essential that eco-town proposals are considered in detail against the PPS standards at every stage of the planning process to ensure that the development meets the social and environmental objectives for eco-towns.
- With many of the draft PPS targets being considerably higher than those that currently apply to development, for example around water supply or green space, it is vital that local authorities involve relevant expertise across these areas, as well as providing appropriate opportunities for public engagement, as proposals go through the planning process.
- As one of the aims of eco-towns is to address the chronic undersupply of housing in England, Shelter considers that high housing need and affordable housing need should be one of the locational principles that is considered when making decisions on which proposals are in suitable locations.
- Both the sustainability assessments and financial will need to be regularly reviewed as the proposals are taken through the planning process to ensure that there is a comprehensive understanding of the environmental, social and financial viability of development.
- Shelter considers that the eco-town PPS should provide a stronger direction on the provision of affordable housing in eco-towns. Shelter believes that at least 50 per cent of homes in eco-towns should be affordable housing, and at least 30 per cent should be social rented. In addition, the PPS should specify what the split should be between social rent and other forms of affordable housing within the affordable housing offer for eco-towns. We consider that this split should be weighted towards social rent.
- Shelter considers that the PPS should include explicit reference to how the cost of public transport will be managed in eco-towns to ensure that cost is not a barrier to its use by residents.
- Shelter agrees with the proposals in the draft PPS for monitoring the sustainability of eco-towns through regional and local monitoring frameworks. In addition, Shelter believes that there is scope for independent monitoring of eco-towns by a national level committee or stakeholder group convened for this purpose.
- In addition to commenting on the standards proposed in the draft PPS, we provide feedback on the proposed eco-town proposals in St Austell, Pennbury, Rackheath, Rossington and Whitehill-Bordon, which Shelter supports in principle. Our support for these proposals is based largely on the affordable housing offer, and the extent to which they will provide suitable social infrastructure and economic opportunities for residents. However, this support is conditional on a number of issues being resolved if the proposals are progressed, such as transport constraints or the potential for negative impacts on the environment.

Introduction

Shelter supports the eco-town concept as one of a range of approaches to addressing two critical issues facing this country: the desperate need for new housing, specifically affordable housing, and the challenge of climate change. By establishing comprehensive and significantly higher standards for development, eco-towns provide the opportunity to be exemplars of social and environmental sustainability that can help shape all new development in the future. This submission builds on our responses to previous eco-town consultation processes, in particular our submission in July 2008 on the Department for Communities and Local Government's (CLG) *Eco-towns – living a greener future* consultation, and statements by the eco-town coalition¹, of which Shelter is a member.

The draft eco-town PPS establishes both strategic and specific standards that eco-town developments will need to meet. These standards sit alongside or expand on, rather than replace, guidance in existing planning policy statements. Shelter's primary interest, and expertise, is the provision of affordable housing within the context of mixed, sustainable communities. As such our comments focus on the aspects of the draft PPS relating to housing, and elements of the physical and social infrastructure required to build a sustainable community. The focus of our response is not, however, intended to diminish the importance of all aspects of the draft PPS, especially those relating to the environmental credentials that eco-towns will need to meet.

In addition to commenting on the draft PPS, we will be providing feedback on some of the proposed eco-town proposals that Shelter supports in principle. Our support for particular development proposals is based largely on the affordable housing offer, and the extent to which they will provide suitable social infrastructure and economic opportunities for residents and the surrounding areas. This support is conditional on a number of issues being resolved if the proposals are progressed, such as transport constraints or the potential for negative impacts on the environment.

Draft Planning Policy Statement: Eco-towns

Does the draft PPS provide sufficient guidance on the consideration of eco-towns through the plan making process?

Taking overall the standards set out in the draft PPS do you think that they achieve a viable eco-towns concept?

¹ The eco-town coalition is made up of leading organisations providing a broad message of support for the eco-town concept. The organisations include: Royal Institute of British Architects, TUC, Bioregional, Town and Country Planning Association, Chartered Institute of Housing, National Housing Federation, Shelter, Crisis and Sustrans.

Overall the draft eco-town PPS provides a sound framework of guidance, covering the unique planning issues and considerations for eco-towns, such as standards for promoting modal share (between walking, cycling, public transport and private vehicle use), energy and water usage. Because the PPS is a high level document a critical issue will be how the specific and strategic standards it sets out are practically applied as proposals are progressed through the planning permission and development process. It is essential that eco-town proposals are thoroughly assessed and managed through the planning system in the same manner as any other major development proposal, and are considered in detail against the PPS standards at every stage of this process to ensure that the development meets the social and environmental objectives for eco-towns.

With many of the draft PPS targets being considerably higher than those that currently apply to development, for example around water supply or green space, the plan making process will be complicated and will require innovation in planning practice. As such it is vital that local authorities involve relevant expertise across these areas, as well as providing appropriate opportunities for public engagement, to inform the planning process.

We agree with the PPS guidelines on the need for regional and local authorities to consider eco-towns as one of the options for providing the housing required in their respective areas. We also support the proposed approach to handling applications for eco-towns before eco-towns are in a Regional Spatial Strategy (or Single Regional Strategy) or Local Development Framework, and for determining eco-town planning applications. Specifically, that when considering whether to approve an eco-town planning application consideration should be given to both the existing plans for providing housing in the region and the merits of the eco-town proposal when viewed against housing need in the area.

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

The locational principles seek to balance the need for guidance as to the location of eco-towns while maintaining a level of flexibility to take account of the characteristics of proposed eco-town sites.

We note that the sustainability assessment (SA) for an earlier draft of the PPS recommended that high housing need and affordable housing need be incorporated into the locational principles. However, the draft PPS states that this recommendation was not adopted because it may conflict with other locational principles such as proximity of employment opportunities. As one of the aims of eco-towns is to address the chronic undersupply of housing in England, Shelter considers that high housing need and affordable housing need should be one of the locational principles that is considered when making decisions on which proposals are in suitable locations.

The current wording of paragraph 3.2 in the draft PPS, which states that 'In identifying suitable locations for eco-towns, consideration should be given to...', does not suggest that the principles operate in a hierarchy but that they are all to be given due consideration with regard to the specific location under review. On this basis we do not consider that there is a risk of conflict with the current proposed locational principles if housing need were to be included as an additional locational principle.

Eco-town standards

Do you consider that the standards provide a clear basis on which to make decisions on planning applications for eco-towns?

Please see above for comments regarding the eco-town standards and planning applications. The standards provide a clear basis for decision making. As noted in the SAs of the draft PPS and the specific eco-town proposals, to help inform decisions around the viability of the settlement and whether planning permission should be granted, it will be necessary to continually revise the SAs against the eco-town standards as more detailed information becomes available about the sites during the planning process.

Do you consider that the cost of implementing the standards will undermine the viability of eco-towns?

As many of the new eco-town specific standards will stretch current practice and require innovative approaches it is difficult to predict what the actual cost of implementing the standards will be. Given that the proposals currently under consideration will require extensive investment in areas such as transport and social infrastructure it is likely that significant levels of funding will be necessary to produce these and other services to the standards outlined in the draft PPS. The costs of development, availability of finance to meet these costs, and being able to access the expertise needed to meet the eco-town standards will all determine whether a specific eco-town proposal is viable.

The *Eco-towns: Financial viability study of the eco-towns programme*² report, which was recently released, reported on the outline financial assessments undertaken on some of the eco-town proposals to test the financial viability of promoters' proposals in order to provide guidance to Ministers on whether the high standard expected from eco-towns could be met without undue risk to public finances. The proposals were assessed against whether the schemes had made provision to meet the draft PPS standards and the potential to address issues identified in the SA and Habitats Regulations Assessment.

² *Eco-towns: Financial viability study of the eco-towns programme*, Department of Communities and Local Government, March 2009.

Not all of the schemes were assessed, and of those that were analysed not all had conclusions about the viability of the proposal (for example, Rackheath). As to be expected there was significant variation in the potential financial viability of the proposals that were assessed. Some, such as St Austell and Rossington, were identified as being unlikely to create sufficient value to cover the indirect and direct costs of development without recourse to some level of public subsidy. Others, such as Whitehill-Bordon and Pennbury, demonstrated that they may be able to create sufficient value without requiring public subsidy.

Given this analysis, it is critical that in addition to revising sustainability assessments for individual schemes as they are progressed through the planning process, the proposal's financial viability should also be regularly reassessed to ensure that there is a comprehensive understanding of the environmental, social and financial viability of the development.

It is not only the initial cost of development that needs to be considered but also the ongoing costs of operating and maintaining the towns. Shelter would not want to see the cost to residents of living in an eco-town being substantially above those of living anywhere else. For example, high service charges or public transport costs would be likely to disproportionately affect those on lower incomes (the same group who would be looking to access the affordable housing available in the town). As much as possible must be done to avoid financial disincentives for people taking the opportunity to commit to sustainable living.

Comments on specific eco-town standards

Housing

The provision of affordable housing

The sustainability assessment on an earlier draft of the PPS recommended that the criterion for affordable housing be set at the figure for the relevant local authority in order to reflect local affordability and local housing need. This recommendation has not been adopted in the current version of the draft PPS, which proposes that at least 30 per cent of housing in an eco-town should be affordable.

While the draft PPS does not prevent higher levels of affordable housing being built in eco-towns, Shelter considers that the draft PPS has missed an opportunity to provide a strong direction on tenure mix in eco-towns in order to better support the development of mixed communities and address housing need through access to high quality affordable housing. As outlined in our previous statements on eco-towns, Shelter considers that at least 50 per cent of homes in eco-towns should be affordable housing, and at least 30 per cent should be social rented.

At the very least we believe that the PPS needs to specify what the split should be between social rent and other forms of affordable housing within the affordable housing offer for eco-towns. We consider that this split should be weighted towards social rent, for example 60 per cent of the affordable housing should be social rent and 40 percent other forms of affordable housing.

Shelter commissioned the report *Neighbourhood Watch* from the London East Research Institute at the University of East London to look at the challenges of building a sustainable community³. This research used Thames Gateway developments as case studies. While the research focused on three particular developments, many of the findings apply more generally to new housing developments, especially where there is a significant proportion of affordable housing. These findings provide useful insights for eco-town developments.

In regard to the planning and delivery of affordable housing in the three developments, there was a gap between what was stated in the original master plans and section 106 agreements, and what was actually implemented. Social and community facilities identified in section 106 agreements were not necessarily delivered, although due to increases in local authority targets the proportion of affordable housing delivered was higher than stated in original documents. Despite a commitment to mixed-tenure developments, residents and developers agreed that more desirable properties were often reserved for owner occupiers.

Affordable housing also tended to be provided later than other housing, and design standards and quality on later stages were not always as high as other parts of the development. There was an assumption of a bi-tenure system in planning documents – owner occupation and affordable/social rented housing. The private rented sector was often ignored in the planning and governance of the new developments, despite private renters being present in all three study areas.

The type and standard of housing in eco-towns

How the affordable housing, and wider housing, offer is managed in eco-towns will be critical. If eco-towns are to meet the aim of providing desperately needed new housing, strong standards need to be put in place to ensure that the homes provided through eco-towns meet the needs of the prospective residents, including those from areas around the towns.

There is a pressing shortage of family housing in many areas, and the eco-town prospectus had a focus on family housing that is not currently reflected in the draft PPS. We consider that the eco-town PPS should include reference to the need for a range of sizes of affordable housing, as is the case for strategic housing market assessments under Planning Policy Statement 3. This should include specifying the number of family sized homes that will be available for social rent and be informed by the identified housing needs of the local population, who must benefit from new housing development.

³ *Neighbourhood Watch: Building new communities – learning lessons from the Thames Gateway*, Shelter, 2008.

We welcome the other housing standards outlined in the draft PPS, including the need to achieve the Building for Life Silver Standard and Level 4 of the Code for Sustainable Homes at a minimum, as well as the lifetime homes standards. However, in order for eco-towns to be exemplar development there should be a minimum requirement for the proportion of homes to be built to Level 6 of the Code for Sustainable Homes and Building for Life Gold standard. These standards, and those relating to energy efficiency, would provide a sound basis for ensuring that homes in eco-towns meet the changing needs of individuals and families throughout their lifetime, while reducing the cost and environmental impact of running a home.

We also support the use of the English Partnership space standards which not only set minimum floor areas depending on the number of rooms in the dwelling but also set storage standards of approximately 5 per cent of the gross internal floor area. Adequate space and storage facilities are vital to ensure that all members of the household feel they have some opportunity for peace and privacy and to store essential equipment such as pushchairs or bicycles.

Employment

The ability to create mixed use, sustainable communities in eco-towns will depend largely on the availability of suitable employment opportunities for all residents, both within and near to the settlement. We support the requirement in the PPS for an economic strategy to be developed, and submitted with planning applications, which will need to demonstrate how appropriate employment opportunities will be established, including facilities to support job creation in the towns themselves and how sustainable access to work opportunities, in the town and its surrounding areas, will be provided+.

However, further guidance on how this strategy should be developed needs to be included in the PPS. This should include illustrating how the economic strategy for the eco-town will align with regional development agencies' and local authorities' activity to support sub regional economic and employment growth, as well as the responsibility for Upper Tier/ Unitary Authorities to produce Local Economic Assessments. The guidance should also explicitly identify the parties that may need to be included in the strategy's development.

An important aspect of this strategy will be a demonstration of how jobs, at a range of skill and income levels, will be created and provide long term employment opportunities. The availability of accessible, sustainable jobs is especially critical for disadvantaged groups, such as those with mental or physical health problems, who may have greater difficulty sustaining employment. We would also like to see connections made in the economic strategy with Government initiatives to increase levels of employment for people in social housing, for instance the provision of integrated housing and employment advice.

In addition, the economic strategy should identify how skills will be developed to provide the highest environmental standards for construction and ongoing development of the town, and what support will be put in place to promote social enterprise and community entrepreneurship and the provision of home working.

Transport

The guidance on transport in the draft PPS outlines ways in which people will be able to be mobile without compromising the low carbon goal of the settlement. We endorse the requirement to include a travel plan with eco-town planning applications. In particular, we are glad to see that there will be a requirement to demonstrate how transport, and other supporting, infrastructure (including principles around good design) will be in place from day one of residential occupation, and for monitoring of the transport system's carbon impact.

As part of responsible development, and integration of eco-towns into the wider region in which they are located, we support the requirements in the draft PPS to have regard to the impact of increased travel on surrounding areas and the need to be ambitious about the proportion of that travel to be undertaken by transport other than cars, for example, walking, cycling or public transport.

The consultation document published by CLG in April 2008, '*Eco-towns: Living a greener future*', noted that some of the proposed eco-town developments had proposed free public transport as a way of discouraging car use. Shelter appreciates that such an ambitious target may not be possible for eco-towns without it impacting on other aspects of the development, for example potentially reducing the level of affordable housing provided in the town. However, we consider that the cost, as well as the frequency and accessibility, of public transportation will be critical to its use by all members of the community and the ability for a settlement to be low carbon. The draft PPS does not currently make any reference to the cost of public transport. We consider that explicit reference should be made to this issue in the PPS.

Equally, we would not want to see financial mechanisms, such as levies, used to discourage the use of cars and promote other forms of transport as such an approach is likely to disproportionately impact on those on lower incomes

Local Services

Creating sustainable communities is a challenging task in established environments, let alone when entirely new settlements are being developed. Not only will eco-towns need a range of services to support community development (such as health, education, retail and leisure facilities), but these facilities will also need to be in place from the time that the first residents move into the town.

Shelter's *Neighbourhood Watch* report found that the local provision of good infrastructure and services is very important to residents. However, there was often a time lag between people moving into schemes and service provision.

Residents canvassed as part of this research felt there was a lack of social and community infrastructure to meet their needs. It was either not factored into plans or, where it was provided, was generally completed several years after the first residents moved in. The establishment of local shops and cafes in the developments suffered from a time lag due to reliance on a market model in which a critical mass of residents is necessary for business. On some developments, this critical mass appeared elusive, despite a clear need. This experience demonstrates the need to facilitate social enterprise as an important source of goods and services, particularly in the early phase of developments, and ensure that services are in place from day one of the development being open to residents.

If the development of services and community facilities in eco-towns does not coincide with residential development the success of the development as both a new community and its ability to meet its environmental aims may be compromised. We are pleased to see that the draft PPS requires these issues and many others to be addressed as part of the transition planning that will have to accompany planning applications, including providing a detailed timetable of delivery of neighbourhoods, employment and community facilities and services. If these standards are not adhered to there is a risk that residents will need to leave the eco-town to access essential services, which in turn may increase the carbon impact of the settlement and affect community cohesion.

Master planning and transition

As noted in the draft PPS, to be successful eco-towns will need to be thriving and cohesive communities that attract people to live and work there from the outset. Shelter's *Neighbourhood Watch* research demonstrates that there is not always continuity between the planning and implementation of a development. For one of the three developments that were looked at for the research there were an impressive array of community facilities in the masterplan, such as a community centre, pre-school provision, and a leisure square with play spaces for different aged children. However, there was a delay in providing these facilities, with developers focusing initially on developing the residential accommodation and some public spaces.

Rigorous transition planning and monitoring of the implementation any transition plan must be undertaken to ensure similar scenarios do not occur in eco-towns. In particular, transition planning will need to focus on employment opportunities, community facilities and core services being in place when the first residents move into the town, and over the longer term. The needs of current residents will need to be integrated into this planning where eco-towns are expanding, or adjacent to, existing settlements.

We note that the draft PPS provides an outline for the issues to be considered as part of the transition plan that must accompany planning applications. Shelter would only want planning permission for eco-towns to be granted for developments where developers were able to clearly demonstrate how the development would be delivered in a way that maintained the integrity of the masterplan. This would mean that there must also be a mechanism for the regular reviews of how the building of an eco-town is progressing against both the applicable planning and building standards, as well as the plans on which the development received planning permission.

Community and governance

Resident participation will be critical for eco-towns, especially where brand new communities are to be established. The requirement to include long term governance structures for the development with planning applications will be an important part of ensuring that the town's management, and social and political development, supports and complements its physical development.

Shelter's *Neighbourhood Watch* report looked at the management of new developments and found varying levels of complexity in the management structures for the three developments investigated for the research. The report recommended that, where possible, a single management system with clear lines of contact to residents should be considered to avoid problems such as communication difficulties between residents and management, and the risk of neglect for the development because no one organisation was clearly accountable for maintenance.

In addition, the report identified issues around service charges for two of the three developments involved in the research. This situation was in part due to the complexity around the management of the developments which made it difficult to collect service charges. Some residents in social rent accommodation felt that the high levels of service charges were simply not affordable and pushed them into a poverty trap. There was also concern about the proportion of service charge that was required to maintain public spaces. They also felt information provided to them when they moved into the scheme lacked clarity on the full extent of the cost of renting at one of the developments, when rent and service charges were added together.

Shelter considers that any governance structures for eco-towns must actively involve residents, and that careful consideration needs to be given to how the development and ongoing costs of facilities, such as the significant level of green/ public space, will be borne by residents, especially those on low incomes, in relation to other housing and living costs associated with living in an eco-town. We believe that the draft PPS guidance on long term governance structures for the development provides a reasonable framework for undertaking detailed planning of these crucial aspects of the ongoing operation and management of eco-towns.

Monitoring

Shelter agrees with the proposals for Regional Planning Bodies and Local Planning Authorities to set Annual Monitoring Report indicators for monitoring the sustainability of eco-towns in their region/ district, and to monitor eco-towns through their regional and local monitoring frameworks.

In addition, Shelter believes that there is scope for independent monitoring of eco-towns by a national level committee or stakeholder group convened for this purpose. This monitoring body would need to be made up of representatives who have relevant expertise in relation to the environmental, social and planning and development standards that will apply to eco-towns. It would be critical that any such body engage with eco-town residents to gain feedback and insight on their experiences of living in an eco-town.

Comments on specific eco-town proposals

In commenting on specific eco-town proposals that Shelter supports in principle, we have considered the information currently available on individual sites including the sustainability assessment, eco-town information leaflet and in some cases additional information provided by the developers. Our support for particular development proposals is based largely on the affordable housing offer, and the extent to which they will provide suitable social infrastructure and economic opportunities for residents and those living in the surrounding areas. This support is conditional on a number of issues being resolved if the proposals are progressed, such as transport constraints or the potential for negative impacts on the environment

St Austell

Shelter conditionally supports the proposal for an eco-town at St Austell. We are particularly supportive of the proposal for 30 to 50 per cent of the homes in the development to be affordable, and the stated ambition of the local authority to provide a greater level of affordable housing if possible.⁴

We note that the Restormel Borough Housing Requirements Study indicated 49 per cent of new annual housing output in the area needed to be affordable, of which, 15 per cent should be social rented and 34 per cent other affordable housing options. However, the West Cornwall Housing Requirements Study (which covers a slightly smaller area than the Restormel Borough and includes St Austell) indicated that of the annual output of new housing in the area, 48 per cent of

⁴ Department for Communities and Local Government, *Sustainability Appraisal and Habitats Regulations Assessment of the Eco-towns Programme St Austell (China Clay Community)*.

these homes needed to be affordable, of which, 60 per cent should be social rent and 40 percent intermediate housing⁵.

At the end of March 2008, there were around 5,360 households on the housing waiting list in Restormel⁶. The level of housing need in Restormel suggests that there should be a greater focus on the provision of social rented homes in any new development, over other forms of affordable tenure. On the basis of this information, Shelter considers that the majority of the affordable housing should be social rented homes.

We support the intention for the homes in the development to be built to achieve Gold Building for Life Standards, and to achieve minimum ratings of Level 4 of the Code for Sustainable Homes, with ambitions for ratings to be higher.

The St Austell region has the potential to benefit from the proposed eco-town through both new development and investment in regeneration of existing communities. The additional community services and employment opportunities promoted in the eco-town proposal would also provide welcome opportunities for current residents who may have to travel out of their region for work and have low average earnings compared to the rest of the South West, with many jobs being concentrated in lower skilled, variable employment such as the hospitality/ service industry⁷. However, further detail on the is needed on the type and number of jobs that will be available.

The prospective environmental credentials of the proposal, particularly those around renewable energy generation, are promising but also need to be seen in context of the possible negative impacts of development. Further detailed analysis of a number of issues, including impact on biodiversity, needs to be undertaken before this proposal can be progressed.

There are several other challenges that Shelter considers need to be addressed prior to any development going ahead. Connecting six different sites into a cohesive, sustainable community will require significant commitment and investment of time and resources. We would like to see more detailed information on the community facilities (such as schools) to be put in place, how these will be connected across the different developments, and how existing and future residents are to be engaged in the design, development, and governance of the settlement.

Another key concern for the project is the viability of its transport infrastructure. St Austell's rural location means that there is currently a high level of reliance on private car use. This issue has not been addressed in the current planning for the settlement and is of particular concern in relation to the provision of a sustainable public transport system and the overall carbon impact of the town.

⁵ Shelter, *Information Leaflet on the proposed St Austell eco-town*, page 9.

⁶ Department for Communities and Local Government, *Housing Statistical Appendix*, 2009.

⁷ Department for Communities and Local Government, *Sustainability Appraisal and Habitats Regulations Assessment of the Eco-towns Programme St Austell (China Clay Community)*.

At this stage it is difficult to assess how the development will be able to meet the transport standards for eco-towns (presuming that the standards to apply to eco-towns will be similar to those outlined in the current draft PPS), due to the limited information available on how a sustainable transport system will be put in place, connect the different parts of the development and promote modal share.

Pennbury

Shelter conditionally supports the proposed eco-town in Pennbury on the basis of its commitment to the provision of affordable housing and community development. Currently, the proposal states that 30 per cent of the new housing in the town will be affordable. In line with our comments on the draft eco-town standards for housing, we would prefer to see more than 30 per cent of the homes in the proposed development being allocated for affordable housing.

However, we are particularly supportive of the intention for 75 per cent of these homes to be for social rent and 25 per cent intermediate housing. We consider the split between social rent and other forms of affordable housing to be appropriate given the level of housing need in the area, expected household growth and the fact that the number of additional social homes delivered annually has not kept pace with targets.

At the end of March 2008, there were around 9,640 households on council housing waiting lists in Harborough, Oadby and Wigston and Leicester, at a time when the number of lettings of social rented housing was declining year on year⁸. The declining number of social lettings is partly a result of social homes being lost to demolition or right to buy, and these losses not being offset by additional new homes for social rent.

With such a clear need for new affordable housing in the area, the proposed eco-town presents an excellent opportunity to help contribute to the region's housing targets. If the Pennbury site is developed it will be critical that local residents have appropriate access to the new housing, particularly the affordable housing, in order to alleviate the housing pressure in areas such as Leicester. Local authorities will need to work closely with the developers to ensure that this occurs.

We support the developer's commitment to promoting innovative approaches to community ownership of affordable housing, and governance and management of community facilities such as funding to contribute to environmental enhancements and public transportation improvements.

⁸ Shelter, *Information Leaflet on the proposed Pennbury eco-town*, pages 10 – 11.

While the Pennbury proposal offers a number of potential benefits in addition to the housing offer, such as the options for renewable energy generation, there are also significant challenges that need to be addressed to make the development socially, environmentally and economically viable.

One of the biggest challenges is the transport needs of the new settlement. The Pennbury sustainability assessment highlighted local residents' current high levels of commuting by private car, the inconvenience of the current public transport system, and the existing congestion on the road network around the proposed site. The current plans for the eco-town do not demonstrate a comprehensive or cohesive strategy to resolving these issues and increasing modal share, or provide sustainable and accessible transport connections to nearby settlements, which will be critical employment zones for eco-town residents. These substantive issues, and the investment required to address them, must be reviewed as a matter of priority before the proposal can be progressed.

Rackheath

The Rackheath eco-town was the only proposal to receive an 'A' rating (a location that is generally suitable for an eco-town). Shelter supports the Rackheath proposal on the basis that 30 to 40 per cent of homes in the new development will be affordable. As yet there is no information on how the affordable housing allocation will be split between social rented and other forms of affordable housing. The Greater Norwich Housing Assessment estimated that of the affordable homes needed to meet growth in the area over the next five years, 87 per cent of these should be for social rent and 13 per cent for intermediate housing⁹. Shelter believes that there should be a similar tenure split in the affordable housing offer in the Rackheath eco-town proposal.

At the time the sustainability assessment was completed for this site there was limited information available from the developer on what the development would look like. However, a more detailed proposal for the Rackheath eco-community, based on the standards outlined in the draft eco-town PPS, has recently been published¹⁰. We have looked at this information in conjunction with the information in the Sustainability Appraisal and Habitats Regulations Assessment of the Eco-towns Programme: Greater Norwich. Shelter is particularly pleased to see commitment from the developers to providing predominantly family sized homes, and we would urge local authorities and developers to work closely together to ensure that the appropriate number of family homes are allocated to social rented housing. In addition to the affordable housing offer, there are a number of other positive aspects to the proposal, including those around community infrastructure and governance, energy and green infrastructure.

⁹ Shelter, *Information Leaflet on the proposed Rackheath eco-town*, page 9.

¹⁰ Rackheath Eco-Community Concept Statement, http://www.rackheatheco-community.co.uk/consult_documents.php

If the Rackheath site is progressed there are areas that need further detailed assessment before the viability of the development can be accurately assessed. One of these is the transport system needed to support a low carbon community, including the public transport options within the town and connecting the town to higher order areas nearby such as Norwich and Wroxham. Given the existing high levels of commuting for work in the region and the likelihood that Norwich will provide employment opportunities for eco-town residents a frequent and accessible public transport system will be essential. The current proposals look sound but further work is needed, including detailed traffic modelling to assess if current road networks will require upgrading, and an assessment of whether a new rail station can be provided at Rackheath.

The other issue relates to the connectivity of the eco-town to existing settlements in the area, such as the existing Rackheath community and Salhouse. While acknowledging the need for additional housing in the Norwich region, careful consideration and planning is required concerning the potential impact of the new development on existing communities. One of the strengths of the proximity of Rackheath and the surrounding centres is the opportunity this provides for a wider range of jobs for eco-town residents. However, we would not want to see the development of a new community compromise the needs of current residents in the area. The local authority needs to work with the developer to assess the impact of the eco-town and how investment in this project may affect and/ or complement plans for community regeneration in places such as Norwich.

Whitehill-Bordon

The Whitehill-Bordon eco-town proposal provides an opportunity to grow and enhance an existing community in a sustainable way. Shelter supports the Whitehill-Bordon proposal in principle on the basis that 40 per cent of the new homes to be provided in the development will be affordable and the local region has significant housing need.

In March 2008 there were over 2,100 households on the housing waiting list in East Hampshire¹¹. In recent years the development of new affordable housing has not had an impact on the backlog of housing need, in part because of the loss of social rented homes to demolitions and right to buy¹². The developers have proposed that the affordable housing offer for this eco-town should be divided equally between social rented and shared ownership. Shelter believes that the majority of the affordable housing in the eco-town should be social rented homes.

We were particularly pleased to see the developer's commitment to the provision of family sized homes, with 72 per cent of the houses (not flats) to be built having three or more bedrooms. It is critical that an appropriate number of family sized homes are made available for people in the

¹¹ Shelter, *Information Leaflet on the proposed Whitehill-Bordon eco-town*, page 10.

¹² Ibid, page 11.

existing Whitehill-Bordon settlement, and surrounding communities, who are not currently able to access suitable, affordable housing.

The other strengths of the Whitehill-Bordon proposal include the fact that environmentally sustainable development is supported by local residents and the local authority, and that it will support much needed development and regeneration of the area resulting from the departure of the Ministry of Defence in several years time, and improve the current poor level of community services and infrastructure in the existing community. Shelter is also pleased to see that the development is centred on the use of public sector, brownfield land.

While there are significant positives for this proposal, there are a number of issues needing further analysis if the eco-town is to be progressed. These issues relate to transport, biodiversity, community cohesion and employment.

There is little information in the sustainability assessment on how a sustainable transport system that promotes greater modal share is going to be developed within the town, and for travel to higher order settlements nearby. This is particularly concerning given the high rate of out-commuting for existing residents, the current poor public transport system in the area, and the distance of the proposed eco-town from the nearest higher order settlements.

Connecting an existing settlement and a substantial new development into a cohesive, sustainable community may present some challenges. While the local community is supportive of the development we would like to see more detailed information on the community facilities (such as schools, recreational spaces and health services) to be put in place, how these will be connected across the town as a whole, and how existing and future residents are to be engaged in the design, development, and governance of the settlement.

The sustainability assessment highlighted a range of possible impacts on the biodiversity of the area resulting from development of the proposed eco-town site, particularly as the usage of some of the land earmarked in the development is likely to change after the departure of the Ministry of Defence. We consider that significant further work needs to be undertaken by the developer (as they have indicated they will do in partnership with Natural England) to assess, mitigate and manage the possible impact of the eco-town on local biodiversity.

With the risk to employment from the withdrawal of the Ministry of Defence, there is also insufficient information on how appropriate business and employment opportunities, at a range of skill levels, will be established in the eco-town. Given the current socio-economic profile of residents in the Whitehill-Bordon area this is a key issue for the sustainability of the development.

Rossington

Shelter conditionally supports the proposed eco-town in Rossington due to its potential to deliver much needed new homes, and progress the regeneration of the area. While the affordable housing offer for the development is the minimum for an eco-town (as set out in the draft PPS), we consider that this level of provision is acceptable given the current state of the local housing market and the opportunity the eco-town presents for the regeneration and further development of the local community. However, we would encourage the developers and the local authority to work together to identify whether there are opportunities to increase the level of affordable housing delivered in the eco-town.

We also support the developer's proposal that of the affordable housing offer, 74 per cent will be for social rent and 26 per cent will be shared ownership, and that a proportion of this housing will be delivered in the existing Rossington settlement as part of the regeneration programme¹³. The developer has stated that the new homes will come in a range of sizes and we consider it critical that a sufficient number of these homes are family sized if the eco-town is truly to meet housing need in the area.

There are several other strengths to the proposal, for example, the new development leading regeneration of the area, and remediation of land contaminated as a result of previous mining activity in Rossington. The existing settlement in Rossington lacks adequate community facilities and the development of the eco-town provides an excellent opening to improve the provision of these services, particularly retail and medical services. The SA also outlined a number of opportunities to create additional jobs at existing employment hubs, such as the local airport, as well as new jobs within the proposed development.

Several aspects of the planning for the eco-town do require further work to ensure that development of the eco-town in Rossington is in fact environmentally sustainable, such as the water strategy and transport. The water supply for the area is currently over licensed and the sustainability assessment notes that this is one of the key weaknesses of the proposal with further work being needed on this issue as well as the potential negative impact of plans for a heat loop system on groundwater. The transport strategy sets some strong and ambitious targets for modal share, however, the plans for public transport system connecting the eco-town to nearby settlements is partly dependent on the development of the surrounding road network, which is not guaranteed.

Another area where the proposal needs further development is how a cohesive community will be developed in Rossington, and how this may impact on nearby areas such as Doncaster. While a community engagement strategy has been developed to help work through these issues, as part of

¹³ Department for Communities and Local Government, *Sustainability Appraisal and Habitats Regulations Assessment of the Eco-towns Programme Rossington*.

the next stage of planning for this development we would like to see further consideration of how community infrastructure and governance will be designed and developed to ensure that Rossington is a viable community.

Conclusion

Shelter has supported the eco-town concept as one of the ways in which we can meet the need for new homes. The aspirational nature of eco-towns means that developing environmentally and socially sustainable towns will involve significant innovation, and commitment from a wide range of stakeholders.

The standards in the draft eco-town PPS go some of the way towards supporting the step change needed to support more sustainable development and communities. However, we consider that in relation to delivering much needed affordable housing that the PPS could go further. At the very least we believe that the PPS needs to specify what the split should be between social rented homes and other forms of affordable housing within the affordable housing offer for eco-towns, and that this split should be weighted towards social rent.

As important as the standards in areas such as housing, transport and energy are, equal consideration needs to be given to how existing and new communities will be actively involved in, and benefit from, the development of eco-towns, particularly the new homes that will be built. We look forward to seeing how the many opportunities and challenges that exist for eco-towns are addressed as the proposals are progressed.

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