

# Browngrad, Cooperville, and Flintown

## A note on Eco-Towns for the Advertising Standards Authority

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*Are Eco-Towns to be green exemplars or unremarkable new villages? Is the cause of sustainability being corrupted to make new settlements more palatable?*

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The Town and Country Planning Association (TCPA) has played a blinder. Originally set up over a century ago to promote Garden Cities, the TCPA has long been the main advocate of free-standing new settlements, adjusting its case to the circumstances of the moment. So when its Chairman, David Lock, was appointed by the Communities & Local Government (CLG) Department in March 2007 to advise the Government on the criteria for establishing Eco-Towns, its foot was firmly wedged in the door to policy-making. The Government is now aiming to build 10 Eco-Towns by 2020. The CLG web-pages on Eco-Towns defer to TCPA sources on practical matters.

### **It seemed like a good idea...**

For years the Prime Minister has been desperate to raise the rate of house building in England, with the current target of building 3 million homes by 2020. The struggle has been to get the public to accept this. Eco-Towns are the latest idea for contributing to meeting housing needs, at 5,000 to 20,000 homes each, and CLG has tried to make them as palatable as possible. Its July 2007 *Prospectus* included requirements for them to:

- include 30-50% affordable housing;
- achieve carbon-neutral development as a whole; and
- each be an exemplar in at least one aspect of sustainability.

By April 2008 the Government additionally felt able to *“announce that no new homes would be built on Green Belt land”* and that *“they make significant use of previously developed brownfield land”*. The initial ‘essential requirements’ of Eco-Towns are set out in Box 1.

**Box 1 Initial Criteria of Eco-Towns**

- (i) Eco-towns must be new settlements, separate and distinct from existing towns but well linked to them. They need to be additional to existing plans, with a minimum target of 5,000–10,000 homes;
- (ii) The development as a whole should reach zero carbon standards, and each town should be an exemplar in at least one area of environmental sustainability;
- (iii) Eco-town proposals should provide for a good range of facilities within the town – a secondary school, a medium scale retail centre, good quality business space and leisure facilities;
- (iv) Affordable housing should make up between 30 and 50 per cent of the total through a wide range and distribution of tenures in mixed communities, with a particular emphasis on larger family homes;
- (v) A management body which will help develop the town, provide support for people moving to the new community, for businesses and to co-ordinate delivery of services and manage facilities.

The process of establishing Eco-Towns has been pursued with great urgency (see Box 2), incorporating an invitation for schemes, short-listing, consultation, evaluation and (somewhat deferred) new planning policy and the announcement of selected sites.

**Box 2 Chronology**

- 7 March 2007** Eco-Towns idea launched by Housing and Planning Minister, Yvette Cooper: proposals by local authorities would be considered; small sites are expected (5-10,000 houses); they would be on brownfield sites (though this rule was soon dropped).
- 23 July 2007** Eco-Towns Prospectus issued by Yvette Cooper alongside Housing Green Paper. Upper site size raised to 20,000 houses; bidding process opened to developers; objective set for at least five new settlements; initial evaluation criteria stated.
- 30 October 2007** Yvette Cooper announces competition to set design standards for Eco-Towns; target number raised to ten.
- 27 February 2008** In a conference speech Caroline Flint, the new Housing Minister, demands one acre of green space for every 100 houses in Eco-Towns.
- 3 April 2008** Caroline Flint announces shortlist of 15 locations and issues Eco-Towns: Living a greener future for consultation.
- 9 April 2008** Caroline Flint appoints 12 members to an Eco-Towns Challenge Panel to provide expert advice and support shortlisted developers “to meet the highest standards possible for sustainability and design in their final proposals”. 2 more members are appointed on 19th May.
- 23 June 2008** The Eco-Towns Challenge Panel makes recommendations for each of the potential Eco-Town developers.
- 30 June 2008** Caroline Flint publishes a YouGov poll for CLG showing that 46% of adults support Eco-Towns while 9% oppose them; the remainder were neutral or did not know.
- 24 July 2008** Caroline Flint issues a Progress Report containing criteria against which planning applications for Eco-Towns will be considered, and raising the bar for acceptable schemes by announcing extra minimum standards. A Scoping Report for a Sustainability Assessment of the Eco-Towns programme is also published, alongside an outline of a promised Planning Policy Statement (PPS) on Eco-Towns.
- 31 July 2008** The Eco-Towns Challenge Panel publishes a second report on the shortlisted sites: this shows progress but the Panel wants further improvement notably to transport and employment strategies.

The Government received 57 proposals for Eco-Towns in response to its invitation. Some of these were old chestnuts, dusted down after their failure to obtain planning permission on previous occasions. In particular, the notorious Eagle Star scheme at Micheldever in Hampshire attracted particular opprobrium, having been rejected four times since 1994. In April 2008 the Government shortlisted 15 sites for detailed appraisal (see Box 3), even though two of the sites were partly in the Green Belt (Rossington and Weston Otmoor) and others such as Pennbury, Curborough and Rossington had previously been specifically rejected through the planning process. A panel of experts (some with sound environmental credentials) was nominated to evaluate them. Subsequently, in July 2008, Prince Charles' Foundation for the Built Environment, one of the judges for the Eco-Town design standards, proposed a further site at Newton near Nottingham.

**Box 3: Shortlist (with CLG summaries, + key progress notes)**

- Pennbury, Leicestershire:** 12-15,000 homes on a development incorporating brownfield, greenfield and surplus public sector land. Four miles south east of Leicester. This proposal could include 4,000 new affordable houses in an area of high affordability pressure.
- Manby and Strubby, Lincolnshire:** 5,000 homes put forward by East Lindsey District Council on two sites, with large elements of brownfield land including a former RAF base. The proposal complements the strategic plan for the phased relocation of communities on Lincolnshire coast because of high flood risk, and could include 1,500 affordable homes in an area of very high affordability pressure. **Withdrawn.**
- Curborough, Staffordshire:** 5,000 homes on the brownfield site of the former Fradley airfield, ten miles from Burton. The proposal could include 2,000 affordable houses in an area of very high affordability pressure. **Withdrawn but planning application possible.**
- Middle Quinton, Warwickshire:** 6,000 homes on a former Royal Engineers depot which has a rail link to the Worcester-London rail line. Six miles South West of Stratford upon Avon. The proposal could include 2,000 affordable houses in an area of very high affordability pressure.
- Bordon-Whitehill, Hampshire:** 5-8,000 homes on a site owned by the Ministry of Defence. A significant number of ex-MoD homes are already on the site, west of Whitehill-Bordon. The proposal could include 2,000 affordable houses in an area of very high affordability pressure.
- Weston Otmoor, Oxfordshire:** 10-15,000 homes on a site adjoining the M40 and the Oxford-Bicester railway. Three miles south west of Bicester, the site includes a current airstrip. The scheme could include between 3,000 and 5,000 affordable homes, in an area of extreme affordability pressure.
- Ford, West Sussex:** 5,000 homes on a site which includes brownfield land and the former Ford airfield. Close to rail line linking London and the Sussex coast. The scheme could include 1,500 affordable homes, in an area of very high affordability pressure.
- Imerys China Clay Community, Cornwall:** Development of around 5,000 homes on former china clay workings, industrial land and disused mining pits no longer needed by owner Imerys. Close to St Austell. The scheme could include 1,500 affordable homes, in an area of extreme affordability pressure.
- Rossington, South Yorkshire:** Up to 15,000 homes regenerating the former colliery village of Rossington, three miles south of Doncaster. The scheme could include 1,500 affordable homes, in an area of moderate affordability pressure. **Scaled back to 5,000 houses.**
- Coltishall, Norfolk:** 5,000 homes on a former RAF airfield, eight miles north of Norwich. The scheme could include 2,000 affordable homes in an area of very high affordability pressure. **Withdrawn by CLG.**
- Hanley Grange, Cambridgeshire:** 8,000 homes on land adjacent to the A11 designed to improve the severe lack of housing in and around Cambridge. The scheme could include 3,000 affordable homes in an area of extreme affordability pressure. **Withdrawn.**

**Marston Vale and New Marston, Bedfordshire:** Up to 15,400 homes on a series of sites, including former industrial sites, along the east-west rail line to Stewartby and Millbrook. The scheme could include 2,000 affordable homes in an area of high affordability pressure. **Larger scheme withdrawn but smaller one of 7,000 remains.**

**Elsenham, Essex:** A minimum of 5,000 homes north east of the existing Elsenham village. Close to M11 and the London to Cambridge rail line. The scheme could include 1,800 affordable homes in an area of extreme affordability pressure.

**Rushcliffe, Nottinghamshire:** An eco-town proposal was submitted for Kingston-on-Soar, to the south of Nottingham. In response to representations from Rushcliffe Borough Council, this site is not to be pursued. However, the Government is proposing to carry out a further review in partnership with RBC to consider whether there is a suitable alternative location with the potential to be viable within the Rushcliffe local authority area. **Two new proposals were put forward in July.**

**Leeds City Region, Yorkshire:** A number of eco-town proposals were submitted for locations within the area of Leeds City Region partnership of 11 authorities and principally between Leeds and Selby. The Leeds City Region Partnership has indicated support in principle for an eco-town within the sub-region. The Partnership has proposed a further study to compare the best alternative locations across the Leeds City Region partnership area. The Government has agreed to support this approach, on the basis that it will allow a further announcement to be made shortly of one or more sites for consultation.

**The Partnership has explored and rejected 14 separate sites and a specific proposal at Gascoigne Wood: the future is unclear.**

The Eco-Town process has now partly stalled. The draft Planning Policy Statement on Eco-Towns promised for September 2008 has not materialised. The Local Government Association (LGA) has obtained a legal opinion that Eco-Towns would be unlawful (see below). A legal challenge by objectors to the Middle Quinton site in Warwickshire has been deemed to have an arguable case and is about to go to a full hearing in the High Court. All bets are off until that case is resolved. Furthermore, in September, Oxfordshire County Council refused to continue work on the proposed Weston Otmoor site, due to alleged unpaid bills. The hiatus provides a moment for reflection on some key questions that Eco-Towns raise.

### Do we need the houses?

The Eco-Towns Prospectus opens with the words “*Without a major increase in new housing, homes will become increasingly unaffordable.*” The Government has nailed its argument for Eco-Towns to the mast of affordability. This it measures as the ratio of house prices to income (both at the lower quartile level). On this measure, housing reached its most unaffordable point at around the same time (July 2007), with the credit crunch triggering house price falls since then. The Government has for years been ill-advised to believe that planning for more land releases would ensure that builders built more houses and thereby brought their prices down.<sup>1</sup> In reality, as the market is now painfully demonstrating, house prices reflect ability and inclination to pay (not just income and inheritance, but how much you can borrow and the interest rate, plus an allowance for expectations – whether boom or bust).

The Government has used the wrong housing argument for Eco-Towns and lost. However, this does not mean that we don't need more houses now or in the years ahead: need for housing is very different from access it. Need is best measured

demographically, mainly allowing for the surplus of births over deaths, people's propensity to form households, household size, and net migration. Even if the credit crunch reverses the migration tide and eases the pressure for 3 million homes by 2020, there will still be seriously large requirements for housing.

### How should we decide where houses go?

The answer of course is ‘the planning system’. Regional Spatial Strategies and local authorities' new Local Development Frameworks (LDFs) can consider the options, integrate housing into the rest of the built environment, and plan for infrastructure. The results are reasoned and provide the basis for future decisions. Even if you don't like the outcomes, you had your chance to influence them and there is a measure of certainty and transparency about future development. You don't have much cause to lie in front of the bulldozers.

Eco-Towns, on the other hand, are being promoted separately from this range of formal plans. CLG's final list of locations is expected to prompt planning applications. These will arise at a late stage in the preparation of Local Development Frameworks, possible even just after they have been approved, contrary to CLG's own advice. The Government is making a habit of avoiding its own democratic procedures. Not only has it been foisting its housing numbers on Regional Spatial Strategies, usually adding substantially more to the numbers arising through due process. It has also been adding housing numbers by central edict. In the last five years it has announced the following:

- **The Sustainable Communities Plan** (2003), providing for additional housing including 200,000 extra houses in the growth areas of Thames Gateway, Milton Keynes/South Midlands, M11 corridor and Ashford;
- **Growth Points** (2006), through a political bidding process amongst a coalition of willing local authorities, lubricated by offers of cash, which provided for 100,000 extra houses in 29 locations (followed by a further 75,000 extra houses in 20 more locations in 2008); and
- **Eco-Towns** (2007), with possibly up to 200,000 extra houses by 2020 (but on the basis of the short-listed settlements unlikely to offer half that).

Eco-Towns have spurred 14 Past-Presidents of the Royal Town Planning Institute to write to *The Times* (15 August 2008) to complain about the by-passing of the forward planning process. They added that “*Securing the best development is a very complex business; to support it, a strong planning system is essential. We find it regrettable that a government which professes to endorse sustainability is pursuing an approach which, except in two or three important instances, is likely to achieve exactly the opposite.*”

The prize quote of CLG's Eco-Towns campaign must go to Caroline Flint who wanted: “*to put on the record that, contrary to some reports, eco-towns will be subject to*

rigorous planning processes. Each proposal will have to submit a planning application and will be properly scrutinised before it can proceed" (27 February 2008).

CLG has announced an intention to issue a Planning Policy Statement (PPS) on Eco-Towns. This would be a material consideration, alongside development plan policies, against which to evaluate planning applications for shortlisted Eco-Towns. The clear implication is that proponents would pray this PPS in aid of approvals regardless of the policies in official adopted or emerging development plans. Central to the LGA's legal opinion that Eco-Towns will be unlawful is the view that the arrangement "appears to be designed to circumvent the normal plan-led process", and for no good reason.

CLG has begun the lengthy process of a Sustainability Appraisal (SA) for the overall Eco-Towns programme and the shortlisted sites individually and cumulatively. Had this been done beforehand through the forward planning system, and many of the sites dismissed, considerable effort and general angst could have been avoided. CLG announced that the SA would test each site against reasonable alternatives. However, it has tried to rig the process. The overall programme will be tested only against not proceeding and against providing new settlements though not in an 'eco' variety. There is no option for providing the homes by some other means. Individual shortlisted locations, meanwhile, will only be tested against alternative proposals for free-standing new settlements. There is no provision to consider the far more realistic options of urban extensions or greater effort at urban renewal. These shortcomings are almost certainly sufficient for the Eco-Towns programme to fail to meet the legal requirement under the European Strategic Environmental Assessment Directive that reasonable alternatives must be identified, described and evaluated.

### Are new settlements best?

This is a matter of judgement and circumstances. Included in the legacy of the post-war Labour Government is the New Towns Act 1946, which underpinned the construction of 32 large new satellite towns around our major cities in the 1950s and 1960s. They now house around 2 million people. This kind of big thinking, tied to city slum replacement, has not been repeated. Essex County Council built South Woodham Ferrers, originally planned for 4,600 homes, from the mid-1970s onwards. In the late 1980s the private Consortium Developments Limited proposed a sequence of Green Belt busting or Plan-busting settlements each of 5,000-8,000 homes on the back of the economic boom at the time, but failed to lay one brick on top of another.

Free-standing settlements have fared less well than urban extensions in the last 30 years. The only modern example of a large free-standing new settlement on the point of construction is Northstowe near Cambridge, with 9,500 homes initially. Cranbrook (linked to Exeter) and Sherford (linked to Plymouth) are on the drawing board and currently proposed for 7,500 and 6,000 homes respectively. All three were promoted through the planning system.



Is the Coop really Green? Protestors demonstrate against the Co-operative Group's proposal for the 15,000 house Pennbury Eco-Town at the Stoughton Estate, Leicestershire.

Photo: Greg Siddons [www.siddons.me.uk/ecotown/](http://www.siddons.me.uk/ecotown/)

CLG's Planning Policy Statement 3 *Housing* places new settlements on an equal footing with other locational options: "Where need and demand are high, it will be necessary to identify and explore a range of options for distributing housing including consideration of the role of growth areas, growth points, new free-standing settlements, major urban extensions and the managed growth of settlements in urban and rural areas" (para. 37).

This is a Government U-turn from its previous position in 2000. Planning Policy Guidance note 3 *Housing* required authorities to "follow a search sequence, starting with the re-use of previously-developed land and buildings within urban areas identified by the urban housing capacity study, then urban extensions, and finally new development around nodes in good public transport corridors" (paragraph 30). Nevertheless it left the door open for new settlements but hardly encouraged them: "the cost of developing a new community from scratch, including the full range of new services and infrastructure, means that they will only infrequently be a viable option due to their scale and the time required to develop them" (para. 72). A series of criteria was imposed, including that "there is no more sustainable alternative".

One of the original intentions of the post-war new towns was that they should be reasonably self-contained, and were deliberately located away from alternative sources of employment to encourage this. The idea of self-containment lasted into the 1990s, when it meshed with newly fashionable talk of 'sustainable development'. In planning terms that implied in particular minimising the need to travel, especially by car. Research advocated settlements of approaching 10,000 dwellings and associated employment and services to facilitate sustainability.<sup>2</sup>

Only two remaining shortlisted Eco-Towns meet this criterion (Pennbury and Weston Otmoor). These are the only ones capable of meeting David Lock's objective that an Eco-Town should house at least 30,000 people. Unfortunately both are almost entirely greenfield sites.

However, self-containment has now diminished as a planning objective, recognising that mobility is highly desired, affordable, practical and in some cases the basis for wealth creation. More attention is now given to enabling movement by non-car modes, particularly with public transport to larger centres. The Eco-Towns *Prospectus* adopts this new model of mobility, and the July *Progress Report* specifically eschews self-containment. In doing so they beg the question of how free-standing settlements can possibly have smaller carbon footprints than housing built into or onto the existing urban fabric.

### Carbon-neutral?

Ministers have repeatedly stated that each Eco-Town must *"as a whole achieve zero carbon"*. However, a footnote to 7 March 2007 press release explained that this *"means no net carbon emissions from all energy uses in the home"*. The *Prospectus* realised that this was barely challenging, and stated that schools, shops, offices and community facilities should also reach zero carbon.

Transport, however, is outside the scope of the carbon-neutral objective. The intention is to plan for 'low carbon living' and to 'minimise carbon emissions from transport', but linking the proposed sites into the transport network and their subregional urban development pattern remains the Achilles Heel of Eco-Towns. Some sites such as Middle Quinton seem destined to clog the local road network.

While the Eco-Towns idea has been evolving, so has the Government's commitment to ramping up the energy performance of buildings. New homes everywhere will be required to be carbon neutral by 2016, so any edge that Eco-Towns may originally have had has now disappeared. So also with other exemplary environmental standards, if Eco-Towns can achieve them, what is to stop the same standards applying everywhere else too?

### Exemplars of sustainability?

Perhaps the greatest value of Eco-Towns lies in the new thinking they have generated in the design and planning of large scale new development, focused on sustainability in all its aspects. The aspirations are high. For example, so far as the natural environment is concerned, the CLG requires *"as a minimum an eco-town will need to do more than just mitigate its environmental impacts, but go further by creating net benefits in improving landscape and biodiversity for the area and creating other new green assets that are sustainable in a climate changed future. The eco-town masterplan should incorporate and enhance existing landscape features and create new networks of habitats taking advantage of the opportunity of whole-town design."*

The bidding process has generated great enthusiasm for designing-in environmentally sound arrangements, spurred in part by a series of worksheets issued by the TCPA. Proposals include efforts to reduce energy consumption, minimise car use, apply renewable energy technologies, manage water use & flood risk, and offer resilience to climate change. Eco-Towns are expected to be water-neutral, where total water use post-development is equal to or less than total water use beforehand.

Numerous case studies have been provided by TCPA and CLG where specific innovations have previously been implemented successfully, some of them on a whole-settlement scale. The skill in the Eco-Towns is not so much to invent new solutions as to apply and integrate existing best practice in the individual circumstances of each site. However, it is questionable whether Eco-Towns are on the cutting edge of sustainable living if exemplars can already be found without the need for such new settlements. There is again little to stop best practice being applied everywhere else.

### What are the priorities?

Implementing all the ideas proposed in CLG's consultation may not be practicable at the same time, while pursuing some might impair the achievement of others. Yet the proposals are unclear about priorities and naively optimistic about funding. The 'deliverability' and 'affordability' analyses may be cathartic. Significant risks remain that the aspirations will be watered down in practice. For example, the design standard for Eco-Town homes has now been set at Level 4 of the Code for Sustainable Homes, whereas the Government had previously trumpeted the need for all new homes to satisfy Level 6 (the Code's highest level, including a definite commitment to carbon-neutrality) by 2016.

Furthermore, why should new settlements be a priority anyway? Why start from scratch when there are plenty of places needing regeneration and brownfield sites requiring attention? Surely these are the areas where the greater environmental gains are to be had? The Chartered Institution of Water and Environmental Management (October 2008) has taken up this theme, criticising Eco-Towns for diverting the Government's attention away from other environmental initiatives: *"plonked in the countryside miles from jobs, shops, public transport and essential services such as sewers and water, and at a time when public expenditure is getting tighter, few eco-towns will actually work. Eco-towns will be isolated and too small to become anything other than commuter dormitories or green ghettos. Far better to concentrate efforts on existing urban settlements where the infrastructure already exists."*

### Seeing through the Greenwash

Communities and Local Government has not provided the attention to detail in policy making for Eco-Towns that the TCPA has provided on the practical aspects. If Eco-Towns are needed to help reduce house prices, then the credit crunch has rendered them obsolete. If they are to help achieve carbon neutrality, then free-

standing locations are the wrong places to start. If they are to be exemplars of sustainability, then it is unclear what is being added to the array of exemplars already available. Those on brownfield sites may tick a box (though only two are over 50% brownfield), but in remote locations other uses – nature conservation even – might be as attractive. Some short-listed proposals are even partially in the Green Belt despite the Government hoping they are not.

Eco-Towns may well offer some good ideas on how to apply environmental best practice at the settlement scale, but CLG has greatly over-stated the benefits of the model. If any Eco-Towns are ever built, they are unlikely to be discernibly more 'eco' than building anywhere else, and in size they will barely qualify as towns rather than villages. They are an after-thought in the list of ruses which the Government has come up with to build more houses in the face of middle England's resistance. They manifest central edict over the democracy, tedious but necessary, of using the planning system to decide where development should best be located. The assessment of alternatives is to be manipulated to produce the answers the Government wants.

In September 2008 the Advertising Standards Authority upheld a complaint about a Government advertisement misleading the public about the proposed Curborough Eco-Town near Lichfield in Staffordshire, because it wrongly implied that the entire 5,000 house development would be built on brownfield land (CPRE estimates the site at 7% brownfield). CLG describes the Ford site as partly a former airfield, without mentioning that this has not been used for over 60 years and is now mostly growing crops. Perhaps the ASA would like to investigate whether they are 'Eco' towns at all?

### Stop Press: November 2008 update

The third Housing Minister this year has added her pennyworth on Eco-Towns. On 4 November Margaret Becket announced CLG's latest proposals. A draft Planning Policy Statement (PPS) has been issued for consultation, in effect thumbing the Government's nose at Justice Collins, who had commented in granting a judicial review of the Middle Quinton site that there is little point in pursuing the Eco-Towns programme until the claim is resolved. CLG's own press release describes the PPS as requiring "the toughest ever green standards for EcoTowns", with the Minister expecting some shortlisted schemes to struggle to meet them. Is this a Government retreat, cannily trying to kill off Eco-Towns by making their standards unattainable? The decision certainly raises a question about who will continue ploughing serious money into promoting them. A Sustainability Appraisal (SA) was also published of the Eco-Towns programme, though many of its recommendations have not been incorporated into the draft PPS, notably on locational criteria, landscape, the historic environment and equivalent standards elsewhere. SAs of shortlisted sites, including alternatives to some which had bitten the dust, effectively seal the fate of Weston Otmoor, largely on the basis of it inevitably being a commuter settlement. A new site at Rackheath outside Norwich emerges as front runner with the only 'A' rating. The remainder might be able to reach the new

planning and design objectives, but the SA highlights particularly the difficulties concerning water: of the 15 locations studied, 14 might adversely affect Natura 2000 sites as a result of additional demands on water resources, and 10 as a result of deteriorating water quality from increased volumes of treated sewage effluent.

### References

1. Bate, R., 2007, *Planning for Housing Affordability: Why providing more land for housing will not reduce house prices*, CPRE.
2. Breheny, M., Gent, T. and Lock, D., 1993, *Alternative Development Patterns: New Settlements*, HMSO (paragraph 8.23).

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The proposed Pennbury Eco-Town is faced with passionate protest in Leicestershire.

Photo: Greg Siddons

