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**Report to**

Scrutiny Board 3  
Cabinet  
Council

18 June 08  
30 June 08  
30 June 08

**Report of**

Director of City Development

**Title**

Consultation on "Eco-towns: living a greener future"

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### **1 Purpose of the Report**

- 1.1 The purpose of this report is to respond to the Consultation "Eco-towns: living a greener future". This paper was published by the Department for Communities & Local Government (DCLG) on 3<sup>rd</sup> April 2008. The Council is required to submit its responses to the questions contained within the consultation by 30<sup>th</sup> June 2008.

### **2 Recommendations**

- 2.1 Scrutiny Board 3 is asked to consider the draft responses to the consultation and forward any comments to Cabinet for its consideration.
- 2.2 Cabinet is asked to consider the draft responses to the consultation, together with any comments received from Scrutiny Board 3, and make a recommendation to Council to enable a response to the consultation to be made.
- 2.3 The Council is asked to consider any comments received from the Cabinet and agree the Council's response to the consultation.

### **3 Information/Background**

- 3.1 The Government has, for some time, been pressing for accelerated house building. This stems from the 2004 Barker Review of House-building, which concluded that the housing affordability problem is as a result of supply side market failure, and as such can be ameliorated by increasing the supply of housing. Notwithstanding the current situation that points to a demand side, rather than supply side market failure, the Barker Review resulted in Planning Policy Statement 3 – Housing (PPS3) that requires the Council to maintain a 5-year supply of housing land, and now proposals for eco-towns.
- 3.2 The Regional Assembly has been reviewing the 2004 Regional Spatial Strategy and the Phase II revision has looked at how the projected growth in households should be distributed through the region. The Phase II revision draft was submitted to Government in

December 2007 and this indicated how 365,000 new households should be distributed throughout the region to best fit with the urban renaissance principles of the RSS. The period of public consultation was originally to be from 7 January to 28 March 2008, but this has now been extended to 8<sup>th</sup> December 2008. This develops the theme of the RSS and identified four major challenges.

1. Urban Renaissance – developing the Major Urban Areas (MUAs) in such a way that they can increasingly meet more of their own economic and social needs in order to counter the unsustainable outward movement of people and jobs facilitated by previous strategies.
2. Rural Renaissance - supporting rural communities to achieve their economic and social potential whilst embracing the challenges of accessibility and climate change.
3. Diversifying and modernising the Region's economy – ensuring that opportunities for growth are linked to meeting needs and that they help reduce social exclusion.
4. Modernising the transport infrastructure of the West Midlands – supporting the sustainable development of the Region.

3.3 The RSS strategy focuses growth on the MUA, and closely reflects the Coventry, Solihull & Warwickshire (CSW) sub-regional strategy endorsed by all 8 Authorities at the CSW Forum In July 2007, which proposes that RSS:

- Adopts the main elements of the CSW Strategy and endorses the CSW Sub-region for the purposes of RSS proposals & policies.
- Provides for estimated housing demand generated by CSW to be met in the Sub-region – so long as it is robust and can be met within the CSW Strategy.
- Maintains the RSS 'step-change' in the Sub-region i.e. 50% (min) growth to Coventry & Solihull; growth focussed on North/South Corridor & Rugby; supporting infrastructure; growth in N. Warks & Stratford limited to local needs.
- Phases housing land releases to encourage regeneration in the MUAs by giving priority to:
  1. sustainable locations first and foremost and,
  2. within those locations, brownfield land before greenfield land;
  3. then, if necessary, urban extensions within-LAs areas; and
  4. only as a last resort, cross-boundary urban extensions in the N-S Corridor – later in the plan period - if no more suitable alternative capacity is available.
- Enables specific local Green Belt boundary adjustment for urban extensions to be made through LDFs - when and where essential to meet long term needs.
- Proposes that releases of land for housing are geared to maintain a constant average annual supply across the Sub-region.
- Excludes the provision of land in the Sub-region to meet any 'overspill' housing needs arising from elsewhere e.g. Birmingham, Redditch, Tamworth; and

- Includes flexibility allowing for different ways of securing the RSS's 'step change' that reflect sensitivity to local circumstances.

**3.4** However, the Government agenda increasingly is demanding more housing be provided and it has commissioned NLP (Nathaniel Lichfield & Partners) to undertake a further study to investigate further opportunities. It has also promoted its growth point initiative and latterly the eco towns.

**3.5** Eco towns are intended to be new, free-standing settlements to tackle climate change, the need for sustainable living, and to increase housing supply. Key criteria for eco towns include:

- A minimum of 5000 new homes, as new settlements separate and distinct from, but well linked to, existing towns;
- The development as a whole should reach zero carbon standards, and each eco-town should be an exemplar in at least one other area of 'sustainability';
- They should provide a good range of facilities, including schools, shops, business and leisure; and
- Between 30% and 50% of the housing should be affordable, with an emphasis on larger family homes.

**3.6** The current consultation seeks views on the 15 short listed locations for eco-towns, two of which are located in the West Midlands region (at Middle Quinton, aka Long Marston in Stratford District and Curborough [Fradley] in Lichfield District).

<b>West Midlands – Curborough</b> Lichfield District Council, Staffordshire County Council	
<b>Description</b>	The eco town proposal is for a 314ha site, 7km NE of Lichfield, part of former Fradley airfield and is 15km from Burton and 35km from Birmingham. Two existing residential communities lie to north and east – Fradley village and South Fradley. A brownfield site with hardstanding and old airfield buildings. The potential for major new development in this broad location was previously identified in the Staffordshire and Stoke on Trent Structure Plan 1996 – 2011 although the relevant policy was not saved.
<b>Proposed Benefits</b>	A new community comprising 5,000 dwellings, secondary and primary schools, commercial, retail and community facilities; a new A38 junction, two new road links to Lichfield, a park and ride, and pedestrian/cycle provision; Eco-energy Park, and sports facilities.  <i>Housing Affordability Pressure – Very High.</i> An eco-town scheme would supply around 2,000 affordable houses over 10 years in comparison with recent annual supply in Lichfield of 100 and a housing waiting list of 3,000 households.
<b>Initial Summary of challenges and constraints</b>	<i>Environment</i> There are high existing environmental pressures in the area which transport infrastructure for the scheme would need to take into account. Some flooding issues (two watercourses run through the site). Issue with water quality. Lichfield waste water treatment infrastructure would need upgrading.

	<p><i>Transport</i> The scheme will need to develop proposals for sustainable and high quality public transport links to the eco-town, particularly taking account of existing congestion. The A38, in particular, would require a strategy to cope with additional traffic generated from the development.</p> <p><i>Employment</i> 7,000 jobs will be achieved from development at Fradley Park employment area (one of the largest employment areas in West Midlands), with potential for further growth which could reduce travel to work problems.</p> <p><i>Conservation and historic constraints</i> Airfield and listed buildings. Historic canal features bordering the site will need to be safeguarded.</p>
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<p><b>West Midlands – Middle Quinton</b> Stratford-upon-Avon, Warwickshire</p>	
<b>Description</b>	<p>The eco-town proposal comprises a 240ha brownfield site 6 miles to the SW of Stratford upon Avon between Long Marston and Lower Quinton. It is former MoD Engineers depot with extensive warehousing, a rail system and a rail (freight use) connection to the main Worcester-Oxford-London line.</p>
<b>Proposed benefits</b>	<p>A scheme of at least 6,000 zero carbon homes on previously developed land, with substantial employment opportunities, affordable housing and community infrastructure, including high quality public transport links to surrounding towns and villages, all supported by leading edge environmental technology. (<i>Housing Affordability Pressure – Very High</i>). The scheme would deliver 2,000 affordable housing units in comparison with current delivery of 170 annually and 3,000 households on waiting list. Stratford experiences very high levels of demand for rented accommodation in relation to its role as an international destination – an issue recognised in the Stratford World Class vision initiative.</p>
<b>Initial summary of challenges and constraints</b>	<p><i>Environment</i> The scheme will need to be developed with design sensitivity to its setting close to Costwolds AONB (Area of Outstanding Natural Beauty) and suitable mitigation measures. Would look for an SFRA (Strategic Flood Risk Assessment) to make sure there is no flood risk on site. Capacity of existing sewage network unlikely to be able to cope. The scheme will need to include a contaminated land survey and to carry out remediation sustainability.</p> <p><i>Transport</i> No major issues regarding the strategic transport network but the scheme would need to develop and support a substantial improvement to public transport links to surrounding centres and particularly Stratford upon Avon.</p> <p><i>Employment</i> The site is already a significant employment centre with scope for expansion around proposed eco-town technologies including recycling and sustainable construction.</p>

	<p><i>Conservation and historic constraints</i> Historic settlements, listed buildings and landscape issues would need to be safeguarded and enhanced as the scheme is developed.</p>
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3.7 The consultation indicates that following preliminary views on eco-towns and the short listed locations, there will be a Sustainability Appraisal of each location and a draft planning policy statement on eco towns that is likely to be published in the summer of 2008. Later in 2008 a final list of locations with potential to be an extension and a final policy will then form the basis for coordination of planning applications for individual schemes.

3.8 The consultation is not clear on whether or not it is intended that eco towns are to contribute to existing RSS figures. The consultation states:

"The Housing Green Paper made it clear that the housing numbers in existing and in some cases emerging plans were not high enough to address the pressing problem of long term housing need and affordability. We are therefore aiming to complete a further set of Regional Spatial Strategy partial reviews by 2011 that will include revised housing numbers for local planning authorities that are consistent with our national aim to deliver 240,000 homes per year by 2016. We expect eco towns to contribute significantly to help to meet those revised targets for additional housing and we want to assure local authorities which include an eco town in their future housing plans that it will, of course, count towards those future housing targets, which in most places are likely to be more stretching"

3.9 The consultation document asks a number of specific questions about the eco-towns proposals, and these are mostly variations on a 'sustainability' theme. Your officers are very concerned that the proposals for eco-towns in the West Midlands region are wholly inconsistent with the RSS draft and fundamentally threaten the strategy of Urban Renaissance. This can be illustrated by the potential impacts on the city's growth agenda for the following reasons:

- It is likely that investment in new housing in particular, but also employment and leisure developments, will be diverted from the MUA to the nearby eco-town/s; and
- It is likely that funding for strategic and other infrastructure, already at risk due to the slowing market, will be diverted to the eco-town/s; and
- It is equally likely that a substantial number of residents of the eco-town/s will commute to other settlements, including Coventry, to work and for leisure pursuits. This would have negative impacts on Coventry, because congestion would increase in the city, but funding to upgrade infrastructure would likely be diverted to the eco-town/s, as well as the 'leakage' of wealth from Coventry; and
- No mention is made of the need to improve the environmental performance of existing buildings; and
- A more efficient way of providing the level of housing that Government wishes to see developed would be to extend existing urban areas, on a smaller scale, to 'tap into' existing infrastructure and reduce the distance that people travel, if not the need to travel at all, or achieve modal shift away from cars.

3.10 Many of the principles outlined in the consultation can be supported as they should be applied to all new development. They include desires that:

- development as a whole should reach zero carbon standards; and
- Affordable housing should make up between 30 and 50 per cent of the total, with a particular emphasis on larger family homes; and

- Higher standards of design should be achieved; and
- Travel Plans should promote an increased proportion of journeys on foot, by cycle and by public transport; and
- Imaginative proposals to create additional green infrastructure are promoted; and
- Water management and efficiency measures are adopted; and
- Communities are empowered and manage community assets.

#### 4 Proposal and Other Option(s) to be Considered

4.1 The consultation includes a number of questions. Draft responses to the questions appear at **Appendix 1** to this report. It is proposed that, subject to your consideration and approval, these responses be submitted to the Government

#### 5 Other specific implications

	Implications (See below)	No Implications
Best Value		√
Children and Young People		√
Climate Change & Sustainable Development	√	
Comparable Benchmark Data		√
Corporate Parenting		√
Coventry Community Plan		√
Crime and Disorder		√
Equal Opportunities		√
Finance	√	
Health and Safety		√
Human Resources	√	
Human Rights Act		√
Impact on Partner Organisations		√
Information and Communications Technology		√
Legal Implications	√	
Neighbourhood Management		√
Property Implications		√
Race Equality Scheme		√
Risk Management		√
Trade Union Consultation		√
Voluntary Sector – The Coventry Compact		√

## 5.2 Climate Change and Sustainable Development

While the Government intends to create freestanding settlements, replete with employment, leisure facilities etc, it has no control over where the future inhabitants of eco-towns will work. Given the size of the towns, it is likely that a number will commute to other settlements to work, shop or relax, and the relative remoteness of the shortlisted eco-town locations means that a significant number of these trips will be taken by car. Overall, it is preferable to locate development within or adjacent to existing settlements, to minimise the length of journeys at the very least, and encourage / enable modal shift as a result of the existing infrastructure. In addition, no mention is made of retrofitting existing buildings to make them more 'carbon efficient', which given the number of existing buildings would be a more financially efficacious approach. Finally, there is tension between achieving economies of scale (eco-towns) and achieving more sustainable land use patterns. It is also worthy of note that no Sustainability Appraisal has been prepared to accompany the consultation.

## 5.3 Coventry Community Plan

The two potential eco-towns within the West Midlands, if taken forward, risk undermining investment in the MUA of Coventry, with the implication that the growth strategy in particular is compromised.

## 5.4 Finance

In the event that one or both of the local eco-towns are taken forward, there is a risk that existing Government and other monies are diverted to the eco-town/s, to the detriment of the MUA.

## 5.5 Impact on Partner Organisations

Given that the eco-towns will be stand-alone settlements, it follows that entirely new infrastructure will be required. The impact of this is likely to be far-reaching, because providers of infrastructure will be under additional pressure to not only plan for and implement existing schemes but also whole new towns.

## 6. Monitoring

6.1 No mention is made in the consultation of monitoring.

## 7. Timescale and expected outcomes

7.1 Responses are required by 30<sup>th</sup> June 2008. The Government will publish a further shortlist of 10 sites 'later this year' (there are currently 15 sites shortlisted). The Government aims to see the first schemes beginning construction by 2010.

	Yes	No
<b>Key Decision</b>		√
<b>Scrutiny Consideration (if yes, which Scrutiny meeting and date)</b>	√ <b>Scrutiny Board 3 18 June 2008</b>	
<b>Council Consideration (if yes, date of Council meeting)</b>	√ <b>30 June 2008</b>	

List of background papers

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Papers open to Public Inspection

**Description of paper**

**Location**

None



## **Appendix 1 – Questions & Answers**

**Seeking views on:**

**The way in which the eco-towns concept is being developed and the different potential benefits that an eco-town could offer;**

It is considered that eco towns may have a role to play in the spatial distribution of growth in certain parts of the country. However within the Coventry Solihull, Warwickshire sub region it is considered that the strategy developed with the 8 authorities and incorporated into the submitted draft RSS Phase II review provides a more sustainable strategy to delivering the Government's objectives. It is further considered that the eco-towns concept should be developed in an integrated way, together with (rather than in addition to) the development planning process (RSS, LDF). Inevitably given that a number of the shortlisted sites are former MOD sites there is suspicion that the key driver of eco-towns is the disposal of surplus public sector land, rather than a genuine desire to achieve more sustainable development. This is because the pattern of land use is a key determinant of 'sustainability', whereby the carbon 'gains' resulting from efficiency of buildings within an eco-town will at least partially be offset by increased transportation carbon emissions. It is considered that a better approach would be more joined up, and include:

- Making money available for improving the performance of domestic buildings through additional insulation etc; and
- Requiring, through the building regulations, that all new building to reach 'zero carbon' standards much earlier than 2016; and
- Locating strategic developments (including those of the order of eco-towns) at the edges of existing settlements, to reduce the need to travel.

**How particular features such as greenspace or innovative approaches to housing can best be developed in an eco-town;**

Greenspace is an integral part of any settlement and it would be expected that English Nature standards would be applied. There may be also opportunity in creating a new settlement to experiment with housing designs, as was the case with the earlier new towns. However this should not be at the expense of such innovation in the existing built up areas where green infrastructure can be extended to improve the quality of life of existing and new residents.

**Preliminary views on the 15 locations going forward for further assessment**

Of these the two in the West Midlands have the potential to draw investment from the Major Urban Area (MUA) contrary to existing and emerging RSS policy that supports the urban renaissance. They will also undermine the sub regional strategy as incorporated into the draft RSS which is built on the principle of sustainable locations to meet growth

**How will eco-towns be different?**

**Are these potential benefits the most important which an eco-town could deliver. Do you have views on how they could be most effectively delivered?**

The Council considers that the eco-towns concept, if taken forward, should not be examined in isolation as is currently the case. This is because a large 'easy' green field sites or large brownfield sites in unsustainable locations risks attracting all of the locally available investment to the detriment of existing larger settlements. These existing settlements are likely to be generally more 'sustainable' owing to their relatively dense built form, more efficient public and other transport systems, and existing other infrastructure such as power, water etc. The City Council is

extremely concerned that the proposed eco-towns at Fradley and Long Marston, in particular, will undermine Coventry's urban renaissance because housing developers will be enticed to these locations. Given the current relative lack of availability of funding sources for development, and the RSS strategy of focussing development in and around the Major Urban Area, eco-towns could absorb a substantial amount of the locally available resource for the next few years.

The Council therefore proposes that eco-towns be reconsidered, and instead sustainable urban extensions at a smaller scale should be promoted. While it is accepted that economies of scale could be diluted by taking such an approach, the benefits to sustainability overall by virtue of the carbon footprint of travel between new development and existing centres are likely to be substantial. Notwithstanding this, urban extensions are likely to be cheaper than new stand-alone settlements, because they can 'tap into' existing infrastructure.

**In addition to these, are there other significant areas of potential benefit which you would wish to see added to the list?**

Grey water recycling, car clubs, a proper network of cycle routes built into the development from the start, and there should be a specific presumption in favour of Sustainable Drainage Systems (SUDs) for all new development.

**Are there particular technologies or approaches which you would wish to see piloted to help achieve the eco-town outcomes?**

None that could not be piloted in connection with a sustainable urban extension or indeed on an appropriately sited brownfield site, by taking a joined-up approach to achieve overall efficiency and liveability. This means that green infrastructure, sustainable transport links such as walking and cycling routes, SUDS, provision of greenspace and amenity and landscaping should all be linked into consideration of future climate change – greenspace and vegetation for cooling and flood management, shade in the public realm, green roofs etc are all planned together to achieve the most benefit. For example, cycle and footpaths could be integrated within greenspaces, providing shade etc.

### **Zero Carbon**

**What is your view on requiring the low and zero carbon energy sources to be located within the eco-town development area and what flexibility should be permitted to ensure that wider energy opportunities beyond the eco-town can be maximised?**

Eco-towns should be required to be self-sufficient in energy, i.e. all energy requirements should be met by on-site generation of renewables. However they should also be of a scale that they can be self supporting and therefore it is essential that their development is linked to employment opportunities within them so as to avoid the perverse situation where effectively they are no more than a dormitory town and unsustainable commuting is a necessity

**In addition to these, are there other significant areas of potential which you would wish to see added to this list?**

No

**Are there particular technologies or approaches which you would wish to see piloted to help achieve the eco-town outcomes?**

None that could not be piloted in an existing area or as part of a sustainable urban extension.

## **Managing Water**

**In addition to these, are there other significant areas of potential which you would wish to see added to this list?**

No

**Are there particular technologies or approaches which you would wish to see piloted to help achieve the eco-town outcomes?**

Yes. Any area that is currently identified as a water stressed area should be precluded from future development, including new eco-town/s. For example, Weston Otmoor (shortlisted site, 10-15000 new homes) is currently identified as being in "serious water stress" by the Environment Agency. This is not the only example of shortlisted sites being located in areas of existing water stress. The Council would question the wisdom of large scale new development in such areas, especially given climate change predictions.

## **Waste**

**In addition to these, are there other significant areas of potential which you would wish to see added to this list?**

No

**Are there particular technologies or approaches which you would wish to see piloted to help achieve the eco-town outcomes?**

Yes, composting should be considered, especially as eco-towns would have a strong emphasis on locally-grown organic food and allotment cultivation.

## **Green Space & Biodiversity**

**Do you have any views on whether this is the right measure for the creation of greenspace and how should it be applied?**

The Council would like to see a standard hierarchy of considerations:

1. Safeguard, protect and enhance existing habitats and species, guided by the LBAP (Local Biodiversity Action Plan);
2. Create a buffer zone of an appropriate area around identified habitats;
3. Design and create green infrastructure – wildlife corridors, SUDS, amenity cycle routes, walkways;
4. Policy of sensitive grounds maintenance for public realm in perpetuity – organic / low chemical use etc – and in public ownership; and
5. Then add built development.

**In addition to these, are there other significant areas of potential which you would wish to see added to this list?**

No

**Are there particular technologies or approaches which you would wish to see piloted to help achieve the eco-town outcomes?**

No

## **More Sustainable Travel**

**In addition to these, are there other significant areas of potential which you would wish to see added to this list?**

To be truly sustainable any new development must be constructed in a way which reduces the need to travel, and offers real alternatives to car transport for all journeys. The eco town concept may work on a very local scale if housing is matched by employment opportunities of the right types for some trips e.g. by encouraging short trips by walking and cycling to the local shops. However, it is unlikely that, due their scale, eco towns would be able to sustain enough facilities to meet all the needs of most residents, therefore requiring additional longer trips into nearby towns and cities. This would be the case for many trips such as shopping for comparison goods, work and leisure. At the local/regional level, walking and cycling become unfeasible and, as in many rural areas, public transport also becomes less feasible, particularly out of peak hours. It may therefore be inevitable that the car could become the predominant form of transport which would undermine the whole concept of an eco town. Even though the Middle Quinton (Long Marston) site has rail access for freight, hence potential for passenger rail, the Council would question the viability of a passenger rail service for a new settlement of the size of the proposed eco-town.

**Are there particular technologies or approaches which you would wish to see piloted to help achieve the eco-town outcomes?**

No

## **Homes and Housing**

**Are there innovative approaches on affordable housing which you would like to see trialled in eco-towns? If so how would they vary from current approaches?**

As a matter of principle the eco towns should not in the City Council's view be an experiment where various emerging approaches and techniques are trialled. Rather those trials should take place in existing settlements of appropriate scale and location where there is an identified need to meet demands for more affordable housing. We would prefer that Innovative approaches on affordable housing do not automatically translate into 'experimental' or 'cheap' housing using untried proprietary building systems or mass, higher density housing (especially a disproportionate ratio of apartments) of limited quality with bland designs and little attention to liveability and estate layout.

Unfortunately, many of the past 'innovative approaches' on social housing especially from the immediate post war re-construction era paid little regard to how people would live and communities interact with the consequence of a lack of identity and social problems later.

Experimental housing estates from that era were often built with a lack of variety and 'hard' concrete or steel structures which displayed obsolescence early on culminating in the demolition and re-development programmes we have today.

Fortunately, modern building regulations and further proposed changes over the next decade under sustainability / carbon reduction objectives will provide vastly improved dwelling standards in terms of construction, energy efficiency, sound insulation and accessibility.

However, national planning policy guidance in requiring the efficient use of land, increases the density of new housing. There can be a temptation for affordable housing to be consigned to the

higher density ranges with consequent pressure on space standards, lack of variety in dwelling types and economic design features

We welcome though the suggested approach on Lifetime homes, flexibility to cater for the needs of an ageing society and the move towards Code Level 6 which should apply to all new housing not just affordable housing.

Rather than suggesting unusual innovative approaches merely to be different, in order to avoid the risk of early obsolescence, we would prefer not only the new eco towns but all new housing irrespective of where it is located, to be designed and built to cater for liveability and people's life cycle changes over the long term and provide for a variety of dwelling types and need to successfully meet national sustainability and mixed / balanced community objectives.

As part of that, we would suggest that target standards should apply for all new dwellings to achieve minimum dwelling space standards, room sizes, internal storage and expand Lifetime and Assistive Technology features to provide more closely for people as they age or develop disabilities, sensory hearing and / or sight loss during their life cycle to be able to remain in their homes. Simple measures included in all new homes (eg task lighting, door sensors, dimmer switches, hearing loop systems, attention to kitchen layout design and adjustable height units etc) would not be unduly costly to install as standard.

Such standards could be incorporated in building regulations or as a separate national housing standards manual much in the same way as the Parker Morris standards from the early 60s and the Housing Quality Indicators / Housing Corporation Design & Quality standards of today.

As Modern Methods of Construction (MMC) with increasing emphasis on Off site Manufacture (OSM) will inevitably be used for all new housing, as eco towns will be formed in independent locations, we consider that there should be national guidance on acceptable methods to avoid the risk of defective housing of the future being inadvertently created. Scandinavian or other European systems whilst having a number of advantages need thorough evaluation to ensure that proprietary 'flat pack' type kits in particular can offer long term durability and attractive elevational features rather than a bland or purely functional appearance.

In particular, eco towns will need to cater for the needs, cultures and lifestyles of new settlers from other countries both in terms of dwelling types needed (especially larger families) and design features.

Provision of suitably designed new housing should be made for people for vulnerable groups needing housing with support and or care within the eco towns communities

There is scope for self build groups to participate in the construction of new housing in the eco-towns although it does take time to establish groups of interested participants and go through the process of building. Key advantage is that self build groups often form into cohesive communities. We would suggest that eco towns options provide strong encouragement and support to self build groups with access to technical advisory services and on site support

## **Jobs**

**In addition to these, are there other significant areas of potential which you would wish to see added to this list?**

No

**Are there particular technologies or approaches which you would wish to see piloted to help achieve the eco-town outcomes?**

No

**West Midlands – CURBOROUGH (Fradley)**

**Do you have any views on the inclusion of this location in the programme?**

The Council objects to the inclusion of this location in the eco-towns programme, because it is contrary to the sub regional strategy developed and endorsed by all 8 of the Authorities in the Coventry, Solihull & Warwickshire sub-region and it will undermine that strategy which seeks growth in sustainable locations on a north south corridor. The Curborough / Fradley site is not a sustainable location for a new settlement nor is the scale of the development sufficient to create a sustainable settlement

**A more detailed assessment will be included in the Sustainability Appraisal. Are there other potential benefits or challenges which you would wish to see addressed in this location?**

Yes. The SA should consider wider impacts, including the diversion of investment away from the MUA to the eco-town. In addition, the SA should consider the transport impacts as well as the buildings themselves – because the planning system cannot control [but it can influence] where people work in relation to where they live. For this reason, the SA should fully take into account the total carbon footprint over the lifetime of the development of both buildings and transportation. This should include reasonable assumptions about the likely levels of commuting into and out of the eco-towns. Notwithstanding all of this, the Council is very disappointed that no Sustainability Appraisal is available to accompany this consultation.

**Are there particular issues which you would like to see the proposals for this location address?**

No for the reasons given above it should not proceed

**West Midlands – MIDDLE QUINTON (Long Marston)**

**Do you have any views on the inclusion of this location in the programme?**

The Council objects to the inclusion of this location in the eco-towns programme, because it is contrary to the sub regional strategy developed and endorsed by all 8 of the Authorities in the Coventry, Solihull & Warwickshire sub-region and it will undermine that strategy which seeks growth in sustainable locations on a north south corridor. The Middle Quinton site is not a sustainable location for a new settlement nor is the scale of the development sufficient to create a sustainable settlement, nor will it meet the needs for affordable housing for Stratford District which is spread across its existing conglomeration of small settlements.

**A more detailed assessment will be included in the Sustainability Appraisal. Are there other potential benefits or challenges which you would wish to see addressed in this location?**

Yes. The SA should consider wider impacts, including the diversion of investment away from the MUA to the eco-town. In addition, the SA should consider the transport impacts as well as the buildings themselves – because the planning system cannot control where people work in relation to where they live. For this reason, the SA should fully take into account the total carbon

footprint over the lifetime of the development of both buildings and transportation. This should include reasonable assumptions about the likely levels of commuting into and out of the eco-towns. Notwithstanding all of this, the Council is very disappointed that no Sustainability Appraisal is available to accompany this consultation.

**Are there particular issues which you would like to see the proposals for this location address?**

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