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Dear Sirs

**ECO-TOWNS PROGRAMME CONSULTATIONS**  
**Draft Planning Policy Statement: Eco-towns - Consultation**  
**Financial Viability Study of Eco-towns programme**

**INTRODUCTION**

The Campaign to Protect Rural England (CPRE) Oxfordshire wishes to submit the following observations in response to the formal consultations on the Government's Eco-towns programme. The observations have been arranged under three main sections:

- (a) Draft PPS – consultation questions 1-3 and 4: Eco-town standards.
- (b) Draft PPS - consultation questions 5 and 6: Sustainability Appraisal/ Habitats Regulations Assessment and Impact Assessments.
- (c) Financial Viability Study - consultation questions 1-3.

From the outset of the eco-towns programme, CPRE Oxfordshire has been extremely concerned about the potentially adverse impacts on the Oxfordshire environment and the difficulties in engaging meaningfully to provide constructive, informed comment. Within the County of Oxfordshire it has been necessary to assess a series of publications and consultation on very major proposals for three different locations - although we are now given to understand the Shipton-on-Cherwell proposal has been dropped from this programme. It has certainly not helped those wishing to comment that the process has been imposed outside the normal regional/local planning framework, and developed rather haphazardly as it goes along.

We have opposed the Parkridge proposal for Weston Otmoor from the start, and we remain strongly opposed. It is deeply flawed as a location and a concept, and there are still many key questions about impact, infrastructure and delivery that remain unanswered. We welcome the overall Sustainability Assessment of grade "C" for Weston Otmoor, which underlines its inherent weaknesses as a proposal. We feel that the DCLG should accept that the scheme fails a number of key tests and remove Weston Otmoor from any final proposed list of eco-towns. We have set out comments on the possible alternative location of North West Bicester below.

We consider that DCLG should accept the current process of identifying specific eco-town locations (like Weston Otmoor) is ill-conceived and discredited, and should be scrapped in favour of the proper democratic, statutory planning process, i.e., any schemes should be taken through the local development frameworks in the context of regional planning policy.

CPRE agrees that raising sustainability standards is in principle laudable, and set out its case for eco-towns to meet ten key tests in February 2008. We feel it is vital that any potential schemes should meet these tests if they are to leave a positive legacy for the future.

### **(a) DRAFT PPS – QUESTIONS 1-3 AND 4: ECO-TOWN STANDARDS**

*Q1. Does the draft Planning Policy Statement provide sufficient guidance on the consideration of eco-towns through the plan making process?*

CPRE Oxfordshire Observations:

No. We consider it is wrong – and potentially unlawful - for the PPS to attempt to identify, and impose, locations for eco-towns outside the normal development plan process. The draft PPS does not make it clear whether the final PPS is to include a list of selected eco-town locations and thereby pre-empt subsequent consideration by a future RSS. It would appear that the PPS allows for future eco-towns to be identified through the RSS, but also that the eco-towns identified in the PPS will sit outside the development plan process. We would argue strongly that the primary purpose of the PPS should be to set down key eco-development principles and standards- for all forms of major development - and not usurp the development plan process.

We are also concerned that the identification of a site within any locations annexed to the PPS may be a material consideration and should be given “material weight” in any planning application process. We consider it quite wrong that “material weight” should be given to a site being identified through the flawed Eco-towns programme, and thereby according it favourable presumption above alternative schemes. Surely it is for the LPA to determine what weight should be attributed to the various material considerations. We would also contend that, where the LDF is being prepared, it would be premature to treat an application favourably merely because it has emerged through the Eco-towns Programme.

It is also our understanding that the failure to carry out a proper assessment of alternatives is contrary to the terms of the SEA Directive, and if the final version of the PPS includes the list of identified sites without any further assessment it would be potentially unlawful.

*Q2. Are the locational principles for eco-towns sufficiently clear and workable?*

CPRE Oxfordshire Observations:

No. The spatial/locational issues are a very weak area, as we comment in detail below. The suggested locations have in the main not emerged from a careful plan-led process but are essentially developer-driven and opportunist. The Government has not explained why it is essential for the schemes to be “a new settlement, separate and distinct”, when most new development will actually take the form of urban extensions. None of the locational principles appear to be only applicable to new settlements.

*Q3. Taking overall the standards set out in the draft PPS do you think that they achieve a viable eco-towns concept?*

CPRE Oxfordshire Observations:

No. The PPS seems to be partly pre-occupied with delivering a programme of what pass for “eco-towns” at all costs, rather than setting down ambitious, but achievable, principles and standards for all future major developments. Some key principles appear to have been

seriously diluted eg advocating level 4 of the Code for Sustainable Homes rather than higher levels and suggesting lower requirements for affordable housing (30% rather than adopted regional/local standards). In our view the whole programme has consistently placed too much emphasis (reflecting political priorities?) on housing delivery as opposed to environmental and economic issues, and there is lack of clarity in how these two very different and potentially conflicting objectives might be weighted. The recent downturn in the housing market surely provides an opportunity for a more measured response to regional housing issues, and for greater focus on the central “sustainability” issues.

### **Eco-town standards**

*Q4. We would like your views on the Government’s proposed standards for eco-towns, in particular:*

*Q4.1 Do you consider that the standards provide a clear basis on which to make decisions on planning applications for eco-towns?*

CPRE Oxfordshire Observations:

No. Future sustainability standards are an extremely important issue, but much more work is required. We feel the PPS, as it stands, reflects a conflict between the Government’s ambitions for housing delivery and sustainability standards. There is a risk that more traditional “commercial” schemes will take precedence over better, more sustainable concepts which require active public/private partnerships and timely Government support. CPRE considers that schemes should be tested through Regional Spatial Strategies and Local Development Framework reviews. These should ensure that decisions on eco-towns take full account of evidence on environmental effects, housing need and alternatives for meeting this need. Decisions on eco-towns should be accompanied by evidence that demonstrates a new settlement to be the most sustainable option for accommodating housing growth compared with other options, such as redeveloping an existing urban brownfield site or an urban extension.

*Q4.2 Do you consider that the cost of implementing the standards will undermine the viability of eco-towns?*

CPRE Oxfordshire Observations:

This is distinctly possible and one has seen evidence of this suggested in the viability studies just published. We consider that if the Government is really serious about future sustainability standards, it needs to accept that more pro-active public/private partnerships with public sector support and funding will be required. “Eco-developments” which aspire to long-term sustainability will not be easy or cheap to implement.

*Q4.3 Are there any standards that you feel are missing? (That are not covered in other Government policy or guidance.)*

CPRE Oxfordshire Observations:

We have no comments.

*Q4.4 Are any of the standards not essential?*

CPRE Oxfordshire Observations:

We have no comments.

### **Zero carbon (paragraphs 4.3 to 4.6)**

*Q4.5 The zero carbon standard attempts to ensure that carbon emissions related to the built environment in eco-towns are zero or below. Have we specified the calculation of net emissions clearly in a way that avoids perverse incentives and loopholes? Is this standard the most cost effective way to do this?*

CPRE Oxfordshire Observations:

It appears that zero carbon in the eco-towns PPS is related to energy use within the buildings only, and we feel that emissions from transport and travel should not be excluded from the zero carbon standard. CPRE considers they should be genuinely carbon neutral, taking into account potential emissions from transport (domestic, public and commercial) and buildings (in construction and use).

### **Climate change adaptation (paragraphs 4.7 to 4.8)**

*Q4.6 The climate change adaptation standard, alongside existing planning guidance, aims to ensure that eco-towns will be more future-proof. Is it sufficiently clear and workable?*

CPRE Oxfordshire Observations:

We would strongly agree with other submissions that the climate change adaptation standards are a key factor and should therefore be clarified.

### **Homes (paragraphs 4.9 to 4.10)**

*Q4.7 Should the PPS be more prescriptive than set out in paragraph 4.9 (e) in relation to energy efficiency? Do you agree that 70 per cent is an appropriate level of carbon mitigation through on-site means?*

CPRE Oxfordshire Observations:

We would strongly agree with other submissions that the Code for Sustainable Homes is an essential ambition and all environmental requirements for homes need to be set high, including affordable home targets. To compromise on these issues would make the eco-towns concept fairly meaningless.

### **Employment (paragraph 4.11)**

*Q4.8 Is this employment standard sufficiently clear and workable?*

CPRE Oxfordshire Observations:

We feel that more work is required to address the importance of a balanced, mixed use community and how this will actually be delivered. The PPS as it stands reflects a conflict between the Government's ambitions for housing delivery and achieving a balanced, sustainable community. There is a risk that more traditional "commercial" schemes will take precedence over better, more sustainable concepts which require active and timely public/Government support, not least in equipping the development with all the necessary social and physical infrastructure, including local employment, education etc. A standard for commuter trips needs defining. Incorporating transport emissions into the zero carbon calculation would also help to discourage long distance commuting. CPRE considers that such developments should be complete communities with homes (with at least 50% affordable), workplaces, schools, shops, recreation, community and health facilities and open space within walking distance and should foster active, sustainable lifestyles and civic participation.

### **Transport (paragraphs 4.12 to 4.16)**

*Q4.9 The transport standard attempts to support people's desire for mobility whilst enabling low carbon living. Is it sufficiently clear and workable?*

CPRE Oxfordshire Observations:

No. Future sustainability standards are an extremely important issue with transport and travel one of the keys to sustainability, but much more work is required. The PPS seems to make no reference to trips *into* the eco-town for employment, shopping etc. The PPS also refers to the need to monitor carbon from transport but there are no defined targets.

### **Local services (paragraph 4.17)**

*Q4.10 The local services standard allows flexibility to reflect existing local provision and the size of the development. Does it cover the essential services which will be needed in eco-towns?*

CPRE Oxfordshire Observations:

Future sustainability standards are an extremely important issue and eco-towns/ eco-extensions need to be highly self-sufficient in terms of local provision. We assume the list mentioned does not purport to be exhaustive since other facilities, such as care home places for the elderly, are not mentioned.

### **Green infrastructure and biodiversity (paragraphs 4.18 to 4.21)**

*Q4.11 The standards proposed on green infrastructure and biodiversity aim to ensure that development is undertaken in such a way that it protects and enhances the best features of local landscapes for the benefit of both people and wildlife. Are these standards reasonable and deliverable?*

CPRE Oxfordshire Observations:

We would strongly agree with other submissions that the standards could be strengthened and clarified. Clear reference should be made to local sites of importance – which were somewhat overlooked in the SA assessments – and to consultation/partnership with local organisations. We would also argue that eco-town proposals should result in a positive demonstrable *net gain* for biodiversity in the local area – not just avoiding a net loss. We also feel the 40% figure for greenspace should not compromise existing green features of value, and, for example, should play a role in providing an interface - softened and graduated as necessary - with the surrounding (often rural) landscape. CPRE considers they should be subject to an independent landscape character appraisal, be sympathetic to their setting, and clearly enhance the local landscape, built and natural heritage, including the designation of new Green Belt where appropriate.

### **Water and flood risk management (paragraphs 4.22 to 4.28)**

*Q4.12 The water and flood risk standards aim to ensure that eco-town developments are planned so that they will minimise water use and flood risk, and raise quality. Are the standards proposed clear and deliverable?*

CPRE Oxfordshire Observations:

Future sustainability standards are an extremely important issue, and water use is going to be a major issue for eco-towns. The SA assessments demonstrate that not understanding the water issues fully can be a stumbling block to other matters. As water and flooding issues become more critical, we support all measures to ensure these matters are fully understood and modelled, and can be managed in the long-term to achieve water neutrality.

### **Waste (paragraph 4.29)**

*Q4.13 The waste standard aims to ensure that eco-towns manage their waste effectively, from their construction onwards. Is proposed waste standard clear and workable way of doing this?*

CPRE Oxfordshire Observations:

We feel that the eco-towns must encourage and support very high standards of waste reduction and recycling in a holistic way to achieve future sustainability standards

### **Transition and development (paragraphs 4.32)**

*Q4.14 The transition and development standard should ensure that initial residents will not live in un-serviced and isolating building sites. Does it get the balance right between*

*supporting initial residents and enabling developers the flexibility they need to build and grow the town?*

CPRE Oxfordshire Observations:

We feel that this is a fundamental issue if the eco-town concept is to achieve more than a being just a traditional “commercial” housing scheme, and more work is required to strengthen the requirements. The PPS as it stands reflects a conflict between the Government’s ambitions for housing delivery and sustainability standards. There is a risk that more traditional “commercial” schemes will take precedence over better, more sustainable concepts which require active public/private partnerships and timely Government support. Delivering a major new development with ambitious eco-principles may well require more novel approaches to delivery, which are less developer-focussed and avoid conflict between the LPA and builders. Indications are that the additional upfront investment eco-towns require means there will be funding shortfalls, especially in the early years, if facilities are not to be delayed, and in some shape or form Government has to be prepared to make up these shortfalls.

#### **Community and governance (paragraphs 4.33 to 4.34)**

*Q4.15 The community and governance standard attempts to ensure that eco-towns will be successful communities, that residents will have a say in how their town is run, and that standards are maintained. Is this standard clear and workable?*

CPRE Oxfordshire Observations:

Again we feel that this is a fundamental issue if the eco-town concept is to avoid being little more than a traditional “commercial” housing scheme. The PPS should set out much more guidance on what is expected in terms of delivery, funding and long-term management arrangements etc by drawing on experience from recent new settlements. It should also attempt to address the roles of public/private sectors, potential partnerships, the governance role of local councils, and the possible role of community trusts etc. It also needs to say something about on-going commitment, funding and support from Government, without which – especially at this stage in their gestation - we cannot see the eco-town concept working.

#### **(b) DRAFT PPS –QUESTIONS 5 AND 6: SUSTAINABILITY APPRAISAL, HABITATS REGULATIONS ASSESSMENT AND IMPACT ASSESSMENT**

*Q5. Do you have any comments on the accompanying Sustainability Appraisal/ Habitats Regulations Assessment or the Impact Assessment?*

CPRE Oxfordshire Observations:

*YES. Working backwards from the detailed examination we made of the SA of the three sites under consideration in Oxfordshire, we do have a number of comments of a more general nature to respond to this question.*

#### **General Observations on SA//HRA/Impact Assessments based on our examination of Weston Otmoor and Cherwell sites**

1. We have a number of concerns about the sustainability appraisals – which we set out below. At the outset, although we do not claim to be experts, we feel there are at least three *fundamental weaknesses in the process* that has been followed by DCLG:

- too much emphasis (reflecting political priorities?) on housing delivery as opposed to environmental and economic issues, and lack of clarity in how these two very different and potentially conflicting objectives might be weighted. The recent downturn in the housing

market surely provides an opportunity for a more measured response to regional housing issues;

- lack of consistency and transparency in the whole process by which the various eco-town schemes have been identified;
- preparing the SA etc in a comparative rush while the eco-town masterplans were tentative, and key information and analysis was still emerging (on crucial issues such as transport and travel, economic impacts etc). In some instances an element of “retro-fitting” of the SA work is apparent.

2. In terms of the *strengths and weaknesses* we feel the overall conclusions in the SA are about right. We welcome the overall Sustainability Assessment of “C” for the Weston Otmoor proposal, which we believe underlines its numerous inherent weaknesses as a proposal. This is the lowest grade – “only likely to be suitable for an eco-town with substantial and exceptional innovation.” However, most of the weaknesses as a scheme tend to stem from its physical characteristics and geographical location, which its promoters cannot alter. This underlines the problems in initially identifying sites via the unusual process of promoter bids rather than methodical selection from agreed sustainability and locational criteria.

3. We do not feel that the 23 *sustainability indicators* used in the SA give a particularly balanced or informative assessment of the overall impacts of the eco-town in terms of the three areas of sustainability i.e., the economy, the community and the environment. There needs to be a proper balance between detailed environmental factors -which tend to predominate and are relatively factual and easy to “score” - and the more fundamental spatial and policy context issues stemming from the location itself, which are more matters of judgment and apparently more difficult to “score”. The factors tend to be mixed up with no method of weighting.

4. The *scoring system* itself is relatively crude, based on “Positive”, “Potential negative”, “Negative”, and “Not known”. Some of the “positive” indicators could easily be argued as a mixed bag of “Positive” and “Potential negative”, and could be rated therefore as “Potential negative”. NB: One example for Weston Otmoor is the positive score for “Listed buildings...etc” where there is no apparent impact analysis, despite the close proximity to Weston-on-the-Green village, its conservation area and its historic buildings.

5. Scott Wilson in fact commented (see below) to DCLG in terms of the Draft PPS on the important difference between detailed on-site “*development*” criteria and “*locational*” criteria. In other words you can have a good concept in detailed “development” terms on a totally unsuitable site strategically. It appears that 9 of the 23 are solely concerned with “on-site” environmental factors. And of the other wider, more complex spatial factors – e.g., housing, employment, regeneration, transport - some seem expressed in a rather simplistic way, leading to rather simplistic impact assessments. It would be quite feasible to “score” the assessments of certain indicators rather differently.

6. In this context it is relevant to note some of the recommended changes to the draft PPS suggested by Scott Wilson – see Non-Technical Summary Table 6. Some of this appears to have been taken on board by DCLG. The initial sentence is key – “The location of eco-towns and, in particular, their proximity to higher order settlements and their links with the public transport network are key determinants of their sustainability.” In other words, you cannot dress up a very poor and inherently unsustainable site on *spatial/location criteria* by promoting the site’s claimed *developmental eco criteria*. This goes to the heart of an eco-

town proposal like Weston Otmoor. We feel these two issues have unfortunately been mixed up in the way the assessments are set out and no more weight is given to the fundamentals than issues of comparative detail.

7. Scott Wilson goes on to comment: “The Draft PPS considers eco-towns somewhat in isolation and greater consideration should be given to their links with existing communities and the benefits that they might potentially provide in terms of community and green infrastructure for example.” We agree that the PPS tends to treat *the eco-town very much in isolation* and as a free-standing, distinct entity – as if this idea is the be all and end all. We do not understand the obsession with free-standing settlements given the obvious advantages of suitable urban extensions. In reality the self-containment is likely to be a fallacy and it will have many connections with the wider world with many different impacts - many undesirable no doubt in sustainability terms. The assessments in turn are fairly weak on analysing the wider impacts and the contributions to wider planning and policy aims. We note that although the SA sets out to be a broad-brush exercise it is simply not convincing in its assessment of the broader impacts.

8. We also have concerns about the very weak detail on *future management and governance* as in the past these have proved crucial issues in the success (or otherwise) of new settlements in the UK. If these schemes are to be true exemplars they have to approach sustainable development and the building of a new community (and the meshing of private and public sectors) in a totally fresh way.

*Q6. Do you have any comments on the issues identified in the Sustainability Appraisal/ Habitats Regulations Assessment of the locations for eco-towns?*

#### **Q6.4 Weston Otmoor and Cherwell**

CPRE Oxfordshire Observations:

*YES. We have grouped our comments under “General observations” about the overall conclusions and system of indicators, and “Detailed observations” about the detailed content.*

#### **General Observations on SA for Weston Otmoor and Cherwell sites**

1. We have a number of general concerns and observations about the SA for Weston Otmoor and Cherwell sites which can be summarised as follows:

2. The assessments of Weston Otmoor have been based on *incomplete information from Parkridge* and seem to take some of the more tentative proposals at face value. The Parkridge masterplan has been subject to continuous changes and in a number of respects it is still not clear what Parkridge are finally proposing. For example the Landscape report from Broadway Malyan identifies a number of inconsistencies or lack of clarity from Parkridge on important issues. Similarly the latest Ecological impact report commissioned by Cherwell DC concludes that Parkridge studies have “too readily dismissed” some key hydrology issues and underlines the need for more work before firm conclusions about impact can be reached. We feel there are a number of inconsistencies running through the SA in terms of levels of detail, different levels of emphasis, and somewhat arbitrary assessments/scoring.

3. The 23 *sustainability indicators* used in the SA do not give a particularly balanced or informative assessment of the overall impacts of the eco-town in terms of the three areas of sustainability i.e. the economy, the community and the environment. There needs to be a

proper balance between detailed environmental factors -which tend to pre-dominate and are relatively factual and easy to “score” - and the more fundamental spatial and policy context issues stemming from the geographic location itself, which are more matters of judgment and apparently more difficult to “score”.

4. The *scoring system* itself is relatively crude, based on “Positive”, “Potential negative”, “Negative”, and “Not known”. Some of the “positive” indicators for Weston could easily be argued as a mixed bag of “Positive” and “Potential negative”, and could be rated therefore as “Potential negative”. One example is the positive score for “Listed buildings..etc” where there is no apparent impact analysis, despite the close proximity to Weston-on-the-Green village, its conservation area and its historic buildings etc.

5. There should be differentiation between detailed on-site “*development*” criteria and “*locational*” criteria. In other words you can have a good concept in detailed “development” terms on a totally unsuitable site strategically. This is effectively the case at Weston where there may well be some good “eco” ideas, but in strategic planning terms the location is totally unsuitable and unworkable.

6. It appears that 9 of the 23 indicators are solely concerned with “on-site” environmental factors. Of the other wider, more *complex spatial factors* – e.g., housing, employment, regeneration, transport - some are expressed in a rather facile way, leading to simplistic impact assessments. It would be quite feasible to “score” the assessments of certain indicators rather differently. For example, building 5,000 affordable houses on one site at Weston clearly does not address known housing demand/need in communities at Banbury and Bicester - yet this is assessed as only a “Positive” factor. The report from Ove Arup on Economic and Social Impacts gives a much more sophisticated and informative analysis of these key spatial issues.

7. There is a lack of meaningful analysis of the *complex wider impacts* examined by Ove Arup. The assessments fragment the impacts into smaller, specific environmental factors e.g., biodiversity, landscape etc, but there is no meaningful bringing together of the cumulative impacts. This is a serious flaw. As examples, there is little analysis of:

- the impact on the City of Oxford when it is the major urban centre, the economic engine of the subregion and in serious housing stress;
- the impact on the Oxford Green Belt per se, and yet this is a fundamental planning/ environmental policy constraint;
- the impacts on Bicester and Kidlington both sizable settlements close to the proposal site – Kidlington hardly rates a mention.

8. Although we have these concerns about the sustainability assessments, we feel the overall conclusions in terms of strengths and weaknesses are about right. We welcome the overall Sustainability Assessment of “C” for the *Weston Otmoor proposal* which we believe underlines its numerous inherent weaknesses as a proposal. This is the lowest grade – “only likely to be suitable for an eco-town with substantial and exceptional innovation.” However, most of the weaknesses as a scheme tend to stem from its physical characteristics and geographical location – which its promoters cannot alter. This underlines the problems in initially identifying sites via the unusual process of promoter bids rather than careful and methodical selection from agreed sustainability and locational criteria.

9. Turning to the assessment of grade “B” for the *Shipton-on-Cherwell site*, we feel that this is very debatable. Based on the criticisms of the assessments discussed above, we feel this

could easily be downgraded to a “C” if greater emphasis were given to the spatial/locational planning impacts. Although there is reference to potential impacts on Bicester, the SA overlooks the complex impacts of the Weston eco-town on Kidlington which is a sizable settlement very close to the proposal site, and again this has to be a serious flaw.

NB: We are given to understand by the representative of DCLG that the Shipton proposal is not now being pursued under the Eco-towns programme, and as such we assume it will now be completely discounted by the Government.

10. Turning to the urban extension to Bicester -*North West Bicester*, this is a new proposal from Cherwell DC and further data is only just emerging. First impressions are that it appears to be more acceptable in overall spatial planning, community infrastructure and regeneration terms, and it may that the grade “B” is appropriate. We note that the recently published Halcrow report commissioned by Cherwell DC concludes: “The initial masterplan ideas and analysis in this report suggest the concept of an eco-town type development in NW Bicester can be supported in principle and is worthy of further investigation and analysis. The location is at least as good as many of the other proposed eco-town locations and better than many - e.g. Weston Otmoor.” However, until more details are provided, we are not able to comment further at this stage.

### **Detailed Observations on SA for Weston Otmoor and Cherwell sites**

NB: As observed above, we are given to understand by the representative of DCLG that the Shipton proposal is not now being pursued under the Eco-towns programme, and as such we assume it will now be completely discounted by the Government. Nevertheless we set down our comments on Shipton for the record.

### **Comments by paragraph – Sections 2.3 - 2.9**

11.

Section 2.3 - Shipton-on-Cherwell

Para 2.3.4 : We feel that as Witney is mentioned Bicester should certainly be mentioned in terms of potential impacts.

Para 2.3.5 : The Shipton site is in fact NOT in close proximity to the A34.

Para 2.3.6 : It should be noted that the planning consent for the development in the Green Belt is not - as seems implied - a ‘carte blanche’, and the commercial scheme now accepted was very contentious. Its rationale is based on the restoration of the derelict buildings and workings. The site is identified as a Major Developed Site in the Green Belt (MDS) to help secure its environmental improvement.

Section 2.4– The Policy Context is fundamental re: Weston and is here set out fairly, especially in terms of the SE Plan. However we would express concern that relatively little account is taken after this section of these key spatial issues.

Section 2.5 – We have commented above on our concerns about the sustainability factors/indicators.

Section 2.6 – Our main concern again with this section is the emphasis on detailed specific environmental factors, and the rather simplistic approach on wider, fundamental locational

issues, e.g., Community infrastructure, Community wellbeing, Homes, Transport, Employment, Spatial. This seems to lead on to weak and simplistic assessments.

Section 2.7 – There is no reference to achieving the development and regeneration aspirations for Bicester central to current plans which would be seriously compromised if Weston went ahead – see Ove Arup Report.

#### Section 2.8

Para 2.8.8 – The Green Belt is likely to be compromised by various elements of the eco-town development (e.g., rail infrastructure, waste plant, car parking etc), and the plan has been changed several times – no reference whatsoever is made to this. No analysis, as far as we can see, of the various cumulative impacts on the Green Belt – this is a key omission. It is not clear from the SA whether Green Belt is a planning issue or an environmental issue or both.

Para 2.8.25 - No analysis, as far as we can see, of the various cumulative impacts on the nearby villages and the conservation area/listed buildings.

Para 2.8.37 – Community infrastructure – we note this is just a list of proposed facilities with no analysis, as far as we can see, and no sense of how good or bad or “stressed” provision might be in the subregion. It would be useful to learn what range of facilities will not be provided on-site, necessitating reliance on and interactions with other urban centres for many years to come.

Para 2.8.41 – Community well-being – we are not clear what this really relates to, or how one scores this. It seems to be a rag-bag of community issues with no analysis. The comments range - very simplistically - from local opposition to proposals, to economic/social impacts and governance.

Para 2.8.44 – Decent and affordable homes – we feel this is very simplistic. There is no analysis of how building large amounts of market and affordable housing at say Weston will affect the other urban areas with severe housing need. The low income households in most housing need are located in Banbury, Bicester, Oxford and Kidlington. How are they affected by this? Is this the optimal answer? The assessments seem to imply that the housing crisis is such that building thousands of homes anywhere in Central Oxfordshire must be beneficial, which cannot be correct.

Para 2.8.47 – Transport and accessibility – again we feel this is very simplistic and gives no sense of the way the subregion will function in terms of transport and access. There is no analysis of the serious locational issues and inevitable wider impacts. This view is wholly supported by the extensive work on transport and travel carried out by Oxfordshire CC and Halcrow. The self-containment arguments simply do not hold water.

Para 2.8.56 – Employment and economy - again we feel this is very simplistic and gives no sense of the way the subregion will function or whether the employment aspirations of the proposals are feasible. No analysis.

Para 2.8.59 – Spatial Issues – we feel that there are fundamental issues here in terms of the local and regional planning policy context but it is very simplistic. Location, transport and economic growth - supported by policy - are going to be key pillars in the success of any eco-town, and yet the SA provides no meaningful synthesis of these issues.

## Section 2.9

We note that, out of all the issues identified above, this section does actually attempt to differentiate between *location* issues and *development* issues.

Para 2.9.1 – 2.9.4 - Weston – We note that the only two key location strengths the SA is able to identify are in relation to the provision of houses in an area of housing pressure, and the proximity of the railway line, as opposed to seven weaknesses. We note the long list of issues requiring further work.

Para 2.9.5 - 2.9.8 – Shipton – similarly we note that only three key location strengths are identified in relation to the provision of houses in an area of housing pressure, the proximity of the railway line and the regeneration of the disused quarry, as opposed to five weaknesses. We note the long list of issues requiring further work.

### Comments on the tables:

#### Section 2.10

##### *Observations on Table 3: Sustainability of Weston Otmoor*

12. We welcome the overall Sustainability Assessment of “C” for the Weston Otmoor proposal which we believe underlines its numerous inherent weaknesses as a proposal.

13. We have a number of concerns about the detail of the sustainability assessments and the simplistic approach to scoring the schemes. We have commented on some of the issues above. We feel it would have been more meaningful to differentiate between *location* issues and *development* issues. The *development* issues are generally on-site issues which can be improved or altered - the *location* issues are generally fundamentals that cannot be changed.

Comments/ assessments on the indicators we would question in the SA include:

14. *Biodiversity and green infrastructure* – We most certainly fully agree with the negative rating. Please note that most of Weston (sic) Fen SSSI is within the developer’s site location, not “just to the northwest” of it.

##### *Landscape and historic environment* –

15. *Designated landscapes etc* - we query the “positive” score where there is clearly a major impact on the current rural landscape and many architectural and layout details of the scheme are not yet known. This stems from the very narrow definition of the indicator in terms of protecting formal designations only, which does not allow for seriously adverse impacts on landscape *character* (the proposals imply the current rural landscape has little value). This also says nothing about how well the scheme attempts to integrate into the landscape, through a claimed “progressive, graded urban/rural interface.” In reality it is almost impossible to envisage how a huge scale urban settlement can merit a “positive” impact on a pleasant rural landscape.

16. *Listed buildings etc* - we query the “positive” score where there is no apparent impact analysis, despite the sensitive issues created by close proximity to Weston on the Green village, its conservation area and its historic buildings etc. Again this stems from the very narrow definition of the indicator in terms of protecting formal designations only, which does not allow for seriously adverse impacts on *character*. Again, in reality it is almost impossible

to envisage how a huge scale urban settlement can merit a “positive” impact on a nearby conservation village.

#### *Community infrastructure / well-being*

17. *Will contribute to higher order centre* - we query the “positive” score in respect of Oxford where there is no apparent overall impact analysis on the City of Oxford. In reality we suspect it would be a mixed bag if key investment is drawn from the city. It seems that merely being near Oxford scores a “positive”. Surely this requires a more sophisticated analysis given the vast range of economic, social and community issues involved. There is also no real appraisal of the fit with “broader planning policies/objectives” despite the reference to them. This important issue is split between this section and Spatial issues, but not adequately addressed in either.

18. *Will facilitate regeneration* – we do not query the “negative” score but feel that the section should comment directly about the impact on the physical and social infrastructure of the existing settlements. The potential regeneration of Kidlington should also be mentioned – for example a new rail station at Weston might well compromise the proposed new station for Kidlington.

19. *Air Quality MAs* – we do not understand why this specific issue should constitute a third of the scores for Community infrastructure / well-being – apparently equal to the entire potential impact on the community/town of Bicester. There are many other community well-being/health issues. Another example of the over-emphasis on formal designations?

#### *Decent and affordable homes*

20. *Demand for housing* - we feel this is very simplistic and we query the “positive” score. There is no analysis of how building large amounts of market and affordable housing at Weston will affect the other urban areas with severe housing need and the subregional housing market overall. The “positive” score implies that the housing crisis is such that building thousands of homes anywhere at all in Oxfordshire must be beneficial, which cannot be correct. It has not been demonstrated that Oxfordshire requires large scale additional housing in this location. We also feel it has never been clear whether the new housing is designed to meet the City of Oxford’s housing needs or Cherwell District’s, which are vastly different.

21. *Demand for affordable housing* - we feel this is also very simplistic, and we query the “positive” score. The low income households in most housing need are actually concentrated in Banbury, Bicester, Oxford and Kidlington. How will they be affected by this eco-town? Is this the optimum way of delivering the homes needed? The “positive” score implies that the housing crisis is such that building thousands of affordable homes anywhere in the Oxfordshire countryside must be beneficial, which cannot be correct. In fact funding for social housing - and other social infrastructure - could well be reduced for towns like Banbury and Bicester under this scenario, and for many households make the prospects of securing an affordable home in the town where they live and work even more remote.

#### *Transport and accessibility*

22. No comment on the detailed scores. However, we feel that there should be some attempt to assess and score the overall feasibility of the claimed *self-containment* of the eco-town,

which is one of the key issues. This has been highlighted in the extensive work on transport and travel carried out by Oxfordshire CC and Halcrow. The self-containment arguments simply do not hold water.

### *Spatial issues*

23. No comment on the scores. However, the *locational / spatial* issues are fundamental. There seems little correlation between some of the key policy/spatial issues discussed in section 6 and 8 and the five actual indicators used. We feel that there should be some attempt to assess and score:

- the overall strategic policy “fit” of the eco-town.
- the overall strategic infrastructure “fit” of the eco-town.
- the overall impact of the eco-town on the Green Belt.

24. We would query the last indicator referring to “Within growth area” – does this only refer to the narrow definition of the Government Growth Areas? Section 8 does not make this clear and rightly refers to other relevant “growth” policy areas, such as the Central Oxon subregional strategy, the Oxford-Cambridge Arc, etc.

### *Section 2.11*

#### *Observations on Table 4: Sustainability of Shipton*

25. We feel the assessment of grade “B” for the Shipton on Cherwell site is very debatable. Based on the criticisms of the assessments discussed above, we feel this could easily be downgraded to a “C” if greater emphasis were given to the spatial/ locational/ accessibility issues. Although there is reference to potential impacts on Bicester, the SA overlooks the complex impacts of Weston eco-town on Kidlington, which is a sizable settlement very close to the proposal site, and again this has to be a serious flaw.

26. We have a number of concerns about the detail of the sustainability assessments and the simplistic approach to scoring the schemes. We have commented on some of the issues above. We feel it would have been more meaningful to differentiate between *location* issues and *development* issues. The *development* issues are generally on-site issues which can be improved or altered - the *location* issues are generally fundamentals that cannot be changed.

27. Comments/ assessments on the indicators we would question in the SA include:

### *Biodiversity etc*

28. *SSSIs within site etc/presence of priority habitats etc* – there is again an over-emphasis on formal designations without much “feel” of the significance of local wildlife sites – a point made strongly by various interested bodies.

### *Community infrastructure / well-being*

29. *Will contribute to higher order centre* - we query the “positive” score in respect of Oxford where there is no apparent overall impact analysis on the City of Oxford. In reality we suspect it would be a mixed bag if key investment is drawn from the city. It seems that merely being *near* Oxford scores a “positive”. Surely this requires a more sophisticated analysis given the vast range of economic, social and community issues involved. There is also no real appraisal of the fit with “broader planning policies/objectives” despite the reference to them. This

important issue is split between this section and Spatial issues, but not adequately addressed in either.

30. *Will facilitate regeneration* – we query the “positive” score. The scheme clearly reclaims the former quarry, but the section should assess the wider impact on the physical and social infrastructure of the surrounding settlements such as Bicester. The potential regeneration of Kidlington should also be mentioned – for example a new station at Shipton may compromise the proposed new station for Kidlington.

31. *Air Quality MAs* – we do not understand why this specific issue should constitute a third of the scores for Community infrastructure / well-being – apparently equal to the entire potential impact on the community/town of Bicester. There are many other community well-being/health issues. Another example of the over-emphasis on formal designations?

#### *Decent and affordable homes*

32. *Demand for housing* - we feel this is very simplistic and we query the “positive” score. There is no analysis of how building large amounts of market and affordable housing at Shipton will affect the other urban areas with severe housing need and the subregional housing market overall. The “positive” score implies that the housing crisis is such that building thousands of homes anywhere at all in Oxfordshire must be beneficial - which cannot be correct. It has not been demonstrated that Oxfordshire requires large scale additional housing in this location. We also feel it has never been clear whether the new housing is designed to meet the City of Oxford’s housing needs or Cherwell District’s - which are vastly different.

33. *Demand for affordable housing* - we feel this is very simplistic and we query the “positive” score. The low income households in most housing need are actually located in Banbury, Bicester, Oxford and Kidlington. How will they be affected by this eco-town? Is this the optimum way of delivering the homes needed? The “positive” score implies that the housing crisis is such that building thousands of affordable homes anywhere in Oxfordshire must be beneficial - which cannot be correct. In fact funding for social housing - and other social infrastructure - could well be reduced for towns like Banbury and Bicester under this scenario and for many households make the prospects of securing an affordable home in the town where they live and work even more remote.

#### *Transport and accessibility*

34. *Proximity to higher order centre* – we are puzzled by the “negative” score in view of Shipton’s location which the table shows as closer to Oxford (10km) than the Weston proposal (11km).

35. *Proximity to railway station* - we query the “positive” score as there must be serious doubts about the feasibility of the new station – which we feel should rank as a “potential negative” score - like Weston.

36. *Proximity to Motorway etc* - we query the “positive” score in view of its remote location in relation to the M40 and A34 – which we feel should rank as a “potential negative” score - like Bicester – or even a “negative” - like Weston.

37. We have no other comment but we feel that there should be some attempt to assess and score the overall feasibility of the claimed self-containment of the eco-town, which is one of the key issues. This has been highlighted in the extensive work on transport and travel carried out by Oxfordshire CC and Halcrow. The self-containment arguments simply do not hold water.

#### *Spatial issues*

38. No comment on the scores. However, as we have commented above, the locational/spatial issues are fundamental. There seems little correlation between some of the key policy/spatial issues discussed in section 6 and 8 and the five actual indicators used. We feel that there should be some attempt to assess and score:

- the overall strategic policy “fit” of the eco-town.
- the overall strategic infrastructure “fit” of the eco-town.
- the overall impact of the eco-town on the Green Belt.

#### *Section 2.11*

##### *Observations on Table 4: Sustainability of NW Bicester*

39. With regard to the urban extension to Bicester -North West Bicester, this is a new and emerging proposal from Cherwell DC and little reliable data is available. First impressions are that it appears to be more acceptable in overall spatial planning, community infrastructure and regeneration terms, and it may that the grade “B” is appropriate, but until much more work is done and more details are provided we are unable to comment further at this stage.

40. For general comments see above. At this stage we have had little opportunity to digest published material, and do not have extensive detailed comments. Comments/ assessments we would query in the SA include:

#### *Transport and accessibility*

41. *Proximity to Motorway etc* - we query the “potential negative” score in view of its location in relation to the M40 and A34, which must be superior to Shipton. To be consistent, we feel this should rank as a “positive” score.

#### **Observations on HRA for Weston Otmoor and Cherwell**

42. This is fairly technical work and has only reached tentative conclusions. At this stage we have no detailed comments to make.

### **(c) GENERAL OBSERVATIONS ON THE FINANCIAL VIABILITY STUDY**

*Comments are invited on the information presented, in particular on the following questions:*

- *Do you consider that as a high level strategic assessment this study has identified the main issues affecting viability?*
- *Are there major areas of cost or infrastructure provision and funding or other issues affecting financial viability which are not identified and could be considered at this stage?*
- *Are you aware of evidence which would lead you to different conclusions to those set out here? For example, where the assessment shows a negative financial outcome are there additional public policy reasons (e.g. regeneration or site restoration) which would justify an alternative approach?*

CPRE Oxfordshire Observations:

1. Our initial comment is that this data on *Financial Viability* has been provided at a very late stage in the process, and little time has been provided to comment meaningfully on this important aspect of the viability (and deliverability) of the eco-towns programme. We base our observations on the studies published for Weston Otmoor and NW Bicester.
2. We are also very concerned at the information tabled by Cherwell DC in their latest Executive report (30 March 2009) which sets out serious criticisms of the way in which the viability studies have been assembled by DCLG. We already had concerns about too much reliance on information supplied by the developers, and insufficient input from and engagement with the local authorities, and this report has merely reinforced that view.
3. The studies also acknowledge that a large number of assumptions have had to be made, allowing large ranges of possibility. Coupled with incomplete information on key matters from the scheme promoters, and the context of the most severe economic down-turn in a generation, we feel that one can place little reliance on the studies, and we therefore wish to confine our comments to a number of *general observations*, as follows:
4. We are concerned that the studies are “interim” only and have been prepared in some haste, with significant qualifications (and hence huge risks) set out on page 5 of Introduction, ie :
  - key variables such as land values and house prices;
  - lack of certainty on major infrastructure funding;
  - the alternatives assessed on different basis.
5. There is evidently far too much reliance on information supplied by the developers and insufficient input from and engagement with the local authorities. A number of conclusions are therefore highly questionable: for example the high rates of house building proposed by Parkridge for Weston Otmoor which have significant implications for its viability, and the prospects for the transport and travel proposals. We would therefore argue the relatively favourable financial viability assessment for Weston Otmoor is highly questionable.
6. The study identifies a large number of relevant “high level” issues but seems to concentrate on the main issue of traditional “commercial viability” - what Cherwell call a private new town concept - as opposed to what might make most sense in terms of public/private sector partnerships to create a viable *community built around eco principles*. We feel that DCLG (or Ministers) have not yet worked out what the eco-town concept should be : a traditional private development at little cost to the public purse (the current emphasis), or a new paradigm of an eco-community implemented by public/private sector partnership more in the spirit of the original new towns.

7. We remain deeply concerned that the Government is making no commitments to ensuring that the requirements for complex major infrastructure can be funded and delivered on time, yet this is surely a crucial element in deliverability and viability, and success as a place to live and work.

8. We are concerned that the studies take a very simplistic view of S.106 planning agreements, and note that Cherwell have stated: “the basic assumptions on development content and phasing appear not to have been fully articulated or analysed to take account of the feedback from the various streams of assessment – including Government / Government Agency and local utility and service provider input.” We also note that in the heads of terms there are numerous reasonable LPA requirements/expectations where the developer offer is apparently falling short, even on basic issues such as affordable housing – one of the DCLG’s rationales for the eco-town. This is hardly a recipe for effective partnership and a viable community, and certainly does not provide any degree of assurance.

9. We concur with Cherwell, in terms of reaching *different conclusions*, that deliverability is not the same concept as “commercial viability”. We feel that very little account has been taken of what mechanisms and bodies will be needed so that the eco-towns, with all their high ambitions and special difficulties beyond conventional developments, should be delivered and implemented (and managed in the long term) as successful - and “green” - communities.

We thank you for reading these comments and trust that they will be taken into account.

Yours faithfully

B. A. Tremayne  
(Chairman)

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