

Responses to the Issues Raised by the Co-operative Group/HCA at the Scrutiny Commission Meeting on 28 January 2009

- 1) The Co-op/HCA maintain that it is acceptable to have 'developer-led' rather than 'plan-led' proposals. This issue of the adequacy of the Eco-Town consultation process as opposed to the normal plan led process has been the subject of a High Court challenge. The Court had ruled that the 'plan led' approach and the consultation had been adequate. The Co-op pointed out that the plan-led process also required Councils to invite landowners and developers to put forward potential sites for assessment.

Response – It is accepted that landowners and developers are invited to submit potential sites as part of the 'plan led' process but this is only a small part of the 'plan led' process. The 'plan led' approach means that local planning decisions are taken through the established local decision making process involving local authorities and local communities. It also means having regard for existing planning policies and comparing alternative sites to ensure that the best development sites are identified. The eco-town programme does not do this and therefore fails in this respect.

- 2) The Co-op/HCA state that the level of information now provided for the Pennbury development is significantly greater than that available to Councils in determining the appropriateness or otherwise of other proposed sustainable urban extensions in the context of the Regional Plan.

Response – It is agreed that the Co-o/HCA have provided a substantial amount of information although key information (as indicated in the Scrutiny Panel Report) is still missing. In some ways, the information provided is more detailed than that provided for the Regional Plan – in others it is not. However, regardless of this, the most important consideration is that if the Government shortlist Pennbury in the PPS then it is according it a very favourable planning status. It becomes a material consideration in any future planning decisions about Pennbury. It is therefore essential that it has been subjected to rigorous examination which necessitates a detailed level of information.

- 3) The Co-o/HCA state that the East Midlands Regional Plan Proposed Changes have not ruled out the Pennbury site but have stated that more work, particularly on the transport infrastructure, is required. The Co-op/HCA also believe that the report from Hyder Consulting had concluded that the Pennbury site was equal to, or better than some of the sustainable extensions proposed with the exception of access to employment. The Co-op/HCA also state that the Roger Tym report had suggested that the site had potential to accommodate between 500 –

1,000 homes.

Response – The Proposed Changes to the East Midlands Regional Plan make it clear that virtually all housing needs can be met from existing allocations and the proposals contained in the Plan. This does not include Pennbury. The Plan actually states in paragraph 4.2.29: “However a number of factors make the prospect of planned sustainable urban extensions to the PUA in Harborough or Oadby and Wigston difficult without sustained and significant transport infrastructure investment”. As Pennbury has not been included, as it could only be considered with sustained and significant transport infrastructure investment which is not part of the Co-op/HCA proposals, then it is appropriate to say that Pennbury has been ruled out.

Regardless of any comparisons between Pennbury and other locations, the critical point about the Hyder work is that it does not recommend that the Pennbury area be carried forward as an area for development. It cites transport concerns, landscape and heritage constraints and environmental concerns as reasons for not pursuing it. One of the experts who gave evidence to the Scrutiny Panel commented that it was a really excellent report which explained clearly why development was not appropriate at Pennbury.

The Roger Tym Study concludes that the Regional Plan requirements can be largely met from already identified sites together with the proposed Sustainable Urban Extensions (SUEs). This does not include the Pennbury area (classed as Zone 3 in the Roger Tym work). The Study did, however, identify a shortfall of 1500 units and the suggestion was made that this could be met from small SUEs of 500 to 1000 units. Zone 3 is mentioned as one possibility (along with others) but this would be subject to overcoming major transport concerns and a number of other very real concerns which are set out in the Report. The Roger Tym report certainly does not countenance development of the scale of Pennbury.

- 4) The Co-op/HCA acknowledge that the current economic downturn had impacted on house prices and sales but believe that there is general agreement that there was a medium to long term undersupply of housing, particularly affordable housing. The market will catch up.

Response –The need to build more affordable houses was noted in the Scrutiny Panel report. However, there is very strong evidence that the financial crisis is impacting on the housing market and that migration assumptions need to be reviewed. Based on this, the County Council has already questioned the need for more housing over and above that already identified in the Regional Plan and calling on the Government to review its housing need calculations before committing to yet more housing allocations.

- 5) The Co-op/HCA commented on the issue of “being well linked to, but distinct from, existing settlements” and referred to the fact that the House of Commons Environmental Audit Committee had recognised the need for eco towns to be close to existing commercial centres to

ensure sustainability.

Response – the Committee does in fact state that eco-towns should be “located close to commercial centres and employment opportunities”. If this is the case then it suggests that eco-towns could provide fewer jobs than originally envisaged meaning that more people will travel out of the eco-town to go to work with the consequent transport problems which this would create. Of more relevance however, is the fact that the House of Commons Environmental Audit Committee, in holding its Inquiry into the Government’s house building plans, has urged the Government to rethink its target to build three million new homes by 2020 in light of the economic downturn. The Committee has warned that pressure to provide land for so many homes - which may not be needed now the housing market has slowed - could lead to greenfield sites being developed unnecessarily, and that measures favouring brown field sites over greenfield land should be reintroduced. The Committee is also calling for all new houses to meet high environmental standards not just those that may be built in eco-towns.

- 6) The Co-op/HCA disagreed with the Panel’s interpretation of the sequential test.

Response – different interpretations of the sequential test approach are clearly possible but what cannot be disputed is the fact that for many years Government planning policy has favoured the development of brown field and other urban sites ahead of green field sites.

- 7) The Co-op/HCA believe that the accepted approach is to consider housing need on a HMA basis (i.e. the wider Leicester area) and not at such a local level as Pennbury.

Response –Housing need in strategic terms is often considered at the HMA level. The Scrutiny Panel Report makes reference to housing need at the more local level because it received expert evidence that related to a more local level. However even if the need for affordable housing across the whole of Leicester and Leicestershire is taken into account it is clear that neither Pennbury, nor any other single location, is able to meet the needs of the whole area. For example people from Loughborough want affordable housing in the Loughborough area not at Pennbury. Furthermore any attempt to provide for housing needs in a single location can only lead to additional travel as people travel back to work or visit family and friends. Such a response is clearly fundamentally opposite to sustainable development.