

Draft Planning Policy Statement for Ecotowns

Department for Communities and Local Government Consultations

April 2009

Introduction

The Landscape Institute (LI) is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The Institute's accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape architecture profession work to the highest standards. Its advocacy and education programmes promote the landscape architecture profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit.

The LI welcomes the opportunity to submit its views as part of consultation on the draft Planning Policy Statement (PPS) for Ecotowns. The LI hopes that the Department for Communities and Local Government will find the input helpful in refining the draft PPS.

Fundamentally, the LI is disappointed that the concept of green infrastructure (GI) does not appear to have been fully understood in the draft PPS. GI is essential to the viability of ecotowns and the attainment of many of the additional standards set out in the PPS, such as biodiversity, flood risk management and climate change adaptation. As such, it must be the central organising spatial framework for the development of ecotowns and should be seen as an overarching principle in their design and ongoing management. Whilst we welcome acknowledgement of the multifunctional nature of GI, its fundamental role in delivering a wide range of ecotown objectives is undermined by paragraphs 4.18 and 4.19 which treat GI in the same way as other standards within the draft PPS.

Additional views of the LI on the consultation questions to which it has made a response are set out below:

General questions

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

The draft PPS seems does not place sufficient emphasis on the importance of place-making in creating new ecotown communities. The LI believes this is absolutely fundamental to the success of the ecotowns as places where people will want to live and where business will want to invest. This needs to consider local context and landscape character and the creation of an identity for each ecotown. The provision of architectural richness and variety, public realm, private space, connections and linkages must be secured by design principles such as inclusive design. These principles are well laid out in other documents. The assumption should be that development proposals will be assessed against Building for Life criteria and that any new development would be part of an ongoing dialogue with CABI or a regional design review panel from an early stage in the design process.

A multidisciplinary approach is essential to the successful design of ecotowns. The professional team should be established from the start and incorporate all the necessary professionals from the outset with a commitment to remain throughout the design process and with excellent project management skills.

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

The LI believes that if ecotowns are to be truly 'exemplar schemes' then GI must be the central organising spatial framework for their development, as outlined in paragraph 5 of this response.

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

The LI believes that a GI based approach to ecotown planning is essential in ensuring a thorough development appraisal and needs to be included in the assessment of future funding requirements. Such an approach would consider the costs and benefits (economic, environmental and social) of the capital investment and subsequent revenue management costs of the green space and other open areas. For example, at present significant revenue liabilities exist, or are being created, to provide flood storage areas to reduce flood risk. If designed as high quality GI, such assets can also generate leisure, biodiversity and health benefits which will provide much better value for money and the opportunity to share management costs. In order to achieve this, it is essential that multi-disciplinary teams collaborate in the development, masterplanning and integrated site planning and design which are essential to successful design, development, future management and funding of GI.

Ecotown standards questions

Climate change adaptation

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

The LI believes that attention should be paid to green or soft engineering principles within the PPS to both mitigate and help adapt to the effects of climate change. In particular, this should include making multifunctional use of new building and infrastructure space for new planting, especially trees, for water management and renewable sources of energy production.

Homes

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?

The LI considers that the issue of 70 per cent carbon compliance is premature as there is currently a separate consultation process underway on the definition of zero carbon to which this standard relates. However, ecotowns represent an ideal opportunity to meet standards which go beyond 70 per cent.

The previous consultation on Ecotowns in general (DCLG, June 2008, Ecotowns: Living a greener future) stated that:

“Ecotowns offer a major opportunity to improve the quality and delivery of housing and to trial new approaches...This could include achieving Building for Life gold standard on new residential development and aspiring to meet Level 6 of the Code for Sustainable Homes (and Level 3 as a minimum)”

The LI notes, with some disappointment, that the standard has reduced the Building for Life aspiration to silver and that there is no mention whatsoever of a wish to attain Level 6 of the Code for Sustainable Homes. If ecotowns are to be truly exemplar schemes, as the Government has stated, then the LI would encourage revisiting the aspirations as set out in June 2008.

The standard could make reference to the desirability of considering integrated technology for a variety of purposes, such as ventilation, solar heating, cooling and daylight provision.

The LI considers it is important that homes should be developed in a variety of built forms, which draw on characterisation studies and are appropriate for the location in which the ecotown is being developed. Furthermore, the external appearance of the dwellings should not act as symbol for the tenure type.

Transport

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

The LI believes that any travel/layout plans for ecotowns must also include a movement and connectivity hierarchy that links the design of the settlement. This should incorporate issues such as permeability, links to existing roads, tracks, footpaths and buildings. It should be clear how the routes link with the wider environment

and neighbourhoods. Growth developments scenarios should also be indicated in the movement plans. The standard should reflect this.

Green infrastructure and biodiversity

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?

Whilst the LI welcomes acknowledgment of GI and its multifunctional nature in this standard, we would refer the Department back to paragraph 5, page 1, of this response which stresses the need for GI to act as an overarching principle in the planning, design and management of ecotowns.

Additionally:

The area of land allocated to green space should be at least 40%, as stated by the Rt Hon Margaret Beckett in her speech delivered at the recent CABE Space/Natural England conference, Park City. It is important to note however that this represents a significant reduction when compared to green space allocations in a 19th century Garden City. For example, Hampstead Garden Suburb today comprises 62% green space.

With regards paragraph 4.18, which states that at least half of the 40% allocated to green space which should be public, the LI considers it crucial to clarify what is meant by the term 'public'. The LI considers that this should be defined as publicly owned, managed and fully accessible green space where a primary, but not necessarily sole, function is that of open space. This should also exclude incidental green space associated with or within the curtilage of public buildings or infrastructure.

Private gardens and amenity land associated directly with housing, business parks and other developments may well, and indeed should, contribute to the overall green infrastructure. However, the LI believes that the PPS needs to ensure that such areas of restricted access should not be given as much weight in planning terms as public space when considering the overall provision of green space within the development envelope.

Both the design quality and ongoing management arrangements for all green space, regardless of ownership, should make a positive contribution towards appearance, character and multifunctionality. Adequate mechanisms must also be in place to ensure ongoing maintenance of green spaces if the multiple benefits they can deliver are to be sustained.

The LI endorses a functional approach to green infrastructure provision. The acceptability of the layout requires an assessment of the functionality, not just of the percentage of land allocated to private and public open space. This requires a multidisciplinary planning and design approach to be adopted from the outset. Furthermore, to ensure ongoing functionality, management arrangements must be included in the proposals.

The guidance contained within the TCPA/CLG worksheet on GI should be given substantial weight when considering proposals for new settlements, with particular reference to Natural England's ANGST (Access to Natural Greenspace Targets) recommendations.

Water and flood risk management

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?

The LI believes the standard would benefit from incorporating water-related initiatives such as rainwater collection as grey water recycling

The LI supports the comments regarding multifunctional use for open space including flood storage. The design of flood storage should be undertaken by a multidisciplinary team that considers the wide potential of such an asset, including its aesthetic, biodiversity and recreational values.

Additionally, the LI questions that only ecotowns in areas of serious water stress should aspire to water neutrality. All ecotowns should achieve this if they are to be exemplar schemes.

Transition and development

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?

It is important that the standard emphasises that essential infrastructure is delivered before the houses are occupied. In later phases there will be the opportunity to create GI well ahead of the house building. This should be advocated as the benefits of GI, with adequate management, increase over time. Investment in GI is needed before growth occurs – ‘planning gain’ isn’t early enough. The standard should reflect this.

Building development may be phased but the green infrastructure should be planned and implemented early in the development process. Structural funds used to deliver other early infrastructure must incorporate GI as a by-product. Furthermore, temporary uses and landscape solutions should be considered for land that is to be developed, such as in areas where buildings have been demolished or where land has been cleared – land should not be left ‘in limbo’.

Community and governance

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?

Clearly the long term governance arrangements are crucial to the success of the ecotowns. There will be a wide range of professional input required to make this work, as well as creative engagement techniques that are there for the long term. Landscape management will be one profession that will be required to ensure the long term integrity of the green infrastructure assets. Whilst the LI agrees that the existing democratically elected parish councils will have role, there should not be a resumption that a parish council will either want to, or have the skills to, be able to undertake a significant role in the long term management of arrangements. Models for engagement will need to be fit for purposes according to site-specific circumstances.

The ongoing management and maintenance of multifunctional open/green space provides significant potential for locally based workers with diverse skills to develop community identification, ownership and relationships. Ecotowns should have a significant number of rangers, wardens, park managers, community workers etc to encourage voluntary work and community engagement from residents, school and local employers.

The Landscape Institute would like to thank the Department for Communities and Local Government for being given the opportunity to contribute to the draft Planning Policy Statement for Ecotowns. For any queries relating to this response, or for future consultations, please contact:

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