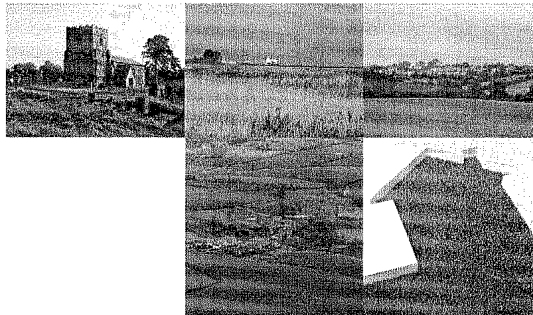


APPENDIX Q

**Harborough District Council
Leicester City Council
Leicestershire County Council
Oadby & Wigston Borough Council**

Pennbury Strategic Assessment
Summary Report
December 2008



Halcrow

1 Executive Summary

1.1 SA of the PPS

The stated purpose of the SA is unclear. The SA seems to imply that it has accepted the principle of the Eco-towns programme and has been used simply to "suggest ways in which their impact could be rendered more sustainable." (Para. 1.5.5) This is inadequate and unsatisfactory. The SA should be more than "an input to the Eco-towns Programme", it should be the mechanism to determine whether specific locations and development proposals are acceptable in principle to go forward to further evaluation through the LDF process.

The approach to the consideration of alternatives in the SA is fundamentally flawed. The SA deals with alternatives simply by considering the situation with the draft PPS (i.e. developing eco-towns) versus the situation without the draft PPS (described as "business as usual"). The SA should have considered the option of "Sustainable Urban Extensions" as an alternative to the free-standing eco-town concept and appraised this alongside the do-nothing option. In the East Midlands there are a number of existing and potential SUEs which represent very realistic alternatives to Pennbury, including those put forward in evidence by the County Council to the Public Examination of the draft RSS, as well the Panel Report recommendation that the Burton-Leicester corridor was worthy of consideration.

The SA fails to provide any convincing explanation as to why Sustainable Urban Extensions (SUEs) have not been considered and appraised as viable alternatives to the eco-town concept. It also fails to contain any convincing evidence that Sustainable Urban Extensions could not be designed to achieve the same sustainability benefits as eco-towns, if the eco-towns criteria are applied to them. The SA for Pennbury should have evaluated the potential SUEs in the East Midlands as viable alternatives to Pennbury, particularly since the SA evaluates a number of alternatives elsewhere, including urban extensions (at Bicester).

The SA reveals that the East Midlands is the only English region in which there is no shortfall between the 2004 household projections and housing supply identified in the RSS (Figure 9). On this basis there is no pressing need to consider an eco-town at Pennbury, particularly since a partial review of the RSS is underway.

Section 3.7 summarises the benefits that are planned to flow from eco-towns and Table 6 identifies whether the proposed eco-towns standards would represent an improvement on business as usual. Note that all of these supposed "improvements" could also apply to Sustainable Urban Extensions, which would not represent "business as usual" if the eco-towns criteria were applied to them.

Table 6 identifies an eco-town transport standard that "*key connections around the ecotown do not become congested*". This is certainly a significant risk at Pennbury and this standard is a welcome criterion against which schemes should be evaluated. Given the importance of this issue it is not sufficient, as suggested by the SA, that this criterion is applied at planning application stage. This is too late in the process and decisions in principle may have been taken. The DCLG and local authorities should be satisfied that proposed eco-towns will not lead to congestion on key connections around the site, before any decisions in principle are taken.

The SA states that the requirement that there should be access to one employment opportunity per new dwelling represents a clear improvement on business-as-usual in terms

of policy. The SA should also have gone on to consider how easily this objective may be delivered and monitored, before attaching any significance to this criterion.

The DCLG has not accepted the recommendation that one of the locational criteria should be that eco-towns be located in an "area of high housing and affordable housing demand". This is illogical and inconsistent since the whole programme is so clearly related to the government's objectives to increase the delivery of housing.

The government has also not accepted the recommendation that eco-standards be developed for urban extensions. This is a major wasted opportunity since urban extensions are an important category of development which are likely to provide a major delivery vehicle for new homes around the country.

1.2 SA of the Pennbury location

The SA is split into three different documents. Even within the locational chapter there is a further split and the sustainability effects of the location are considered separately from the sustainability effects of the development proposal. This disaggregated approach is unhelpful and makes it difficult to form a holistic view of the overall sustainability effects of the Co-ops proposals at local, sub-regional and national levels. The different elements of the SA should be integrated into a coherent whole.

The stated purpose of the SA is unclear. It appears to be being used simply to "explore the benefits and disadvantages associated with each of the locations and development proposals as an input to the Eco-towns Programme". The SA should be more than "an input to the Eco-towns Programme". It should be the mechanism to determine whether specific locations and development proposals are acceptable in principle to go forward to further evaluation through the LDF process.

The SA has been undertaken at a strategic level and it is broad in its assessment, conclusions and recommendations. However, it is sometimes too broad to be very useful. Para. 2.4 describes the key sustainability objectives which need to be considered, and these essentially form the sustainability framework against which both the location (Table 6) and the developers proposals are evaluated (Table 7). However, none of these objectives include factors which are typically considered in an SA, including soil resources (particularly important in the case of a greenfield location), health, education and equality. The treatment of "spatial issues" is also incomplete. The assessment of locational issues should surely include the extent to which it is capable (or not) of accommodating a free-standing settlement which is "separate and distinct, but well linked to a higher order centre". This is one of the key eco-town criteria that has been re-iterated though all the various consultation documents, and is repeated again in para. 4 of the draft PPS. These issues are not dealt with in the SA, which is a major omission.

Many sections of the SA simply accept the assertions and claims made by the Co-op. This is unsatisfactory; the SA should have undertaken a critical appraisal of the Pennbury proposals to arrive at an independent view of the merits. The SA should not ascribe benefits to aspects of the proposals which are no more than aspirations at this stage, rather than detailed commitments.

The environmental baseline section places too much reliance on regional analysis (e.g. regional bio-diversity issues). There is a lack of detailed understanding of local issues and priorities and Oadby and Wigston SA for example is not referred to at all.

The SA ignores the very real difficulties in implementing the Co-ops proposed transport improvements. It is not clear that the proposed measures can be implemented in such a

constrained urban environment, where the costs are likely to be considerable and acquisition of multiple parcels of land far from straightforward. The SA ignores these very real difficulties and, as a result, the summary assessment records the transport effects as positive or potential negative, when all four entries should have been recorded as negative.

The Habitat Regulations Assessment concludes that *"It did not prove possible to say with confidence that development at Pennbury under the Eco-towns Policy Framework will not lead to adverse effects on Rutland Water SPA & Ramsar site as a result of recreational pressure or on European sites as a result of increased abstraction or on the Humber Estuary as a result of cumulative deterioration in water quality"*. A number of mitigation measures are recommended, including application of Natural England Accessible Natural Greenspace Standards (ANGS) to open space provision within the eco-town and additional measures, including site management, which may be required at the European sites, to be specified at the detailed project-based Appropriate Assessment stage. Given the specialist ornithological interest at both international sites affected by Pennbury, it is unclear whether "similar recreational functions" can actually be achieved at Pennbury. Moreover, it would seem logical that the PPS Appropriate Assessment should be satisfied that all the potential effects on European sites are capable of being managed and mitigated before it is approved, and not leave residual effects to a project level Appropriate Assessment, by which time the policy context may be fixed.

In the assessment of the situation with the eco-town, the SA is unbalanced by an uncritical acceptance of Co-op aspirations and objectives. There is no evidence in the Masterplan that objectives in relation to bio-diversity, climate change, flood risk, transport etc can or will actually be delivered. The UK Sustainable Development Strategy identifies 5 guiding principles, including Using Sound Science Responsibly. This includes taking into account scientific uncertainty through the precautionary principle. The SA should be based on the precautionary principle and should not be influenced by unsubstantiated assertions for which there is no evidence.

The SA uncritically repeats the Co-op's assertion that the *"compact nature of the development is likely to minimise the impact upon the character and setting of existing settlements"*. In fact, the most recent Masterplan Vision document, October 2008, has changed the distribution of the proposed development blocks from the Compact 50 option. The development now extends further to the north, to the south and to the west. In addition to being highly visible from Houghton on the Hill, Kings Norton and Ilston on the Hill, the development boundary is now very close to settlements at Great Glen, Oadby, Little Stretton and Stretton Hall.

The statements regarding access to rail services appear contradictory and do not appear to reflect the latest Co-op proposals contained in the Masterplan Vision document. If access to rail services is essential, it is unclear why this is not one of the key recommendations of the SA. It is not mentioned for example in section 2.8.5 which summarises issues that require further consideration and elaboration. No consideration appears to have been given to the fact that the location of any rail station at Great Glenn would be some 5km from the town centre, and would presumably need a connecting bus service to facilitate easy access. The SA should not attach any weight to the possibility of a rail service to Pennbury without much greater certainty that it can be delivered.

Para. 2.8.2 summarises some of the main weaknesses of the location, including difficulties in delivering public transport improvements within Leicester City, water resource issues, flood risk, loss of greenfield land, a high magnitude of change to the rural tranquil landscape and issues of community cohesion. These are all significant issues.

The SA does not accord sufficient weight to employment matters in the appraisal of either the eco-town location or the development proposals. This is a fundamental weakness that undermines the credibility of the appraisal process.

Para. 2.8.4 summarises the issues which require further consideration and elaboration. All of these are relevant and necessary. Note that reference is made to the need for "*further analysis and development of the economic and commercial role of the proposed eco-town*". This is probably the key omission in the Co-op's proposals and this element cannot be emphasised too much.

Table 7 identifies serious short-comings in the development proposal in terms of the lack of a detailed and credible masterplan, energy strategy and transport strategy. However, it does not comment that the proposals lack a credible employment strategy, ecology strategy, landscape strategy or water management strategy. This lack of information should be reflected in the overall appraisal.