

# Shelter's response to the CLG's Eco Towns – living a greener future consultation

**From the Shelter policy library**

**July 2008**

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# Shelter

Shelter is a national campaigning charity that provides practical advice, support and innovative services to over 170,000 homeless or badly housed people every year. This work gives us direct experience of the various problems caused by the shortage of affordable housing across all tenures. Our services include:

- A national network of over 20 housing aid centres
- Shelter's free housing advice helpline which runs from 8am-midnight
- Shelter's website which provides housing advice online
- The Government-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, which are approached by people seeking housing advice
- A number of specialist projects promoting innovative solutions to particular homelessness and housing problems. These include 'Homeless to Home' schemes, which work with formerly homeless families, and Shelter's Inclusion Project, which works with families, couples and single people who have had difficulty complying with their tenancy agreements because of alleged antisocial behaviour. The aim of these particular projects is to sustain tenancies and ensure people live successfully in the community.

## Introduction

Shelter welcomes the opportunity to respond to the Government's *Eco-towns - Living a green future* consultation.

Shelter strongly supports the policy of eco-towns as a way of contributing towards meeting the desperate need for more housing, while at the same time acting as exemplars of successful innovation in achieving social and environmental sustainability. As such, we believe that it is vitally important that the eco-towns programme goes ahead as quickly as possible, but also to ensure that the selected eco-town proposals live up to the highest social and environmental standards.

This response is divided into two sections. Part A responds to the questions contained in Chapter 3 of the consultation regarding the benefits that the Government should be looking for eco-towns to deliver. Part B sets out comments in relation to 4 of the 15 individual eco town bids: Western Otmoor, Middle Quinton, Ford and Pennbury (Stoughton).

## PART A: THE BENEFITS OF ECO-TOWNS

*We would welcome your comments on the potential benefits listed below. We are particularly interested in innovative approaches and techniques which require the whole town scale to be piloted successfully.*

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

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

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

### Zero carbon

Shelter believes that eco-towns offer a valuable opportunity to pioneer the new technologies and innovation needed to enable the achievement of the Government's 2016 zero carbon target. We support the requirement set out in the eco-towns prospectus that each eco-town development as a whole should reach zero carbon standards, both for environmental reasons, and to make homes more affordable to run and help tackle fuel poverty. In order to help stimulate the necessary step

change in investment and construction methods necessary to achieve the 2016 target, we also believe that so far as practical, there should be a target for each individual eco town home, across all tenures, to meet code level 6 of the Code for Sustainable Homes on carbon emissions with immediate effect. In addition, it will be important to ensure that adherence to zero carbon standards is properly monitored and enforced.

Shelter believes that where zero or low carbon energy sources are used by eco-towns, these should be located within eco-town development areas. We note the conclusion of the Callcutt Review of house-building delivery that it is difficult to demonstrate that remotely supplied renewable energy is additional to what would have been generated anyway, and recommend that flexibility for energy sources to be located beyond eco-town development areas should be limited to cases in which on site provision is impractical.

### **Future climate change and managing water**

We support the expectations and benefits set out in the consultation document. In particular, we welcome:

- The aspiration of water neutrality, and the minimum requirements that eco-towns should achieve level 3/4 of the Code for Sustainable Homes before 2016 and level 5/6 after 2016.
- The emphasis on the use of Sustainable Urban Drainage Systems
- The strong expectation that all built up areas will be located in the lowest risk flood zone areas (Flood Zone 1)

### **Green space and biodiversity**

We share the Government's view that eco towns have real potential to combine new development with the existing features of the natural landscape in a truly environmentally sustainable way. Integrating green spaces into the urban fabric enhances the quality of life for local residents and can act as a focus for community engagement, while providing a habitat for wildlife and enhancing biodiversity, and we support the suggestion that 20% of eco town development areas should be dedicated to green infrastructure. We also strongly endorse the use of developer funding to support maintenance of green space through endowment and third sector management. Recent research by Shelter into development in three case study areas in the Thames Gateway highlights how the quality of green public space can quickly deteriorate, if thought is not given at the outset to how maintenance costs will be met<sup>1</sup>.

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<sup>1</sup> "Neighbourhood Watch – Building New Communities: learning lessons from the Thames Gateway," Shelter, July 2008, forthcoming.

We support the use of brownfield land for eco-towns, but also believe that there is significant scope for eco-towns to be located on green field sites without damage to our natural heritage. Of course, where it can be demonstrated that eco-town proposals would have a significant negative impact on sites of particular natural beauty or special scientific interest that overrides the social need for development, these developments should not go ahead and alternative sites should be sought.

### **More sustainable travel**

Shelter welcomes the proposals set out in the consultation for what eco-towns should aim to deliver in terms of more sustainable travel. In particular, it is vitally important that eco-towns are well connected by frequent and reliable public transport links. Good public transport both within, and to and from eco towns, is essential if new communities are to be both socially and environmentally sustainable in the long term. Transport must be affordable, especially for those on low incomes, and must also be in place by the time the first residents move in.

We strongly endorse the proposal to incentivise public transport usage through the provision of free travel, and the use of endowments for public transport in order to maintain high quality infrastructure and information provision. Provision of detailed public transport plans for each eco town proposal needs to be a priority in order to address the concerns of those who fear that eco towns will increase the number of cars on the road, and thereby undermine the zero carbon targets. For the investment and plans for transport to be in place and correctly phased close coordination is required between all the relevant agencies, and the Government should do all that it can to assist in this coordination. Consideration also should be given to the land surrounding eco towns to allow for potential future growth of the town, so that eco towns can aim to grow into self sufficient public transport hubs.

### **Homes and housing**

Shelter believes that eco-towns offer the potential to make a really significant contribution to the supply of social rented and affordable homes in areas of the country where there is a chronic shortage of such accommodation. In addition, they provide an opportunity to focus on delivering homes that are built to the highest possible design standards, and which contribute to the creation of genuinely mixed-income, mixed-tenure communities.

The Government's eco town prospectus set out a requirement that affordable housing should make up between 30 and 50% of the total units delivered. In Shelter's response to the Government's Green Paper *Homes for the future – more affordable, more sustainable*, we suggested that this should be strengthened to require at least 50% of the homes delivered to be affordable and at least 30% to be social rented. However, analysis of the 15 eco-town locations shortlisted reveals that a number of the proposals envisage proportions of affordable housing below 30%, with the maximum

proportion of any proposal being 40%. No proportions for the percentage of social housing are given. Shelter believes that there is potential for many of the schemes to be considerably more ambitious in terms of the levels of affordable housing that they are offering, and recommends that this should be an important factor when deciding which of the schemes to progress. In particular, we consider that there is a particularly strong case for raising the proportion of affordable housing delivered in the case of those proposals involving the development of surplus public sector land, in view of English Partnerships' 50% minimum target for developing affordable homes on such sites. In addition, we call for the bids to make clear what proportion of social rented housing they will include, and maintain our view that the target level should be 30%. Finally, we would emphasise the importance of ensuring that all affordable housing provided as part of eco-towns adheres to the definitions set out in Planning Policy Statement 3 (Housing).

Eco towns must be designed in such a way as to create genuinely mixed tenure communities, in which the contribution of housing across all sectors is recognised and supported. Development should be tenure blind, with social and affordable housing pepper potted in at a micro level amongst owner occupied housing. Developers, RSLs and third sector organisations must work together with local authorities to ensure that advice and services are in place to meet the support needs of vulnerable residents. In addition, it is crucial that a strategic approach is taken to the management and development of the private rented sector, to ensure that it operates well and supports the objective of cohesive, sustainable communities – particularly in cases where there is a high proportion of buy to let landlords. Eco towns present an opportunity to pick up on the points made in the Callcutt Review concerning the potential for local authorities to work with eco town developers to address the long-term management of housing across tenures, and stewardship of the public realm. Furthermore, they offer the chance to put into practice innovative forms of tenure and housing management. For example they could explore flexible tenure models that allow people to staircase between social rented housing and homeownership, to adapt to changing financial circumstances.

It is important that the housing provided through eco-towns meets the needs of the local population - both in the immediate area and in nearby towns where there are high levels of housing need - and the individual households who will live in it. Homes should offer: decent (Parker Morris) space standards; flexible design to allow rooms to be used for different purposes to meet the needs of changing households; private outdoor spaces in the form of private gardens or large terraces; minimised shared entrances to flats to improve safety and encourage neighbourliness; and ground floor storage for outdoor items such as cycles and children's toys. Particularly pressing in many areas is the shortage of family housing, and we welcome the emphasis given to this in the eco towns prospectus. Given the high levels of overcrowding in existing social homes, it is especially important that sufficient quantities of new social rented homes are family sized.

We support the vision that housing provided through eco-towns should meet level 6 of the Code for Sustainable homes. However, as noted above, we are concerned that the proposed minimum

requirement of code level three will lead to inadequate progress towards the 2016 zero carbon standard, and recommend that there should be an immediate target for every eco town home to meet the carbon emissions aspect of level 6 of the Code for Sustainable Homes.

## **Community building and empowerment**

Genuine community involvement will be vital to the success of eco towns. This will need to be underpinned by adequate funding and we support the use of endowment from development value to fund the employment of community workers as one way of helping to achieve this. We agree that potential and existing residents should be actively involved in the design of the new eco towns, and also recommend that community development plans should be drawn up to coincide with residents moving in. We support the idea of creating community development trusts to enable residents to determine how services are run and managed.

## **Jobs**

We agree with the potential job-related benefits identified in the consultation document. The development of social enterprise to provide local employment and local services will be key to the success of eco towns, and we hope that this aspect will be developed and supported in the eco town proposals that are accepted. In addition, in view of the role that we hope eco-towns will play in providing social tenancies, we believe that it is important that strategies are developed to provide the job opportunities and support required to enable social tenants to work. In this regard, eco-towns will need to ensure that they are well linked into the initiatives that the Government is currently developing to increase levels of employment in social housing, for instance the provision of integrated housing and employment advice.

## **Health and education services**

While we support the statements in the consultation document about the need for eco-town residents to have access to first class health and education services, we would stress the importance of ensuring that these, and other community facilities, are available from when the first residents move in. Too often in new developments, there can be a time lag between when residents start to live there and the provision of such services locally, undermining the healthy functioning of the local community. As with transport, it is essential that authorities work together to ensure that schools and health services are in place from the start, and that funding and planning mechanisms facilitate this.

## **PART B: COMMENTS ON INDIVIDUAL ECO TOWN BIDS**

Shelter strongly supports the principles behind eco towns and welcomes the benefits that they have the potential to bring. We also understand the need for them to be assessed carefully on a case by case basis to ensure that selected eco town proposals live up to high environmental and social standards.

### **Weston Otmoor**

#### **Transport**

The eco-town proposal for Weston Otmoor by Parkridge Holdings has focused on the potential advantages of its location in transport terms. This includes its existing rail transport links, which are to be extended by the developers to provide a direct connection to Milton Keynes and London. Shelter supports this prioritisation of funding for public transport.

We also welcome the proposed on-site tram service that will be free to all Weston Otmoor residents. However we want assurance that the costs required for this free transportation will not be passed onto residents, as this may make living in Weston Otmoor unaffordable for many potential households. In addition, we believe that the proposed road charging has the potential to disadvantage those households on low incomes and may act as a disincentive to those who might otherwise choose to live in the on-site affordable housing.

#### **Community infrastructure**

Shelter is also supportive of Parkridge Holdings' proposal to fund the development of community infrastructure. Shelter's current research on Growth Areas is revealing that community infrastructure, such as 'village greens' and community centres often still haven't been built years after the first residents have moved in, leaving children to grow up without the facilities they need to develop and socialise. It is important that a firm commitment from the developer is sought to ensure that the two secondary schools, up to eight primary schools, healthcare provision and other community facilities go ahead and are in place in time for when the first residents move in.

#### **Affordable housing provision**

Parkridge Holdings' proposal cites significant housing stress as one of the reasons why the eco-town should be located in Weston Otmoor. The area has nearly 3,500 households on the housing waiting list and 117 households living in temporary accommodation. In addition, the District has "under-provided in relation to the housing requirements in the Oxford Structure Plan and the



provision of affordable housing is well below the target set by the Council's Housing Strategy and the level of need established by its Housing Needs Study (2004)<sup>2</sup>.

As such, Shelter supports the plans by Parkridge Holdings to deliver up to 15,000 homes at Weston Otmoor. However, we have some concerns that a target for affordable housing has not yet been set. Naturally, the development will need to comply with Government's criteria that 30 -50 per cent of housing in eco-towns is affordable. Nevertheless, we are keen for Parkridge Holdings to stipulate what proportion of the housing they develop will be for social rented housing. We suggest a minimum of 30 per cent of the homes are social rented and a further 20 per cent low cost home ownership – a total of at least 50 per cent affordable. Other forms of housing provision, such as sheltered housing and supported housing schemes must also be included.

### **Sustainable communities**

Parkridge Holdings have proposed that the residential developments surround a central high street and we support their proposal to 'pepperpot' affordable housing throughout the development, giving all residents easy access to community, employment and retail facilities, as well as ensuring that no resident travels more than 400 metres to a transport point. We support this approach.

We consider eco-towns to be a key opportunity to develop inclusive, cohesive, mixed and sustainable communities and want Parkridge Holdings to deliver a development that is tenure blind, has a mixture of type and size of housing and operates equality of housing management services for all Weston Otmoor residents.

### **Green space and biodiversity**

Shelter is aware of concerns that have been raised by certain environmental groups about the risk to the habitat of certain plant species and wildlife that they fear the eco town proposal poses. We also note that the proposal does recognise the importance of preserving the meadowland in question. Whilst we are not qualified to comment on the substance of these fears clearly careful consideration needs to be given to the concerns expressed to decide if the proposal should go through to the next phase, and should the plans go ahead every effort made to ensure the disruption and damage to the grassland that supports this wildlife is minimised.

### **Middle Quinton**

The proposed eco-town for Middle Quinton will be an important step in delivering affordable housing across Stratford through the most environmentally sound processes.

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<sup>2</sup> Draft Local Development Framework, Core Strategy, Cherwell District Council, Key Issues 4

Development plans for an eco-town in Middle Quinton, an area 6 miles outside Stratford upon Avon, propose over 6,000 dwellings. In alignment with the Government's guidance on eco-towns, between 30-50% of these dwellings will be affordable. Over the next few years, the development has the potential to deliver 3,000 much needed affordable homes in an area where lower quartile house prices are between 9<sup>3</sup> and 13<sup>4</sup> times the average income. This is a vast improvement on the mere 311 additional affordable homes delivered in the district between 2005-07<sup>5</sup>.

## **Housing need in Stratford upon Avon**

The Core Strategy for Stratford states that tackling local housing need is a priority. House prices in Stratford are the highest in the region, with the average house costing £100,000 above the regional average<sup>6</sup>. Furthermore, there are currently 2,779 households on the Council's housing waiting list<sup>7</sup>, highlighting an acute local need for more affordable housing.

## **Infrastructure**

Shelter notes local concerns over the potential pressure the development could place on surrounding infrastructure and public services. We are encouraged by the developers' proposals for an integrated rail and bus system to serve future communities; however, we urge that such infrastructure is in place well in advance of the first household moving into Middle Quinton. We also ask that transport infrastructure responds to the needs of households on low incomes.

Concerns about infrastructure, environmental damage and social sustainability must be acknowledged and adequately addressed. Central and local government must take the lead in this through adequate funding, stringent planning requirements and thorough public consultation with future communities intending to live within the development and existing communities around the development.

## **Affordable housing provision**

Shelter is asking for 50 per cent of eco town homes within Middle Quinton to be affordable and 30 per cent to be social rented housing. In delivering affordable housing, it is important that the new communities created are socially as well as environmentally sustainable, providing for a balanced mix of incomes, tenures and housing need. Furthermore, the homes themselves must meet

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<sup>3</sup> CLG Live Tables: Table 576 Housing market: ration of lower quartile house prices to lower quartile income by district.

<sup>4</sup> Home Truths, The Real Cost of housing 2007 –2012, National Housing Federation West Midlands. February 2008.

<sup>5</sup> Stratford on Avon Housing Strategy 2006-11 Action Plan.

<sup>6</sup> CLG Live Tables: Table 585 Mean House Prices based on Land Registry data, by district (2007) – Stratford mean house price - £275,648; West Midlands average - £175,424.

<sup>7</sup> CLF Live Tables; Table 600 Rents, Lettings and Tenancies; Numbers of households on local authority waiting lists (2007).

rigorous design and space standards and genuinely respond to the diverse needs of the communities they will house.

Shelter believes that Middle Quinton, if planned correctly, can help address the housing crisis in the West Midlands. We are concerned that the Regional Assembly, County Council and District Councils, and elected representatives across all parties are currently opposed to the Middle Quinton development. We fear that this level of opposition at a regional and local government level could have long term effects on delivery of affordable housing within the district. We also believe that in order to work eco town developments will require full co-ordination and integration of transport, education, health, employment and housing strategies with eco town plans, and that plans will be undermined without this. We urge regional and local decision makers and key Government agencies to work through the concerns that have been expressed about the Middle Quinton eco town proposal, in order to come up with a workable eco town plan to address diverse housing needs in one of the least affordable parts of the West Midlands, and build a new town that is an asset to the region.

## **Ford**

Shelter believes that an Eco-town in Arun provides a unique opportunity for the whole community. It offers the chance to build a new sustainable, mixed, cohesive and ecologically balanced community supported by community infrastructure and public transport that is able to meet the diversity of need in Arun. It can also deliver strong neighbourhoods where the existing and future population of Arun will want to live.

## **Housing need in Arun**

The Arun DC Housing Needs Survey, undertaken in 2004, provides a detailed evidence base of housing need in Arun. It shows an annual requirement of 1,072 affordable units – 1,016 more units than the 56 affordable homes delivered in 2004-5.

The survey also suggests that, as a result of the “increase in house prices over the last few years, and more recently, the difficulties in obtaining mortgages, the need for affordable housing is likely to have increased”. The average house price in the county is now £234,630.

Even though there is evidence that the situation is improving, there were still 161 households living in temporary accommodation in Arun<sup>8</sup> at the end of December 2007. Despite this, in 2006-7 only 14 affordable homes were delivered in Arun DC. This is a level of affordable housing delivery that cannot fully address the housing needs of the households in temporary accommodation in Arun. It

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<sup>8</sup> Source: CLG Homelessness Statistics, December 2007

also represents a 75% decline in affordable housing delivery between 2004 and 2007 at a time when there has been a 180% increase in the number of households on the Housing Register in Arun.

### **Affordable housing provision**

The Ford Airfield Vision Group (FAVG) eco-town bid document proposes to deliver at least 5,000 dwellings and, in line with Council Planning Policy will aim for at least 40% of these homes to be affordable.

This level of affordable housing provision is nearly six times the number of affordable homes that Arun has delivered over six years (339) and, as such, Shelter believes that it offers a real opportunity to address Arun's housing needs. However, we believe the scheme could go even further, offering as much as 30% social rented housing, with a further 20% for low cost home ownership.

### **Pennbury/Stoughton**

#### **Housing need in the Leicestershire Area**

The Pennbury (Stoughton) eco-town is focused on land to the southeast of Leicester within the Leicester and Leicestershire Housing Market Area<sup>9</sup>. Within this area, at the end of March 2008 a total of 226 homeless households were accommodated in temporary accommodation in Leicestershire. About 22,180 households are on the housing waiting lists in the area. This is an increase of 32 per cent since 1997.

We note, in the context of this need, that a total of only 530 additional affordable dwellings were provided in the City and County for 2006/07, and moreover, that the area, and particularly Leicester, appear to have suffered a downward trend for affordable housing provision in recent years.<sup>10</sup> In 2006/07 financial year a total of 128 homes were sold under Right To Buy in the area.

### **Affordable housing provision**

Shelter welcomes the proposal that a minimum of 4,000, or approximately 33 per cent, of the new homes in the proposed eco-town would be affordable. We also welcome the inclusion in the proposal of a proportion of affordable homes being made permanently affordable due to specific

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<sup>9</sup> The Leicester and Leicestershire HMA covers the unitary authority Leicester City and the district authorities of Blaby, Charnwood, Harborough, Hinkley and Bosworth, Melton, NW Leicestershire, and Oadby and Wigston.

<sup>10</sup> CLG Table 1003: Additional affordable dwellings provided by local authority area.

tenure agreements. We would recommend, however, that in order to meet newly arising housing need, and go some way to meet the backlog of housing need in the surrounding area 50 per cent of new homes in the proposed eco town at Pennbury should be affordable, and 30 per cent social rented.

### **Transport and community infrastructure**

We note the developer's proposal that infrastructure and services would be put in place to match the requirements of the first residents, developing as the community grows. We would welcome specific commitments on the timings of provision of local facilities, as well as the arrangements for on-going maintenance of facilities. Funding and development of community infrastructure must be prioritised so that these are available at the time residents move in.

Shelter believes that there must be extremely efficient, regular and affordable public transport both within the ecotown and to neighbouring settlements. It is vital that concerns on transport are addressed, and that transport infrastructure responds to the needs of people on low incomes.

### **Zero carbon**

Shelter supports designing a community where eco-measures will lead to lower households bills, as the developer suggests. We would seek assurance that high environmental standards should not lead to higher rents or service charges, or other measures, such as congestion charging, that would impact disproportionately on low-income residents.

### **Community involvement**

Shelter wishes ensure that the views of communities - including the views of those in housing need - directly influence what is built. We believe that new developments will only succeed if they are planned and developed with the full involvement of communities, including local authorities and future residents. We believe there is a great opportunity for local people and the relevant local authorities to shape a new vision of affordable housing and mixed, sustainable communities.

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