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25th September 2009

Dan Smith
Eco-town Team
Zone 1/J9
Eland House
Bressenden Place
London SW1E 5DU

Email response sent to: daniel.smith@communities.gsi.gov.uk

Dear Mr Smith

JOINT RTPI AND PLANNING AID RESPONSE TO ECO-TOWNS – ALLOCATIONS FROM THE ECO-TOWNS FUND CONSULTATION

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public. Planning Aid works with people and communities to help them influence changes to their local areas. Planning Aid provides free and independent professional advice to community groups and individuals who cannot afford to pay professional fees.

The RTPI and Planning Aid consider it vitally important that the proposed Programme of Development (PoD) process outlined in the Eco-towns consultation document is well equipped to integrate within the existing planning framework of statutory documents. For example, proposals outlined in the PoD to bring forward eco-towns should highlight infrastructure or service gaps that can subsequently be added to the sustainable community strategy (SCS) and local development framework (LDF).

These planning documents, prepared and approved by both the local planning authority and the local strategic partnership include detailed planning policy that is used to determine the outcome of applications for planning permission and it is important for the integrity and validity of the planning system that PoDs do not end up as separate non-statutory documents running in parallel.

The RTPI and Planning Aid believe that an effective and thorough community consultation process should underpin the local authority's eco-town Programme of Development and associated bid for additional funding from the Growth Fund. This could be set out in a document similar in content to a Statement of Community Consultation (SoCC) prepared to support nationally-significant infrastructure projects, or could be an existing or adapted programme of consultation. The adequacy of the SoCC process should in turn form a key element of the consideration of the bid.

Planning Aid is well versed to assist in the development of PoDs. This can be achieved on a number of fronts, through consultation phases with the local community, and again through the amendment of the SCS and development plan

documents to include more detailed plans for the eco-town.

Both the RTPI and Planning Aid would be pleased to assist with the integration of these suggestions into the Eco-Towns Fund Allocations framework.

In addition, please find a more detailed Planning Aid response to the formal consultation questions enclosed below for your consideration.

If you require any further assistance, please contact Matt Thomson, Head of RTPI Policy and Practice on 0207 929 9466 or email matt.thomson@rtpi.org.uk.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sue Percy'.

Sue Percy
Director Professional Services

Enc.

**Consultation on “Eco-towns – allocations from eco-towns fund”
Response from Planning Aid**

General comment from Planning Aid

Planning Aid works with people and communities to help them influence changes to their local areas. Planning Aid provides free and independent professional advice to community groups and individuals who cannot afford to pay professional fees. Planning Aid is keen to ensure that the benefits of full and proper community consultation and engagement are captured as part of the process of taking forward the eco-town programme.

The Planning Act 2008 and associated Guidance on Pre-application Consultation (CLG Sept 2009) introduces a statutory requirement for community consultation, to be undertaken by promoters as part of the process for taking forward new Nationally Significant Infrastructure Projects (NSIPs). Whilst eco-towns are different to NSIPs, and will be taken forward under the procedures set out in the Town and Country Planning Act, they are significant developments and the messages relating to good practice and proper consultation extolled in the Planning Act 2008 and associated Guidance should be applied to the process of allocating funding to support the eco-town PoD.

Existing communities will have an interest in shaping the new development in their area, what it may mean for them, identifying potential mitigation measures which could be built into the development and ways in which the eco-town could support wider strategic or local objectives. The new residents will clearly have views on how their community is developing socially, environmentally and economically and which options and alternatives might be taken forward at different points of time.

Planning Aid believe that an effective and thorough community consultation process (which should be set out in a document similar in content to a Statement of Community Consultation¹) should underpin the local authority's eco-town Programme of Development and associated bid for additional funding from the Growth Fund. The adequacy of the SoCC process should in turn form a key element of the consideration of the bid.

Q1. Do you agree that these are the main areas which an eco-town Programme of Development (PoD) should address?

Are there other important areas which should be included?

Planning Aid Response

Planning Aid believe the Programme of Development should include, as an integral element, the need for thorough and effective community consultation and engagement. Clearly in the early stages this will focus on the existing local communities, but as the development progresses arrangements should be put in place to expand this to include the new eco-town residents. Planning Aid would therefore suggest that the PoD should include the need for local authorities to work with the promoters to prepare a Statement of Community Consultation (or similar document) which will describe how consultation will be undertaken with both existing and new communities. This document will provide additional information to government to enable a rounded assessment of the PoD to be undertaken and enable funding allocations to take account of the costs of full and thorough consultation.

Planning Aid would therefore suggest that the following issue be added to the list of areas to be addressed by the PoD:

- *A statement of community consultation(or similar document) which sets out the process by which thorough and effective consultation and engagement will be undertaken, with both existing and new communities.*

¹ Planning Act 2008 Guidance on pre-application consultation

*Q2 Do you agree with these assessment criteria?
Are there key criteria missing?*

Planning Aid Response

Building on the general discussion and the response to question 1, Planning Aid would suggest that the following criterion is added to the list:

- *A Statement of Community Consultation (or similar document) which sets out a thorough and effective processes for engagement and consultation with existing and new communities.*

Q3 How can we improve the assessment questions to better reflect the requirements of an eco-town Programme of Development (PoD)?

(a) Are there any assessment questions that you do not feel are relevant?

(b) Which elements from an eco-town PoD do you not feel are adequately represented in the assessment questions?

Planning Aid Response

The key criteria listed in the consultation document have been translated into a series of questions. Building on the general discussion and the response to question 1, Planning Aid believes that there should be a third entry question, namely:

- *Has a Statement of Community Consultation (or similar document) been prepared and does it represent a thorough and effective consultation process with existing communities?*

The adequacy of community consultation should also be reflected in each of the remaining questions. For example how will effective community consultation inform the identification of early win schemes and the existing community? How will consultation with community groups and the voluntary sector inform the development of robust local delivery mechanisms and partnership arrangements?