



Campaign to Protect
Rural England

THAMES GATEWAY STRATEGIC
FRAMEWORK
Key Choices Report:
a discussion paper for TGSP
(DCLG, July 2006)

Comments by CPRE Thames Gateway

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Introduction

1. CPRE Thames Gateway is a consortium of CPRE London, Kent and Essex Branches, and CPRE National Office. We welcome the discussion paper as potentially an important step forward in the development of the Government's plans for the regeneration of the Thames Gateway. In particular, the broad scope of the policy issues that it addresses, demonstrates that the Government recognises that the success of the Thames Gateway depends on achieving progress towards social, environmental and economic policy objectives, and that the project is far more than simply a major housebuilding programme. It sets out proposals for a range of substantial new initiatives, sometimes backed up clear quantifiable targets. We very much welcome this.

2. We applaud the approach being taken to developing the Framework within the context of the 2007 Spending Review process: i.e. not publishing the final Framework until the scale and scope of agreed future funding provision has been established. This indicates that the Framework is intended to go well beyond a mere statement of the Government's aspirations for the Thames Gateway and that it will be a meaningful statement of long term commitment.

3. This paper addresses directly some of the specific 'matters to be addressed in preparing the Framework' that DCLG has identified in the discussion paper, and makes some observations on the general text.

Thames Estuary Park

4. The stated purpose of the proposals for a Thames Estuary Park are greatly to be welcomed: to drive higher standards of landscape management, as well as to encourage higher standards of urban development and regeneration. It remains unclear, however, what is being proposed - if anything - by way of a unifying statutory designation or other legislative or regulatory provisions by which the Park would be defined. The proposals are likely to be very well served by much greater clarity as to precisely what such provisions are appropriate and therefore what - if any - new legislation is required. Clarity in this regard would serve to crystallise the Park concept in the minds of its advocates, enabling them to focus clearly on the key objective of putting the necessary statutory provisions into place.

5. The paper explicitly rejects the suggestion that the Thames Gateway area should be designated a National Park. Of most concern in this regard, however, is the reason given for rejecting National Park status: the paper implies that National Park status would 'restrict' development rather than 'make ample provision' for it. This strongly suggests that the Government has aspirations to allow new development in the Thames Gateway to encroach

significantly beyond existing urbanised areas and in such a way that would have a substantial impact on the landscape. Such an approach would be anathema to the founding rationale of the Thames Gateway Growth Area which is to promote urban regeneration and create an exemplar of sustainable development. Also of concern in this regard is the failure of the paper to make any mention of the target - established in the march 2005 Thames Gateway Strategy¹ - for at least 80% of new housing to be built on previously developed sites.

Urban green space

6. The value of good quality, well-managed accessible and natural green space within and close to urban centres in enhancing the liveability and attractiveness of an area (and the health and wellbeing of its residents) is now widely recognised. Conspicuous by its absence in the discussion paper, therefore, is any clear reference to the question of objective standards of access to, and quality of, urban and peri-urban greenspace. This is surprising given the high profile of this general issue (for example through the Thames Gateway greenspace strategy²), and the existence of appropriate standards that are already in use. These standards include:

- the Green Flag Award standard managed by the Civic Trust;
- the Accessible Natural Greenspace Standard for Towns and Cities; and
- the public open space hierarchy in the London Plan (Table 3D1, page 146).

7. The Interim Framework should include costed proposals for the Thames Gateway-wide adoption of standards for the quality, management and accessibility of greenspace and natural greenspace.

Ensuring good design

8. We strongly welcome the recognition that '*good design is a prerequisite for creating sustainable communities*' and, indeed, we welcome the high profile that the paper gives to this issue. The discussion paper seems to recognise that the economy of the Thames Gateway - and market demand for new housing and office development - is unlikely to improve substantially if its housing and urban areas are unattractive and uninspiring. The range of initiatives proposed for driving up design quality are to be welcomed, i.e:

- A Gateway Identity Publication from CABI
- Design targets based on the Building for Life standard
- Design Codes
- Design Champions, who would be senior decision-makers

9. The Framework should, however, go somewhat further. For example, it could promote:

- development briefs

¹ *Sustainable Communities: Delivering the Thames Gateway* (ODPM, March 2005)

² *Creating Sustainable Communities: Greening the Gateway. A Greenspace Strategy for the Thames Gateway.* (ODPM/DEFRA, 2004)

- concept statements
- village or town design statements
- *Planning for Real* and *Enquiry by Design*
- Home Zones

10. It should also:

- confirm that all public sector funding bodies (for example, the RDAs and UDCs) will make their contribution conditional on the highest standards of design;
- commit DCLG/DCMS to overseeing an audit of the design skills available among local authorities;
- encourage LPAs – possibly in collaboration with each other – to create a ‘design advisory panel’ which would have statutory consultee status and which would be required to offer an opinion on the design quality of every significant development proposal, including at the early stages of plans being drawn up; and
- propose additional incentives to LPAs to put design frameworks in place through the Planning Delivery Grant.

The Economy

11. At paragraph 6.6, the document states that ‘*employment growth needs to go hand-in-hand with housing growth*’. While the general aim of not increasing demand on commuter transport systems is laudable, the notion that jobs and housing growth should *always* proceed closely in tandem can be taken too far and can therefore unnecessarily restrict the pace of development where adequate transport links between jobs and new homes exist. On occasion, it may be necessary in the shorter term for housing growth in urban areas outside London to be supported by employment within London. Similarly, employment growth in the outer Thames Gateway could sensibly be supported by commuting from London if capacity exists on transport networks. The crucial point is that investment in transport - and public transport in particular - supports plans for employment growth throughout the Gateway. In the longer term, growth in the availability of skilled labour in areas accessible to - but outside - London will help promote investment outside London.

12. The ‘matters to be addressed’ suggest (number 3) that emphasis might shift away from ‘targets’ to ‘quality’ and ‘sustainability’. Any proposed shift away from targets is potentially worrying because it risks seriously compromising accountability and the extent to which project can be focussed on appropriate objectives. Moreover, it is not *necessary* to reduce the emphasis on targets in order to focus on ‘quality’ and ‘sustainability’. Indeed, an emphasis on targets can support those policy objectives.

13. The proposal (number 5) for a rolling programme of upgrading industrial estates is a good one and was a key recommendation by the Thames Gateway London Partnership in its well received 2001 report *Heroic Changes*.

14. In addition to the proposals set out under ‘matters to be addressed’, the Interim Framework could also usefully propose advocate a proactive and speculative approach by the

public sector, in partnership with the private sector, so as to ensure that high quality new business accommodation is made available in appropriate key locations at an early stage in the provision of new housing in the area. The approach should be one of market-creation rather than market-following. The Government (DCMS/DTI) should be more forceful in encouraging delivery agencies to do this. It should resource them to do so, including through underwriting loans necessary to fund suitable speculative development, and adopt a strategy for bringing premises forward in a co-ordinated and managed way across the Thames Gateway.

Housing (mixed communities)

15. We are delighted to see the apparent recognition of the scope for, and feasibility of, meeting a wide range of housing needs within higher density developments:

‘Government recognises that there are other viable high density options, and we would encourage local authorities and developers alike to think more creatively.’

(Paragraph 7.31)

16. There is now a substantial body of work available illustrating how, for example, family housing with gardens can be provided in high quality, higher density development. If the Thames Gateway is to attract the middle- and higher-income earners and higher-skilled individuals that will be crucial to the successful growth of the area’s economy, and also achieve other policy objectives such as urban regeneration and countryside protection, it will be important to meet those and other housing needs within high quality, higher density developments. The Interim Framework should expand on the sentiment within paragraph 7.31 and better illustrate the importance and feasibility of improving housing provision along the lines implied.

17. The ‘Matters to be addressed’ ask: *‘What additional specific actions to accelerate house completions are needed?’* (number 2). We suggest the following as a minimum:

- measures to increase the available land supply through investment in site assembly (new financial mechanisms, for example, are discussed elsewhere in the discussion paper);
- public funding for affordable housing (the decline in the rate of building of which accounts for the entirety of the reduction in overall housebuilding rates since the mid-1970s); and
- major investment in public transport infrastructure.

18. At number 3, the ‘Matters to be addressed’ ask whether the 35% target for affordable housing should be confirmed. In response, care should be taken that that figure does not imply a substantial increase in the proportion of social housing in areas that are already dominated by social housing. That outcome may be contrary to the objectives of creating mixed income communities and promoting the Thames Gateway’s economy. Given that the great majority of the proposed new housebuilding in the Thames Gateway is likely to take place within London - in areas already provided with large quantities of social housing - 35% may be too high a figure if it is to comprise predominantly social housing.

19. However, there is a substantial unmet need for intermediate housing in London (i.e. subsidised affordable housing for households who cannot afford suitable housing on the open market but whose income disqualifies them from eligibility for social affordable housing). Indeed, individuals who qualify for intermediate housing are likely to be more important to the future economic development of the Thames Gateway than many of those who qualify for social affordable housing. It would therefore be appropriate for intermediate housing to constitute a substantial proportion of the proposed 35% affordable housing provision. Similarly, a substantial proportion of the proposed 35% affordable housing might be required to meet the needs of key workers within the current and expanded public services in the Thames Gateway.

20. In summary, therefore, the proposal that 35% of new housing should be ‘affordable’ needs to be further developed so as to ensure that it contributes adequately to meeting the needs for ‘key worker’ and ‘intermediate’ housing and does not lead to an over-concentration of low-income households. This issue is relevant to numbers 4 and 5 of the ‘Matters to be addressed’.

Transport

21. It is worrying that the paper does not clearly advocate the proposed extension of the DLR to Barking Riverside. This is despite recognising that:

‘Only a proportion of the 10,000 homes can be built prior to the extension of the Docklands Light Railway system to Barking.’ (Paragraph 8.18)

22. In addition to those that are identified in Table 8.1, the following transport infrastructure schemes should be considered and would help to realise the maximum urban regeneration potential in the Thames Gateway:

London

- Upgrade the proposals for the East of London and Greenwich waterfront transit schemes from a bus to a tram service.

North Kent

- A link between the North Kent line and CTRL at Ebbsfleet.
- Longer trains (and therefore platforms) on the North Kent line.

South Essex

- A rail link between Crossrail and the C2C London Liverpool Street to Shoeburyness mainline railway, thereby allowing Crossrail services to avoid the current Fenchurch Street bottleneck and provide more direct routes to other destinations. There is an existing connection which is currently used by one C2C train from Liverpool Street to Fenchurch Street at night to maintain route knowledge and uses the Gospel Oak to Barking line near Woodgrange Park. A new link would be a substantial undertaking (for example requiring a tunnel, or major demolition works to accommodate greater flows), but if South Essex is to be provided with mass transit, there seems little alternative.
- Extension of Gospel Oak to Barking services to Tilbury. This would require no new infrastructure apart from new platforms at Barking.

- A north/south rail link in South Essex Benfleet to Wickford, joining the C2C line to the Shenfield/Southend line.
- Enhancement of the rail (passenger and freight) link from East London to Tilbury and Shellhaven. This route is currently served by the C2C service alone. We advocate entirely new track parallel to the current line.
- A three-way link between C2C, CTRL and DLR at Dagenham Dock, or a station and interconnection for the Channel Tunnel Rail Link at the Thurrock/Havering border to provide for domestic services on that line.
- The ‘Shenfield Curve’, linking the eastern branches of the London to Chelmsford/Southend line, making direct access from Southend to Chelmsford possible.

Skills: A competitive workforce

23. We welcome the clear recognition that:

‘realising the growth potential of the Thames Gateway will entail more concerted efforts on skills’ (Paragraph 9.15)

and that:

‘overall the challenge remains considerable with the rate of improvement in the skills base over the last few years radically insufficient to meet the forecast needs of 2016 and beyond.’
(Paragraph 9.13)

24. We therefore welcome the proposal to establish a target for the percentage of Gateway residents having Level 3 and above qualifications.

25. The discussion paper also recognises a:

‘lack of sustained employer engagement and powerful employer leadership in design and development of learning pathways, mobilising other employers and giving importance to training of their own workforce’
(Paragraph 9.14)

but it remains unclear what proposals are being put forward to address this. Public funding of work-based learning initiatives might be a way forward, coupled with an appropriate target for the number of placements achieved in work-based learning initiatives. Paragraph 9.21 appears to recognise the need for something along those lines:

‘we see the need to create effective learning markets which would better match qualified candidates to labour market needs. Over time, this would include...increasing financial incentives for employers to express demand (perhaps brokered voucher system) and offer jobs in return for qualified candidates’

26. The Interim Framework should firm up this approach and indicate how much funding is likely to be required.

Public services

27. We welcome the recognition of the importance of good quality public services in attracting the *'senior, managers and professionals'* who will be crucial to the development of the Thames Gateway's economy.

28. We welcome recognition that:

'All too often, in the Gateway as elsewhere, occupation of new housing developments starts well before new or expanded public services and community facilities are in place. This leads to immense frustration and anger among new residents and increases pressure on the already stretched services and facilities for existing residents.'
(Paragraph 10.9)

and that:

'capital and revenue budgets for key community services – and the consequent development programmes – are not aligned adequately with planned housing developments.'
(Paragraph 10.10)

29. The proposals (Paragraph 10.13) in this regard are therefore to be welcomed. The key issue, however, will be the nature of the forthcoming proposals for *'planning and financing mechanisms/processes to ensure public services and facilities are there (just) in time to support the growth of existing communities and the establishment of new communities'* (Paragraph 10.16).

30. Nevertheless, there is a danger that any such mechanism which depends on the value of land increasing as planning permission is granted can potentially give LPAs a perverse incentive to grant planning permission on greenfield sites (from which the uplift in value is likely to be greatest) which would otherwise not be considered appropriate for development.

Water-neutral growth

31. The proposals set out in respect of water conservation indicate a step-change in the Government's recognition of the problems associated with the potential limiting affect that water supply may have on the scale of possible growth in the Thames Gateway. That is to be welcomed. The key point that the discussion paper makes is that:

'DCLG will ensure that numbers of, and location of, additional housing will be fed into the water resource and wastewater infrastructure planning process as early as possible.'
(Paragraph 11.12)

32. Nevertheless, greater clarity is still required to show that those planning processes will cover the full period of major anticipated growth up to - and beyond - 2016. The Interim Framework should provide that clarity.

33. The notion of water-neutrality is an interesting one and should be pursued. However, the discussion paper does not explicitly recognise that this will require large-scale retro-fitting of existing homes and, if that is to be done, how it would be made an obligation on developers and how it would be funded. It may, for example, be possible to use the planning system to secure funding for retro-fitting through S106 agreements. The Building Regulations will also have a role to play. These options should be addressed in the Interim Framework. Indeed, it is surprising that the discussion paper does not consider either because the Government, in a response to the ODPM Select Committee three years ago stated that:

*'it may be beneficial to explore the extent to which the Building Regulations could facilitate additional water conservation measures [and] the scope for a more targeted approach through the planning system, in line with local and regional water resources, should be fully explored.'*³

Engaged communities

34. We particularly welcome recognition that:

'people are happier with decisions and plans if they have had the opportunity to shape them. This principle will be one of the key themes of the Local Government White Paper. In addition to increasing people's satisfaction with decisions and plans, engaging and empowering local communities strengthens democracy and can both inform and provide a real driver for the improvement of local services.'
(Paragraph 12.8)

35. The converse of this - which CPRE holds to be true - is that, *irrespective of the quality of planning proposals* for new housing and other developments, local communities are likely to object if they do not feel engaged with the planning process. This leads to time and resources being wasted on confronting objections rather than in finding innovative solutions to practical difficulties. We therefore broadly welcome the proposals in the discussion paper, the key one of which is the proposal for a 'Community Engagement Kitemark'.

36. Various techniques for promoting public engagement are identified in the discussion paper in the context of improving urban design quality. These would also serve to engage the community in the regeneration and development process more generally. The following initiatives have been suggested above and are also relevant in this context:

- Concept Statements
- Village or Town Design Statements
- Planning for Real and Enquiry by Design
- Development briefs

37. The Interim Framework should promote these initiatives in the Thames Gateway and, in addition, it should encourage LDVs, LPAs and RDAs to pro-actively seek the engagement of the local community and its approval of policies and plans. Meetings of the UDCs and all other such

³ Government response (July 2003) to ODPM Select Committee Report on *Planning for Sustainable Communities: Sustainable Communities in the South East*.

bodies should be open to the general public and the agenda papers and minutes made publicly available.

Investment

38. We welcome recognition that:

‘to be “fit for purpose” the delivery mechanisms to implement the Strategic Framework must ensure that Government takes the necessary actions to attract, and enable, private investment.’
(Paragraph 16.1)

39. The suggestions (Paragraph 17.5 - 17.6) concerning the recycling of capital receipts and ‘local asset-based delivery organisations’ are therefore of great interest and should be energetically pursued. Nevertheless, these proposals do not diminish the need for the Government to be clear about the proposed scale of its own investment. We therefore welcome the assurance in paragraph 17.17 that:

‘The final version of the Framework will provide robust estimates of the scale of Government investments which will be required to achieve the 2016 growth targets.’

Brownfield Strategy

40. Many brownfield sites in the Thames Gateway present significant obstacles to their redevelopment. It is not necessarily the case that land will be brought forward at a rate commensurate with the rate at which the Government intends that new housing and other development should be delivered without encroaching unnecessarily on greenfield land. In the absence of convincing evidence that urban brownfield land is likely to be brought forward quickly enough, local authorities may be unable to resist unnecessary greenfield development. A clear ‘brownfield land reclamation strategy’, linked to the growth rates anticipated in RSS and the *London Plan*, would help in this regard and would help identify any shortcomings in the likely rate at which brownfield land is likely to be brought forward. The Interim Framework should confirm that English Partnerships, in collaboration with the RDAs, will produce a clear brownfield land reclamation strategy for the Thames Gateway, setting out:

- the rate – in terms of hectares per year – at which sites need to be brought back into use, both at the ‘strategic’ level and in respect of each area;
- the likely costs of doing so, together with identified sources of funding (at a strategic and local level);
- the location of the sites requiring reclamation, highlighting the priority sites (this will probably need frequent updating);
- the agencies that will take responsibility for bringing forward each site; and
- the major obstacles to bringing forward each site, together with a range of measures required to overcome those obstacles.

41. Such a strategy is likely to draw on the issues and initiatives identified through the National Brownfield Strategy initiative and the RDAs ‘subsequent Brownfield Land Action

Plans'⁴. Consistent with the capacity-based approach to development, RPBs should ensure that the strategy is capable of delivering sufficient urban brownfield land to accommodate housebuilding targets. If it does not, then either the targets should be reduced or additional financial resources sought.

42. It may be a matter of some concern that the discussion paper makes no mention of the National Brownfield Strategy initiative. In view of recent speculation that the initiative may be abandoned or substantially weakened, the Interim Framework should explain how that Strategy might affect the Thames Gateway regeneration programme (and *vice-versa*).

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⁴ Sustainable Communities: Building for the future. ODPM, February 2003.Paragraph 4.6