

Comments by CPRE Thames Gateway
January 2006

Introduction

1. CPRE very much welcomes the Thames Gateway evidence base / evaluation database initiative. With only one exception, the following comments offer support for the targets and indicators that are proposed by ODPM at this stage. They also suggest a small number of additional targets that would help illustrate progress towards the policy objectives established in the Government's Thames Gateway 'Strategy' of March 2005 (*Creating Sustainable Communities: Delivering the Thames Gateway*). We particularly welcome the commitment to undertake research to fill the gaps in the current proposed indicator set and the suggestions made below as to additional indicators are made in view of that commitment.

2. We also welcome the suggestion that relevant indicators should be monitored at a local level. ODPM should have a role in overseeing the collection and reporting of that data in a way that allows - as far as appropriate - direct comparison between localities.

Targets

3. It would be highly desirable for several of the indicators to be associated with a specific numerical target. Very few such targets, however, currently exist on a Thames-Gateway-specific basis and will therefore need to be developed. The forthcoming Strategic Delivery Framework proposed for the Thames Gateway should provide an opportunity to determine the appropriate level at which to set these targets. The sub-regional partnerships and Local Delivery Vehicles (LDVs) should be encouraged to establish targets for their areas specifically.

The proposed indicators

4. We support the inclusion of all but one of the indicators (*'loss of employment land to housing'*) that are currently proposed. The following comments are made in respect of individual indicators (or groups of indicators).

5. *Property prices* - The preferred direction of change of house prices (and, arguably, the rateable value of commercial property) is not necessarily obvious. An increase in prices may be a strong indication of improving economic success of the Thames Gateway and the increasing attractiveness the area as a place to live. This is therefore arguably a desirable outcome. On the other hand, however, recent Government statements have suggested that the purpose of the large scale housebuilding programme within the *Communities Plan* is to reduce the rate of house prices inflation. There may be a clear contradiction here as to the Department's preferred outcome and this should be clarified in the baseline report and in subsequent reports.

6. *Amount of employment land (Annex C)* - Legitimate concerns have been expressed by some commentators over the predominance of low intensity, low value land uses such as

warehousing and distribution in the Thames Gateway. Support for that kind of industry does not feature as a high priority in economic strategies in the Thames Gateway. Not all new employment-related development is therefore necessarily in keeping with an appropriate economic policy objectives. The preferred direction of change across land-use types should be linked to an assessment of requirements made through, for example, the strategies of RDAs or the regeneration frameworks of LDVs.

7. *Losses of employment land (Annex C)* - The update¹ (January 2005) to PPG3 - *Housing* - is a welcome acknowledgement of the need to re-allocate excess employment land for new housing. The current wording of the indicators, however, gives the impression that 'loss' of employment land in this way is necessarily undesirable and this seems inconsistent with the policy objective behind the PPG3 update. The intention and preferred direction of change should be clarified. In any event, unless there is significant concern that the supply of employment land in the Thames Gateway is or will become insufficient, then the proposed indicator would not seem to be a useful one. Progress in line with the PPG3 update may, however, be usefully illustrated through a subtly re-wording the penultimate proposed indicators in Annex C as follows:

'Amount of excess employment land released for residential development'

8. Whatever wording is used, it is important that the indicator refers clearly to *excess* employment land that has been clearly identified as such through an objective assessment (involving the RDA and the local authorities) of realistic likely needs. CPRE has concerns, for example that some of the employment land sites currently in line for housing in Thurrock are likely in fact to be required for employment, especially in view of the ambitions of the Thurrock UDC to generate substantial new employment opportunities in the area. There is therefore a significant concern that the loss of such sites may soon result in additional employment land being designated on greenfield sites in the Green Belt.

9. For similar reasons, the proposed indicator '*Losses of employment land in (i) development/regeneration areas and (ii) local authority areas*' is inappropriate because the loss of a certain amount of employment land is consistent with Government policy.

10. *Car ownership* - The value of this indicator is questionable. While the Strategy seeks to encourage public transport use through the location of new development close to public transport facilities, this indicator may - if anything - measure the extent to which new development *fails* to do so. The preferred direction of change for this indicator should therefore be given. Alternatively, the indicator could be deleted.

Additional indicators

11. The Thames Gateway Strategy included a number of useful statements of the Government's policy objectives across a wide range of issues concerning the area's future development and regeneration. While most of those issues are addressed in the proposed list of indicators, several are not. Also, very few are addressed in quite the way that is suggested in the Strategy. The following comments address this question and propose a number of additional (or replacement) indicators that are more consistent with the stated aspirations of

¹ *Planning Policy Guidance Note 3: Housing Update. Supporting the Delivery of New Housing.* ODPM, January 2005.

the Strategy. They concentrate on outcomes, most of which will be influenced by activity that is - fortunately - already included in the proposed output indicators. As suggested above, wherever possible, targets should be developed for all outcome indicators, including those proposed below.

12. **Educational and employment skills** - The Strategy states that:

'By 2010, we will...increase the volume and quality of work based learning initiatives, like apprenticeships'. (page 51)

The proposed indicators include '*% 16 and 17 year olds full time education and training*', but the number of work-based training opportunities as such is not included. We propose that it is included. The question of the quality of work-based training is not addressed at all and we therefore propose that a suitable indicator is developed and included.

13. The Strategy states that:

'By 2010...a much higher proportion of residents will have achieved NVQ Level 3 skills' (page 6)

Although the indicators address educational achievement (Key Stage 2 results), NVQ Level 3 achievement is not addressed. We propose that it is included.

14. **Design quality** - The Strategy states that:

'to ensure that development is sustainable in the long term, new housing must be of high design quality...High environmental and quality standards are important to ensure that new homes are attractive to buyers. The Government is committed to driving up standards'. (page 32)

It is therefore very surprising and disappointing that the proposed indicators do not address the question of the quality of urban design and housing design at all. This is all the more surprising in view of the new impetus that has been given to this issue through the revised PPS1 - *Delivering sustainable development*. CABE is and has been doing a great deal of work towards developing objective, criteria-based assessments of housing quality and the opportunity should be taken to take this work forward in the Thames Gateway through the inclusion of an appropriate indicator.

15. **Health care** - The Strategy states that:

'By 2016...all residents will have access to high quality healthcare' (page 6)

The proposed indicators, however, include none that will measure progress towards this goal. We therefore propose the following two indicators:

- i. Number of GPs/head of population
- ii. Proportion of resident with access to high quality healthcare

16. **Transport** - The Strategy states that:

‘Across the Gateway, growth and new development will be focused initially on areas with good existing or planned transport links.’ (page 27)

‘Public transport use’ is included as a proposed indicator, but a far more direct assessment of the extent to which this commitment is being achieved should be possible. We propose, for example:

Percentage of new dwellings built close to good existing or planned transport links.

17. Whatever wording is used, it is important that the indicator refers exclusively to transport links that have been clearly demonstrated to meet an acceptable minimum standard. In Thurrock, for example, CPRE is concerned that the UDC is suggesting that it will seek to concentrate house building close to the existing rail links. The UDC is thereby claiming that transport needs will be met, despite the fact that the rail link is already very overcrowded and does not serve all the necessary destination.

18. The Strategy also states that:

‘The Community Infrastructure Fund will help to tackle these [transport accessibility]constraints, providing funding for transport schemes that unlock housing growth’ (page 27)

We propose that the number of development locations constrained by transport limitations should be assessed and monitored.

19. **Public consultation** - The Strategy states that:

‘The Government is committed to giving people more power and a greater say in the way that their communities are run’. (page 37)

This is a welcome commitment because the quality of public consultation and the extent to which communities feel engaged in local policy-making is emerging as a key concern among Thames Gateway residents. Regrettably, however, none of the proposed indicators address this issue. We propose that ODPM develops an indicator or indicators to (for example) assess the number of individuals making written responses at various stages in the LDF process.

20. The Strategy also advocates the development of Neighbourhood Charters (Page 40). The number of Charters (or the number of eligible areas not covered by a Charter) should therefore be monitored.

21. **Access to the waterfront** - The Strategy states:

‘We aim to ensure that access to the rivers is extended so that many more people have the opportunity to use the river for leisure and transport.’ (page 22)

We propose, therefore, that the number of kilometres of river frontage left inaccessible should be monitored.

22. **Sustainable construction** - The Strategy states that the Government will:

'Protect water resources and reduce waste production by promoting the Code for Sustainable Buildings across the Gateway'. (page 26)

and

'Encourage local authorities to promote the Code and apply similar standards consistently to privately developed new homes'. (page 36)

23. Although the proposed indicators include *'number of new builds meeting energy efficiency standards'*, no mention is made of other elements of the Code's requirements (such as water efficiency). Given the current profile of the Code for Sustainable Buildings, it seems extraordinary that the proposed evaluation database should not seek directly to illustrate the extent to which it is being taken up. We propose that the indicators include the number of new homes built to the standards of the Code.

24. **Key worker homes** - The Strategy states that the Government will:

'continue to support key workers on low and moderate incomes through the Key Worker Living scheme and the new First Time Buyers initiative.' (page 34)

Given the importance of there being sufficient housing available for key worker staff of expanded public services in the Thames Gateway, we therefore propose that the number of additional subsidised homes made available to key workers through these schemes should be monitored.

25. **Water resources** - The Strategy states that the Government has:

'set in place a statutory framework to ensure that adequate water supplies will be available in all areas, including those experiencing growth and worked with water companies to ensure that they can plan ahead for forecast growth. All water companies covering the Gateway have costed plans in place to ensure that they are able to meet demand' (page 25)

Given the - quite reasonable - planning, conservation and other constraints that may affect the provision of additional supply, the availability of potable water may become a major constraint on the potential housing growth trajectory of the Thames Gateway. We therefore propose that the relationship between confirmed available supply and anticipated demand (i.e. available supply volume / head or some such indicator) is monitored closely.

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