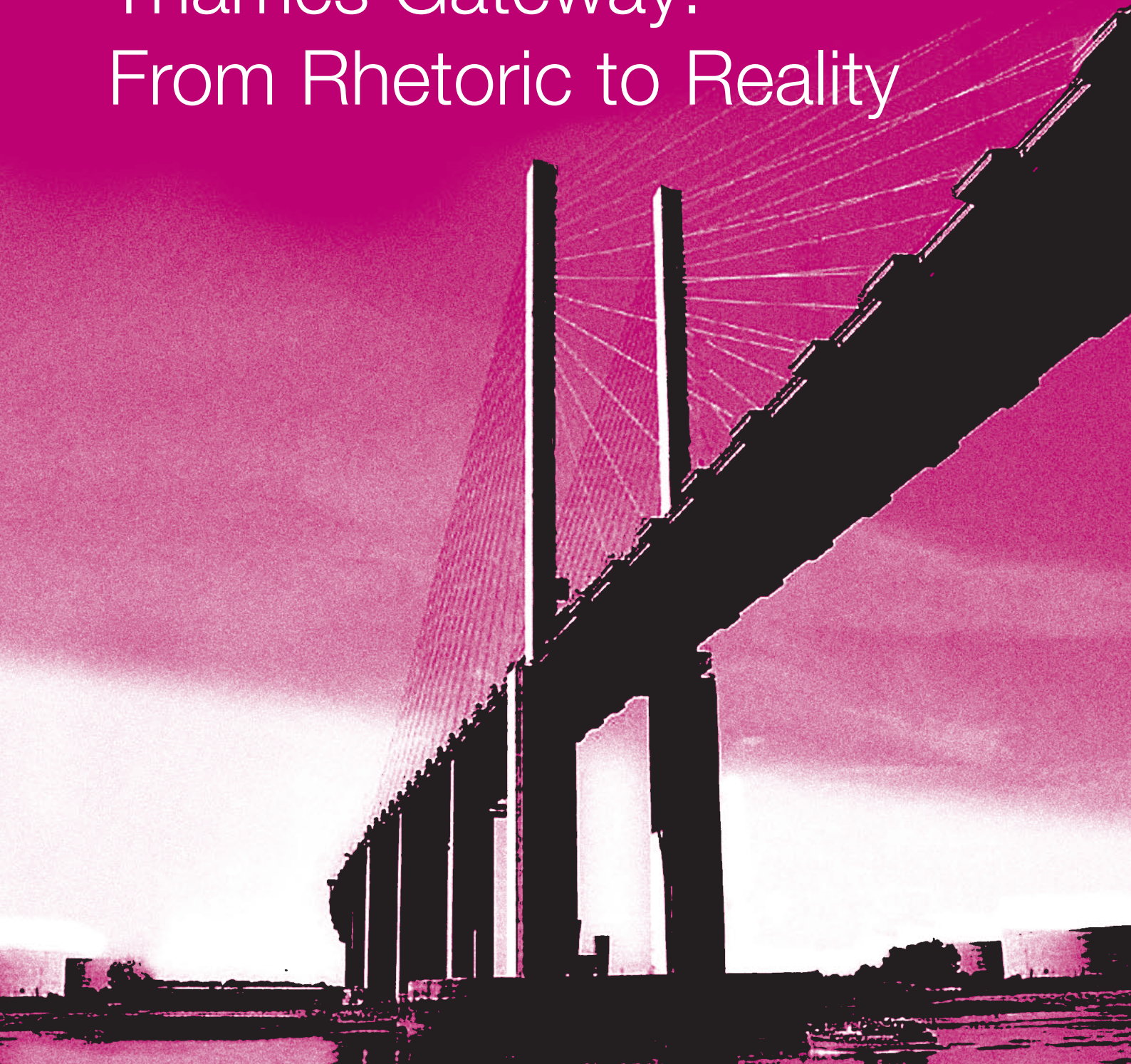




Campaign to Protect
Rural England

A CPRE report

Thames Gateway: From Rhetoric to Reality





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September 2005

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Introduction

Background

The Communities Plan anticipates the building of around one million new homes in south-eastern England over the next decade or so.¹ The successful regeneration of the Thames Gateway offers an unprecedented opportunity to accommodate much of that development on urban brownfield land, thereby greatly reducing the pressure for urban sprawl and new road-building across south-eastern England and helping to regenerate existing urban centres. CPRE is therefore generally strongly supportive of the Government's intention to regenerate and redevelop the Thames Gateway.

In 2004, CPRE published *Thames Gateway – Making Progress*, which addressed a range of barriers to reclaiming urban brownfield land and increasing the provision of new housing. In March 2005, the Government published its strategy for the Thames Gateway, *Building Sustainable Communities: Delivering in the Thames Gateway* (the 'Strategy'). CPRE welcomes a great deal in the Strategy, which we see as a genuine attempt to start firming up delivery timetables across a range of important commitments.

Building on our 2004 report and having regard to the Government's new Strategy, this document addresses a wider range of issues affecting the successful redevelopment and regeneration of the Thames Gateway and sets out a range of recommendations to that end.

Recommendation

Now that the Government's Thames Gateway strategy is in place, it should publish, on an annual basis, a report of progress against the commitments and aspirations that it sets out, together with data indicating trends in key factors influencing quality of life and the quality of the urban and rural environments. It should consult publicly on the indicators that will form the basis of those reports.

¹ *Sustainable Communities: Homes for All – A Five Year Plan from the ODPM*. ODPM, January 2005. The objective is for an additional 1.1 million new homes in the wider South East between 2003 and 2016.

The potential

Development pressure across south-eastern England, with its associated costs in respect of loss of countryside and rural tranquillity, traffic generation and pressure on public services, is very largely driven by out-migration from London. Net out-migration to the surrounding four English regions is currently running at around 100,000 individuals *per annum*.² The successful regeneration of the Thames Gateway could help mitigate the impact of this exodus by providing a place where people want to live and work – in London and beyond – in high quality new and regenerated developments set within a high quality landscape. The Thames Gateway is therefore a key test-bed for the policies set out in the November 2000 Urban White Paper.

The Government recognises the enormous untapped redevelopment and growth potential offered by the Thames Gateway: the relative proximity to areas of particularly high property values, coupled with the high concentration of urban brownfield land and its geographical position between London and European markets. Despite these powerful drivers of change, however, this potential is in danger of being squandered if development is allowed to proceed without a strong strategic approach within central Government and effective delivery mechanisms at a local level.

² *Social Trends 35*. ONS, March 2005: In the year ending June 2004, 201,000 people moved from London to the South East, Eastern, South West or East Midlands regions, whilst only 100,000 people moved in the opposite direction. This is consistent with the trend over the past several years.

Vision

The Strategy states that:

'Sustainable Communities are places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.'

CPRE's vision for the Thames Gateway is consistent with that of the Government, and the recommendations presented in this document will help to make this a reality. Our vision is that the Thames Gateway's redevelopment will, to the greatest possible extent and into the long term, meet the need for housing and other built development that would otherwise be met through urban sprawl and urban out-migration throughout south-eastern England. The objective throughout the area should be to create a place which is attractive for people to live in, work in and visit. New development should be of the highest standards of design and quality and should be confined entirely to the existing urbanised areas and previously developed land. A new regional park authority should be created to lead on the enhancement and protection of the existing environmental infrastructure – waterways, open spaces, parks, rights of way, marshland, historic landscapes and features, and biodiversity. Such an authority should aspire to create a rural environment which is attractive and resilient and which provides opportunities for quiet enjoyment in a way which positively contributes to and helps achieve the development agenda.

The Policy Framework

Housing

Housebuilding numbers

CPRE's strong support for the Thames Gateway regeneration project is based on the premise that, consistent with the Urban White Paper, realising latent urban capacity there will allow new housebuilding to be focused largely within existing urban areas rather than elsewhere in south-eastern England. CPRE does not, however, accept that there is currently a significant level of unmet need for housing that requires a rate of housebuilding across the South East and Eastern Regions in excess of the rate currently proposed in regional planning guidance. Nevertheless, under the sequential approach, and subject to the ability of the market to deliver, it is appropriate that a high proportion of housing provision across the South East should be somewhat concentrated within the Thames Gateway because it is an area in which urban brownfield land resources are concentrated. We therefore support the proposal made recently by the Institute for Public Policy Research (IPPR) and the Commission on Sustainable Development in the South East that a 'Greater South East housing forum' should be established.³ Such a forum could ensure that the additional housing capacity that is identified in urban areas in the Thames Gateway is properly taken into account in assessing housing needs elsewhere in the greater South East. The 2004 Interregional Planning Statement supports this approach, expressing the desire to:

*'maximise its contribution to [meeting] the huge housing needs of the wider South East.'*⁴

So long as housebuilding requirements (in terms of planned provision) across south-eastern England are not increased, and so long as there is a policy of avoiding unnecessary greenfield development in the Thames Gateway, it would be appropriate for the numbers built in the Thames Gateway to increase commensurate with the identified availability of urban brownfield land. This could represent a much higher number than the 120,000 dwellings between 2001 and 2016 proposed under the 'mid-term scenario' in the Communities Plan. Indeed, the Thames Gateway's three regional planning authorities have subsequently proposed a figure of 128,500 over the same period.⁵

However – irrespective of the proportion built on brownfield land – it will not be possible to know the likely scale of development that will be possible throughout the Thames Gateway until adequate urban capacity studies (UCSs) are completed across the entire area. The outcome of recent work by the Mayor of London indicates that the ambitious and energetic approach taken in London is identifying very considerably more urban capacity than has hitherto been identified. The estimated urban potential in London has thereby been increased from 59,000 new homes by 2016 to 100,000 and appears to have continued to rise up to and beyond 120,000 into the longer term.⁶

3 *Meeting Housing Need in the South East*. Working paper five. Anthony Vigor and Peter Robinson. IPPR/Commission on Sustainable Development in the South East, April 2005. Page 37.

4 *Growth and regeneration in the Thames Gateway*. Interregional Planning Statement by the Thames Gateway Regional Planning Bodies. Mayor of London, East of England Regional Assembly and South East England Regional Assembly, August 2004. Paragraph 4.10.

5 *Growth and regeneration in the Thames Gateway*. Interregional Planning Statement by the Thames Gateway Regional Planning Bodies. Mayor of London, East of England Regional Assembly and South East England Regional Assembly, August 2004.

6 The 59,000 figure comes from *Creating Sustainable Communities: Making it Happen*. ODPM, July 2003. The Mayor's more recent publication, *Redevelopment: An Investors' Guide to Brownfield Land*, Mayor of London, June 2005, gives a revised figure of 100,000.

Outside London, UCSs have not necessarily been completed to the same high standards. The three regional planning authorities, for example, accept that their figure of 128,500 new dwellings should be tested through further housing capacity studies and the regional planning process. That being the case, in the meantime, it would be unacceptable to make assumptions about the quantity of new housing and associated development that each part of the Thames Gateway outside London can accommodate. It seems reasonable to assume that considerably greater urban capacity could be identified if the strongly pro-active approach taken by the Mayor of London were to be replicated elsewhere. CPRE is deeply concerned that the Strategy makes no reference to urban capacity studies or the need for more robust assessment of brownfield potential.

Recommendations

Regional Planning Bodies (RPBs) and Local Planning Authorities (LPAs) should ensure that:

- **any increase in urban capacity identified in the Thames Gateway is translated into reductions in the quantities of new housing required by the Government to be built elsewhere in the south-eastern England;**
- **no numerical targets for housebuilding should be set for any part of the area unless based on the outcome of a satisfactory urban capacity study; and**
- **urban capacity studies for each local authority area in the Thames Gateway are tested against the standards achieved at the strategic level in London and are revised as appropriate.**

Brownfield target

Despite the relative abundance of vacant urban brownfield land, the Thames Gateway area is predominantly rural and much of it is within the Green Belt. Protecting urban green space and the setting of the waterways – and reducing the legacy of vacant and derelict urban sites – will be a crucial part of maintaining and improving general quality of life in the Thames Gateway, creating a place where people will wish to live and work, and therefore promoting the area's economic fortunes.

There is considerable pressure to deliver new housing in the Thames Gateway as quickly as possible. Indeed, there are potentially benefits to be had from quick delivery because the sooner new housing can be provided on urban brownfield sites in the Thames Gateway, the sooner the need for housebuilding in less appropriate locations will diminish and the sooner the quality of the urban environment can be improved.

However, the pressure to deliver quickly inevitably translates into pressure to build on convenient greenfield sites that are not subject to the complications of some urban brownfield sites. The section below – 'Greenfield threat' – presents a number of examples of proposed developments on greenfield sites in the Thames Gateway. Moreover, in view of the costs to the public purse that large scale housebuilding incurs (including infrastructure costs and land remediation as well as subsidising social housing), there must be a temptation to seek to tap the profits of greenfield development in order to help meet those public sector costs. The Government's insistence that the entirety of the Green Belt land in Thurrock should be included within the area of the Thurrock UDC, and the references in the Thurrock UDC consultation document to allowing greenfield development that 'enables' regeneration, may give the impression that this is the Government's intention. CPRE does not accept that it is necessary or acceptable to allow urban sprawl in order to help fund urban regeneration.

Each housing development that is allowed on a greenfield site in the Thames Gateway constitutes a lost opportunity to repair the fabric of the existing urban areas. A moratorium on greenfield development has been shown to be a realistic and effective driver of urban regeneration in other parts of the UK and should be applied in the Thames Gateway.

In the longer term, the Government intends to revitalise housing markets in England's northern cities. CPRE supports that basic objective because it is consistent with the objective of focusing development in areas which have the greatest concentrations of vacant urban brownfield land. If the Government's strategy were to be successful, it would be appropriate to assume that the current level of demand for housing in south-eastern England will be reduced in due course as the northern cities begin to present a more attractive alternative. That being the case, planning authorities and the Government should strongly resist claims that greenfield land needs to be released against the sequential approach on the assumption that it will 'eventually' become necessary.

CPRE does not accept that any need has been demonstrated for housing (or economic development) on greenfield sites outside urban areas in the Thames Gateway at least for the remainder of the Communities Plan period (up to 2016). In order to avoid the unnecessary release of greenfield sites, it is crucial that the fundamental principles of the sequential approach and a capacity-led approach are held to the forefront of planning policy.

In view of the Mayor of London's ambition to provide 120,000 new dwellings on brownfield land in East London (albeit probably over a longer timescale), meeting the Government's objective of 120,000 additional dwellings throughout the Thames Gateway by 2016 should not require the use of any greenfield land. Indeed, the former Minister for Housing and Planning, the Rt. Hon. Keith Hill MP, acknowledges that:

*'At an average density of 40 dwellings per hectare, there is more than enough brownfield land in the Gateway to accommodate the housing growth targets that the Government propose.'*⁷

Notwithstanding that 40 dwellings per hectare is far too low an average density that should be acceptable across the Thames Gateway, this statement makes it clear that the Government considers that a target of 100% of new development in the Thames Gateway to be on urban brownfield land is feasible up to and well beyond 2016.

Helpfully, the Strategy identifies one of the Government's key principles as:

'to return derelict and contaminated brownfield land to productive use.'

However, it also establishes a minimum target that *'at least 80% of new homes'* in the Thames Gateway should be built on previously developed land. This is an unreasonably low figure in view of the confirmation elsewhere in that document that *'this proportion has been steadily increasing year on year'* and reached 85% in 2003. The Government's minimum target appears therefore to be a step backwards.

⁷ Official Report, 15 November 2004, Column 1075-1076.

Recommendation

The Mayor of London and the RPBs should adopt a sub-regional target that 100% of all new development throughout their respective parts of the Thames Gateway should take place on urban brownfield land, at least until the end of the Communities Plan period (2016). In the meantime, LPAs and Government Regional Offices should support the sequential approach by strongly resisting any applications on greenfield land in the Thames Gateway, irrespective of whether greenfield sites are identified in development plans. LPAs should ensure that development plan reviews support sequential testing of allocated sites.

Greenfield threat

The Government's emphasis on a large house building and economic development programme within the Thames Gateway will inevitably attract interest from developers whose proposals do not accord with the standards advocated in the Communities Plan and are targeted on greenfield sites rather than contributing directly to urban regeneration. There is mounting evidence of the Government's Thames Gateway project being used with some success as a 'Trojan Horse' by which to promote greenfield development. The following proposals have either received, or have yet to be refused, planning permission:

- in October 2004, Castle Point Council granted planning permission for a motel complex on Green Belt land adjacent to the A13;
- the 'Thamesgate' plans for some 14,000 new homes and commercial accommodation around East Tilbury would consume hundreds of hectares of greenfield land in the Green Belt;
- the 'discussion maps' issued by the Thurrock UDC present various options for new settlements on greenfield land in the Green Belt;
- The English Partnerships plans for housing at Dry Street, Basildon, is on land that the local council had earmarked for Green Belt designation;
- a proposal known as 'Medway Magna' has been promoted for 9,250 new houses in the Capstone Valley outside Gillingham, including part of the Capstone Valley County Park;
- a proposal for a 'science park' and up to 5,000 new houses has been promoted for greenfield land outside Sittingbourne;
- the current draft RSS for the East of England states that '*Around some urban areas, however, reviews of Green Belt boundaries are needed as part of an appraisal to identify the most sustainable locations for new development in line with the sub-regional strategies... and to respond to the Government's Sustainable Communities Plan. Reviews will therefore be undertaken in... Thames Gateway South Essex.*' (Policy SS7)

In addition, the 2004 Regional Economic Strategy for South East England refers to the intention to '*realise the potential of major, mostly brownfield, sites*' for the North Kent Thames Gateway. '*Mostly*' brownfield leaves a great deal of scope for a substantial amount of greenfield development.

Residential density

The Government and the Mayor of London appear to have accepted the benefits that raising urban residential densities bring: increased viability of public services, local retail facilities and public transport; reduced need to travel by car, and less need for additional public investment in infrastructure. The Commission for Architecture and the Built Environment (CABE) has recently published a report⁸ which strongly supports building at higher densities and addresses the key factors in achieving successful high density developments. The London School of Economics highlights the economic benefits of raising residential densities, estimating that development at 'sufficient density' creates 300 service jobs per 1,000 homes.⁹

However, because the Government's 'mid-term growth scenario' of 120,000 additional dwellings was based essentially on (then) current and planned transport infrastructure capacity limits, rather than on the likely availability of land, it is highly unlikely that that figure represents the true capacity of the Thames Gateway to accommodate new housing in urban areas. There is therefore a danger that the 120,000 figure will be translated into less than optimal density requirements on a site-by-site basis. This may substantially undermine the benefits outlined above and compromise the scope for further growth beyond 2016. The 2004 Interregional Planning Statement recognises this issue:

*'There is a risk, especially in the western and mid parts of the Gateway, that too much land may be released to low density uses and thereby obstruct the potential for uses generating more jobs and wider economic benefit or for release of that land to residential use.'*¹⁰

The Town and Country Planning (Residential Density) (London and South East England) Direction 2002 (the 'Density Direction') commits the Secretary of State to intervening in planning applications for housing on sites greater than 1 hectare that involve a density of less than 30 dph (net). That was set against a national average (2002) of 27 dph (now 33 dph). In its response to the Select Committee report,¹¹ the Government states that it:

'does not rule out extending the geographical scope of the Direction, raising the notification threshold from 30dph or applying it to sites smaller than one hectare.'

8 *Better Neighbourhoods: Making higher densities work.* CABE, March 2005.

9 *A framework for housing in the London Thames Gateway.* LSE Housing, CASE and Enterprise LSE Cities. December 2004. Vol. 1, page 37.

10 *Growth and regeneration in the Thames Gateway. Interregional Planning Statement by the Thames Gateway Regional Planning Bodies.* Mayor of London, East of England Regional Assembly and South East England Regional Assembly, August 2004. Paragraph 2.8.

11 Government response (July 2003) to ODPM Select Committee Report on Planning for Sustainable Communities: Sustainable Communities in the South East. Response to Recommendation(s).

In the Thames Gateway, because the focus is on urban regeneration, a significant proportion of new housing is likely to be brought forward on sites of less than 1 hectare. In the whole of London, for example, some 50-60% of housing is expected to be built on sites less than 0.5 hectares.¹² Overlooking the importance of securing appropriately high densities on small sites may therefore very significantly undermine the delivery of housing numbers and this could justify a review of the Density Direction. We welcome the Government's recent announcement that it intends to extend the Direction to a wider area.¹³ Nevertheless, because of the focus in the Thames Gateway being exclusively on previously developed urban sites, any revision of the Density Direction should make it more geographically specific and set a much higher threshold either for urban areas generally or for the Thames Gateway specifically. This would not necessarily mean that developments at a relatively lower density would be considered inappropriate but it would mean that they would be more closely scrutinised.

Recommendations

RPBs and the Mayor of London should adopt an average density of 90 dph (net)¹⁴ for new housing in urban areas throughout the Thames Gateway.

The Government should review the 2002 Density Direction with a view to raising the intervention threshold in the Thames Gateway. We recommend that that threshold should be set at 80 dph (net).

Balancing housing and economic development

It is clearly preferable for new housing to be built in areas where there are already sufficient employment opportunities locally. However, the reality is that one of the main barriers to the Thames Gateway's regeneration is the lack of resident people with higher-level skills.¹⁵ Employers will not move into the area until the necessary skills are available within reach. It is, however, not necessarily the case that there is or will be sufficient housing available in appropriate locations in the Thames Gateway that is attractive to higher skilled individuals and company executives and a shortage of such housing could undermine the prospects for economic regeneration. On the other hand, any policy that appears to allow housing development to run significantly ahead of the creation of jobs locally runs the risk of creating 'dormitory' housing developments, exacerbating congestion on commuter networks and promoting urban sprawl.

¹² *Pers.comm.* Mr Giles Dolphin, GLA, March 2004.

¹³ *The Town and Country Planning (Residential Density) (London, South East England, South West England, East of England and Northamptonshire) Direction 2005.* January 2005.

¹⁴ Average residential density of new housing across London in 2004 is 83 dph (net). In inner London, the average over 2002-2003 was 91 dph (net).

¹⁵ *Delivering Skills for Communities. First Skills Audit of the Thames Gateway. Summary Report October 2004.* Learning and Skills Council, October 2004.

Recommendation

LPAs, the RPBs and the Mayor of London should acknowledge that, where:

- **there is significant potential for local regeneration;**
- **a shortage of homes that are attractive to higher income earners has been demonstrated;**
- **transport links are adequate to enable additional commuting; and**
- **reasonable provision is made for economic development that is likely to come forward in due course,**

some flexibility should be allowed in the phasing of housing development and the provision of employment space. This flexibility should be limited to the urban Thames Gateway area, rather than applied elsewhere (where it could lead to pressure for housing growth, incursions into greenfield land and increased levels of commuting, particularly by car). This policy should be backed up by confirmation that the objective of creating a balance between the overall employment numbers (and quality of jobs) and the provision of new housing remains unchanged.

Mixed communities

In order to help improve the image of the Thames Gateway and prevent the emergence of deprived neighbourhoods and the associated blight that that causes, it is important that housing developments provide for a wide range of housing types and tenures suitable for a range of income groups. Sufficient housing should be provided in the Thames Gateway that is attractive to higher income earners in order to help promote the economic regeneration of the area. The 2004 Interregional Planning Statement recognises this issue:

*'There has to be a range of housing types and costs across the Gateway, including more homes for higher and medium level income groups.'*¹⁶

Housing areas should be seamless in respect of tenure and this can be achieved through good design and mixing. We welcome the Government's acknowledgement of the importance of this issue and its recent announcements to the effect that the review of PPG3 will address the need for LPAs and developers to work together to deliver the appropriate mix of housing for their community.¹⁷

In addition, a substantial proportion of the housing demand in south-eastern England is attributable to families with young children which leave London in order to find appropriate and affordable accommodation. The Thames Gateway offers an opportunity to help meet those needs in high quality urban developments and therefore help reduce the need for greenfield development elsewhere.

¹⁶ *Growth and regeneration in the Thames Gateway. Interregional Planning Statement by the Thames Gateway Regional Planning Bodies. Mayor of London, East of England Regional Assembly and South East England Regional Assembly, August 2004. Paragraph 4.13.*

¹⁷ ODPM News Release 2005/0008 - 24 January 2005: *'Planning system will deliver more affordable housing - Hill'*.

Recommendations

LPAs, the RPBs and the Mayor of London should:

- **acknowledge the significance of creating mixed income residential developments in helping to achieve regeneration objectives and should guard against creating areas of predominantly low-income households through an excessive concentration of subsidised social housing; and**
- **include policies in LDFs and regeneration frameworks that will ensure that sufficient housing is provided to meet the needs of families with children, including those needs that arise from out-migration from London.**

Key workers and affordable housing

In order for the Thames Gateway to become and remain an attractive option as a place to live, it is important that the quality of public services is perceived to be adequate. Given the non-affordability of market housing for many public sector staff in frontline services, that will require potentially significant levels of public and private subsidy. In wishing to see that sufficient 'affordable housing' is provided in the Thames Gateway, CPRE's principal concern is that there should be adequate subsidised provision of key worker housing in order to maintain the quality of public services.

It has been widely accepted that, nationally, there is a significant shortfall in the provision of social housing compared to the level of need and a significant shortfall in the funding available.¹⁸ CPRE recognises and welcomes the actual and committed increases in the Government's investment in affordable housing since 2003, including through the July 2004 Spending Review. Nevertheless, while these programmes are clearly a big step in the right direction, it remains unclear whether the totality of anticipated Government expenditure in the Thames Gateway is sufficient to meet requirements for key workers specifically. The ODPM Select Committee, for example, found that the Housing Corporation did not appear to have any targets for affordable housing for rent in the Growth Areas or long term funding allocations.¹⁹ Making a similar point, the London School of Economics states that:

*'There is no consistent plan for the development of affordable housing across the [Thames Gateway] sub-region. It is not yet clear if adequate levels of subsidy will be available for new building in addition to repair of existing stock.'*²⁰

Furthermore, it is important to ensure that sufficient affordable housing is provided which is suitable for families with children. If crude targets for affordable housing are applied without regard to the diverse nature of local needs, there is a danger that key workers who benefit from housing subsidies may be forced to leave the Thames Gateway area altogether when they have children.

¹⁸ For example, *Building for the Future – 2004 Update. A Report of the Shelter Housing Investment Project. Shelter, March 2004; and Review of Housing Supply: Delivering Stability: Securing our Future Housing Needs. Final Report – Recommendations. March 2004.*

¹⁹ ODPM: Housing, Planning, Local Government and the Regions Committee. *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East. Eighth Report of Session 2002-03. Paragraph 59.*

²⁰ *A framework for housing in the London Thames Gateway. LSE Housing, CASE and Enterprise LSE Cities. December 2004. Vol. 1, page 30.*

Recommendations

LPAs, RPBs and the Mayor of London should:

- **acknowledge that sufficient affordable key worker housing should be made available in the Thames Gateway to meet the staffing needs of frontline public services; and**
- **establish indicative costed targets for the number of dwellings that are to be provided for key workers in the Thames Gateway at sub-market prices for rent and sale over the period of the RSS for each sub-region, including the proportion that should be suitable for families with children.**

Community Infrastructure

Through the Communities Plan, the Government has stated that its response to the challenge of sustainable growth is to:

*'address public services and infrastructure needs to enable the new communities to function.'*²¹

and the Strategy identifies one of the Government's key objectives as being:

'to ensure that infrastructure and local services are in place when the community needs them'

It is important for the long term attractiveness of the Thames Gateway, and to avoid the waste of land caused by car-dependency, that new housing is not provided through large, monolithic housing estates with no amenities or facilities, that engender no sense of community, and have no sense of place. Such an approach would be inconsistent with the Government's objective of improving 'liveability' in urban areas as set out, for example, in *Living Places: Powers Rights, Responsibilities*²² and its approach to 'sustainable communities'.

In London, the LDA has produced a 'development and investment framework' which sets out the requirements in respect of community infrastructure provision. It is estimated that the regeneration of the London part of the Thames Gateway will require fifty-five new primary schools, ten new secondary schools, nine new leisure centres and six new playing fields. This exercise should be helpful, not only in helping to identify the costs involved, but also in maintaining a strategic overview of the delivery of the required developments over time.

The Prime Minister has acknowledged the importance of ensuring that the Thames Gateway's redevelopment constitutes a step change in the way that towns and cities are planned, including in respect of local amenities:

*'The new developments proposed in specific parts of the South East including the Thames Gateway represent a huge opportunity for us to show what can be achieved in terms of modern, smart, 21st century, sustainable living: not just in terms of reduced energy use, but also through better waste management, sustainable transport and availability of quality local parks and amenities.'*²³

and the Government has made it clear that:

*'The communities plan sets out that growth areas must not be dormitories; they must be communities. That also depends on providing good quality community infrastructure.'*²⁴

²¹ *Sustainable Communities: building for the future*. ODPM, February 2003. Chapter 5.

²² DEFRA, February 2003.

²³ The Prime Minister, the Rt. Hon. Tony Blair MP speaking on climate change on 14 September, 2004.

²⁴ Yvette Cooper MP, Parliamentary Under-Secretary of State at ODPM, *Official Report*, 22 October 2003, Col. 760.

Key to ensuring that communities in the Thames Gateway are provided with the local amenities that they require will be to ensure that adequate provision is made for them in masterplans. Potentially in support of such an approach, the Department for Transport has completed eight accessibility planning indicator pilots.²⁵ Six core accessibility indicators have been agreed, which include access to education and health care (two indicators each) and access to jobs and major retail centres. Each English Local Transport Authority (LTA) outside London is required to report against these indicators as part of their next Local Transport Plan (LTP). However, CPRE has been unable to identify any evidence that LTAs are aware of the existence of these indicators and we therefore assume that this initiative has been delayed or re-scheduled.

Recommendations

RPBs, the Mayor of London and LPAs should:

- **confirm that ready access to local public services and amenities is a crucial element of creating successful places consistent with the approach to planning advocated within the Communities Plan;**
- **develop standards, which should be established in planning policies, for the proximity of all major housing developments to community infrastructure, including schools, hospitals, GP surgeries, libraries, sports and leisure facilities, and green open space; and**
- **ensure that masterplanning is undertaken for all major development in the Thames Gateway, and that the masterplans make adequate provision for community infrastructure.**

The two RPBs should undertake an exercise similar to that undertaken in London to identify the required additional provision in respect of local services and other community infrastructure for the Kent and Essex parts of the Thames Gateway. Provision for the necessary developments should then be made in development plans and masterplans and monitored through the RSS monitoring process.

²⁵ *Official Report*, 22 July 2004 : Column 553W. Question number 185820.

The Economy

Delivering employment opportunities

Economic regeneration and increasing the number and variety of employment opportunities is a crucial element of the Thames Gateway's social and environmental regeneration. Indeed, housing growth and urban regeneration on the scale envisaged in the Communities Plan may not be achieved without it. The 2004 Interregional Planning Statement, for example, states that:

*'The capacity of the Gateway will only be fully realised if new investors and residents can be attracted to it in very large numbers.'*²⁶

Waiting for the market for new employment-related development to offer certainty before suitable business accommodation is provided may not result in sufficient accommodation coming forward soon enough to maintain a balance between population growth and job growth. For example, in 2001, the DETR Thames Gateway Review noted that 42% of the proposed new housing, but only 16% of the proposed employment floorspace had been built.²⁷

Economic growth – and therefore employment opportunities – may be constrained by the unwillingness of private sector investors to take a lead by providing suitable premises for new employers in the area. According to the ODPM's research,²⁸ the planned capacity of transport infrastructure will not be sufficient to accommodate the Government's target population growth in the Thames Gateway unless new employment opportunities are created close to residential areas. Moreover, the concept of sustainable communities requires mixed use development that facilitates access to employment opportunities within convenient reach of residential areas and which do not require the use of a car.

The housebuilding programme should be complemented by a strategy for creating new jobs in the Thames Gateway and we therefore welcome the Government's commitment, given in the Strategy, to:

'publish a Thames Gateway economic statement which brings together the work of the three Regional Development Agencies, Learning and Skills councils and local authorities and identifies areas for further action by December 2005.'

The Strategy acknowledges that:

'A measure of our success in regenerating the Thames Gateway will be the extent to which it attracts private investment.'

CPRE agrees, but it is disappointing that the Strategy makes no commitment to measuring the extent to which that private investment is attracted.

²⁶ *Growth and regeneration in the Thames Gateway. Interregional Planning Statement by the Thames Gateway Regional Planning Bodies. Mayor of London, East of England Regional Assembly and South East England Regional Assembly, August 2004. Paragraph 5.5.*

²⁷ *Thames Gateway Review: Final Report. DETR, January 2001. Page 26.*

²⁸ *Relationship between Transport and Development in the Thames Gateway. Llewellyn-Davies, 2003.*

Recommendations

The Government should, in collaboration with RDAs and the sub-regional partnerships, undertake to publish an employment and business growth strategy for the Thames Gateway, consistent with the policies in RSSs and the regeneration frameworks of LDVs in each sub-region, in order to reduce commuting into central London and to create more economically sustainable communities in the long term. The forthcoming *Thames Gateway economic statement could*, at least in part, perform that role. That strategy should incorporate a number of appropriate indicators, including the increase in employment rates and private investment in the Thames Gateway over time.

The employment and business growth strategy should 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 (ODPM/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.

The employment and business growth strategy should recognise the significance of the following issues in promoting the economy of the Thames Gateway and indicate how they are each being addressed. It should address the need to:

- improve the appearance and management of town centres;
- improve the landscape quality in the Thames Gateway, including through ‘undergrounding overhead power lines’;
- promote the cultural identity of the Thames Gateway;
- improve the educational attainment and skills base among the local population;
- provide adequate new housing that is attractive to higher income earners; and
- improve the management of business parks and other employment areas.

Some of these issues are addressed elsewhere in this report as well as in the 2001 report by the Thames Gateway London Partnership *Heroic Change*.²⁹

Through its programme of re-locating civil service jobs out of central London, the Government should consider re-locating a proportion of those jobs to appropriate sites in the Thames Gateway.

²⁹ *Heroic Change: Securing Environmental Quality in the Thames Gateway London*. TGLP, 2001.

Educational attainment and employment skills

In the London Thames Gateway, progress in meeting national learning targets lags behind that of other parts of London and employers have reported particular problems when recruiting for positions requiring 'higher-level' technical and/or managerial skills.³⁰ This is a self-reinforcing situation that is clearly a disincentive for employers to locate or expand in the Thames Gateway and therefore undermines social and economic regeneration. The likely result is that urban regeneration opportunities presented by economic development and associated housing growth will be foregone and employees resident in the Thames Gateway will continue to have to commute outside the area or leave the area altogether in order to get to work.

In October 2004, the Learning and Skills Council (LSC) published a report³¹ which showed that there is a serious shortage of employment skills in the Thames Gateway and that shortage is considered by employers to be detrimental to their competitiveness. The report quotes the Deputy Prime Minister as saying that:

'We need a culture change in skills and training for a broad range of occupations in order to deliver sustainable communities.'

The Strategy states that the Government will:

'raise the standards of learning, work-related skills, employability and further educational achievement across the Gateway. We will provide new opportunities for adults to increase their skills'

and

'increase the volume and quantity of work-based learning initiatives'

CPRE strongly supports these sentiments and therefore welcomes the commitment to publish the *Skills for Communities Action Plan* which will seek to address the shortcomings identified in the LSC skills audit.

Recommendation

We urge the Government to ensure that the forthcoming *Skills for Communities Action Plan* recognises that the skills deficit in the Thames Gateway is acting as a brake on the area's social and economic regeneration. Appropriate measures that demonstrate a commitment to improving the situation might include establishing targets for the achievement of academic and vocational qualifications in the Thames Gateway, and for the number of placements achieved in work-based learning initiatives.

³⁰ *Going East. The Economic Strategy of the Thames Gateway London Partnership*. TGLP, June 2001.

³¹ *Delivering Skills for Communities. First Skills Audit of the Thames Gateway. Summary Report*. Learning & Skills Council, October 2004.

Employment land

A major impediment to the delivery of housing numbers in the Thames Gateway (as elsewhere) is the excessive allocation of land for employment-generating development. This problem has been recognised and, to some extent, addressed through the recent update to PPG3 *Supporting the delivery of new housing*³² and associated guidance. The Mayor of London has also recognised this issue and has taken action to oversee the re-allocation of such land for housing whilst maintaining sufficient land to accommodate new economic development. It is disappointing that there appears to be no such equivalent exercise being undertaken for the rest of the Thames Gateway.

Recommendations**We urge the Government to confirm that:**

- **LPA's are encouraged urgently to make a realistic assessment of the overall quantity of employment land that is likely to be needed across the area and develop programmes to oversee the re-allocation of excessive land for other purposes (notably housing); and**
- **in determining the scale of land requirements for economic development and the locational criteria for major sites (especially inward investment sites), LPA's are encouraged to take a robust stance in negotiations with developers over the suitability of prospective sites so as to avoid the unnecessary release of greenfield land.**

32 ODPM, January 2005.

Transport

The Strategy acknowledges that:

'The transport network in the Gateway is already under strain with heavily used road and rail commuter routes and local networks that are already at capacity.'

Notwithstanding the implementation of policies for reducing the need to travel, the Thames Gateway needs to be provided with sufficient major transport infrastructure, consistent with the objective of reducing reliance on the car, maximising the re-development of urban brownfield land, maximising residential densities and meeting transport needs across all modes. The key issue is for transport infrastructure requirements to cease to be a limiting factor to the area's redevelopment potential. Further, in order to 'pump-prime' the economic regeneration of the Thames Gateway and make it more attractive to new employers, it will be necessary to provide good transport access to existing high skill employment opportunities *outside* the Thames Gateway (principally London) in order to allow higher skilled individuals to move into the area in the short to medium term.

Transport planning

In 2003, ODPM published a report³³ that identified the transport infrastructure requirements for making possible the delivery of 120,000 new homes and 180,000 new jobs in the Thames Gateway by 2016. That report identified no projects as being necessary over and above those that had already been agreed by the Government. Some have suggested that the figures of 120,000 new homes and 180,000 new jobs were identified by the Government principally on the grounds that that scale of growth would not require significant additional public expenditure on transport infrastructure. Indeed, the Government has told the ODPM Select Committee that there would not be any special funding for transport provision in the Growth Areas.³⁴ If that were to remain the case, we fear this would undermine the objectives of maximising the urban regeneration potential of the Thames Gateway.

Moreover, although the 2002 ODPM study took into account a large number of schemes and proposals, it is not necessarily the case that those schemes were identified with a view to realising the maximum urban regeneration potential of the Thames Gateway. The ODPM Select Committee made a similar point thus:

*'Major transport projects are being considered for the South East but there is no certainty that they will be coordinated with the major house-building programme.'*³⁵

³³ *Relationship between Transport and Development in the Thames Gateway*. Llewellyn-Davies, 2003.

³⁴ ODPM Housing, Planning, Local Government and the Regions Committee. *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East*. Eighth Report of Session 2002-03. Paragraph 129.

³⁵ ODPM: Housing, Planning, Local Government and the Regions Committee. *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East*. Eighth Report of Session 2002-03. Recommendation (II).

In the absence of a comprehensive and strategic approach being taken to identify the transport infrastructure requirements, schemes are likely to be brought forward simply through the lobbying of individual local authorities and other interest groups. This is not an acceptable approach because it is not driven by strategic objectives. Possibly heralding a sea-change in the Government's approach to transport planning in the Thames Gateway, former Transport Minister, Rt. Hon. Tony McNulty MP offered clear support for an objectives-led strategic approach across the Thames Gateway.³⁶ This is supported by the Strategy, which emphasises that:

'some areas remain where transport constraints limit the capacity for growth.... In these areas, we are committed to working with local partners to... identify what needs to be achieved'

Recommendation

We urge the Government, together with the Mayor of London and the RPBs, to urgently undertake a strategic, Thames Gateway-wide study with the objective of identifying the additional transport infrastructure required in order to maximise the urban regeneration potential of the Thames Gateway. Those requirements should be taken forward in part through the Local Transport Plan settlement in 2006. A selection of new projects that would help deliver regeneration benefits in the Thames Gateway and that are advocated by CPRE are set out below at Appendix 1.

Current transport infrastructure proposals

Rail infrastructure and major public transport development outside the London part of the Thames Gateway is seriously lacking. Of the various proposals in official documents, CPRE has serious concerns about the following three:

Thames Gateway Bridge – In principle CPRE supports the idea of a Thames Gateway Bridge in the proposed location. However, we object to the particular scheme because it has not been convincingly demonstrated that it will not encourage urban out-migration and stimulate additional housing demand across the South East by facilitating commuting from outside London. Selective tolling could provide an effective mechanism for excluding long-distance commuter traffic – but allowing commercial traffic – if the charges are set at an appropriate level.

Lower Thames crossing – A multi-modal 'Lower Thames' river crossing at East Tilbury and east of Gravesend is currently a remote possibility. Its principal purpose would be to allow rail freight to by-pass London. If built, however, it is likely to involve a major new rail route across Green Belt land. Further, if it provided for road traffic, it would require major new roads and intersections, including through the Thames Estuary and Marshes Special Protection Area and RAMSAR site and therefore raises major issues of conservation and environmental law. Indeed, it has been proposed in the context of providing for a London outer orbital route.³⁷ Such a facility would inevitably draw pressure for further residential and industrial development in the immediate vicinity. However, were the crossing guaranteed to be a rail-only crossing, then it would be beneficial, particularly as a London freight by-pass. It might be possible to develop existing track on the south side to link the crossing to the national rail network.

³⁶ Speaking at the *Thames Gateway Forum*, London, 24 November 2004.

³⁷ For example, *Thames Gateway London: The Transport Agenda*. TGLP, May 2002.

Crossrail extension from Abbey Wood to Ebbsfleet – In general, CPRE strongly supports the Crossrail proposals, but we have reservations about the possible effects of extending the southern branch eastbound services beyond Abbey Wood to Ebbsfleet. Given that CTRL will provide a high speed link between Ebbsfleet and London, there is a danger that the combined capacity provided by Crossrail and CTRL could be taken as justification for substantial additional releases of greenfield land for housing and associated development at Ebbsfleet and beyond.

Recommendations

We urge the Government to:

- **demonstrate that the proposed tolling regime for the proposed Thames Gateway Bridge will effectively exclude long distance commuter traffic and to ensure that that objective is built into any planning consent;**
- **accept that a lower Thames road crossing would be unacceptable on environmental grounds and would inevitably create unwelcome pressure for further residential and industrial development in its immediate vicinity; and**
- **ensure that the infrastructure required to extend Crossrail services eastwards from Abbey Wood is not put in place until it has been demonstrated that there is sufficient latent urban brownfield capacity to accommodate the additional housing demand that extending Crossrail could bring about.**

Complementary measures

Reducing reliance on the private car will improve the urban environment and will enable tighter standards of parking control (residential and non-residential) to be applied. That will enable higher densities to be achieved in residential and commercial development, making more efficient use of land and helping to deliver housing throughout the Thames Gateway. Achieving a modal shift away from private car use and towards public transport will require various measures to control traffic growth and make public transport a more attractive option. We therefore welcome the commitment in the Government's Strategy to *'promote innovative transport solutions including road pricing [and] better bus services.'*

Many small scale and non-engineering measures can achieve significant improvements in mobility and accessibility very much more cheaply than large scale infrastructure projects. Research undertaken by CPRE, T2000 and others, however, has shown that, despite their effectiveness and good value for money, opportunities to implement small scale solutions are frequently overlooked in favour of large, expensive infrastructure projects.³⁸ Quite apart from the question of whether this is an inappropriate use of public money, it undermines the objectives of reducing traffic growth and improving accessibility. Several small scale complementary measures have already been identified by the Thames Gateway sub-regional partnerships.

³⁸ *Valuing the Small: Counting the Benefits*. CPRE, CTC, Living Streets, Transport 2000, The Slower Speeds Initiative, Sustrans. October 2004

Recommendations

RPBs and local authorities should recognise the value of reducing the need for car usage in the Thames Gateway to take forward a range of complementary transport management measures through RSS and Local Transport Plans (LTPs), including:

- **bus lane prioritisation;**
- **car-parking standards which do not encourage car use;**
- **planning permission being made conditional on the adoption of green travel plans;**
- **co-ordination of new developments with public transport services;**
- **guarantees of service levels to new developments;**
- **route management information;**
- **closer integration of fares, ticketing and timetabling;**
- **transport audits for proposals for new housing developments; and**
- **linking planning permission to levels of transport accessibility.**

Aviation

Aviation in the UK causes unacceptable noise disturbance to millions of people, creates huge amounts of atmospheric pollution and allows significant potential tourist expenditure to be lost to the UK economy. CPRE does not accept that the UK economy will – as frequently claimed by those with a vested interest in expanding the aviation industry – suffer unless the industry were allowed to expand. Demand for air travel over and above existing levels of provision in the Thames Gateway should either be foregone or met by alternative transport modes. The development of any new airports (including, for example, Marinair, within the Thames Estuary) or the expansion of any existing airports within the Thames Gateway (such as London City Airport) is unacceptable on environmental grounds.

Recommendation

We urge the Government to confirm that it will adopt a policy of demand management in respect of the aviation industry in the Thames Gateway and throughout the UK.

The Urban Environment

Promoting market demand for housing will be a key factor in determining the quantity of new housing that can be provided in the Thames Gateway, and therefore in realising the potential for regeneration. Addressing market demand will require turning around the area's reputation as having an unattractive, poor quality urban environment with poor quality housing. That is no small task. The quality of new housing, the redeveloped town centres, and their ongoing management and maintenance need to be addressed through very significant effort and improved regulatory control by planning authorities and all local delivery vehicles and relevant government agencies.

Design quality

The Government accepts that high quality design is crucial to the delivery of sustainable communities. In particular, to work well and be acceptable to the local community, high density developments require careful attention being paid to design quality, both in respect of individual buildings and the layout of developments. Good design will be important if higher income earners and higher skilled individuals are to be attracted to live in the Thames Gateway, and is therefore crucial for the economic prospects of the area (and therefore the likely housing growth trajectory). Not only will new development need to be attractive for its own sake, but the design of housing and town centres has a profound effect on the social development of an area and will be crucial if the Thames Gateway's reputation is to be improved.

PPS1 *Delivering Sustainable Communities* requires LPAs to reject applications for poorly designed developments and CPRE has strongly welcomed this. We also welcome the Government promoting the Design Champion model among public agencies and LPAs. PPG3 *Housing* places a considerable emphasis on securing well designed residential developments of the highest standard.

We welcome the fact that achieving good quality design – and rejecting poor quality – is becoming increasingly 'hard-wired' into the planning system such that procedures that favour good design become the default option. This approach would be greatly enhanced by some mechanism that ensures that poorly designed developments can be rejected by planning authorities and – crucially – ensures that those decisions can survive the appeal process.

Nevertheless, research undertaken by CABE³⁹ has shown that well designed housing schemes are the exception rather than the norm, with less than 20% of 100 developments surveyed across the London, South East and Eastern Regions being rated by CABE as 'good' or 'very good'. Worryingly, there is evidence from appeal cases in London that the Mayor may be unable to enforce any building requirements – including design-related requirements – that go beyond statutory minima (for example, in respect of sustainable construction and the Building Regulations).

³⁹ *Housing Audit: Assessing the Design Quality of New Homes*. Phase 1 report. CABE, 2004.

Against this backdrop, the aspirations of the Communities Plan mean that the quality of development that takes place in the Thames Gateway will be seen as an important test of the Government's commitment to delivering the Plan's aspirations and of its ability to achieve real improvements in standards. CABE has identified a skills deficit among planners and cites this deficit as an important factor in preventing good design from becoming the norm.⁴⁰ It recommends that a programme of training and skills is developed with local authority members and officers and the employment of more design-trained staff. The £170 million in additional resources made available in March for the Planning Delivery Grant will potentially be of significant benefit in that regard.

The ODPM Select Committee has recognised the importance of the quality of new build in the Thames Gateway being carefully monitored by central Government. It recommends that CABE is tasked to take on this role:

*'The design quality of the new housing in the Growth Areas in the South East will be crucial to the long term success of the programme. With the Government's urgency to boost housing development and the use of offsite manufacturing, there is a danger that design quality will suffer. CABE should be monitoring very carefully the design quality of the new housing, particularly those built using offsite manufacturing.'*⁴¹

CABE itself has also identified excessive priority being given to highway design and car-parking as a major factor in poorly designed residential developments. Likewise, the ODPM Select Committee noted that:

*'Rigid highway standards and design guidance are inhibiting the implementation of the aspirations in PPG3 to create well designed neighbourhoods. New highway standards and guidance are urgently required which are more flexible to allow architects and planners to draw up designs to fit a particular locality.'*⁴²

We therefore look forward to these issues being addressed in the forthcoming revised guidance on highway design.

Home Zones make an enormous contribution to the quality of life and therefore, potentially, to the attractiveness of the Thames Gateway as a place to live. There is a need to consider incorporating the principles of Home Zones into residential developments at the masterplanning stage. Retro-fitting Home Zones into established residential areas can sometimes be too costly to be an attractive option for local authorities.

Better and more pro-active consultation with local communities can be an effective way of encouraging good design. *Enquiry by Design, Planning for Real* and the preparation of Village Design Statements, for example, are procedures that have been shown to produce a beneficial outcome.

⁴⁰ *Housing Audit: Assessing the Design Quality of New Homes – London, the South East and the East of England*. CABE, October 2004.

⁴¹ House of Commons ODPM Housing, Planning, Local Government and the Regions Committee. *The Role and Effectiveness of CABE*. Fifth Report of Session 2004–05. March 2005. Paragraph 68.

⁴² ODPM Housing, Planning, Local Government and the Regions Committee. *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East*. Eighth Report of Session 2002–03. Recommendation (r).

Recommendations

We urge ODPM to pursue the notion of a design ‘quality threshold’ for the Thames Gateway. The CABE-sponsored Building for Life award criteria may provide the basis of such a test. An appropriate standard would encompass consideration of the local context, and standards of construction, attractiveness of design and layout, access to amenities, incorporation of green open space, and managing the impact of electricity distribution systems.

RPBs and the Mayor of London should emphasise the significance of ensuring good design in helping to deliver regeneration objectives by confirming that the following initiatives should be adopted in respect of development in the Thames Gateway, including through appropriate policies in RSS and LDFs:

- **Design coding**
- **Development briefs**
- **Concept Statements**
- **Village or Town Design Statements**
- **CABE’s Design Quality Indicator (DQI) assessment**
- **Planning for Real and Enquiry by Design**
- **Home Zones**

The Government should:

- **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 to overseeing an audit of the design skills available among local authorities in the Thames Gateway and encourage the regional centres of excellence to address any shortcomings that are identified;**
- **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;**
- **confirm that it will give LPAs additional incentives to put design frameworks in place through the Planning Delivery Grant; and**
- **require CABE to undertake systematic monitoring of the quality of all significant new development in the Thames Gateway and publish results of that monitoring on an annual basis.**

Construction

Sustainable construction – The regeneration and redevelopment of the Thames Gateway will have significant implications for the demand for construction materials and other natural resources requirements. Increasing the amount of housing in south-eastern England will inevitably place additional demands on natural resources, including water, land and the need for landfill capacity. The principles of sustainable construction will help to minimise this impact. Importantly, research undertaken by WWF⁴³ and others indicated that, in terms of personal expenditure and capital costs, developing homes to high environmental standards could be cheaper than building to the standards demanded by current building regulations.

The Government states⁴⁴ that it is committed to increasing the environmental standard to which all publicly funded housing is built. The feasibility of doing so is borne out by the following:

- English Partnerships sets a minimum BREEAM EcoHomes ‘very good’ standard in all its development briefs and ‘excellent’ for its own developments;
- The Housing Corporation, in its recently published Sustainable Development Strategy, confirms that all ADP-funded (Approved Development Programme) schemes are expected to achieve EcoHomes ‘very good’ standard by 2006.

Although it is generally a very welcome initiative, the EcoHomes standards below the ‘very good’ level allow some of the assessment criteria to be entirely overlooked. This flaw potentially allows houses that do not promote good waste management or water efficiency to be accredited.

CPRE welcomes the Code for Sustainable Buildings and we welcome the fact that it is being piloted in the Thames Gateway. However, there are three principal areas of concern. Firstly, for practical reasons, the scope of the Code is, initially, likely to be somewhat limited, addressing only water use, energy consumption, waste management and sourcing of timber. Secondly, as the House of Commons Environmental Audit Committee noted in respect of the project’s Senior Steering Group:

‘It is incredible that the Government has not thought it important to have any representation from the organisations that have the greatest expertise in this area. This omission does not inspire us with confidence that the Code will result in significant and meaningful improvements in how houses are built or how their impacts on the environment are minimised.’⁴⁵

Thirdly, without regulation, there is no real incentive for the housebuilding industry to raise its game in respect of environmental performance (and, indeed, the quality of construction). The Environmental Audit Committee noted that:

‘The apparent reluctance within the House Builders Federation to acknowledge the need drastically to improve the environmental performance of the building process and of new houses is a matter of serious concern. It is particularly worrying that the current political drive for a significant increase in house building coincides with a shortage of skills in the industry. In the absence of commercial pressure to raise the industry’s environmental performance we believe that the Government has a duty to intervene to ensure adequate environmental standards.’⁴⁶

⁴³ *One Planet Living in the Thames Gateway*. WWF, BioRegional and SEI, June 2003.

⁴⁴ Government response (July 2003) to ODPM Select Committee Report on *Planning for Sustainable Communities: Sustainable Communities in the South East*.

⁴⁵ House of Commons Environmental Audit Committee. *Housing: Building a Sustainable Future*. First Report of Session 2004–05 Volume I. Para.140.

⁴⁶ House of Commons Environmental Audit Committee. *Housing: Building a Sustainable Future*. First Report of Session 2004–05 Volume I. Para.159.

The Strategy acknowledges that the Government is committed to driving up standards through the development control and Building Regulations systems. It confirms that, from April 2006, all new homes receiving Government funding will meet the Code for Sustainable Buildings. However, the Strategy fails to promote the use of the Ecohomes standard which is already being required by English Partnerships and the Housing Corporation and promoted (at the 'very good' level) through the current draft regional Spatial Strategy for the South East. The Thames Gateway Strategy is therefore apparently a step backwards. In respect of private development, the Strategy states that LPAs will be 'encouraged' to promote the standards in the Code through LDFs and, again, overlooks the Ecohomes standard. If this is because standards beyond Building Regulations minima cannot be legally enforced, then a review of these arrangements should be undertaken to ensure that the EcoHomes standard becomes the norm.

Recommendations

The Government should:

- **review the Code for Sustainable Buildings at the earliest opportunity and, in so doing, aim to match the highest feasible BREEAM⁴⁷ Ecohomes standards (at least 'very good' standard), including promoting the re-use of urban brownfield sites, increasing residential and commercial densities, and increasing the use of recycled and recycleable materials;**
- **confirm that the Code will be progressively incorporated into the Building Regulations so that it can be applied robustly to non-public-sector development; and**
- **correct the omission by which the Senior Steering Group for the Code for Sustainable Building includes no representation from the organisations that have the greatest expertise in the issue.**

Quality of construction – One of the key impediments to realising the full potential of the Thames Gateway is the area's reputation as a place of poor environmental quality, poor quality housing and run-down neighbourhoods (a reputation which is not universally justified). If that reputation is to be turned around in the long term, it is crucial that the mistakes made during the 'rush to build' in the 1960s and 1970s are not repeated. A great deal of caution must be exercised, not only on the design of new housing and town centres, but also on the quality of construction so that new residential areas and renewed town centres remain attractive and prestigious for decades.

Given that the Government is strongly committed to greatly increasing the rate at which new housing is built, there is a risk that the quality of construction of new houses will be compromised in order to meet building targets. There may be at least two reasons for this. Firstly, as the Government accepts, there is currently a shortage of skills in the construction industry and an expansion of the required capacity of the industry is likely to exacerbate that situation. Secondly, significant emphasis is being put on the potential for new building materials and construction techniques (including off-site manufacture) to speed up the delivery of new housing. There is a danger that new building materials and construction techniques could be adopted before their durability and suitability for purpose has been properly demonstrated *in situ*. This was a problem during the development of the New Towns in the 1960s: in Milton Keynes, architects were eventually restricted to developments of 70 houses at a time to limit problems of large areas succumbing to materials and design failure.⁴⁸

⁴⁷ Building Research Establishment Environmental Assessment Method.

⁴⁸ Regeneration & Renewal 29 October 2004. Page 22.

In evidence given to the Environmental Audit Committee, the question of the quality of construction was addressed by the Building Research Establishment:

*'Certification is a much broader issue than just working out the environmental performance. It would incur fitness for purpose, durability, safety, fire safety, the whole range of things you might want to include; the sort of things that would give you or I confidence as a purchaser that this thing was going to perform over a long period and needs to be safe and durable.'*⁴⁹

The Chief Executive of the Housing Corporation has acknowledged that potential problems with the quality of new housing in the Growth Areas need to be addressed:

*'we also are doing some work with BRE on issues around the durability of housing because, frankly, even if it has a very good EcoHomes rating, if it is not going to last then that is not a good environmental product.'*⁵⁰

This is a difficult issue: there is a strong tension between, on the one hand, using innovative materials, techniques and designs to increase the rate of output of new houses and improving the design quality and, on the other, guaranteeing quality in construction. In short, under current arrangements, guaranteeing high quality construction stifles design innovation and can undermine output volume. It can also increase build costs (although the differential is not inevitable and is reducing). The answer is likely to lie in the use of the system of warranties and insurance for new housing.

In 1998, the Construction Task Force, chaired by Sir John Egan, published its report *Rethinking Construction*.⁵¹ The report was commissioned by the Deputy Prime Minister, Rt. Hon. John Prescott MP, to investigate the scope for improving quality and efficiency in UK construction. The report identified a need to dramatically improve the quality of construction in the UK but, regrettably, made no clear recommendations for regulatory measures through which that improvement might be brought about.

Because problems with the durability of new materials and construction techniques may not – by definition – become apparent for some time, there might not be a simple regulatory measure that would allow inappropriate products to be removed from common usage. Indeed, when problems do become apparent, there is no obvious forum in which that experience may be shared with those procuring products for housebuilders. Moreover, because of the risk of libel or the risk of harming the reputation of particular developers or developments, those identifying problems might be reluctant to publicise them. It is therefore unclear how problems that are identified may be communicated to practitioners.

We welcome moves towards the establishment of the national centre for sustainable communities skills, which will provide an opportunity to address this issue.

⁴⁹ Mr David Warriner, Building Research Establishment, giving evidence to the Environmental Audit Committee enquiry: *Housing: Building a Sustainable Future* on 23 June 200

⁵⁰ Mr Jon Rouse, from uncorrected evidence to the House of Commons Environmental Audit Committee enquiry: *Housing: Building a Sustainable Future?* 3 November 2004.

⁵¹ *Rethinking Construction. The report of the Construction Task Force to the Deputy Prime Minister, John Prescott, on the scope for improving the quality and efficiency of UK construction.* July 1998.

Recommendations

RPBs, LPAs and the Mayor of London should acknowledge the significance of sustainable construction techniques in the Thames Gateway in helping to deliver wider sustainable development objectives and long term environmental quality.

The Government should engage in a dialogue with the National Housebuilding Council (which provides warranties for most new housing through a Standard Assessment procedure rating) and the Council of Mortgage Lenders (who require buildings insurance) to take a far greater interest in, and more imaginative approach to, the scope for new materials, techniques and designs to provide a high quality product. CABE and ODPM should pursue this issue through a dialogue with those bodies with a view to urgently securing approval for good quality innovative materials and construction techniques.

The Government and English Partnerships should ensure that the National Centre for Sustainable Communities Skills undertakes to act as a forum to facilitate the sharing of knowledge about the durability of new products, materials and construction techniques among housebuilders, housing managers, architects and their contractors.

The Government should examine the Building Regulations in order to establish whether they guarantee a satisfactory standard in the case of modern construction materials and techniques, and, equally, whether they allow the value of innovative products and techniques to be recognised. If they do not, they should be reviewed urgently. The scope for promoting the use of British Standards – which are frequently applicable to aspects of construction quality that are not subject to Building Regulations – should be examined.

The Government should extend the Code for Sustainable Buildings to include demanding requirements in respect of build quality and the durability of construction methods and materials.

Urban centre management

'Liveability' and the image of many of the urban centres is a significant impediment to the attractiveness of the Thames Gateway and therefore to the potential for the market to deliver regeneration and redevelopment. Private investment is discouraged by a poor urban image and a poorly maintained urban environment. People with higher-level technical and/or managerial skills will be discouraged from taking up employment opportunities in the area, undermining social and economic regeneration. Social and physical – and economic – factors are therefore all closely interlinked.

The built environment has a very significant influence on the image of an urban centre. The Thames Gateway London Partnership, for example, recognises that:

'Town centres strongly influence the perception and success of an area'⁵²

⁵² *Heroic Change: Securing Environmental Quality in the Thames Gateway London*. TGLP, 2001.

The wholesale redevelopment of town centres such as Basildon and Aveley in the 1950s/60s, for example, is now shown to have been poorly conceived, with insufficient regard for the durability of buildings and general maintenance.

Retail facilities provided the original *raison d'être* of urban centres but the viability of many small local shops has been fatally undermined by supermarkets – in particular, out of centre supermarkets. Lakeside (Thurrock) and Bluewater (Kent) are two classic examples. Closure of local shops leads to the neglect of the properties, vandalism and graffiti, loss of community spirit and general degeneration. Dartford, for example, has suffered badly as a result of the nearby Bluewater shopping centre. Any large scale housebuilding programme around Bluewater – regrettably in prospect – would be likely to have a devastating effect on Dartford. Social factors continue to drag down the image of some Thames Gateway urban centres and therefore undermine economic and physical regeneration. In particular, crime, fear of crime and antisocial behaviour – including litter, graffiti and vandalism – are a major impediment.

In view of these issues, we welcome the fact that the Strategy identifies one of the Government's key principles as being:

'to promote the prosperity and vitality of town centres and local businesses'

This is supported by the Government's recent *'How to'* initiative, aimed at promoting action to improve the quality of town centres, neighbourhoods and parks.

An appropriate mix of uses in urban centres can help prevent parts becoming uninhabited at night and therefore help reduce the risk of vandalism and other crime. In addition, there are a number of design solutions that would help deter graffiti and better facilitate the maintenance of buildings.

The Government's neighbourhood renewal initiative provides additional funding to local authorities to improve service delivery to address unemployment, educational attainment, crime, health, and housing quality. Local Strategic Partnerships (LSPs) are set up to take them forward. However, despite the fact that Thames Gateway urban centres in Kent and Essex would be likely to benefit in the longer term, only the Thames Gateway London boroughs currently qualify for neighbourhood renewal funding. This is because the funding is limited to the UK's 88 most deprived local authorities as defined by the Index of Deprivation, despite the fact that the Thames Gateway is a national regeneration priority.

The proposals set out elsewhere in this document in respect of reducing traffic, promoting architectural quality and promoting and protecting the Thames Gateway's heritage value will be crucial in raising the area's image and encouraging private investment.

Recommendations

Through masterplanning, LPAs and Government Regional Offices should ensure that all major new developments are provided with adequate access to leisure, recreation and green open space, particularly for young people.

LPAs should adopt an Area Action Plan as part of their Local Development Framework and take the following initiatives forward, seeking additional funding from the Sustainable Communities initiative if necessary:

- community development trusts;**
- town centre improvement zones;**
- business improvement districts;**
- Neighbourhood Wardens;**
- Safer Stations schemes;**
- CCTV; and**
- concerted efforts to deal with litter, graffiti and vandalism.**

Local authorities should consider putting in place private management companies made democratically accountable through appointment by the local authority. This approach has been shown to be effective in helping to maintain a high quality of urban environment in the Greenwich Millennium Village.

Where necessary, local authorities should be ready to use their powers of compulsory purchase to facilitate the renovation and improvement of existing buildings (as well as redevelopment). Similarly, full use should be made of powers under s.215 of the Town & Country Planning Act 1990 to require owners to tidy up a property where its condition affects the amenity value of an area. Government Regional Offices should support local authorities in taking this action.

In the interests of the future of Dartford town centre, Kent County Council, Dartford Borough Council and the Secretary of State should take a strong stance against any proposals for a large scale housebuilding programme around Bluewater.

The further expansion of supermarkets – especially out-of-centre supermarkets – in the Thames Gateway should be avoided and local authorities should make use of their powers to encourage an appropriate mix of small scale retail facilities and street markets in town centres. Particular attention should be given to the role of local retail facilities and street markets in supporting urban vitality and a sense of community.

LPAs should require building design and urban design to promote rather than undermine a clean and well managed urban environment, including through an appropriate mix of uses in urban centres to help prevent parts becoming uninhabited at night, and design solutions to help deter graffiti and better facilitate the maintenance of buildings.

Local authorities should identify appropriate temporary uses for vacant brownfield sites. An appropriate use is one that effectively reduces the visual blight that such sites can cause but will not become an obstacle to redevelopment.

The Government should modify the qualification criteria for the Neighbourhood Renewal scheme, effectively extending it to the urban districts within the Kent and Essex Thames Gateway. The Liveability Fund and other Government funds already earmarked for the Thames Gateway should be made available to support it.

The Historic Environment

The strength of character of an area promotes social and economic benefits by helping to create a sense of place, civic pride and a sense of belonging, and by attracting people and businesses. The Strategy recognises that culture can be a key driver in sustainable regeneration of communities and CPRE maintains that the historic environment is an important part of an area's cultural identity.

Recent research by English Heritage has challenged the presumption that the Thames Gateway is a barren wasteland devoid of character. The area's historic environment includes evidence of prehistoric settlements, ancient landscapes, military fortifications, historic towns, traditional agricultural practices and industrial remains. There are also numerous examples of the 'remarkable everyday' in local features such as street furniture (e.g. cattle troughs, lamp-posts and milestones), ironmongery and numerous minor architectural features, all of which contribute to local character and require protection. It is important to note that it is not only those elements of the historic environment that have received statutory designation that make a valuable contribution to the character of an area.

That historic environment is, however, under threat from inappropriate development. We welcome the fact that the Government is addressing the need to protect the historic environment of the Thames Gateway, but, despite the fact that the Strategy identifies one of the Government's key principles as being '*to preserve and enhance the Gateway's environmental and cultural heritage*', it says very little about how that heritage will be identified and protection achieved.

Nevertheless, the Government's current review of heritage protection legislation has identified a number of areas for improvement to the current system. It accepts that the historic environment '*is a contributor to overall quality of life*' and makes an important contribution to economic and community regeneration.⁵³ It accepts that its protection will be a vital part of RSS, requiring authorities to make protection a key plank in their Community Strategies.⁵⁴ This has provided a useful basis for the idea of a 'new kind of national park' for the Thames Gateway promoted by architect Sir Terry Farrell, with support from Demos, English Heritage and CPRE. CPRE believes this idea might best be carried forward through the establishment of a new regional park authority (see part 3 on the institutional framework). Such an authority will be able to coordinate and facilitate the delivery of the initiatives set out in *Creating sustainable communities: Greening the Gateway*.⁵⁵

Effective public engagement is necessary in order to find the best way to take forward change in an area in a way that protects that which people value. Although reaching people and facilitating communication requires specialist skills and experience, there is a large network of organisations and practitioners, many of whom work closely with local and regional arts and voluntary networks.

⁵³ *The Historic Environment: A Force for the Future*. DCMS, 2001.

⁵⁴ *Review of Heritage Protection: The Way Forward*. DCMS, June 2004.

⁵⁵ *Creating sustainable communities: Greening the Gateway. Implementation Plan*. ODPM, Feb. 2005.

Recommendations

As recommended by the Government,⁵⁶ LPAs should:

- appoint champions for the historic environment within their management structures;
- ensure that elected members have access to training in respect of the historic environment; and
- use community strategies to address the role of the historic environment in promoting economic, employment and educational opportunities.

In order to help provide real protection for the historic environment through the planning system, LPAs should engage with the process of characterisation at a local level, and involve the public in so doing. The following area characterisation tools should be considered for collecting information to be used to inform the development plan policies:

- Historic Landscape Characterisation
- Landscape Character Assessment
- Natural Areas
- Conservation Area appraisals
- Town Design Statements
- Market Towns Health check
- Village Design Statements
- Neighbourhood regeneration appraisals
- Area appraisals e.g. Conservation Area Appraisals
- Development design tools e.g. Enquiry by Design
- Farm audits
- Community design tools e.g. Planning for Real and Placecheck

LPAs should require all draft plans and planning applications to be subject to appraisal against policies for protecting and enhancing the historic environment. Those policies should be backed up by the recognition of its importance in creating a sense of place and a sense of cultural identity; and

LPAs should ensure that there is effective public engagement in order to identify and protect that which people value. For example, they could consult with the Association of Heritage Interpretation and national, regional and local organisations (such as the Architecture Centre Network) dedicated to promoting community involvement in discussions about the fate of their area.

⁵⁶ *The Historic Environment: A Force for the Future*. DCMS, 2001. Paragraph 1.3.

Landscape

Low expectations have allowed a lack of good landscape management policy to harm the image of the Thames Gateway, for example as a result of the proliferation of overhead power lines, landfill sites and power generation industry. A degraded landscape is likely, in turn, to seriously harm the ability of the area to attract inward investment and therefore undermine the employment prospects of its population, exacerbating the cycle of social and environmental decline.

Through the Communities Plan, the Government has stated that its response to the challenge of 'sustainable growth' is:

*'to ensure that the built environment in new and expanded communities is of a high quality, and the surrounding countryside is protected and enhanced.'*⁵⁷

and the Strategy states that:

'The Government believes that communities are more successful and enjoy a better and healthier quality of life if they have easy access to an attractive and well designed and managed green environment which is rich in biodiversity.'

The Government's principal initiative to address this issue is *Greening the Gateway*, which reveals an appreciation of the importance of protecting and enhancing the landscape and urban green space. CPRE welcomes many of the commitments contained in the implementation plan that accompanies that report. In particular, we welcome the target that all local authorities in the Thames Gateway should have greenspace strategy in place by 2008. Maintaining and improving the quality of the landscape, including through policies that enhance biodiversity, needs to become a more important consideration in planning policy. A new regional park authority for the Thames Gateway, as proposed below, would serve to promote this objective.

Recommendations

LPAs, RPBs and the Mayor of London should confirm that effective protection and management of the landscape is an important factor in promoting the regeneration of the Thames Gateway.

All LPAs in the Thames Gateway should, in collaboration with the Countryside Agency, undertake a Landscape Character Assessment (LCA) and produce landscape action plans in order to identify potential landscape and other environmental constraints on development. In exclusively urban areas, LCA should focus on the urban landscape ('townscape') and protecting views of the landscape within which they are set.

⁵⁷ *Sustainable Communities: building for the future*. ODPM, February 2003. Chapter 5.

RPBs, LPAs, RDAs and LDVs should adopt policies to avoid a net loss of biodiversity in rural areas, to actively pursue opportunities to achieve a net gain in biodiversity across the Gateway, and to avoid damage to locally important wildlife sites, geological sites and ancient woodlands and their settings. The Government should ensure that these policies are taken forward in the operational plans of the Environment Agency and the Countryside Agency (and, in due course, the new integrated agency).

LPAs should adopt policies in LDFs that will ensure that, in cases where damage is unavoidable, planning conditions or planning obligation will provide for mitigation and compensation.

LPAs should ensure that opportunities for enhancing biodiversity are identified in LDFs.

LPAs, RPBs and the Mayor of London should ensure that, with regards to any development proposal that may harm internationally important sites, the decision-making processes set out in international and national law will be rigorously applied.

Overhead power lines

The existence of numerous overhead power lines throughout the Thames Gateway has a significant detrimental effect on the image and attractiveness of the area. Designing residential areas so as to minimise the visual intrusiveness of overhead power lines is not, in itself, an adequate solution. It is not clear that the scope for using s.106 agreements to help pay for undergrounding has been adequately explored, nor that the uplift in property values arising out of the environmental improvement achieved through undergrounding has been adequately taken into consideration.

Recommendation

LPAs, RPBs and the Mayor of London should ensure that, as far as is feasible, all existing overhead power lines in the Thames Gateway will be ‘undergrounded’. All new power lines should be undergrounded. The costs will be offset to some extent by the reduced power losses in the network as compared to overhead lines.

Green Belt and the urban fringe

The perceived ‘poor quality’ of some Green Belt and other urban fringe land is frequently offered by prospective developers and representatives of ODPM as a reason to develop it. This ignores the purpose of the Green Belt, which is to promote urban regeneration and avoid sprawl and coalescence of urban areas by shutting off the easy option of greenfield development (and therefore urban sprawl). Any building allowed on greenfield land in the Green Belt is likely to represent a missed opportunity to help regenerate urban areas and should be strongly resisted. However, we strongly welcome the Government’s commitment to maintaining Green Belt in all regions⁵⁸ and we hope that this commitment will help to resist pressure for taking land out of the Green Belt in the Thames Gateway.

⁵⁸ *Sustainable Communities: Homes for all*. ODPM, January 2005. Page 62.

There is a great deal of scope for enhancing the landscape and biodiversity value of much of the Green Belt and urban fringe more generally. In evidence to the ODPM Select Committee,⁵⁹ English Nature, for example, emphasised that the role of Green Belt was to stop urban sprawl. It accepted that the environmental quality of some Green Belt land was not high and proposed that it should be improved so that the Green Belt had a positive role in providing for nature conservation, recreation and amenity. English Nature accepts that there are opportunities for large-scale habitat restoration and the Thames Chase initiative on the London/Essex boundary has shown how the landscape and amenity value of otherwise largely unremarkable land in the Green Belt can be effectively enhanced through good management. A new regional park authority for the Thames Gateway, as proposed below, would serve to promote this objective.

Recommendations

The Government, RPBs and LPAs should recognise that maintaining the Green Belts in the Thames Gateway is an important factor in promoting the area's regeneration and resist the relaxation of Green Belt restrictions in the forthcoming reviews of development plans and RSS.

Local authorities and LDVs (such as the Thurrock UDC) should adopt an objective of improving urban fringe management and adopt a target to increase the coverage of environmentally beneficial land management schemes (e.g. organic farming or community woodland) in urban fringe areas so as to increase biodiversity and agricultural and social amenity value.

Through its Strategic Development Framework, the Thurrock UDC should adopt the objective of securing better management of greenfield land, improved access (subject to ecological constraints) and habitat creation designed to support and enrich the wildlife value and landscape character of the area. Any management work should only be pursued in the light of prior assessment of the land's environmental value. Misguided operations designed to 'tidy up' unkempt land containing valuable habitat should be strongly resisted.

The River Thames and its tributaries

The river is the most significant distinguishing feature of the Thames Estuary, defining the landscape and historical/industrial character of much of the area, providing an important recreational resource, and contributing to a 'sense of place'. Within urban areas, the river environment also has value as a public transport corridor (including walking along the riverside) and as a key element in achieving attractive redevelopments in urban areas. These functions are under threat from inappropriate development that is too close to the water's edge, causes the loss of wharves or unnecessarily restricts public access.

59 ODPM Housing, Planning, Local Government and the Regions Committee. *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East*. Eighth Report of Session 2002-03.

The Strategy states that the Government aims 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'

We welcome this commitment, but no explanation is given as to how this will be achieved and how the factors that undermine that objective are to be addressed.

Recommendations

The Mayor of London, RPBs and LPAs should:

- **include in development plans policies that strongly discourage any development within 50 metres of the edge of the River Thames that does not require a riverside location; and**
- **undertake to publish and keep updated a map indicating where public access to the water's edge is currently possible and currently not possible and where, they believe, public access could and should be improved.**

Sewerage and storm water overflow – In east London in particular, the sewerage system is unable to cope with peak flows generated by stormwater runoff. The major pollution incident in the summer of 2004, resulting in a very substantial loss of aquatic life in the Thames, was a very graphic illustration of the problems caused by combined sewage systems.

Population growth in the Thames Gateway is likely to greatly exacerbate the likelihood and frequency of sewage pollution incidents because the increased normal flow of sewage will be closer to the capacity of the system. In London, it is already at capacity. Moreover, any redevelopment of land that creates new impermeable surfaces may increase the load on the surface water drainage system in the event of rain. The system will therefore be caused to overflow in the event of less intense surface water runoff (i.e. more frequently) and the quantity of sewage discharged will be correspondingly greater.

The Mayor of London has urged Thames Water Ltd to develop and implement proposals for a 20-mile long interceptor pipe that would help maintain the combined sewerage system within capacity in the event of heavy stormwater load. The interceptor pipe is likely to cost £1 billion and the investment will require Government approval. It may require increased water bills.

Recommendations

The Government should proceed with the proposal to develop the interceptor pipe that is required to avoid stormwater overflow incidents from the combined sewerage system. The Mayor of London should continue to lobby the Government on this issue.

LPAs should include policies in LDFs requiring all relevant development to incorporate porous paving and other elements of sustainable urban drainage systems (SUDS). This is also an important element of reducing the risk of fluvial flooding.

Flood Defence

The increasing risk of severe tidal flooding associated with storm surge in the Thames Gateway has received a great deal of media attention, and has generated a great deal of public concern. Concern has also been expressed by the Environment Agency about the increasing risk of fluvial flooding, exacerbated by an increase in the area of land covered by impermeable surface. Large areas of the defences in Kent and Essex may be in need of renewal and enhancement. The Association of British Insurers (ABI) has been particularly vocal, making it clear that the issue is real and that it could undermine the delivery of new housing in the Thames Gateway on the scale that the Government intends.⁶⁰ It also indicates that the true condition of some flood defences may be unknown and the poor condition of some 5% of tidal defences is such that they require urgent attention. In particular, the ABI indicates that fluvial defences in the Upper Lee are of a poor standard.

CPRE's principal concern with regard to flood risk is that the risks should be managed responsibly so as to enable development to take place in urban areas while avoiding development outside urban areas. We accept that much of the Thames Gateway benefits from some of the highest standards of flood defence anywhere in the UK and the Government takes the view that the five 'strategic development locations' are adequately protected against tidal flood risk (i.e. capable of withstanding tidal flooding at a level likely only once in one thousand years⁶¹). The Government supports the approach of limiting development to within those areas for the time being, and this is to be welcomed as promoting urban regeneration and protecting the countryside. It also tends to support the sequential approach set out in PPG3 – *Housing*, which CPRE strongly supports.

However, despite the Government's policy, there is an unfortunate history of flood risk apparently being overlooked in the Growth Areas. The House of Commons Environmental Audit Committee reported that:

*'the Environment Agency has raised concerns with us about the level of development that will be at high risk of flooding in the South East as a result of the SCP [the Communities Plan]. It told us that of the 2,811 planning applications to which it objected in 2003 and for which it knows the outcome, 323 were permitted by local planning authorities against the Agency's advice. Of these at least 21 were major developments.'*⁶²

On the face of it, this record is likely to undermine public confidence in the Government's determination to take the risk of flooding seriously and could lead to inappropriate development outside of urban areas. The Environment Agency's flood risk management strategy⁶³ will not be published before 2008 and, in the meantime, there is serious doubt – at least among the public – that the Government's housebuilding programme in the Thames Gateway is deliverable within the constraints of responsible flood risk management.

60 *Making Communities Sustainable. Managing flood risk in the Government's Growth Areas.* Summary Report. ABI, February 2005.

61 *Creating Sustainable Communities – Making it Happen.* ODPM, July 2003.

62 *House of Commons Environmental Audit Committee. First Report of Session 2004–05 Volume I.* Para.71.

63 *Thames Estuary 2100.*

PPG25 – *Development and Flood Risk* requires lower flood risk areas to be prioritised above higher risk areas⁶⁴ for development purposes. Despite the fact that this is intended to take place within the context of the sequential approach set out in PPG3, there is a risk that these policies may be undermined through areas of lower flood risk outside urban areas being prioritised for development in an attempt to avoid the need to enhance flood defences. These dangers are especially real in Kent and Essex where the choice of greenfield sites is greater than in London.

CPRE therefore welcomes the proposal for a Flooding Direction in cases where local authorities are minded to approve major developments despite Environment Agency objections. By providing the Secretary of State with the opportunity to intervene, the Direction should help the Government to realise its policies for countryside protection and urban regeneration by helping to stop development outside urban areas. Within urban areas, however, consistent with PPG3, it will be important that the Direction results in decisions that reflect the concept of balanced risk management, rather than seeking to avoid risk altogether by overlooking the potential of urban areas to accommodate new development.

Recommendations

We urge the Government, in the forthcoming review of PPG25, to:

- **re-emphasise and make explicit that the sequential approach set out in PPG25 is intended to be operated within the context of the sequential approach set out in PPG3;**
- **promote the concept of balanced risk management so as to enable development to take place on previously developed urban sites; and**
- **encourage RPBs and LPAs to take a strong stance against the provision or enhancement of hard flood defences that would merely facilitate the development of land beyond existing urban areas. Where additional hard flood defences outside of urban areas are proposed, the case for them should not rest on the value of any additional land made available for development. For example, any cost/benefit analysis of the scheme should not take account of resultant rises in land values arising out of increased developer interest and should not assume that developer contributions may be forthcoming in due course.**

The Government should also:

- **incorporate flood resilience into the Code for Sustainable Buildings; and**
- **as recommended by the ABI, ascertain, as a matter of urgency, the true condition of flood defences where this is unknown.**

RPBs, the Mayor of London and LPAs should provide for open space throughout the Thames Gateway and beyond to incorporate water bodies such as lakes and ponds for the collection and storage of rainwater that could then be used to supply grey water systems and/or drinking water sources. Wetlands should be used to collect runoff – thereby also helping to mitigate flood risk and local authorities should ensure that this is promoted through the Green Grid initiative.

⁶⁴ A sequential approach is set out in paragraph 30 and Table 1 of PPG25.

Water Resources

Water supply resources across much of eastern Kent and Essex are already stretched. It is clear that the additional demand that would arise under the Government's growth scenario up to and beyond 2016 cannot be met without a significant improvement in the efficiency with which water is used and a major investment programme to bring forward additional resources. Nevertheless, there appears to be no clear action plan in place setting out an investment programme and the necessary regulatory initiatives to meet needs arising out of the Government's growth plans up to and beyond 2016.

The Strategy is unacceptably vague on this issue, stating merely that a 'statutory framework' is in place to ensure that water supplies 'will be' available. It also states that the water companies have costed plans in place 'to meet demand', but it is not clear that those plans cover the full period of major anticipated growth up to 2016 or that they are consistent with established planning policies. A desalination plant in Barking is identified as an example of the proposed new provision, but that scheme is a very long way from being formally agreed (and was recently rejected by the Mayor of London). A substantial report recently published by IPPR and the Commission on Sustainable Development in the South East states that:

*'Currently there is no clear mechanism for integrating water resource management and development planning.'*⁶⁵

The key issue is that, without sufficient water being made available, urban regeneration and the potential scale of housing provision in the Thames Gateway may be undermined. Furthermore, a failure by planning authorities and water supply companies to take proper account of water supply limitations in determining the scale and pattern of development is likely to result in excessive abstraction, compromising the ecological or landscape value of surface water courses (including internationally significant wetlands).

The existing Regional Water Resources Strategies are primarily driven by the water supply companies and are largely aspirational. Few of the development options have been properly assessed for environmental impact and sustainability. If asked to confirm that they are able to meet projected supply demands, the water companies would be likely to respond in the positive (as they have done) in the hope that the Government's growth plans would eventually require public investment to deliver the additional infrastructure required to meet that level of supply. The strategies put forward by the water supply companies tend to be strongly biased towards increasing supply rather than demand management. This is understandable from a narrow commercial standpoint but is not necessarily the most appropriate strategy. According to the Environment Agency:

*'most [water supply] companies have allowed for the ODPM's "sustainable communities", but no company has taken account of the intention that these communities should have less impact on the environment and use less water.'*⁶⁶

⁶⁵ *Managing Water Resources and Flood Risk in the South East*. Working paper four. Louise Every and Julie Foley. Commission on Sustainable Development in the South East / IPPR, January 2005. Page 30.

⁶⁶ The Environment Agency's advice to Ministers on final water resources plans, as reported in the Agency's *Demand Management Bulletin* (August 2004).

There are currently no well developed official plans for the provision of major new infrastructure to supply the Thames Gateway (such as reservoir development or a desalination plant). New water supply infrastructure takes many years – perhaps decades – to get on stream: some initial studies are already underway, but if major works are indeed required, then planning for them needs to proceed urgently.

The Environment Agency has stated clearly which water resource developments the water companies need to go ahead with for the time being, and Ofwat has provided for these to be funded. It is now up to the companies to implement the schemes and for the Government to encourage them to do so.

Water efficiency – the Government is well aware of the need to improve water efficiency, particularly in the Thames Gateway. In its 2004 report into the Growth Areas, the House of Commons Environment, Food and Rural Affairs Committee stated that:

*'So far, the Government appears to have paid less attention to the problems of water shortages due to drier summers – yet many of the areas where large new developments are planned are also areas where little water is available. Society needs to manage its demand for water.'*⁶⁷

Water companies have included varying levels of water efficiency into their plans but the Environment Agency takes the view that companies need to do more than they already are doing. Reducing leakage rates from water supply infrastructure, for example, remains a very significant factor in water supply potential. In the area served by Thames Water, leakage rates are currently over 40% and have been increasing in recent years. Elsewhere in the Thames Gateway, leakage rates are currently around 12-15%. Significantly reducing leakage (for example though 'sleeving' distribution pipes) will require major investment, especially in the Thames Water supply area.

The installation of water efficient fittings in homes can theoretically achieve savings of up to 25% in water consumption. Up to 30% can be achieved where rainwater harvesting systems are installed.⁶⁸ New development should incorporate measures to minimise water consumption and action should be taken to maximise the replenishment of groundwater and surface water courses. Nevertheless, despite potential cost savings to householders, water efficiency is unlikely to be achieved without effective regulation and, in the meantime, strong planning policies are required. Appendix 2, below, sets out a range of measures that can be taken to improve water efficiency.

⁶⁷ House of Commons Select Committee on Environment, Food and Rural Affairs – Sixteenth Report. Session 2003-04. *Climate Change, Water Security and Flooding*. September 2004.

⁶⁸ Water efficiency and the Thames Gateway – Final draft. Paper for ODPM seminar, 6 October 2003. Westcott, R J. 2003.

In respect of the scope for achieving greater efficiency through a review of the Building Regulations, the Government stated in its response to the ODPM Select Committee 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. This would provide the means to deliver the greatest water savings in the areas where they were needed most, such as the South East.... The next review of this part of the Regulations...will look to see how these provisions can be expanded to approach the highest standards, including recycling of water.'*⁶⁹

We look forward to the Building Regulations being upgraded in line with improved standards to be established in the Code for Sustainable Buildings. However, the Government does not yet appear to have undertaken to explore the scope for a more targeted approach to water conservation through the planning system.

Recommendations

The Government should follow through its suggestion that it should explore the scope for a targeted approach to water conservation through the planning system.

RPBs and the Mayor of London should ensure that policies in the RSS and the *London Plan* seek to ensure that the efficiency with which water is used in the Thames Gateway is improved. RSS and the *London Plan* should include a list of requirements in respect of additional water supply infrastructure, leakage reduction and reduction in per capita consumption at point of use that would ensure that an adequate water supply can be provided under the anticipated growth scenarios in the Thames Gateway. It should be made clear that the environmental impact of those requirements has been assessed and considered acceptable and that the plans have been costed and agreed by the water companies and the regulatory authorities.

The Government should require all water supply companies to publish a set of commitments by which they intend to discharge their statutory duty to promote water efficiency.⁷⁰ Those commitments should be linked to targets for water efficiency improvements.

⁶⁹ Government response (July 2003) to ODPM Select Committee Report on *Planning for Sustainable Communities: Sustainable Communities in the South East*.

⁷⁰ Section 93A of the Water Industry Act 1991 as amended by the Environment Act 1995 (Paragraph 102 of Schedule 22): *'It shall be the duty of every water undertaker to promote the efficient use of water by its customers'*.

Waste Management

The anticipated increase in the Thames Gateway's population will have major implications for the quantity of household waste requiring collection in that area and treatment or disposal. In addition, the construction of new homes on the scale anticipated will generate large quantities of construction waste. Waste collection and disposal authorities need to be prepared for this and, according to the Environment Agency, a number of additional waste management and disposal facilities are required.

Recommendations

LPAs (through planning obligations), RPBs, the Mayor of London and the RDAs (through funding conditions) should require all new building in the Thames Gateway to conform with the waste management criteria of the BREEAM EcoHomes 'Very Good' standard or equivalent and to achieve best practice in respect of the use of recycled and secondary aggregates.

RPBs and the Mayor of London should undertake to estimate the additional waste arisings from the anticipated population expansion and building programme in the Thames Gateway and clarify how the total waste arisings in the area compares with current treatment and disposal capacity. Estimates of arisings should be made under a scenario of current waste management practice and also under a scenario of improved waste management practice that the Government intends to promote. The scale of any shortfall between arisings under each scenario and current treatment and disposal capacity should be addressed through the RSS process.

LPAs should ensure that masterplans make provision for kerbside collection of recyclables and ensure that the design of new homes includes space for collecting recycled household waste.

LPAs and LDVs should ensure that waste from building sites is significantly reduced through separation, re-use and recycling of aggregates.

Local authorities should pilot variable charging schemes for domestic waste that could reduce municipal waste generation and encourage greater re-use and recycling.

Waste disposal authorities should make greater use of the River Thames as a waste transport corridor.

Sustainable Development in Planning

In early 2004, a review was undertaken by the Thames Gateway Strategic Partnership into the use by LPAs and RDAs of sustainable development frameworks and checklists in the Thames Gateway.⁷¹ The review showed that there was little awareness and use of sustainability assessment methodology in the appraisal of plans and planning applications in the Thames Gateway. Only six of the 20 planning authorities reported to use any of the available checklists or frameworks over and above development plan policies and environmental impact assessment. The apparently limited use of the tools available to planning authorities and RDAs suggests that the potential benefit to be gained from their use is currently being largely forgone.

Key among the findings of the research were that:

- no methodology is likely to be used by an LPA unless it is adopted as a Supplementary Planning Document (SPD); and
- LPAs need to be adequately resourced with trained staff in order to make use of sustainable development checklists and similar methodologies.

ODPM has subsequently undertaken to fund the World Wide Fund for Nature (WWF) to help prepare regionally-specific sustainability checklists for use by planners and developers. We welcome this.

Recommendations

The Government should:

- **be ready to encourage local authorities to adopt sustainable development checklists being prepared by WWF as Supplementary Development Documents;**
- **encourage LPAs to use the Planning Delivery Grant and other resources being made available through the Communities Plan in order to make proper use of the available methodologies for appraising plans against sustainable development objectives; and**
- **recognise the social value of new development meeting sustainability criteria, irrespective of the additional short term costs that that may require, and the value to the public purse through avoiding future social, economic and environmental decline in the Thames Gateway.**

⁷¹ *Report to the Environment Sub-Group on a study into the use of sustainable development frameworks and similar guidance in the Thames Gateway.* Thames Gateway Strategic Partnership – Environment Sub-Group. Working Group on Sustainable Development Guidance in the Thames Gateway, March 2004.

Governance and Delivery

The Institutional Framework

We welcome the recent reconstitution of the Thames Gateway Strategic Partnership; the new ‘thematic’ basis of its meetings; and its new role in moving from strategy development to overseeing effective delivery. Below, we make a number of suggestions as to how new and existing institutional structures may better work towards more effective strategy delivery.

The local authorities and local delivery vehicles

RSS and the *London Plan* will be the principal mechanisms through which the improved standards advocated in the Communities Plan should be taken forward by local authorities and, indeed, through which local authorities may influence the Government’s policy for the Thames Gateway. RPG9A – *The Thames Gateway Planning Framework*, however, is now almost ten years old and the anticipated scale of new housing and employment opportunities has been greatly increased since it was published. Notwithstanding the existence of the three regional spatial strategies, there is therefore a strong case for a comprehensive review of RPG9A. In particular, a unified Thames Gateway sub-regional spatial strategy and associated transport strategy could usefully facilitate integration of transport and land use planning between London and the outer Thames Gateway.

PPS11 – *Regional Spatial Strategies* suggests that non-statutory sub-regional guidance might be appropriate for the Growth Areas⁷² and the TGSP has agreed that a review of RPG9A should follow a review of RPG9 (for the South East Region), which is currently underway. The 2004 *Interregional Planning Statement* was a useful start, but is limited in scope and is not necessarily ‘owned’ by the LPAs (and is not statutory). It is crucial, in the interests of developing a shared sense of purpose among LPAs that the area’s planning framework is developed and ‘owned’ by those authorities with responsibility for its delivery.

Recommendation

The Government should initiate a comprehensive review of RPG9A shortly after the current round of RSS is concluded in the South East and Eastern Regions.

Local Strategic Partnerships (LSPs)

The Strategy offers a commitment for the Government to:

‘engage with the voluntary and community sectors in the Thames Gateway programme, recognising the value of their contribution to the achievement of sustainable communities and ensuring the benefits the sectors can offer are well integrated into our delivery structures.’

At a local level, the potential for LSPs to contribute to the development and implementation of policy is under-developed. While some partnerships have not been as effective as had been hoped, others have shown that the model can work well. In particular, LSPs – where well run and constituted and properly resourced – provide a valuable opportunity for promoting the effective engagement of the local community. This is crucial for raising standards and maintaining local political support.

⁷² Paragraph 1.15

However, the reality is that, generally, the public knows little about the LSPs' role or activities, and usually gets little or no opportunity to participate. Despite this, consultation with the LSPs has – regrettably – been used as a proxy for proper public consultation. It has been proposed,⁷³ for example, that the Thurrock Urban Development Corporation (UDC) will work closely with the local LSP as a representative of community interests. This needs to be supplemented by direct community consultation because the effective reach of the LSPs into the community remains very limited. Nevertheless, the need to develop mechanisms to better engage the public – especially the existing communities – in decision-making about the future of their areas remains urgent and the LSPs could potentially provide a large part of the answer. A series of principles that may underpin the successful establishment or revitalisation of LSPs is given in Appendix 3.

Recommendation

The Government should encourage the creation of new LSPs in the Thames Gateway where none is present and undertake a review of the effectiveness of LSPs in delivering strategic objectives and facilitating effective public participation. Where LSPs fall short of high standards, resources should be invested in improving them. Of particular importance is that LSP members are widely drawn and include people who are able to articulate environmental and community concerns effectively.

A regional park authority

There is a plethora of initiatives underway by public agencies in the Thames Gateway which, collectively, undertake to identify, manage and enhance the area's cultural, historic and natural heritage. Several are mentioned elsewhere in this report. These initiatives are to be welcomed because, if they are successful, they will contribute to improving the attractiveness of the Thames Gateway as a place to live, work or visit and will enhance the quality of life there.

It is not clear, however, that all of these initiatives are necessarily promoting consistent objectives, are properly co-ordinated or that the objectives of each are as ambitious as they could be. The proposals by architect Sir Terry Farrell imply that some sort of unifying administrative structure should be put in place with responsibility for developing and implementing an ambitious vision for protecting and promoting the Thames Gateway's rural and historic environment. CPRE supports this general concept, which has been referred to as a 'new kind of national park'. While national park status as such is not proposed, we agree that it could be beneficial for some sort of new administrative structure or authority to be established in the Thames Gateway with responsibility for developing and overseeing the delivery of a strategy for enhancing and managing the area's cultural, historic and natural heritage. That strategy should establish clear objectives for the Thames Gateway, identify a range of initiatives to deliver those objectives and act as a basis upon which funding is provided. The authority could be entitled to raise money through, for example, development gain, to fund environmental enhancements and appropriate management regimes.

⁷³ This proposal has been made by, for example, Thurrock Council officers and representatives of the Board of the Thurrock UDC.

The Government has recently committed to launch and promote a vision of the countryside in and around towns and pilot its implementation in the Thames Gateway by 2006.⁷⁴ Such an initiative could be taken forward by the kind of regional park authority proposed above.

Recommendation

The Government should consult on proposals to set up a new regional park authority (or some similar body) in the Thames Gateway with responsibility for developing and overseeing the delivery of a strategy for managing the area's cultural, historic and natural heritage and raising money for that purpose.

A regional observatory

CPRE welcomes ODPM's recent undertaking to establish an 'evidence base' for the Thames Gateway – a collection of key statistics indicating the extent to which social, environmental and economic conditions meet with the Government's objectives. Accurate information of that kind will be crucial in order to allow action plans to be drawn up and resources to be effectively targeted.

The evidence base should not, however, be a one-off exercise. If the right statistics are developed and kept updated, it has the potential to develop into a facility for monitoring success in achieving policy objectives, monitoring trends, and informing periodic reiterations and refinements of plans and programmes. Such facilities – as 'regional observatories' – are already established at a regional level elsewhere in England, helping inform Regional Spatial Strategies, Regional Sustainable Development Frameworks and RDA economic strategies.

A regional observatory for the Thames Gateway makes sense in view of the scale and complexity of the Thames Gateway regeneration 'project' and in view of the fact that a single strategy for that project has been published by the Government. It would help provide accountability for the substantial Government funding being invested in the Thames Gateway and help provide assurance that those resources are being effectively deployed. It would also help to rationalise the various disparate data-collection exercises that are underway in the Thames Gateway and provide the continuity that is necessary to refine the information that is collected.

Recommendation

The Government should establish a regional observatory for the Thames Gateway, tasked to develop, collect and maintain key statistics that will illustrate the extent to which social, environmental and economic policy objectives are being achieved and will allow plans and programmes to be properly refined and informed. The observatory should be an independent body. It should be closely linked with and operated by academic institutions in the Thames Gateway so as to allow a high degree of academic rigour.

⁷⁴ *Creating sustainable communities: Greening the Gateway. Implementation Plan.* ODPM, February 2005. Page 37.

Public Engagement

Effective public participation in decision-making is crucial if political support is to be maintained at a local level and can be an effective way of ensuring that design quality is kept high. The first reaction of the local community when it learns of proposals for large scale development within or close to its area is to feel justifiable concern that local services will be overwhelmed and the character of their area will be irreversibly changed. In order to help ensure that new development is designed to an appropriate standard, it is crucial that public aspirations are raised and that those aspirations are given a voice in the development of policies and plans.

In order to raise aspirations – and also to help maintain political support at a local level – the existing community of the Thames Gateway must be encouraged to become much more actively engaged in plans for the area’s redevelopment. If it feels that its views are not properly listened to and respected, it is likely to take a negative view of plans for significant development projects in its area irrespective of the quality of what is proposed. A more pro-active approach is required and, indeed, a culture change may be required on both sides. We therefore welcome the Government’s recent recognition that:

‘Formal processes and guidance are important. But they need to be supported by cultural change, with a new approach from planners and greater involvement by communities.’⁷⁵

The Strategy confirms that:

‘the Government is committed to giving people more power and a greater say in the way that their communities are run’

Various specific techniques for facilitating better public participation in planning policy are described above (including *Planning for Real*; *Enquiry by Design*; design statements and concept statements). In addition, there are various area characterisation tools (described above) that can be used to help identify and protect the historic environment.

Recommendations

LDVs, LPAs and RDAs should pro-actively seek the engagement of the local community and its approval of policies and plans. Meetings of the UDCs and all other such bodies should be open to the general public and the agenda papers and minutes made publicly available.

The Government, LSPs and local authorities should develop the approach to public participation in planning policy in the Thames Gateway through encouraging communities to exercise their influence over the spending decisions of public bodies.

⁷⁵ *Sustainable Communities: Homes for all*. ODP, January 2005. Paragraph 3.15

Immediate Implementation

Despite the fact that a great deal of policy that CPRE would welcome is being developed at a strategic level, development that does not meet satisfactory standards is continuing apace in various locations in the Thames Gateway (e.g. West Thurrock). This problem needs to be addressed immediately. It is not acceptable to expect improvements only after hoped-for changes in the institutional framework have been achieved, or until reviews of development plans and regional planning guidance have been completed. The Communities Plan exists now as a clear statement of Government aspirations and, as such, should be used to drive up standards in its own right.

Recommendation

Government Regional Offices, the Mayor of London, LDVs and local authorities should undertake systematically to appraise planning applications against the aspirations of the Communities Plan and related Government statements. Those aspirations should be used to justify insistence on the highest standards.

Investment

Public Expenditure

In the public debate surrounding the Government's Communities Plan, much has rightly been made of the need for new housing to be accompanied by the necessary public-sector-funded 'community infrastructure' (schools, health facilities, open space etc) and, of course, utilities. The London School of Economics reckons that, generally, costs for 'basic infrastructure' start at £45,000 per new housing unit.⁷⁶ Much of the required funding will obviously come forward from general taxation in the normal way and through private sector developer contributions (s.106 agreements/planning obligations). There seems, however, to be common agreement that a new funding stream must be identified urgently, such as schemes for capturing the increase in land value created by public investment in new transport infrastructure.

Concern has been expressed (for example by Kent County Council) that there are likely to be difficulties experienced as a result of a time lag between actual population expansion in the Thames Gateway and the associated increase in public expenditure reaching the local authorities in question. This is largely a result of the approach taken in the UK whereby funding coming forward to local authorities is often required to be preceded by the population growth with which it is associated. Elsewhere in Europe it would be usual for the public investment to be made up-front as it becomes apparent that population growth will be taking place.

There is evidence of real problems being created by the failure of the Government to ensure that additional funding to local authorities is brought forward in time. In Kent, a shortfall of £300 million for the provision of community infrastructure was identified and has been cited as a reason for housebuilding programmes being delayed.⁷⁷ The leader of Kent County Council has summarised the situation succinctly:

*'The failings of the current system for funding community infrastructure are twofold – they do not produce enough infrastructure funding, and they do not produce it at the right time.'*⁷⁸

In response to a series of Parliamentary Questions in October 2004, the Government appeared to have not yet made an assessment of how much public expenditure will be required for expanding a range of public services in the Thames Gateway and to what extent those services will need to be expanded.⁷⁹ Indeed, the ODPM Select Committee found that:

*'There has not yet been any full assessment of the costs of providing the necessary services in all the Growth Areas'*⁸⁰

76 *A framework for housing in the London Thames Gateway*. LSE Housing, CASE and Enterprise LSE Cities. December 2004. Vol. 1, page 38.

77 Sir Sandy Bruce-Lockhart, Leader of Kent County Council, quoted in *Planning* magazine, 15 October 2004. Page 3.

78 *Funding community infrastructure: a local authority view for sustainable communities*. Sir Sandy Bruce-Lockhart. *Building Sustainable Communities: Capturing land development value for the public realm*. Ed. Peter Bill. Smith Institute, 2004.

79 *Official Report* 15, 18 and 19 October 2004. Question numbers 190738, 190739, 190740, 190740, 190746, 190941, 191507, 191516, 191517, 191518, 191519, 191520.

80 ODPM Housing, Planning, Local Government and the Regions Committee. *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East*. Eighth Report of Session 2002-03. Paragraph 94.

It seems unlikely that the necessary funding to local authorities will be made in a well-planned and timely way in the absence of an assessment of when that funding will be required, and how much. The need for anticipated population growth to be taken into account in the determination of the budgets of local authorities through a revision to the Local Government Finance Formula or top-up grants was identified by the ODPM Select Committee,⁸¹ but, worryingly, the Government appears to have rejected both suggestions. No alternative proposals were offered in the Government's response.

Recommendations

We urge the Government to:

- **publish an assessment of the likely costs associated with the Thames Gateway regeneration programme, including costs in respect of additional urban centre renewal and management, site acquisition and decontamination, flood defence and new transport infrastructure;**
- **identify, on a district-by-district basis, the scale of expenditure likely to be required to deliver the expanded public services and utilities throughout the Thames Gateway; and**
- **ensure that the anticipated population growth is taken into account in the determination of the budgets of local authorities through, for example, a revision to the Local Government Finance Formula or top-up grants.**

Funding mechanisms

The need for a new fiscal mechanism to extract some of the windfall gain arising out of the granting of planning permission or public investment in infrastructure has become the subject of an increasing amount of discussion recently, especially in relation to the Communities Plan. The Communities Plan identifies the wider issue of value-capture⁸² but is somewhat vague as to a convincing mechanism for achieving this.

There appears to be a commonly-held belief, however, that development taxes are unlikely to work because they have been tried several times in the past and have 'failed'. This notion has been authoritatively challenged⁸³ and should not be allowed to undermine the Government's determination to develop a workable development tax for appropriate sites. Nevertheless, the proposal for a 'planning gain supplement' put forward by Kate Barker should be treated with caution because she appears to take the view that its usefulness depends on the implementation of her proposals to radically alter the nature of the planning system from being policy-led to being market-driven.⁸⁴ Indeed, all such taxes which depend 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) that would otherwise not be considered appropriate for development. If greenfield development in the Thames Gateway is to be very limited – as CPRE argues that it should be – then the potential for a tax on the uplift in land values to yield adequate revenue would also appear to be limited.

81 ODPM Housing, Planning, Local Government and the Regions Committee. *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East*. Eighth Report of Session 2002-03. Recommendation (cc).

82 *Making it happen: Thames Gateway and Growth Areas*. ODPM, July 2003. Paragraphs 47-50.

83 *A review of development land taxes since 1947*. Wyndham Thomas CBE, Vice President of the Town & Country Planning Association. *Building Sustainable Communities: Capturing land development value for the public realm*. Ed. Peter Bill. Smith Institute, 2004.

84 *The political and economic case for a planning gain supplement*. Kate Barker. *Building Sustainable Communities: Capturing land development value for the public realm*. Ed. Peter Bill. Smith Institute, 2004.

Site assembly and remediation – The greater the rate at which urban brownfield land can be brought back into a developable state, the quicker new housing can be provided on those sites, and the more effectively the pressure for greenfield development can be resisted. In order to maximise that rate, however, significant expenditure may be required in site acquisition and assembly (including use of CPO) and remediation. Where net profits are marginal, the private sector may be reluctant to energetically pursue development and there is therefore a role for the public sector to undertake the required investment (albeit perhaps through a joint venture with the private sector such as through a public/private partnership).

‘Value capture’ can be achieved through taking land into public ownership (or undertaking a joint venture), preparing it for redevelopment (including through site assembly and remediation) and then re-selling to developers (or the private sector partner in a joint venture). Public ownership of land offers the very significant additional benefit of allowing the characteristics of the development (e.g. design quality and mix of house sizes) to be more reliably determined in accordance with Government aspirations. It should be possible for a public-sector-owned rolling fund to be maintained which grows as a result of the profits secured through the disposal of land holdings. English Partnerships is already doing this in other parts of England (such as the East Midlands coalfields) but there is no equivalent for the Thames Gateway, despite it being a national regeneration priority.

Recommendations

We urge the Government to:

- **develop a new tax for capturing the uplift in value created by the granting of planning permission and investment in infrastructure and for re-directing that revenue towards the additional local costs levied on the public purse created by population expansion in the Growth Areas. However, any such tax should be closely linked to the objectives of the policies set out in development plan documents and should not be applicable where it would act to undermine the sequential approach to development. The Government should acknowledge that the potential of such a scheme in the Thames Gateway may be limited in view of the limited potential for greenfield development; and**
- **initiate an ambitious programme for capturing the increase in value created by public investment in site acquisition, assembly and remediation, and directing the funds generated into further investment of the same kind in the Thames Gateway.**

Brownfield Strategy

Many brownfield sites in the Thames Gateway present significant obstacles to their redevelopment. It is not necessarily the case that sites 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 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.

Recommendations

We urge the Government to 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 local authority of UDC/LDV 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.**

Such a strategy is likely to draw on the issues and initiatives identified in the National Brownfield Strategy and the RDAs' subsequent Brownfield Land Action Plans.⁸⁵ 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.

⁸⁵ *Sustainable Communities: Building for the future*. ODPM, February 2003. Paragraph 4.6

Appendix 1 – Transport Infrastructure Proposals

CPRE proposes that RPBs, the Mayor of London, local authorities and the DfT should promote and take forward the following transport infrastructure schemes which are additional to those already identified in the public arena and will help to realise the maximum urban regeneration potential in the Thames Gateway:

South Essex

- i. 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.
- ii. Extension of Gospel Oak to Barking services to Tilbury. This would require no new infrastructure apart from new platforms at Barking.
- iii. A north/south rail link in South Essex Benfleet to Wickford, joining the C2C line to the Shenfield/Southend line.
- iv. 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.
- v. 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.
- vi. The 'Shenfield Curve', linking the eastern branches of the London to Chelmsford/Southend line, making direct access from Southend to Chelmsford possible.

North Kent

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

London

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

Appendix 2 – Promoting Water Efficiency

The following is a list of suggestions as to how water efficiency in the Thames Gateway can be improved.

- i. A 'twin grid' that enables re-use of 'grey water' for non-potable uses and limits the consumption of drinking quality water to uses that require water treated to that standard. Grey water and rainwater harvesting systems may perhaps be considered first for commercial developments and larger housing developments.
- ii. Amendments to the Water Fittings Regulations so as to require the installation of water-efficient fittings on re-letting or sale (as is the case with fire regulations).
- iii. Amendments to the Building Regulations so as to require the installation of water-efficient fittings on refurbishment.
- iv. A requirement as condition of planning consent that several existing houses are retro-fitted with water-efficient technology under the terms of planning obligations for new developments.
- v. A contribution towards the costs of reducing leakage rates from outside the Thames Water supply area. This could be justified on the grounds that successfully reducing leakage may facilitate the more intensive development of urban brownfield land in the Thames Gateway, and thereby help reduce the pressure for greenfield development throughout south-eastern England.
- vi. Planning Inspectorate support for efforts to translate the Government's statements on the need to improve water efficiency into strong development plan policies that will be robust in the face of developer's appeal.
- vii. Detailed supplementary planning guidance supporting the implementation of water conservation measures and sustainable drainage systems.
- viii. Policies in Local Development Documents requiring that demanding standards for water conservation and recycling measures (i.e. water efficiency standards and grey water recycling for non-potable uses) are built into all new planning approvals.
- ix. Metering of water supplies to all new buildings. Meters are visible to the occupants (visibility tends to enhance the effectiveness of the meters in reducing consumption).
- x. Policies in Local Development Documents requiring that, where economically feasible, rainwater harvesting facilities should be required in all new developments.
- xi. Water bodies such as lakes and ponds used for the collection and storage of rainwater to supply grey water systems and/or drinking water sources.

Appendix 3 – Achieving Success With Local Strategic Partnerships

Helpful lessons about how LSPs may become effective fora for genuinely participative and inclusive decision-making can be drawn from those LSPs that have achieved success in that direction. The following are principles that, if adopted by LSPs, would help to enhance their effectiveness and enhance public participation:

Strategic focus – The LSP should be driven by a strong focus on delivering strategic objectives for its area addressing social, environmental and economic outcomes. In turn, strategic objectives should be determined by an agreed vision for the area and that vision should be informed through the contributions of grass-roots local community interests. This means that the LSP's membership should be signed up to a clear statement of that vision and those objectives and each member should understand their own role in delivering them. General and specific action required by each member to deliver strategic objectives should be clearly identified within the LSP's strategy.

Remit – The range of objectives and potential activity that the LSP may consider undertaking should be developed without reference to the various funding streams that may be available: the conditions attached to existing funding streams may undermine the achievement of objectives specific to the LSP's area. In the worst examples, some LSPs may be little more than conduits for money and have no clear strategic objectives of their own. LSPs should consult with each other and agree shared objectives and operational integration where appropriate. LSPs are responsible for overseeing the production of community strategies – potentially a very powerful tool providing a basis for strategic plans and strategies of all LSP members, including local authorities. LSPs should focus their efforts on improving the quality of community strategies, particularly with regard to addressing environmental issues, securing wider community engagement and commitment from all partners to delivering the strategy.

Composition – Form should follow function. The membership of the LSP may be drawn from a wide variety of organisations with a significant role to play in the development and delivery of strategic objectives. It should include members who are able to articulate environmental and community concerns effectively. They should be representative of the wider community and incorporate a broad range of interests. Members who are able to offer advice and expertise should sit alongside those with direct responsibilities for delivery. The LSP should be self-developing and its formation should not be strongly directed by the local authority or Government Regional Office (GRO). The LSP's senior management should have a clear understanding of the range of skills and responsibilities that member organisations need to provide (the Government's proposed Centre for Sustainable Regeneration Skills may have a role in helping develop that understanding). The LSP should be effectively supported by a strong and properly resourced team of officers.

Identity – A somewhat intangible but nevertheless crucial quality of a successful LSP is that it should develop its own identity separate from that of any one of its member organisations. In particular, while local authority representation is important in the interests of public accountability (and initiatives proposed by the LSP may require formal endorsement and adoption by the local authority), the LSP should not be dominated by the local authority (or authorities) within whose area(s) it operates. While local authority members or officers may take a leading role in the LSP, it must have a clear purpose of its own and a sense among its membership that the LSP itself is responsible for driving forward its agenda. Fundamentally, the LSP's management team should be accountable to the LSP's Board, rather than to the local authority.

Leadership – Howsoever an LSP is constituted and however clear are its objectives and the individual roles of its membership, there is no substitute for strong leadership from within. The personal leadership qualities and clarity of purpose of the LSP's senior management are perhaps the single most significant factor in the success or otherwise of any LSP.

Boundaries – The boundary of the LSP should be determined by the area which best enables it to deliver strategic objectives, and not by arbitrary local authority or other operational boundaries. Again, form should follow function.

Public accountability – The extent to which member organisations have delivered action identified by the LSP as being necessary to deliver its objectives, and the effectiveness of that action, should be subject to regular review by the LSP. The outcome of such reviews should be publicly available.

Neighbourhood focus – In order to effectively facilitate public engagement at the local level, the LSP requires dedicated resources at that level, for example in the form of a dedicated neighbourhood officer. A process of active consultation should be undertaken with the local community in order to identify neighbourhood-specific priorities and actions consistent with wider objectives. The LSP should go to adequate lengths to avoid the perception of being 'top-down' or attempting to dominate the local agenda.

Community Empowerment Network (CEN) – CENs have been set up as facilities through which to engage voluntary sector service delivery agencies within LSPs. CENs have an ongoing role in facilitating consultation among their members, sharing information, and channelling the views of members to the LSP. However, frequently, CENs and LSPs are not working to an agreed set of priorities, thereby undermining the effectiveness of both. CENs should always be effectively represented on LSPs. GROs should ensure that the GRO teams dealing respectively with CENs and LSPs are co-ordinated and in close operational contact.



Campaign to Protect
Rural England

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