



Campaign to Protect  
Rural England

**A CPRE report**

# Thames Gateway: making progress

CPRE's proposals for making the most of an unprecedented regeneration opportunity to help protect the countryside across South East England.

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# Introduction

CPRE wants to see the most made of the regeneration of the Thames Gateway. It offers an unprecedented opportunity to accommodate on brownfield land much of the future demand for housing and economic development in south-eastern England. The Government takes the view that there will be at least 1.1m more households in the wider South East by 2016<sup>1</sup>, and the redevelopment of the Thames Gateway could greatly reduce the pressure for greenfield housing, industrial development and associated infrastructure in the London region and beyond.

The Thames Gateway's regeneration could also help to mitigate the scale of urban out-migration from London by providing a place where people want to live and work in high quality new and regenerated developments set within a high quality landscape. That is the Government's vision, which CPRE shares, but there are major obstacles to realising it.

This paper provides a briefing on issues concerning the proposed redevelopment of the Thames Gateway, explains the obstacles to its successful regeneration and offers a way forward in overcoming them. It is principally about optimising the area's urban capacity and long term attractiveness as a place to live or work. CPRE urges the Government and delivery agencies to take action now to consider carefully the recommendations for policy and practice set out in this paper. It also outlines the historical background to the Thames Gateway 'project' and annexes give details of the major political and administrative institutions and public policy development processes through which the area's redevelopment will be managed.

## The area in question

The Thames Gateway is the area of land extending some 43 miles eastwards from central London (Tower Bridge) to the outer reaches of the north and south shores of the Thames Estuary in Kent and Essex<sup>2</sup>. At its widest (easternmost) point, it is some 20 miles wide (including the Thames Estuary itself). It covers a total area of 81,000 hectares and, although predominantly rural in character outside London, contained over 3800 hectares<sup>3</sup> of previously developed – or brownfield – land in 1999 (not all of which is suitable for redevelopment<sup>4</sup>). That latter figure may well be a significant underestimate, and large amounts of industrial land are likely to continue to become newly vacant in the Thames Gateway each year. While much of the brownfield land is contaminated as a result of its industrial history, the Government has recently stated<sup>5</sup> that the Thames Gateway contains over 17% of the available supply of previously developed land in the South East. The population is estimated to be around 3.3 million.

In addition to the legacy of vacant brownfield land, the decline of industries

*1 Making it happen: Thames Gateway and Growth Areas. ODP, July 2003. Paragraph 6*

*2 The Thames Gateway is defined here by the DETR Thames Gateway Review 'Study Area'*

*3 Thames Gateway Review – Final Report. DETR, January 2001*

*4 PPG3 Housing precludes from the definition of previously developed sites, those that have significant biodiversity or social amenity value. Remoteness from urban areas may also render a site unsuitable for redevelopment.*

*5 Mr Phil Hope MP, Parliamentary Under Secretary of State. Official Report 19 April 2004 Column 370W*

such as power generation, docks and gas works has led to high levels of unemployment in defined pockets. Much – but by no means all – of the urbanised part of the Thames Gateway is characterised by run-down, poorly designed neighbourhoods with low quality housing (especially in parts of London). This is largely a result of the drive to provide housing for employees of the industries that provided the impetus for the area's growth in the post-War period. Poor public transport provision has led to high car use and low density development. Skills and income levels among the resident population tend to be low and individuals who prosper tend to move out, undermining the area's potential for indigenous regeneration.

## **Recent history**

The Thames Gateway (as the 'East Thames Corridor') was first established in national policy as a major planning concept through the South East Regional Planning Guidance (RPG) process in 1990. RPG9a *The Thames Gateway Planning Framework* was published in 1995 and identified the area as one of substantial growth potential. The concept has maintained its profile through the regional planning processes ever since and, most recently, as a major growth area identified through the Government's *Sustainable Communities Plan (SCP)*, which has an associated action plan specifically for the Thames Gateway. The SCP has made available a significant amount of new money for a wide range of projects to promote the redevelopment of the Thames Gateway. For example, £446 million to be spent on a wide range of projects over three years was announced in July 2003 and more is likely to be forthcoming

following the 2004 Spending Review. Redevelopment initiatives within the Thames Gateway are focused on 14 'Zones of Change' which collectively contain the vast majority of the areas of brownfield land. These predominantly comprise the existing urbanised areas and together amount to around one-third of the total Thames Gateway area.

## **Vision**

CPRE's 'vision' for the Thames Gateway is that the area'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. This new development should be confined entirely to the existing urbanised areas and previously developed land, and should be complemented by the protection and enhancement of the natural landscape and built heritage.

In the most recent major statement of Government policy *Creating Sustainable Communities – Making it happen* (July 2003) the Government committed support to enable the delivery of at least 120,000 new homes in the Thames Gateway by 2016. These are expected to be predominantly within five 'strategic development locations'. The scale and pattern of development that is envisaged by the Government is determined largely by the pattern of currently planned transport infrastructure projects (this does not include Crossrail, for which there is as yet no clear Government commitment). This is considered by the Mayor of London and the Regional Planning Bodies for the South East and East of England Regions to be

based on a very significant underestimate of the available capacity of previously developed urban land and buildings and – importantly – may even be too low a figure to secure private sector contributions on the scale that will be necessary to fund the required civic infrastructure.

Depending on the true availability of previously developed land and the provision of major new public transport and other infrastructure, CPRE believes that a figure approaching 300,000 is likely to be a more realistic target without requiring any encroachment into greenfield land (albeit over a longer timescale than 2016). We therefore support the Mayor of London's aspiration to deliver at least 120,000 new homes on brownfield sites in the London part alone. At the same time, we accept that some brownfield land will not be suitable for redevelopment because it is remote from urban areas, has inadequate transport accessibility and may have significant biodiversity or social amenity value. Importantly, if the Thames Gateway's regeneration is to address the problem of urban out-migration from London, then new housing must be provided which will meet the full range of housing needs, including adequate provision of large family houses with gardens. Design quality in respect of individual dwellings and entire developments is key to achieving that whilst making the most efficient use of land.

Realising the Thames Gateway's potential will require, broadly:

- > raising the average density of new developments;
- > increasing the rate of recovery of previously developed urban land and buildings;

- > meeting the full range of housing needs;
- > creating a high quality and attractive residential environment, protecting urban environmental assets and providing good access to all necessary amenities; and
- > maintaining and creating a high quality and attractive rural environment and avoiding urban sprawl.

In addition, the scale of redevelopment likely in the Thames Gateway has significant implications for environmental impact caused by the consumption of natural resources, particularly construction materials and water resources. That impact should be minimised through the adoption of best practice, in particular in respect of the sourcing and efficient use of water and construction materials.

### **Political context**

The political significance of the Thames Gateway being identified by the Government as a major growth area should not be overlooked. The fact that the Prime Minister chose to chair the Cabinet sub-committee (MISC 22) whose work led to the July 2003 Government statement is very strong evidence that the issue is being taken seriously by the Government. The political momentum appears to be coming primarily from the Deputy Prime Minister, the Rt. Hon. John Prescott MP.

There is a view among regeneration professionals who are closely involved with the Thames Gateway project that the Government is nervous about the potential cost implications of the area's

comprehensive regeneration. These costs are in respect of, for example, transport and other civil infrastructure (e.g. power supply, water and sewerage) and site decontamination. The relatively unambitious nature of the July 2003 statement, for example, may reflect the fact that the Government has not committed public money to some major transport infrastructure projects such as Crossrail. CPRE is disturbed by reports that the Government may be concerned that consideration of environmental quality concerns in the Thames Gateway (including avoiding greenfield development) will give rise to additional costs that may seriously undermine the rate of delivery of new housing. Concern has also been expressed that the Government is focussing unduly on the crude numbers of new housing units and is concerned that insistence on high standards of design, sustainability performance and environmental protection may undermine the delivery of the required numbers. Whether these concerns are justified or not, the Government should address them if it values the full confidence of professionals engaged in the Thames Gateway's regeneration.

Notwithstanding the Deputy Prime Minister's conviction, the success of the Thames Gateway's redevelopment will depend on the enthusiastic support of other Government departments – notably Transport, Health, Education, Culture, Media and Sport and, not least, the Treasury. Recent Government announcements to the effect that some of these departments are increasingly engaged in the Thames Gateway project are therefore welcome, and we look forward to the necessary budgetary commitments being made to bring forward the required community infrastructure.

# An agenda for positive change

The five 'headline' objectives set out above under 'CPRE's Vision' cannot be achieved without progress being made on each of a number of major issues identified below.

The issues identified below are all significant obstacles to the regeneration of the Thames Gateway and need to be addressed simultaneously if satisfactory progress is going to be made. Some of these themes are expressed below in terms of the absence of specific targets, and this is because Government targets indicate the extent to which there is a clear commitment to specific policy objectives. In the absence of targets, Government commitment can be assumed to be absent and the likelihood of progress being achieved therefore seriously undermined. The 2001 report on the Government's Thames Gateway Review<sup>6</sup> noted that:

'There are no targets set for the Thames Gateway and hence nothing against which to monitor progress. Targets and milestones for the area would assist in future reviews of RPG9A [and development plans] and in evaluating the effectiveness of different streams of (public) investment.'

Ultimately, it appears to be widely accepted that the 'key' to unlocking the regeneration of the Thames Gateway is in creating confidence among the major institutional investors that a reasonable profit is likely to be forthcoming from the project. Creating that confidence will require major, up-front public sector investment in infrastructure, site decontamination and flood defences in order to create a number of nuclei around which substantial further development can take place.

The following is a list of major issues holding back progress in the Thames Gateway (especially in respect of realising latent urban capacity), together with CPRE's proposals for overcoming those barriers. This is CPRE's agenda for positive change.

## Major transport infrastructure

Despite the need to develop the Thames Gateway in a way that reduces the need to travel, transport accessibility is likely to be a major limitation on the possible scale of redevelopment. Schemes that have at least partial approval include: the Channel Tunnel rail link and the Greenwich Waterfront and East London transit schemes Phase 1; East London Line extension; Docklands Light Railway extensions; the Thames Gateway Bridge; and various road improvements. However, according to the Government's own research<sup>7</sup> in advance of the July 2003 statement, a significant package of schemes beyond these appears to be necessary even to deliver 120,000 new homes. Crossrail 1 would greatly enhance the capacity of the Thames Gateway to intensify its existing business districts and, it appears, would be necessary to deliver anything above 60,000 new dwellings in the London part. The Government however has not yet made the necessary funding commitment. There appears also to be some cause for concern over Transport for London's proposed East London Transit scheme, which ought to take the form of a tram system to link

*6 Thames Gateway Review – Final Report. DETR, January 2001*

*7 Transport and development in the Thames Gateway. Phase 1. Final Report. Department for Transport, February. 2003*

Barking Reach to Barking Town Centre but now appears likely to be downgraded to a mere bus service. Apart from upgrading the existing C2C mainline railway service into London, there appears to be no major additional public transport infrastructure planned for South Essex. Notwithstanding all the other factors that limit the development capacity of the Thames Gateway, the key issue is to illustrate what level of investment in transport is necessary in order for accessibility to cease to be a limiting factor to the area's redevelopment potential. **The Government should publish information clearly setting out the extent to which additional new housing and commercial/industrial development on urban brownfield sites in the Thames Gateway could be increased through the delivery of various additional transport infrastructure projects, and showing to what extent each scheme has received the necessary approvals and funding commitments.** It is possible that some of the proposed schemes are incompatible with protecting quality of life and environmental quality in the area: for example, a Thames Gateway bridge that encourages long-distance commuting and threatens an important area of urban green space (Oxleas Wood).

### **Community infrastructure**

In order to avoid the waste of land caused by car-dependency and to maximise the attractiveness of new development, the Government and planning authorities should adopt clear standards for the provision of community facilities including schools, hospitals, sports facilities and open space. Such an approach would be consistent with the Government's

objective of improving 'liveability' in urban areas as set out, for example, in *Living Places: Powers, Rights, Responsibilities*<sup>8</sup> and what it has in mind in respect of 'sustainable communities'. It is estimated that the regeneration of the London part of the Thames Gateway, for example, will require 55 new primary schools, ten new secondary schools, nine new leisure centres and six new playing fields<sup>9</sup>. As above, key to achieving this will be the enthusiastic engagement of all relevant Government departments – Transport, Health, Education and Culture, Media and Sport. CPRE therefore welcomes recent statements by Health, Education and Transport ministers committing their Departments to supporting growth in the Thames Gateway<sup>10</sup>. **High level Ministerial statements from each relevant Government department should now be translated into standards of proximity to community infrastructure for all major housing developments, which should be established in planning policies.**

### **Funding for community and civic infrastructure**

Substantial sums of public money will be required to pay for the infrastructure of 'sustainable communities': health care, education, local transport infrastructure, recreation and leisure facilities. In addition, there is the cost of providing 'civil' infrastructure such as sewerage, energy supply, water supply and other utilities. The £446 million announced by the Government in July 2003 for various regeneration projects was a welcome start, but much more public money will be needed over the coming decades. The scale of funding required is likely to greatly exceed what can be secured through

8 DEFRA, February 2003

9 *Thames Gateway Development and Investment Framework*, Mayor of London/TGLP/LDA, May 2004

10 ODPM News Release 2004/0059 *Extra Public Services for the Growth Areas* (15 March 2004)

private sector developer contributions (Section 106 agreements) and it seems clear that a new funding stream must be identified, such as schemes for capturing the increase in land value created by public investment or a new development land tax. 'Value capture' through taking land into public ownership and then re-selling to developers is likely to be the simplest approach but requires substantial up-front public investment. In March, the London Development Agency (LDA) accepted the need for substantial additional funding in the order of hundreds of millions of pounds but was still looking to the Government to resolve the matter<sup>11</sup>. **The Government should urgently address this funding gap head-on and fully and publicly explore the available options.**

### Professional regeneration skills

The shortage of appropriately skilled professionals in the regeneration and 'built environment' sector (including construction workers and local authority planners) is widely recognised as a major impediment to progress nationally. On the need to improve the design and quality of new developments and improve the public realm, the Chairman of the Government's Commission for Architecture and the Built Environment (CABE), for example, has said that:

'There are simply not enough people with the right skills to do the job. This is the biggest single barrier to the achievement of the Communities Plan.'<sup>12</sup>

A programme is underway to address the skills shortage (including the LDA's Centre for Urban Regeneration Excellence for London) but it is unlikely to bring about

significant change except in the long term. We welcome the Egan Skills Review key recommendation – accepted by the Government – for a National Centre for Sustainable Communities Skills. **The Centre should be required to identify which skills gaps and capacity shortcomings need to be addressed, and how. In addition to masterplanning and construction skills, particular attention should be paid to skills for bringing urban brownfield land back into use, designing good quality high density housing, managing the land supply through the planning system so as to avoid unnecessary greenfield development (the 'Plan, Monitor and Manage' approach advocated in national planning guidance) and enabling an appreciation of landscape character and value to influence planning decisions.**

### Compulsory purchase

Anecdotal evidence suggests that major developers are stockpiling large areas of land in the Thames Gateway and do not appear willing to begin development while the value of these assets rises substantially. Ironically, falling values may also create reluctance among landowners to release sites for development. This kind of speculation can only be stopped by bringing the sites into public ownership through compulsory purchase and then releasing it as and when appropriate to developers. Useful changes to the compulsory purchase procedures are now in prospect as a result of the *Planning and Compulsory Purchase Act* but there is some doubt as to whether the relevant authorities will be willing (or indeed capable due to the skills shortages

11 Mr Tony Winterbottom (Director of Strategy Implementation and Project Development, LDA) addressing the London Assembly plenary meeting of 17 March 2004

12 Sir Stuart Lipton, Chairman of CABE, writing in *Planning* magazine, 5 March 2004

outlined above) to take advantage of the new provisions. **The Government should monitor carefully the effectiveness of the new arrangements and how widely they are being implemented in the Thames Gateway.**

## Density targets

In order to ensure that land is developed at an appropriately high density and land-wasting minimised, appropriate targets need to be developed and adopted by the Government and, ideally, the Mayor of London and the boroughs. Recent data shows that average residential densities in four of the seven London Thames Gateway boroughs has actually *decreased* since 1997<sup>13</sup>. There is a danger that the Government's current aspirations to deliver only 120,000 new dwellings will be translated into less than optimal density requirements on a site by site basis, compromising the scope for further development after 2016. It is important that there should be strategic targets for the average density being achieved across the wider Thames Gateway area in order to avoid too many individual developments being allowed at the lower end of the 'acceptable' density range. The Government, however, has not adopted any density targets for the Thames Gateway beyond the general standards already established in PPG3 *Housing* which merely makes a vague reference to the need for urban densities to usually be over 50 dwellings per hectare (dpha)<sup>14</sup>. CPRE believes that **local planning authorities, regional planning bodies, the GLA and the RDAs should adopt an average density of 90 dpha (net) and a minimum density of 80 dpha (net) for urban areas throughout the Thames Gateway.** The figures could be higher for

London. That is approximately the density of London's highly desirable Georgian and Victorian streets and squares and also allows for the provision of family housing with gardens. These targets should be cascaded down through sub-regional strategies, Area Development Frameworks, masterplans and development briefs.

## Design and construction quality standards

In order to ensure that the Thames Gateway becomes and remains an attractive place to live and work in the long term, there needs to be some mechanism by which to ensure that poorly designed developments can be rejected by planning authorities and – crucially – for those decisions to survive the appeal process. Appropriate standards should 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. The Building Research Establishment's *Sustainability Checklist for Developments* and the CABI-sponsored *Building for Life* award criteria may provide the basis of such a test. The Government's recent endorsement of the 'Urban Coding' concept and the ODPM's new Housing Quality Forum may also be useful steps in the right direction. Designers and planners should be informed and guided by the English Heritage Thames Gateway strategy. Crucially, without adequate attention to design quality, it is not possible to successfully achieve suitably high densities. **Local planning authorities, regional planning bodies and the GLA should be required to adopt policies promoting good design in development plans and the use of best practice guidance. Every local**

13 Ken Livingstone, Mayor of London, in response to Mayoral Question 1635/2003 (September 2003)

14 Paragraph 58

**planning authority should be required 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 designs being drawn up.**

## **Sustainable construction**

In addition to addressing the barriers to achieving the full regeneration potential of the Thames Gateway, CPRE advocates minimising the remote environmental impact of the area's regeneration through universal adoption of the principles of sustainable construction. **Local planning authorities, regional planning bodies, the GLA and the RDAs should require all new building (including flood defences) in the Thames Gateway to conform with the BRE EcoHomes standard or equivalent for sustainable construction and, in particular, to achieve best practice in respect of the use of recycled and secondary aggregates and water conservation.**

## **Greenfield protection**

Despite the relative abundance of vacant 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 brownfield land – will be a crucial part of maintaining and improving general quality of life in the Thames Gateway and in creating a place where people will wish to live and work for decades to come. The successful regeneration of urban greenspace (and possibly also greenfield land in the urban

fringe) may require the creation of a new statutory agency set up for that specific purpose. With the support of CPRE and English Heritage, architects Terry Farrell & Associates are promoting a vision of large scale urban and rural environmental enhancement in the Thames Gateway through improving urban green spaces and linking them with a better managed surrounding countryside. This vision has been promoted through the idea of creating a new kind of 'national park' for the region.

Developers will succeed in targeting greenfield sites and leaving urban brownfield sites unredeveloped, unless it is made clear that there can be no question of those greenfield sites being developed. Regrettably, the Government has recently indicated that it would be satisfied with limiting greenfield development to 20% of development overall<sup>15</sup>. This seems perverse given that the reason for the Government directing housing towards the Thames Gateway is because it offers such potential for re-using previously developed land and avoiding greenfield development.

Particularly given the Mayor of London's ambition to provide 120,000 new dwellings on brownfield land in East London, meeting the Government's objective of 120,000 dwellings throughout the Thames Gateway should not require the use of any greenfield land. **The Government, the regional planning bodies, RDAs and all local planning authorities should instigate an immediate moratorium on greenfield development in the Thames Gateway.**

This is consistent with the conclusion of the Thames Gateway Review that 'The clear thrust of the Thames Gateway initiative is to achieve regeneration through

*15 Rt. Hon. Keith Hill MP (Minister of State for Housing and Planning) in response to written Parliamentary Question number 153584 by Mr Robert Spink MP (Official Report: 11 Feb 2004: Column 1530W)*

the development of largely vacant or derelict sites'. CPRE welcomes the 'Green Grid' initiative, which is being led by the sub-regional local authority partnerships, but, disappointingly, the Government's recent document *Greening the Gateway* contained very few – if any – clear policy commitments.

## Flood defences

An increasing amount – if not all – of the Thames Gateway is likely to be threatened by major flooding over the coming decades. A realistic programme of developing flood defences – or flood management – is essential to allow investor confidence, and the concerns of the insurance industry will be of particular importance. Flood defence infrastructure will have environmental implications, in particular in respect of aggregates demand. These are further reasons for minimising the amount of greenfield development. It should be borne in mind that limiting development to the existing 'urbanised' areas is likely to avoid the necessity for some new flood defences because those areas are already protected to some extent. The risk of fluvial flooding would also be reduced by avoiding building on greenfield land within the catchments of the River Thames and its tributaries. The Environment Agency estimates that £4 billion is required to be spent on enhancing flood defences over the next 30 years, but a clear programme of the required work is not expected to be identified and published before 2006. The London Assembly takes the view that upgrading the Thames Barrier, which, according to the Assembly, will be needed by 2030 at the latest, will alone cost £4 billion. Given the call made on housebuilders' profits by affordable

housing and other planning gain commitments, it seems clear that significant public investment is likely to be required. **The Government should make it clear where the necessary funds are expected to come from.**

## Water resources

Water resources across much of eastern Kent and Essex are already stretched. Even if a major programme of water conservation measures were to be undertaken in the Thames Gateway, water resource limitations may be too great to allow all the available land to be redeveloped. A desalination plant is currently being considered at Crossness, but desalination may prove unacceptably expensive, as may be long distance transfer from, for example, the River Trent or west of London. Long distance transfer may also have unacceptable nature conservation implications. At the very least, demanding standards for water conservation and recycling measures need to be built into all new planning approvals. Retrofitting existing housing with water-efficient technology may also be necessary and could have a very much more significant effect. The solution may be a 'twin grid' that enables re-use of 'grey water' where appropriate and limits the consumption of drinking quality water to uses that require it. **Before major development takes place, the Government should explain how the water resources requirements will be met, including through the introduction of challenging but achievable demand management measures in new and existing developments.**

## Reallocation of employment land

A substantial quantity of land in the Thames Gateway remains allocated in UDPs as 'employment land', i.e. exclusively for industrial or other business premises use, and a great deal continues to become newly vacant each year. A very great deal (perhaps the majority) of such land stands practically no chance of ever being required for such uses (unless, perhaps, it is developed wastefully for very low intensity purposes such as warehousing and distribution). This is not a problem for the Thames Gateway alone. According to the Deputy Prime Minister:

'The planning system has not planned well for economic development. Planners have failed to review the sites they allocate. Too many are of no interest to the market, while others are in unsustainable locations. I expect local authorities to have a real shake out of their sites'.<sup>16</sup>

In part because no area-wide assessment has been made of how much employment land is necessary, local planning authorities have been reluctant to release this land for other purposes (e.g. housing) because of the unrealistic fear that that would stifle economic growth in their areas. Government proposals to require the re-use of designated industrial and commercial land for housing unless a convincing case for retention is made are a useful step in the right direction but at least some of the land in question is likely to be greenfield. **As appears to be happening in London, local authorities throughout the Thames Gateway should be required to undertake a strategic assessment of realistic**

**employment land requirements, together with an agreed limit to the quantity that may remain vacant.** It should be made clear that it is the urban brownfield sites that should be prioritised for re-allocation. Many excess sites, especially those that are greenfield land, may also warrant complete withdrawal from development plans. CPRE looks to the Government to take this approach forward in draft Planning Policy Statement 4 (PPS4) on employment development, expected later this year.

## Getting on track – a review of RPG9a

Most of the policy proposals set out above could be established through a review of RPG9a (now approaching ten years old), offering a clear statement as to the required number of new homes and jobs and the new infrastructure required to deliver them. The Thames Gateway Strategic Partnership has agreed that a review of RPG9a should follow a review of RPG9 (for the South East Region), which is currently underway.

Such a review should be guided by a comprehensive strategic environmental assessment (SEA) which, although not done for the current version of RPG9a, may be required under the Strategic Environmental Assessment Directive<sup>17</sup>. The 2001 report of the Thames Gateway Review states that 'RPG9a clearly needs to be brought up to date'. Not least among the factors adding urgency to that review are the fact that the Deputy Prime Minister has recently increased the amount of new jobs and housing that he expects the Thames Gateway to accommodate; the current RPG9a omits most of the area on the north side of the

*16 Speech by Deputy Prime Minister, John Prescott MP, to the joint ODPM/Treasury/CBI/LGA Planning and Productivity Conference on 15 December 2003*

*17 Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, and to others under certain circumstances.*

estuary; it has not been tested at an Examination-in-Public compromising its legal robustness and therefore the likelihood that policies based on it will be upheld at appeal; and is not accompanied by a Strategic Environmental Assessment. SEAs in respect of regional spatial strategies for the three constituent regions may not adequately address cross-border issues, such as requirements for major transport infrastructure or availability of brownfield land. A review would also provide an opportunity to develop a proper implementation framework for the Thames Gateway project, helping to resolve and clarify the roles of the plethora of formal policy development processes and official institutions with responsibility for the area's redevelopment. Environmental objectives could be supported by, for example, area-wide targets for greenfield protection, housing density, and special protection for the river frontage, which is a major environmental and heritage asset for the area.

# Summary of recommendations

Together with local planning authorities, RDAs, UDCs and the GLA as appropriate, the Government should:

## Policy framework:

- > instigate an immediate moratorium on greenfield development in the Thames Gateway;
- > instigate an immediate full review of RPG9a *The Thames Gateway Planning Framework*, including a comprehensive Strategic Environmental Assessment;
- > publish information clearly setting out the extent to which additional new housing and commercial/industrial development on urban brownfield sites in the Thames Gateway could be increased through the delivery of various additional transport infrastructure projects, and showing to what extent each scheme has received the necessary Government approvals and funding commitments;
- > define clear standards for the accessibility of new housing to community facilities including schools, hospitals, sports facilities and open space, and adopt them in development plans;
- > adopt an average density of 90 dpha (net) and a minimum density of 80 dpha (net) for urban areas throughout the Thames Gateway (and higher in London).

## Funding:

- > urgently address the funding gap for community infrastructure;

- > explain where the estimated £4 billion required to be spent on enhancing flood defences over the next 30 years is expected to come from.

## Skills and tools:

- > require the National Centre for Sustainable Communities Skills to identify the skills gaps and capacity shortcomings that need to be addressed, and how. In addition to masterplanning and construction skills, particular attention should be paid to skills for bringing brownfield land back into use, designing good quality high density housing, implementing the 'Plan, Monitor and Manage' approach set out in national planning guidance so as to avoid unnecessary greenfield development, and enabling an appreciation of landscape character and value to influence planning decisions.
- > monitor carefully the effectiveness of the new arrangements for compulsory purchase and how widely they are being implemented in the Thames Gateway, and establish a skills-exchange practitioners' network;
- > require local planning authorities, regional planning bodies and the GLA to adopt policies promoting good design in development plans and the use of best practice guidance. Every local planning authority should be required 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 designs being drawn up;

- > undertake a strategic assessment of realistic requirements for employment land and establish an agreed limit to the quantity that may remain vacant, excluding greenfield sites for re-allocation and recognising that many sites – especially greenfield ones – may also warrant complete withdrawal from development plans;
- > require all new building (including flood defences) in the Thames Gateway to conform with the BRE EcoHomes standard or equivalent for sustainable construction and, in particular, to achieve best practice in respect of the use of recycled and secondary aggregates and water conservation; and
- > explain how the water resources requirements will be met, including through challenging but achievable demand management measures in new and existing developments.

# Annex 1: Policy development process for the Thames Gateway

National, regional and local government planning policy for the Thames Gateway is being developed through the following major processes:

- > *Sustainable Communities Plan* (Office of the Deputy Prime Minister – ODPM);
- > *Regional Planning Guidance/Regional Spatial Strategies* (South East Regional Assembly and the East of England Regional Assembly);
- > *London Spatial Development Strategy* – the ‘London Plan’ (Mayor of London)
- > *London sub-regional spatial strategies* (Mayor of London);
- > *East London Urban Development Corporation* (ODPM/Mayor of London); and
- > *Economic Development Strategies* (each of the three Regional Development Agencies – RDAs).

There are also a number of other (ostensibly subsidiary) processes underway:

- > *London Thames Gateway Development and Investment Strategy* (LTGDIS – a strategic investment strategy for the Thames Gateway) (ODPM/Mayor of London);
- > *Thames Gateway London Partnership Economic Strategy* (Going East – An investment strategy developed by the TGLP partners) (TGLP – see below);
- > *Thames Strategy East* (a spatial planning framework specifically for

areas close to the river) (TGLP);

- > *Green Grid* (establishing a network of protected open space) (TGLP); and
- > *Area Development Frameworks* (detailed land use and planning policies for specific defined areas) (Mayor of London).

With the exception of the first (which appears to be very significant) it is not clear as yet which of these ‘subsidiary’ processes above are likely to have the greatest weight and their relationships to each other are far from clear.

# Annex 2: Thames Gateway policy development institutions

The following public institutions are responsible for policy development (and, in some cases, implementation) on a strategic scale in the Thames Gateway. Some produce their own detailed policy statements (as listed above), while some (also listed above) exist more to contribute to other policy development processes. The apparent proliferation of such bodies has created something of a quagmire and this may be a major barrier to effective policy development and, indeed, meaningful public participation:

## **MISC 22 Cabinet Sub-Committee** –

Chaired by the Prime Minister, this committee was set up in advance of the July 2003 Sustainable Communities announcement in order to examine the development potential of the Thames Gateway.

## **Thames Gateway Strategic Partnership**

(TGSP) – a grouping of Government Ministers, the Mayor of London, Regional Development Agency chairmen, sub-regional Partnership chairmen and representatives from the regional assemblies in the Thames Gateway. It is chaired by the Minister for Planning (currently the Rt. Hon. Keith Hill MP) and it aims to develop and implement a pan-Gateway regeneration agenda. The TGSP has a number of ‘sub-groups’ – including the Planning Sub-Group and the Environment Sub-Group – on which NGOs, statutory agencies and local authority partnerships are represented.

**Thames Gateway Strategic Executive** (TGSE) – the officer-level (Civil Service and executive agency) body that supports the TGSP.

## **Sustainable Communities Delivery Unit**

(SCDU) – This is perhaps the key unit within all of the Government departments (it is within ODPM). It includes responsibility for Thames Gateway, English Partnership sponsorship, design issues, Millennium Communities and Urban Regeneration Companies. The Urban Policy Unit would report to this new unit.

## **London Thames Gateway Partnership**

**Board** (LTGPB) is a non-executive working group jointly chaired by the Mayor of London and the Minister for London. Its role is to oversee and co-ordinate the planning and accelerated delivery of regeneration projects and programmes in the London Thames Gateway, principally through the *London Thames Gateway Development and Delivery Strategy* (above). The Board comprises various regeneration and housing quangos and the private sector. It is not the board of the London Thames Gateway Partnership (see below).

## **Thames Gateway Steering Group**

(TGSG) is a GLA-led initiative and acts as the executive group supporting the LTGPB, setting and taking forward the LTGPB’s agenda. It brings together the GLA, LDA, ODPM, English Partnerships Transport for London and the Thames Gateway London Partnership (representing the boroughs) together with a range of other agencies.

**Thames Gateway London Partnership; Thames Gateway South Essex Partnership; and Thames Gateway Kent Partnership** variously comprise representatives of constituent local authorities, Regional Development

Agencies, educational agencies and public, private and voluntary sector organisations. The Partnerships are created to lead the strategic regeneration of their respective sub-regions. The London Partnership excludes NGOs from its membership, but allows NGOs to participate in various Task Groups (e.g. the Planning Task Group and the Environment & Quality of Life Task Group).

**East London Urban Development**

**Corporation** (ELUDC), also referred to as the 'London Thames Gateway UDC', will be a public-private 'special delivery vehicle' whose board will include representatives of local authorities and the LDA.

**English Partnerships** (EP) – EP is the national urban regeneration agency. It is an executive agency of the ODPM and is responsible for taking forward major land assembly and regeneration projects. These are usually carried out in partnership with local authorities and the private sector. EP currently has a particular focus on re-assigning surplus Government-owned land and is developing a national brownfield strategy aimed at increasing the rate at which previously developed land is brought forward for redevelopment.



Campaign to Protect  
Rural England

## **Campaign to Protect Rural England**

The Campaign to Protect Rural England (CPRE) exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country. We promote positive solutions for the long-term future of the countryside to ensure change values its natural and built environment. Our Patron is Her Majesty The Queen. We have 59,000 supporters, a branch in every county, nine regional groups, over 200 local groups and a national office in central London. Membership is open to all. Formed in 1926, CPRE is a powerful combination of effective local action and strong national campaigning. Our President is Sir Max Hastings.

Campaign to Protect Rural England  
128 Southwark Street  
London SE1 0SW

Tel: 020 7981 2800  
Fax: 020 7981 2899  
Email: [info@cpre.org.uk](mailto:info@cpre.org.uk)  
Website: [www.cpre.org.uk](http://www.cpre.org.uk)

CPRE is a company limited by guarantee, registered in England, number 4302973. Registered charity number: 1089685

For further information about our work on the Thames Gateway contact:

Nigel Kersey  
Director  
CPRE London  
70 Cowcross Street  
London EC1M 6EL

Tel: 020 7253 0300  
Fax: 020 7490 3001  
Email: [office@cprelondon.org.uk](mailto:office@cprelondon.org.uk)

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