



**The countryside charity
London**

Working for a greener city

Green London Bulletin




January 2020


CPRE London

CPRE London's AGM: 21 May 2020
What is London's Countryside?

Croydon plan slammed. In a submission to the consultation on the draft Croydon Local Plan, CPRE London said:

“Housing targets must be realistic: the proposed target is exceptionally high. Unrealistic targets mean that too many sites are allocated, green sites are built out before brownfield sites, and land is wasted.”



CPRE said it did not support building infrastructure in the Green Belt and there are no exceptional circumstances to justify it. Neither does it support release of three sites from the Green Belt or use of Sanderstead Recreation Ground for a school expansion. It encouraged borough residents to write in opposition to the plans   .

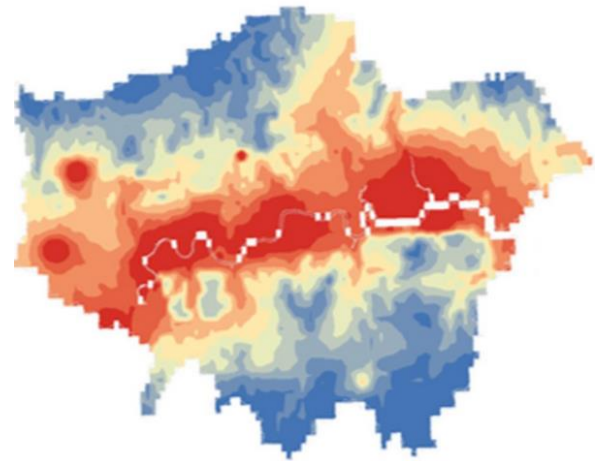
Mayor supports Green Belt. Sadiq Khan has written CPRE London confirming the importance of the Green Belt role in responding to the Climate Emergency .

“The strong protection of the Green Belt and Metropolitan Open Land (MOL) is also important due to the multiple environmental functions this land performs particularly within the context of a climate emergency. They provide many benefits including ensuring transport emissions to not increase from sprawl, supporting London's resilience to a changing climate (such as preventing flooding) as well as supporting food growing, providing important habitats for wildlife and allowing space for recreation and relaxation for Londoners.”







“I believe that the continued, strong emphasis I have placed on protecting London's Green Belt and MOL [in the London Plan] is justified.”

Open and Green

Green health. Burgess Park in Southwark is the most polluted park in London hosting a Parkrun; Goddington Park in Orpington the least . Following a study of 185,000 deaths in London, researchers concluded that increased urban vegetation reduces heat and mortality. They commended mayoral strategies to increase London's green infrastructure and to maximise the health benefits of open space by ensuring equitable access for all Londoners .






Variation in daytime temperatures in London 

Protecting green spaces. The Union of Hackney Gardens said it was alarmed at the lack of a community designation policy to protect open spaces in the emerging local plan . By a majority of three to two, the supreme court refused town green status for school playing fields in Lancashire and NHS land at Leatherhead in Surrey. The essence of the judgement that if land is held for statutory purposes, it cannot be registered as a town green. It is probable that this judgement also applies to the registration of rights of way    . PDP London has won an international design competition to create a green strategy for the Low Line walking route in Southwark .






Winning design for the Low Line

Climate emergency. Hammersmith and Fulham council has set up a resident-led Climate and Ecological Emergency Commission . Tom Edwards from the BBC looked at the challenges facing London in hitting Sadiq Khan's target of carbon neutrality by 2030 . Climate Central published a world map of areas at risk of coastal flooding by 2050 as sea levels rise .



Coastal flood risk 2050

The London Plan

Intention to publish. Sadiq Khan gave a defiant response to the inspecting panel's final report . He told housing secretary Robert Jenrick he had accepted 28 of the recommendations, many of which relate to technicalities of housing policies. He agreed with a further 12 in part or with amendments but has rejected 15 recommendations completely. These include policies that are central to the plan, including protection of the Green Belt and MOL. He accepted a reduction in housing targets . The Plan will be considered by the London Assembly at a plenary meeting on 6 February. There is considerable disagreement between City Hall and the inspectors on policies for Heathrow, the Green Belt, MOL and fracking. Robert Jenrick was expected to have either agreed to the modified plan, which is unlikely, or launched a high court challenge in January but in a letter just published, he told Khan before Christmas that he will take until 17 February to respond  PLAN. In a letter to Jenrick, CPRE London said:

“The strict policies to protect Green Belt and MOL set out in the plan are essential to the effective regeneration and reuse of previously developed land in London, as well as being vital for the health and wellbeing of Londoners. Moreover, in the face of unprecedented climate and nature emergencies, the role of Green Belt in managing urban growth will only become more important in future.”

Green Belt. The inspectors recommended a city-wide Green Belt review as part of the next iteration of the plan. Sadiq Khan rejected this: “A commitment to review Green Belt in this plan potentially prejudices any future spatial strategy and risks undermining the objectives and delivery of this plan.” In another challenge, the inspectors wanted the plan's Green Belt policies brought into line with the NPPF, allowing development in very special circumstances. Khan responded the plan's policy that “development proposals that would harm the Green Belt should be refused” must remain unchanged. The inspectors said the plan's commitment to support extensions of the Green Belt should be deleted. Again, Khan's answer was no. He also rejected the recommendation that boroughs review Green Belt boundaries to provide sites for industry: “The Mayor does not want to encourage a major shift of industrial activity to the outskirts of London as this is likely to give rise to negative impacts on the London economy and increase vehicle miles, congestion and pollution.” (Policy G2)

Metropolitan Open Land. The inspectors said the policy that “development proposals that would harm MOL should be refused” should be deleted. Khan said no: “Given the importance of MOL to Londoners, the Mayor considers that MOL should have the highest levels of protection, in line with that of Green Belt land.” The plan also says the quantum of MOL should not be reduced. The inspectors wanted this deleted. Khan responded: “Ensuring the quantum of MOL is maintained will be important to not undermine the wider objective of more than 50% green cover in London.” (Policy G3)

Heathrow. The inspectors want the London Plan to be subservient to the Airports National Policy Statement, which gives the green light to Heathrow's third runway. They want the aviation policy deleted in its entirety, including the statement:


“The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities.”

Khan declined to change any policies on Heathrow saying a third runway is incompatible with the Mayor's Transport Strategy and deletion of Policy T8 would leave a policy vacuum. (Policies T3; T8).


Transport. Khan refused to weaken the safeguarding of strategic sites for transport infrastructure. (Policy T3)

Waterways. Khan rebuffed a change that would allow MOL status to be extended to areas of the Thames: “Additional stretches of the River Thames should not be designated as Metropolitan Open Land, as this may restrict the use of the river for transport infrastructure related uses.” (Policy SI14)

Biodiversity. The London Plan allows for biodiversity offsetting. The inspectors asked for net biodiversity gain “where possible”, weakening the policy. Khan disagreed and said all off-site compensation must deliver greater biodiversity. (Policy SI11)

Fracking. Although the government has imposed a moratorium on fracking, national planning policy still allows for it. The inspectors told Khan he should remove his veto on fracking. He retorted: “The Mayor is strongly opposed to the exploration and production of shale gas in London and considers it is vital to have a London wide planning policy on this” . (Policy SI11)

Sustainable drainage. Khan has accepted the recommendation that “Development proposals for impermeable surfacing should normally be resisted.” Previously the plan said impermeable surfacing should be refused. (Policy SI13)

Housing targets. The inspectors told Sadiq Khan to cut his housing targets for the capital and for boroughs. They said there was an overreliance on small sites for delivery and the overall target should be cut nearly 20 per cent from 649,350 to 522,850 dwellings. Small sites will be expected to accommodate 119,250 homes over the plan period, down from 245,730. Khan accepted this but told Jenrick: “I want to make it clear I am absolutely committed to delivering more of the homes that Londoners need, and this will include making greater use of small sites across the capital as well as bringing new players into the market”  PLAN (Policy H1)

Affordable housing. Conversion or rebuilding of empty offices or other non-residential uses to housing is subject to vacant building credit under which affordable housing contributions are only payable on any increase in floor area. The London Plan had tried to restrict this but the inspectors said this was not compliant with the NPPF. Sadiq Khan has accepted the recommendation to delete the policy but said boroughs can disapply the policy based on local evidence. (Policy H9)

Design. The architect retention clause will remain. The clause guides, but does not compel, boroughs to use the same architect through a development scheme with the aim of improving the consistency and quality of design ^{AJ} **bd.** (Policy D2)

Business. Kahn wants to retain the plan's exhortation to boroughs provide business units at a range of rents. He has also refused to modify the strategic framework for industrial capacity and logistics. (Policies E2; E4.)

Gypsies and travellers. The inspectors wanted the London Plan policy brought in line with the NPPF. Sadiq Khan rejected this and said national policy excludes gypsies and travellers who had ceased to travel but still lived in caravans, or those in bricks and mortar seeking a caravan. (Policy H16)

Around the Capital

Barnet. Finchley Central Underground Station could be redeveloped for 560 homes in blocks of flats between seven and 20 storeys high ^{THIS IS} **Loi.** The borough approved the redevelopment of a Sainsbury's supermarket site in Colindale to provide a mixed-use development including 1,309 homes, 35% affordable, despite its density being double London Plan guidelines ^{THIS IS} **Loi PLAN.** Robert Jenrick allowed an appeal for 1,350 homes in buildings up to 11 storeys high on North London Business Park, despite the site is not being allocated for tall buildings. The council had rejected the scheme because of its excessive height, scale and massing. Barnet does not have a five-year land supply ^{THIS IS} **Loi.**

Brent council has replaced its single-use plastic parking ticket wrappers with a biodegradable version ^{Evening} **Stam.**

Brentford. A five-year certificate of immunity from listing has been issued for Grimshaw Architects' Homebase, paving the way for the site's redevelopment for a Tesco and housing **bd.**

City. Foster & Partners have launched an appeal over the rejection of its plans for the controversial 305m high Tulip tourist attraction **bd.** Plans have been submitted for the new Museum of London scheme, now costed at £337m, at West Smithfield **bd.** Architects have been appointed to repurpose Smithfield Market and improve the public realm ^{Isling} **bd.** ^{Evening} **Trib.**



Plans for the Museum of London

Ealing. Residents are protesting against Durston House School's plans to build a 540-pupil capacity building on Castlebar Playing Field ^{Evening} **Stam.**

Enfield council has agreed the first phase of Meridian One. Fifty per cent of the planned 900 homes will be affordable **bbc.**

Greenwich. One-third of customers at the new Ikea arrived on foot, by bike or by public transport ^{Loi} **bd.** Plans for a 28-storey tower on the banks of Deptford Creek have been approved, despite only 20 per cent of the apartments being affordable ^{Loi} **bd.** Changes are being drawn up to the Greenwich Peninsular masterplan. The Greenwich Society said: "There is no additional green space at all although the existing Central Park is dwarfed by new blocks" **bd.**

Hackney. Robert Jenrick has told the council not to approve conversion of Whitechapel Bell Foundry into a boutique hotel without his authorisation. The UK Historic Building Preservation Trust said: "It's good, it's timely, it's necessary. We were faced with cultural vandalism on a great scale" ^{Evening} **Stam.** The National Lottery granted £4.4m for improvements the grade II-listed gothic Abney Park Cemetery in Stoke Newington **bd.**

Harrow. Architects have been appointed for the new Harrow Arts Centre **bd.**



Harrow Arts Centre

Hounslow. Highways England has granted £340,000 Gunnersbury Park to mitigate the impact of the M4, including renovation of three threatened historic buildings ^{W4} **bd.** A TfL plan for 12 tower blocks on Bollo Lane, up to 25-storeys high, have been criticised by Rupa Huq MP and residents ^{W4} **bd.** Plans have been submitted for a 22-storey tower in West Acton. Allotment owners say the blocking of light from such a tall building would be devastating for them ^{W4} **bd.**

Islington. Ocado's plan to build a lorry depot next to the only playground in Islington to meet EU pollution limits has led to a boycott of the delivery company, along with protests by parents who have children at Yerbury Primary School and their teachers ^{Evening} **Stam.** ^{Isling} **Trib.**

Kensington & Chelsea council has now decided to support a scheme in West Cromwell Road it rejected last May. The scheme has increased in height since Sadiq Khan called it in. The developer is promising more than one acre of landscaped public space ^{MyL} **bd.**



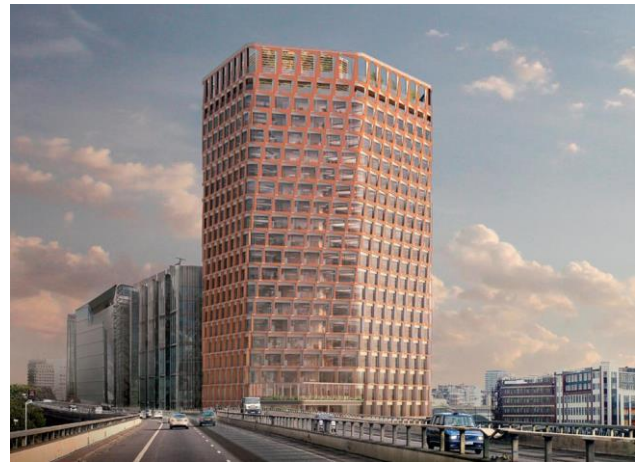
Plans for West Cromwell Road

Green London Bulletin from CPRE London

Lewisham council is investigating after the Noah’s Ark pub in Deptford’s conservation area was demolished without permission **THIS IS LOI**. Robert Jenrick has allowed an appeal for a 365-home redevelopment of a Tesco car park with three towers up to 34 storeys high, despite only 20 per cent of the housing being affordable **bd**.

Southwark. Judges threw out a challenge to the redevelopment of the Elephant and Castle shopping centre **bd**. Only 36 out of 100 independent traders still operating at the shopping centre have been allocated new premises **bd**. A site on Old Kent Road could host an alligator farm within a Grade-II listed Victorian gasholder **bd**. Plans have been lodged for a mixed use scheme at the Victorian Siemens Brothers factory **bd**.

Tower Hamlets council has adopted its local plan to 2035 **bd**. Robert Jenrick has granted permission for a £1bn redevelopment of **Westferry Printworks**. This was despite the scheme being slated by a planning inspector who said it would fail to preserve the setting of Tower Bridge, the Grade-I listed Old Royal Naval College and the Maritime Greenwich World Heritage Site. Tower Hamlets council said the scheme “breached virtually all the design principles identified in the development plan”. Jenrick accepted many of the criticisms of the scheme, including the impact on Tower Bridge, but said employment during construction and the additional housing outweighed the harm the scheme would cause **bd** **Ad** **Ad** **Ad**. Councillors agreed an emergency motion declaring they would examine “all available options, including a judicial review” in order to stop the scheme **bd** **Ad** **Ad** **Ad**.



Rejected Kingdom Street scheme

Planning and Housing

Phone kiosks. Last year, Westminster won a high court legal case requiring telephone companies to get planning permission for new phone boxes. The city is now hoping to persuade ministers to amend planning regulations to allow councils across the country to serve a notice forcing telecoms operators to remove unused and redundant boxes. There are about 1,000 phone boxes in Westminster. The council has said it wants to retain up to 100 listed red boxes while removing the modern kiosks, many of which are used as advertising hoardings **bd**.

Design. The design of new housing developments in England is overwhelmingly mediocre or poor, with less-affluent communities the worst affected, according to a national audit conducted by UCL for CPRE and the Place Alliance. Tom Fyans, Campaigns and Policy Director at CPRE said:

“The Government has presided over a decade of disastrous housing design and must raise standards immediately. This research is utterly damning of larger house builders and their failure to build the homes our communities deserve. They must significantly raise their game if we are to create the sorts of places that future generations will feel proud to call home. It’s no wonder so many of our communities feel apprehensive towards new development when the design is so poor.”

Greater London was the most improved region in England. One case study in the capital was rated very good, another poor. Overall, 20% of London schemes were rated very good and 45% mediocre **bd** **CPRE**.

Affordable housing. The Local Government Association claimed that more than 13,500 affordable homes have been lost across England over the past four years because office to residential conversions do not contribute towards affordable housing **Local Gover**. The Real Story on BBC World Service looked at the affordable housing crisis, including a community housing project in London **bd**.









Plans for Westferry Printworks


Wandsworth. The Alchemist pub in Battersea was illegally demolished in 2015. Although it was rebuilt, it has not come back into use. Now its owners have won a planning appeal to change it to D2 use – assembly and leisure **bd**.

Westminster. New plans have been drawn up for housing and shops on the historic Newson’s Yard in Belgravia **bd**. Historic England rejected a request from Save Britain’s Heritage and the Twentieth Century Society to spot-list Portcullis House. Parliamentary estate managers plan to remove the water feature in the atrium. Historic England said this does not present a serious enough threat **bd** **Ad**. The council blocked an 18-storey mixed use scheme on Kingdom Street on design and heritage grounds **bd** **Evening Stan**.





Resources






Fly-tipping. Camden had the most fly-tipping incidents in London in 2018/19 (25,765). It was followed by Brent (23,965), Croydon (22,184), Hounslow (21,897) and Haringey (21,320) . Harrow council is implementing a new proactive strategy to reduce fly-tipping in the borough . Barnet is to review its penalty charge notice scheme for fly-tipping after residents were fined for putting out recycling . There are concerns that fly-tipping will increase after Barnet councillors agreed a £70 annual charge for collecting green waste . The Local Government Association demanded tougher sentences for people convicted of fly-tipping after new figures showed that offences have surged over the past six years but only two offenders have been hit with the maximum £50,000 penalty since 2014 .

Waste & recycling. Sadiq Khan revealed he had signed off just three Reduction and Recycling Plans (RRPs), for Enfield, Tower Hamlets and Richmond councils, amid fears London will not achieve its target of 50% recycling by 2025. The capital's recycling rate was 33.4% in 2018/19 .

London Power. Sadiq Khan launched a green energy company .







High Speed 2





Environment. HS2 Ltd has published a new statement of its environmental objectives . The new policy drops the company's commitment to "seek environmental enhancements and benefits". More on this in the January 2020 CPRE SE Bulletin . The Wildlife Trusts said HS2 will destroy and divide "huge swathes" of "irreplaceable" natural habitats, including 108 ancient woodlands . Extinction Rebellion and other groups protested against felling of trees in the Colne Valley .

In the courts. HS2 Ltd wants to erect fencing and an earth embankment in a field near South Harefield to enable a population of newts to be moved out of the way of the proposed viaduct. Hillingdon borough refused approval on the basis that the design and external appearance of the works should be modified to preserve a site of archaeological interest and nature conservation value. It said the development could reasonably be carried out elsewhere. A planning inspector agreed but the secretaries of state approved the scheme. Now the high court has ruled in favour of HS2 and ministers. Hillingdon challenged on the grounds of damage to archaeology but the judge ruled against the borough  . A Park Village East resident has been granted permission to bring legal proceedings against HS2 Ltd for its Euston tunnel design, claiming that it will "endanger the lives and properties of residents nearby" if a retaining wall at Mornington Crescent collapsed . HS2, which argued that protesters were occupying a pathway at a construction site in Hillingdon illegally, won a possession order at the high court and evicted the protesters . But new protesters soon returned .











Bailiffs at Hillingdon Outdoor Activity Centre

Oakervee Review. Another leak of the report suggests the cost of HS2 could rise to £108bn . Lord Berkeley, former deputy chair of the Review, published a dissenting report. He claimed the review suffered from "a bias towards accepting HS2's evidence in preference to those of others". He said the £107bn cost could be cut by £50bn by improving northern and midlands rail links instead. Terminating the line at Old Oak Common instead of Euston would be save a further £8bn. He criticised HS2's economic case and said the design was over-specified. The environmental costs of the project had been omitted from the Oakervee Review: "Compared to improving existing lines, HS2 is not good for the environment". The rail industry condemned Lord Berkeley's conclusions    . Transport secretary Grant Shapps said he wanted more information about the scheme .

National Audit Office. The NAO published a critical report on the costs and risks of HS2. It said the complexity of the project was underestimated. Costs are ballooning. Value for money is deflating. The political uncertainty surrounding the project, especially the northern sections, will load in more costs. It is "impossible to estimate with certainty" how much HS2 will eventually cost, the auditors concluded. But it will be above £100bn    .

Heathrow

Delay. The Civil Aviation Authority rejected Heathrow's request to boost spending from £650m to £2.4bn ahead of a Development Consent Order being granted. Heathrow said the decision would delay completion of the third runway until between early 2028 and late 2029    . As a result of the decision, Heathrow will run a new eight week consultation on its plans from April. The airport confirmed that an application for a Development Consent Order will be submitted towards the end of 2020  . The airport has submitted a new business plan to the CAA promising a lowering of fares over the next decade. The plan gives two options. Opening the third runway in 2028 would cost £14bn as planned. Opening in 2029 would cost £3bn more  .

Pollution. Pollution from planes using Heathrow airport has been detected in central London, King's College researchers said   .

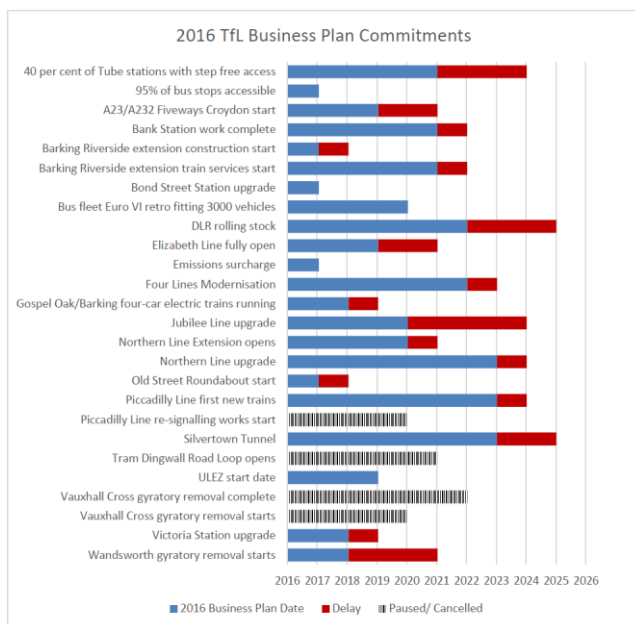
Crossrail

Crossrail. Sadiq Khan said he can guarantee Crossrail will open next year . Transport commissioner Mike Brown said the latest working assumption was that the central section of Crossrail will start operating between September and December 2021 . Crossrail trains from Maidenhead to central London may not begin until December 2022, TfL said

Crossrail 2. Sadiq Khan said the line may be delayed after money had to be diverted due to the three year delay in opening Crossrail . Nearly 80 council and business leaders from London and the South East signed a letter to the Standard urging the government to prioritise Crossrail 2 and help to tackle the housing crisis by unlocking up to 200,000 new homes . The Northern line will “simply cripple” due to “chronic overcrowding” if Crossrail 2 is not built, Assembly transport committee deputy chair Caroline Pidgeon warned . There are warnings that funding for the scheme could be affected by new investment rules expected to be introduced in the March Budget. These will prioritise investment in the North

Transport

Figure 2: Most projects dates from the 2016 Business Plan have now slipped



Infrastructure. In its official response to the Mayor’s 2020-21 budget, the Assembly criticised the infrastructure delivery record since Sadiq Khan assumed office in 2016, citing delays to 17 of 26 infrastructure projects. It said the delay to Crossrail could delay other projects further

Buses. Passenger numbers in the capital fell from 2.4bn in 2013/14 to 2.2bn in 2017/18. TravelWatch blamed the decline on lower bus speeds. It called for more bus and bike only streets, along with extension of congestion charge hours to speed up services

Active travel. Cycling UK accused the government of an abject failure to promote cycling after DfT statistics showed a drop in the number of adults cycling. In Havering, only 5.9 per cent of adults rode bicycles at least once a month in 2017-18 . TfL has released proposals for cycleways in Charlton and Woolwich

Roads. A last-ditch attempt by Hackney Council to suspend work on the Silvertown Tunnel was rejected by Greenwich Council leader Danny Thorpe . Kingston council is consulting on introducing a borough wide 20mph limit

Air quality. In a London study, researchers found higher ozone levels were linked to increased risk of preterm birth and stillbirth. Increased traffic non-exhaust PM_{2.5} (from tyres, brakes, etc.) is also linked to increased risk of preterm birth and stillbirth. Louder traffic noise is linked to risk of preterm birth . Pollution from non-exhaust particles is as damaging to health as exhaust fumes, Cambridge researchers said

Sadiq Khan urged the government to increase funding to clean up the pollution affecting the capital’s rivers. The call comes as new research revealed the extent of road run-off pollution on waterways. John Bryden from Thames21 said pollution from roads “is one of the least understood and most complex forms of river pollution,” while different sources of pollution are under the oversight of different government agencies and departments, complicating the response . London drivers could face £20 fine for leaving engines running when parked . Westminster council is to scrap coach parking bays after drivers failed to turn off idling engines. The bays outside Parliament will be replaced with electric car chargers and cycle racks. The scheme might be extended to other tourist areas in Westminster City . Merton council is to increase the cost of parking “to discourage the reliance on car use to reduce toxic pollution from vehicles”

The CPRE London eBulletin

Editorial. Views expressed are those of the editor Andy Boddington at cprenews@andybodderson.co.uk, not CPRE. **CPRE London:** 020 7253 0300, office@cprelondon.org.uk, cprelondon.org.uk.