



The countryside charity
London

Working for a greener city

Green London Bulletin

April 2020

CPRE London

A More Natural Capital. Fourteen environmental organisations including CPRE London have published a manifesto outlining the action needed in London to reduce pollution and waste, improve health and wellbeing, secure nature's recovery and increase resilience to climate change. It will form the agenda for discussions with political leaders up to the delayed local and mayoral elections in May 2021  . Neil Sinden Director of CPRE London said:

"When the time is right, we intend once again to press the candidates to commit, if elected, to supporting and delivering as many of the objectives as they can. In the meantime, we would welcome feedback on the manifesto and further ideas on how to achieve its aspirations for a healthier, greener and more liveable London."

Inappropriate MOL development. CPRE London wrote to Sadiq Khan criticising his support for redevelopment of Dulwich Hamlet Football Club Stadium. Alice Roberts criticised the Mayor's argument that acknowledged inappropriate development on Metropolitan Open Land (MOL) was acceptable because the rules of the Football Association required enclosed stadiums: "The redevelopment should not be at the expense of much used and valued natural open space, including a well-used community football pitch" .

Royal Parks. CPRE London has responded to [The Royal Parks Movement Strategy](#) consultation urging faster and bolder action to reduce the impact of cars, a more positive approach towards cyclists and a greater emphasis on London's climate, nature, air quality and inactivity/health crises .

Green Belt. New research by CPRE London reveals major threats to the Green Belt in nine boroughs . It said controls over Green Belt development must be strengthened if it is to continue to function effectively as climate changes. Alice Roberts said:

"Our Green Belt is our 'climate safety belt', promoting the development of a compact, efficient, low-carbon city and protecting us from floods and high temperatures. With more extreme weather events, our Green Belt is also now vital in managing rainfall and flooding and reducing high temperatures generated by the urban heat island effect."

CPRE London has a new look website . Staff are working from home . The 2020 AGM has been postponed until October – details to follow.

Urban Food

Five a day. Growing fruit and vegetables in just 10 per cent of city gardens and urban green spaces could provide 15 per cent of the local population with vegetables and fruit, researchers from the University of Sheffield said. Using Sheffield as a case study, they identified 11% of green infrastructure as suitable for allotments and 4% as suitable for community gardening. Flat roofs could also be used for soil free horticulture, such as hydroponics and aquaponics. If soil based horticulture was practiced in 10% of gardens and 10% of green infrastructure, alongside existing allotments, it would provide the 'five a day' for 12% of the local population. This would reduce the UK's dependency on complex international supply chains for most of its fruit and for half of its vegetables  . In a second study, Sheffield researchers found the area of land used for allotments in UK urban areas has fallen by 65 per cent over the past 50 years   .

National Holocaust Memorial

Opposition. Westminster councillors voted to oppose the Learning Centre in Victoria Tower Gardens following advice from planning officers that said the proposals would harm the World Heritage Site. However, the vote is only advisory as Robert Jenrick has called the decision in for his own decision. The UK branch of Unesco's International Council on Monuments and Sites said the memorial would cause "substantial harm" to the gardens and their contribution to the World Heritage Site. Save Victoria Tower Gardens said the scheme would strip the park of its character and turn it into the "antechamber to the Holocaust Learning Centre, a civic space with the security and loss of freedom"         .

Government support. During the planning meeting, secretary of state Robert Jenrick, whose department will decide whether the scheme can go ahead, issued a statement shortly before the decision was made .

"The government remains implacably committed to the construction of the Holocaust Memorial and Education Centre right at the heart of our democracy, beside our national parliament to ensure that future generations never forget. No one, whether in national or local government should shirk their duty to deliver on the promise of this memorial."



The National Holocaust Memorial and Learning Centre

The London Plan

Letter halts London Plan. In March, housing secretary Robert Jenrick ordered Sadiq Khan not to publish the London Plan until significant changes have been made . Jenrick's letter often strays from planning into politics. He told Khan said other mayors have done better, citing Andy Street the Conservative mayor for the West Midlands as an exemplar. "I am concerned that your Plan actively discourages ambitious boroughs" that want to build more housing. Jenrick said: "Housing in our capital is simply too important for the underachievement and drift displayed under your mayoralty, and now in your Plan, to continue." He said Khan must meet with MHCLG officials regularly and provide a quarterly report on progress. Khan must start considering the next London Plan immediately and demonstrate how this will meet the higher level and broader housing needs of London.

Green Belt. Jenrick instructs Khan to change his draft policy which states that any development which would damage the Green Belt should be refused. The policy must align with the NPPF which allows Green Belt development in "very special circumstances". Khan had supported extension of the Green Belt "where appropriate" and said its de-designation will not be supported. Instead Jenrick insists the plan should read: *"Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a local plan."*

Metropolitan Open Land. The draft London Plan had said: "Development proposals that would harm MOL should be refused." Jenrick told Khan that Green Belt policies that allow development in very special circumstances must also apply to MOL. Khan's insistence that the area of MOL should not be reduced and its quality should be improved must be deleted.

Housing. In his uncompromising letter, Jenrick accused Khan of not taken having the "tough choices necessary" to build the homes needed **PLAN:**

"Housing delivery in London under your mayoralty has been deeply disappointing, over the last three years housing delivery has averaged just 37,000 a year; falling short of the existing Plan target and well below your assessment of housing need."

Khan is "jeopardising housing delivery" and had turned down £1bn of government affordable housing funding: *"Following the Planning Inspectorate's investigation of your Plan, they only deem your Plan credible to deliver 52,000 homes a year. This is significantly below your own identified need of around 66,000 homes and well below what most commentators think is the real need of London... The shortfall between housing need in London and the homes your Plan delivers has significant consequences for Londoners."*

Jenrick accused Khan of aiming to build too many small homes and not providing enough for families, driving them out of them out of the capital when they had children. He also demanded more homes built for sale rather than for rent.

Density. Jenrick directs Khan to promote "gentle density around high streets and town centres, and higher density in clusters which have already taken this approach." Assembly Conservatives **had complained** that Khan was "declaring war on the suburbs".

Small sites policy. Jenrick said: "The lack of credibility the Panel of Inspectors were able to attribute to your small sites policies resulted in a drop in the Plan's housing requirement of 12,713 homes per year." No alternative approach to Khan's small sites policy is offered. Garden grabbing was also controversially included in the draft London Plan leading the Conservative group **to allege** "a land grab for every inch of garden in our capital". Jenrick declared the garden grabbing policy "unattractive".

Regeneration. Jenrick blames Khan for the problems at Old Park and Park Royal, where the failure to agree how regeneration would proceed with landowner Cargiant led to a loss of £325m government funding. He said that if Khan can't deliver sites like this, he will "consider all options for ensuring delivery". He calls Khan's requirement of a residents' ballot before estate regeneration is an "onerous condition" (all 13 ballots had voted in favour of regeneration ^{ISS} **HO**). Khan is instructed to give boroughs more flexibility on using designated industrial land for housing "removing the 'no net loss' requirement on existing industrial land sites whilst ensuring boroughs bring new industrial land into the supply."

The wider South East. Khan is directed to begin "producing and delivering a new strategy with authorities in the wider South East to offset unmet [London] housing need in a joined-up way."

Heathrow. Following the appeal court decision ruling that the decision on the third runway was illegal, Jenrick declined to give a direction over the policies opposing Heathrow expansion but reserved the right to do so.

Parking. There are no national parking standards for new housing but Jenrick wants more generous provision in Outer London areas. Boroughs should be allowed to make greater provision for retail parking than Khan proposes.

Reaction. City Hall responded defiantly:

"The Mayor makes no apologies for trying to deliver genuinely affordable housing in the capital while at the same time protecting and enhancing the Green Belt. The Secretary of State is trying to run roughshod over the Mayor's efforts to finalise a London Plan. London is best served by the government devolving further funding and powers to the capital to build the affordable homes it urgently needs, instead of taking this heavy-handed approach."

Neil Sinden of CPRE London wrote to Robert Jenrick supporting increasing housing but warning that his intervention would fuel threats to the Green Belt and MOL. He said London has less than two thirds of the green open space it needs for the number of people who live there: "It is vital that we retain all green space in London and do everything possible to promote the better use of previously developed land instead" .

High Speed 2

Go ahead. Ministers have given formal approval for the first phase of HS2 rail to begin providing contractors obey social distancing rules. The notices to proceed do not include the stations .

New business case. The Full Business Case for HS1 was published alongside the announcement . It said forecasts for future intercity rail passengers are now “lower than the historical growth” seen over the past 25 years. The report also said that it was “not possible to say” whether coronavirus would have a lasting impact on travel patterns which would further devalue the project. Phase 1 is expected to deliver benefits worth £1.20 for every £1 spent. The report warns that benefits could be wiped out – delivering just 70p per £1 spent – if passenger demand fell far below expected levels and wider economic impacts were discounted. Including later phases of the project, the cost benefit is £1.50 per pound, down from £2.70 four years ago.

Reaction. The Adam Smith Institute said: “We’ve got an economic crisis that’s going to cost taxpayers billions. We can’t afford vanity projects like HS2”. The Institute of Economic Affairs said:

“The economic case for HS2 was always weak. With the country in the midst of a Covid-19-induced economic downturn, the cost of this rail project is simply unjustifiable.”



Plans for Old Oak Common submitted in February .

Stations. The Oakervee review said the existing design for the Euston station was “not satisfactory”. It should be reviewed by the Department for Transport and all aspects of the station’s redevelopment should be overseen by a single organisation. That organisation “should not be HS2 Ltd” because of the complexity of the project and the lack of private investment in HS2’s plans. Oakervee recommended terminating HS2 at Euston but said Old Oak Common should be used as a “temporary base” while the final connection to Euston was “got right” .

In the courts. The high court dismissed an action brought by wildlife broadcaster Chris Packham that sought an injunction to halt HS2 to protect woodlands and wildlife . Mr Packham said he would appeal:

“In these times of climate and environmental emergency, resilience is key. Now is not the time to give up, now is the time to muster and protect what we have left.”

Heathrow and Aviation

In the courts. The High Court ruled in 2019 that it was acceptable for the government not to have taken into account the 2015 Paris Agreement – which commits the UK to introduce measures to prevent global temperatures from rising more than 1.5°C above pre-industrial levels – because it had yet to be enshrined in domestic law. The Appeal Court reversed this position in March, ruling that the transport secretary should have considered the Paris Agreement in preparing the national policy statement, which the UK adopted in the following year. It described this failure as “legally fatal” because even though the global climate change commitments were not then yet law, they still represented government policy. Following the judgment, Heathrow Airport put on hold its planning application for expansion and launched an appeal to the Supreme Court against the ruling declaring it was confident of success. The government, however, said it would not appeal .

London reaction. Ravi Govindia, leader of Wandsworth Council, said: “It’s a terrific win for the local authorities who have fought a long battle on behalf of their communities.” Sadiq Khan said: “I am delighted that the Court of Appeal has recognised that the Government cannot ignore its climate change responsibilities” . Hammersmith and Fulham leader, Stephen Cowan said: “This is a landmark result for not just for our borough, but for London, the UK and the planet” . Zac Goldsmith gave a “quite cheer” .

Flight Blight. CPRE’s Network Aviation Group commissioned a report from aviation specialist To70 . *Flight Blight: The social and environmental cost of aviation expansion* makes four proposals:

1. The UK should monitor and report at lower noise threshold levels as this better reflects people’s experience of aircraft noise.
2. Government should commission independent research into the impact of aviation noise on health.
3. The Independent Commission on Civil Aviation Noise (ICCAN) should be given statutory powers to reduce communities’ distrust of the aviation industry.
4. The government should include aviation CO₂ emissions within the net zero greenhouse gas emissions target and further aviation expansion should be ruled out on climate grounds.

CPRE London Director, Neil Sinden said the impact of noise pollution is becoming increasingly important:

“While much of the debate over aviation expansion has quite rightly focused on the climate change impacts, the more immediate impacts of noise pollution that has direct effects on human health are increasingly important. The Government’s forthcoming aviation strategy must fully address both sets of issues.”

With most flights cancelled and Heathrow using only one runway, residents in west London are enjoying a respite. UK flight numbers are down by around 90% and residents hope this will fuel demands for a permanent reduction in plane noise .

Around the Capital

Barnet. Welsh Harp residents are urging the council to refuse an application to build 41 houses on MOL at Cool Oak Lane **Tm**. Councillors have approved the second phase of redevelopment of the Grahame Park Estate in Colindale, which will see more than 2,000 homes built in blocks up to 15 storeys high **TT pbc PLAN**.



Plans for Grahame Park Estate

Bishopsgate Goodsyard. The Weavers Community Action Group wants Hackney and Tower Hamlets councils to follow the example of the **Boundary Estate**, built in 1900, and devise an alternative social housing scheme to the ten blocks proposed **Ad**.

Brent council has submitted a draft version of its local plan to the Secretary of State for examination. The Brent Green Infrastructure Strategy has not yet been published but the draft local plan commits the council to maintaining the Blue Ribbon network and developing a Green Grid for the borough. However, the draft plan calls meeting London Plan targets for greening in Barnet “challenging” **GB**. Approval has been given for 524 new homes at the junction of the River Brent and Grand Union Canal near Stonebridge Park **INS HO SH**.

Bromley. Crystal Palace Football Club has secured planning consent for a new training facility within MOL at Beckenham. The football club agreed that the proposed covered pitch “is inappropriate development” in the MOL but planners accepted that the club had set out a case for “very special circumstances” to justify approval **PLAN**.

City. After Foster + Partners launched a planning appeal for the 300-metre-high Tulip tower, Sadiq Khan asked Robert Jenrick to reject the scheme because of the harm it would cause to London’s skyline and views of the Tower of London World Heritage Site. Khan has put aside £350,000 to fight the appeal **CH bd**.

Croydon council has approved plans for one of the world’s tallest modular buildings, a 49-storey 930-unit co-living tower, after the scheme was amended in response to City Hall concerns about the quality of accommodation **Gu PLAN**.

Enfield council has approved the second phase of the Meridian Water development. This phase will host 2,300 dwellings, student flats or shared living space, and retail development. One councillor argued that social housing should be built instead of the student flats **PLAN vvs**.



Plans for Meridian Water

Greenwich. A planning inspector approved plans to build a 13-storey block next to the Greenwich Peninsula Ecology Park. Greenwich councillors had thrown out the scheme because it would overshadow the park and damage its ecology. The inspector said the habitat of areas that will be shaded by the block could be changed or moved elsewhere on the site **ES**.

Havering council rejected plans for 98 homes on green belt land in Cranham **Re**. It approved a 717-home scheme in Rainham which will deliver 41 per cent affordable housing **Re PLAN INS HO**. Rainham Steel fears that plans for 155 flats for private sale and 84 social houses adjacent to its works will force it close once the housing is built due to noise complaints **Re**.

Hounslow council has approved a development of 420 flats at 1-4 Capital Interchange Way in blocks up to 16-storeys high **BREN TIFORD**.

Kensington & Chelsea council is consulting on renewal of its park services contract for at least a decade with the aim of ensuring park maintenance becomes carbon neutral by 2030 **SH**. City Hall approved a 462-home mixed-use scheme on West Cromwell Road after the developer increased the scheme’s proposed level of affordable housing from 35 to 40 per cent **CH PLAN AJ MYL**.



Scheme for West Cromwell Road

Lambeth. The Twentieth Century Society has lambasted plans to redevelop the locally listed IBM building on London’s South Bank, dubbing them “heavy handed” and harmful to the setting of the neighbouring National Theatre **bd (120)**. Robert Jenrick has approved two towers on the Vauxhall gyratory. The towers – one 185m tall and its northern neighbour 151m – breach Lambeth council’s local plan which restricts heights in the location to 150m **bd**.



The newly approved towers (centre) at Vauxhall Cross

Lewisham. Sainsbury's has withdrawn an application to build high-rise flats on a site in New Cross Gate which TfL wants for the Bakerloo line extension . Millwall football club has released designs for an expanded stadium, including a new plaza .

Merton council rejected plans for a 456-home, 15-storey redevelopment of a Tesco superstore site in New Maldon. Going against officer advice, councillors said they were concerned about the scheme's bulk and height, along with traffic and parking impacts .



Rejected Merton scheme

Old Oak and Park Royal. Ealing council has approved plans for 55-storey and 45-storey twin towers, linked by a residential sky-bridge in the Opportunity Area. The scheme will include 702 new homes, 35% affordable, and a 159-bed hotel .

Richmond. In its response to the consultation on the draft Richmond Local Plan, CPRE London said the borough should not use Green Belt, protected Metropolitan Open Land or other valuable open green space for development. It should instead make more efficient use of land to find space for housing and commerce. The borough should reduce reliance on private cars and more closely integrate its local plan with its transport strategy . Councillors have given the provisional go-ahead for a mixed-use scheme of nearly 700 homes on the former Stag Brewery in Mortlake. They were however concerned about the loss of mature trees, air quality and pollution levels and encroachment on nearby residents . Love Mortlake said the decision-making had been "prejudicial" and announced it was taking legal advice . The decision is expected to be called in by Sadiq Khan. CPRE London wrote to Khan urging him require that the private parking proposed for the scheme is replaced by a much smaller number of car club parking spaces .



Plans for the Stag Brewery

Southwark. Deputy Mayor for Planning Jules Pipe gave the go ahead for more than 1,500 homes and a new secondary school on a former biscuit factory site. The scheme will include three acres of public and play space, with 141 new trees . Planning permission has been granted for a £1.5m revamp of the park at Dickens Square .

Tower Hamlets council has asked the High Court to review housing secretary Robert Jenrick's decision to approve the huge Westferry Printworks development on the Isle of Dogs against the advice of a planning inspector. The approval was made the day before increased community infrastructure levy charges were to come into force in the borough . Sainsbury's lost its High Court challenge to the secretary of state's refusal of permission to redevelop its Whitechapel store for housing . A planning inspector has rejected a 15-storey housing development in east London after judging the proposals to be "overbearing" and "aggressive" in their scale .

Waltham Forest has granted planning permission for a 750-home development on the site of a council-owned leisure centre .

Wandsworth council has approved the redevelopment of York Gardens and Winstanley Road to deliver 2,550 new homes, 35 per cent affordable, and a new 2.5ha public park .



York Gardens and Winstanley Road scheme

Westminster. The Times reported that the £4bn renovation of the palace of Westminster may be cancelled in favour of a £200m "quick fix". This move would save the interior of Richmond House. Historic England had warned that alterations of the Grade II* listed building would lead to substantial harm .

Covid-19

Widening the space for active travel. CPRE London is urging its members to write to councillors asking them to urge their boroughs to introduce measures to create more space for safe walking, jogging, cycling and social distancing [CPRE](#). A local initiative in Barnes has widened pavements to allow people to self-distance shop [TW](#).



Social distancing in Barnes (image: Charles Campion, JTP)

Hackney council is shortlisting streets in the borough which could be turned into car-free zones to give the residents places to exercise. Hackney Councillor, Jon Burke, said: "By creating those temporary liveable, healthy streets we could also be reducing pressure on some of our green spaces." He said he wants to "use this as a teachable moment to see what's possible around road closures" [road](#) [closures](#). TfL is looking at where pavements on red routes could be enlarged temporarily to allow people to remain safety active while maintaining social distance [g](#). The government has temporarily simplified procedures for temporary road closures [PABA](#) [T](#). The Local Government Information Unit has summarised measures around the world aimed at increasing space for social distancing [LGIU](#).

Transport. All forms of travel have plunged in urban areas. Walking, cycling and car and van journeys are all down by about three-quarters, while bus numbers have fallen by 60% [g](#). The AA predicted a permanent reduction in travel because people will have learned to use home-working technology during the crisis [PABA](#). Sadiq Khan announced that London bus travel will be free to reduce contact on buses [Evening Standard](#).

Parks. An analysis by the Guardian found the most deprived Londoners and those from BAME backgrounds would be disproportionately affected by park closures if lockdown measures were increased [g](#).

Planning. A consortium of central London developers and landlords have joined construction giants, RIBA and the LGA in calling for planning permissions to be automatically extended by two years to support the recovery of residential development in the wake of the coronavirus outbreak. Developers also want to be allowed to renegotiate S106 agreements or reduce commitments to affordable housing [bd](#) [bd](#) [PLAN PLAN PLAN](#).

Elections. The local and mayoral elections scheduled for May will now take place in May 2021.

Planning and Housing

Planning White Paper. Ministers are to consult on expansion of permitted development rights (PDR) to allow empty commercial and industrial buildings and residential blocks to be demolished for housing. The housing must be "well-designed new residential units which meet natural light standards". PDR will also apply to upwards extensions of up to two storeys for residential blocks. A Planning White Paper was planned for the spring followed by a white paper on Social Housing. It was also planning to launch a national brownfield sites map in April 2020 (see [National Planning Policy Framework](#)). Ministers aim to encourage greater building within and near to urban areas and will consult on building above stations. They will require all local planning authorities to have up-to-date local plans by December 2023 [RIBA](#) [National Planning Policy Framework](#) [T](#) [PABA](#). RIBA condemned the plans [RIBA](#).

Tall buildings. Historic England is consulting on a revised version of its Tall Buildings Advice Note. The advice makes greater emphasis on a plan led approach, including 3D-modelling to identify suitable areas for tall buildings and assess "various heights and forms of development to assess their impact on heritage assets and the historic character of places that might be affected" [HE](#).

Affordable housing. A study by Lichfields found that schemes of between 500 and 999 dwellings with a higher level of affordable housing (above 30 per cent) were built out at close to twice the rate as those with lower levels of affordable housing, once planning consents had been finalised [PABA](#).

Environment and Transport

Plastic. The North London Waste Authority (NLWA) has partnered with seven London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest – to encourage local businesses to sign up to a commitment to cut single-use plastics. An Islington street has become the first area in London to be certified a 'low plastic zone' [NLWA](#) [recycle](#) [Evening Standard](#).

Roads. Buoyed by the appeal court decision on Heathrow expansion, campaigners are discussing legal challenges to several infrastructure projects [Tran](#). Reports suggest these could include the Silverton Tunnel [ea](#). The costs of the tunnel have risen by £200m to £1.2bn [City A.M.](#) [Gu](#). A 20mph speed limit has been imposed on all TfL roads within the Congestion Charging Zone in a bid to reduce road casualties [PABA](#).

Pollution from all forms of transport has fallen across the world. An analysis by the FT shows that flights have fallen by half [FT](#). Cities around the world are seeing dramatic improvements in air quality as traffic reduces during the Covid-19 emergency [g](#).

The CPRE London eBulletin

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