

London Assembly Scrutiny: Development on derelict land

Initial comments by CPRE London

August 2005

Introduction

1. CPRE London is pleased to contribute to the Scrutiny on the redevelopment of derelict land in London. We see the regeneration of urban centres and the redevelopment of brownfield land in general as being key to the protection of the urban/rural fringe and the wider countryside throughout south-eastern England. The question as to the extent to which barriers to redeveloping derelict land contribute to the loss of greenfield land would provide almost unlimited scope for debate, but the stark reality is that, over the period from January 2001 to March 2005, an average of at least 60 hectares of greenfield land was lost to development of various kinds¹ each year. That figure is a substantial improvement on that for the previous period (1997-2000), during which the average was 105 hectares per year². This may reflect an improving policy environment, including the policies of the Mayor of London (who took office in 2001) and the LDA, and, at a national level, the publication of PPG3 - *Housing* - in 2000. Nevertheless, the loss of 60 hectares of greenfield land per year means that the problem is still a very real one, not only as a direct threat to environmental quality in London, but also in respect of the potential 'opportunity cost' that it represents for urban regeneration.

Barriers

2. There is a plethora of literature on the barriers to making derelict land available and attractive for redevelopment, in particular from the Regeneration Panel of the Royal Institution of Chartered Surveyors. The enclosed CPRE report from 2004 (*Thames Gateway - making progress*) addresses some of the key issues in this regard and offers some recommendations by which they may be addressed. Those issues include:

- the need for transport infrastructure to make derelict sites viable;
- the shortage of professional regeneration skills;
- the role of compulsory purchase;
- the need for enhanced flood defences;
- the need for the reallocation of employment land;
- the need for the rate of VAT to be harmonised between new build and refurbishment; and
- the availability of greenfield land as an alternative.

3. The Scrutiny should not overlook the scope for promoting the market-led redevelopment of derelict land through stimulating the market for housing and economic development in appropriate locations. Key factors here include:

¹ ODPM, August 2005 (permission to publish these data is pending).

² ODPM data (attached).

- the timely provision of transport infrastructure, particularly public transport infrastructure;
- good quality in the design of new urban centres and housing developments; and
- the provision of good quality public amenities and services.

4. In respect of the first of the above, a good example is the equivocation over the provision of a DLR station to serve Barking Riverside, upon which depends the development of the high density development at the South-West corner of the site. CPRE London will be pleased to provide the Scrutiny committee with further comment on the measures required in respect of each of the key factors identified above.

The greenfield option outside London

5. Urban regeneration within London is threatened by the availability of greenfield development sites beyond the London boundary but still within the London housing market (and possibly also the market for economic development). An example is the current *Thamesgate* proposal for a major housing development (comprising some 14,000 units) on greenfield Green Belt land in Thurrock, Essex. While the site in question is entirely outside the London boundary, a greenfield housing development of this magnitude is likely to undermine the marketability of previously developed urban land in London for development. The Mayor is currently considering his position with regard to this particular proposal.

6. Moreover, the principle of maintaining the integrity of the entire Metropolitan Green Belt is threatened by proposals such as *Thamesgate*, which will certainly be seen as a test case of the Government's resolve to resist pressure to relax Green Belt controls around London. If the *Thamesgate* proposal succeeds, then it may be practically impossible to avoid subsequent large scale loss of Green Belt land in and around London, with the accompanying implications for urban regeneration, environmental protection and quality of life here.

A brownfield strategy

6. Much of the derelict land in London occurs within the London Thames Gateway. Many brownfield sites in that area present significant obstacles to their redevelopment and it is not necessarily the case that sites will be brought forward at a rate commensurate with the rate at which the Government intends that new housing and other development should be delivered without encroaching on greenfield land. In the absence of convincing evidence that urban brownfield land is likely to be brought forward quickly enough, local authorities may be unable to resist unnecessary greenfield development. A clear 'brownfield land reclamation strategy', linked to the growth rates anticipated in the *London Plan*, would help in this regard and would help identify any shortcomings in the likely rate at which brownfield land is likely to be brought forward.

CPRE has urged the Government to confirm that English Partnerships, in collaboration with the RDAs, will produce a clear brownfield land reclamation strategy for the Thames Gateway, setting out:

- the rate - in terms of hectares per year - at which sites need to be brought back into use, both at the 'strategic' level and in respect of each local planning authority area;

- the likely costs of doing so, together with identified sources of funding (at a strategic and local level);
- the location of the sites requiring reclamation, highlighting the priority sites (this will probably need frequent updating);
- the agencies that will take responsibility for bringing forward each site; and
- the major obstacles to bringing forward each site, together with a range of measures required to overcome those obstacles.

7. The LDA should draw up such a strategy, which is likely to draw on the issues and initiatives identified in the National Brownfield Strategy and the LDA's subsequent Brownfield Land Action Plan³.

Policy recommendations

8. The Scrutiny is very timely in that the key regional policies that will influence the rate of redevelopment of derelict land will shortly be subject to revision through the revision of the *London Plan*. It is important, therefore, that the Scrutiny is able to emphasise the importance of that revision process and make appropriate policy recommendations for the *London Plan*. As indicated above, those recommendations may fall within several areas, including:

- the need to maintain strong policies against the development of greenfield land within London (the *London Plan* does not take an unequivocal stance against the loss of green open space that does not have a strong statutory designation);
- the need for the Mayor to take a strong stance against greenfield development beyond the London boundary but within the London market;
- the need for a clear brownfield regeneration strategy with a suitably demanding target for the regeneration and redevelopment of derelict land; and
- the need to stimulate the development market in regeneration areas by ensuring high standards of urban and architectural design and the provision of high quality amenities and public services, including public transport.

9. Where relevant, these policies need to be reflected in the LDA's Economic Strategy and Corporate Plan.

10. At a national level, the redevelopment of derelict land is threatened by the Government's current proposals - *Planning for Housing Provision*⁴ - which appear to advocate an abandonment of the sequential approach in the Growth Areas (which includes the Thames Gateway). CPRE London will be pleased to provide a detailed analysis of those proposals.

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August 2005

³ Sustainable Communities: Building for the future. ODPM, February 2003. Paragraph 4.6

⁴ Consultation paper issued by ODPM, July 2005