



Campaign to Protect  
Rural England  
LONDON

## Draft East London Sub Regional Development Framework East London

Comments by CPRE London

September 2005

***Draft Sub Regional Development Framework  
East London (May 2005)***

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**Introduction**

1. CPRE London welcomes the opportunity to comment on the Draft Sub Regional Development Framework (SRDF) for East London, and we find there is a great deal in it that is to be welcomed. In our comments below, we concentrate on the issues that are of particular concern to CPRE London, including those that are relevant to:

- § maximising the provision of new housing in London across a wide range of needs;
- § reducing the legacy of vacant brownfield land;
- § improving the design and general ‘liveability’ of residential areas;
- § avoiding the loss of green space and, especially, Green Belt land; and
- § reducing the impact that London has on the rest of south-eastern England through commuting patterns and urban out-migration.

**Brownfield development**

2. The draft SRDF states that the East Sub Region has London’s largest reservoir of brownfield land and number of Opportunity/Intensification Areas (para 29, page 13). We welcome the emphasis of focussing development on the large amount of brownfield land available in East London. The SRDF should include a clear sub-regional target for the proportion of new development – including housing and economic development - that takes place on brownfield land and we recommend that this target should be set at 100%.

3. ***A brownfield strategy*** - Many brownfield sites in East London are likely to present significant obstacles to their redevelopment. It is not necessarily the case that sites will be brought forward at a rate commensurate with the rate at which the Mayor intends that new housing and other development should be delivered without encroaching on greenfield land. In the absence of convincing evidence that urban brownfield land is likely to be brought forward quickly enough, local authorities may be unable to resist unnecessary greenfield development. A clear ‘brownfield land reclamation strategy’, linked to the growth rates anticipated in RSS and the London Plan, would help in this regard and would help identify any shortcomings in the likely rate at which brownfield land is likely to be brought forward.

4. The SRDF should identify the need for a clear brownfield land reclamation strategy for the East London Sub-Region. The strategy should be driven by the LDA in collaboration with English Partnerships and should out:

- § the rate - in terms of hectares per year - at which sites need to be brought back into use, both at the ‘strategic’ level and in respect of each local authority of UDC/LDV area;
- § the likely costs of doing so, together with identified sources of funding (at a strategic and local level);
- § the location of the sites requiring reclamation, highlighting the priority sites (this will probably need frequent updating);
- § the agencies that will take responsibility for bringing forward each site; and

§ the major obstacles to bringing forward each site, together with a range of measures required to overcome those obstacles.

5. Such a strategy is likely to draw on the issues and initiatives identified in the National Brownfield Strategy and the RDAs' subsequent Brownfield Land Action Plans<sup>1</sup>. Consistent with the capacity-based approach to development, the GLA should ensure that the strategy is capable of delivering sufficient urban brownfield land to accommodate housebuilding targets. If it does not, then either the targets should be reduced or additional financial resources sought.

#### **Links with the Wider South East (para 31, page 14 and item 7, Annex 5)**

6. The draft SRDF discusses the cross-border effects on the neighbouring regions. Addressing cross-boundary issues will require working with the East and South East Region to agree a common approach to development in East London that can also feed into their Regional Spatial Strategies. In our view, current cross-border working arrangements do not seem to be producing an adequate level of coordination at the regional level. The SRDF should propose mechanisms to improve this situation.

7. The East London Sub Region contains part of two of the Government's Sustainable Communities Growth Areas (Thames Gateway and the London-Stansted-Cambridge-Peterborough Corridor). In order to ensure a sustainable pattern of development and minimise unhelpful competition between regions, local and regional authorities should work together to develop plans and policies. Without proper co-ordination, the growth proposals are likely to have an adverse impact on the London parts of the growth areas, given the current needs for investment and regeneration there compared to the relative attractiveness for investment in the LSCP corridor. This is particularly apparent in the policy for growth generated by Stansted Airport (Policy ST4 or the draft East of England Plan<sup>1</sup>), where the 'non-direct' employment benefits generated by the airports expansion would be focused primarily on the Harlow area, with none envisaged for the Lee Valley area of London, whose need for regeneration is similar in nature but on a much greater scale.

8. Similar criticisms also apply in the case of the Thames Gateway/South Essex and 'London Arc' (including Hertfordshire) sub-regions, where there is also a lack of policy linkages across the regional boundary with London. Both areas are treated as if they were a separate entity, despite initial acknowledgement that the relationship with London is critical. The need for collaboration in policy formulation is indicated in the London Plan and the draft SRDF but much more needs to be done to build on existing initiatives such as the Interregional Planning Statement and make sure that the growth of areas in London and outside London are mutually beneficial.

9. One of the main cross-border effects is the scale of net out-migration from London to the surrounding regions. The draft SRDF says nothing about this issue. It should address it explicitly, with reference to the need to provide for the full range of housing needs, the need to improve the quality of the urban environment, and the need to ensure access to high quality public services. The SRDF should reiterate the Mayor's objective of meeting the full range of London's housing needs *within* London.

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<sup>1</sup> *Sustainable Communities: Building for the future*. ODPM, February 2003. Paragraph 4.6

10. East London has high levels of unemployment and low skills. It has the lowest level of self-containment outside Central London with 27% of the sub regional workforce coming from other parts of London and 21% from outside London. We support the measures suggested in the SRDF to address the skills deficit in the sub region, improve self-containment and lessen the impact of commuting into the sub-region from elsewhere. If London is able to meet its employment needs without requiring in-migration of skilled workers from elsewhere and without increasing commuting from surrounding areas, pressure for new housing across the whole South East of England could be reduced.

### **Housing (paras 37-45, pages 17-19)**

11. Housing mix and affordability are key to meeting the needs of Londoners and reducing out-migration. The inner part of East London is providing a lot of new, high density, affordable housing but the outer boroughs have seen falling densities in new development over the past few years. We support actions by the Mayor to require the outer boroughs to increase the density of development and provide a better housing mix to meet a wider range of needs. The need for more four-bedroom houses in inner London boroughs was identified in the 2004 Housing Requirements Study<sup>2</sup>. We recommend that the SRDF includes indicative targets illustrating the required mix as part of the London Housing Needs initiative.

12. We welcome the call for boroughs to fully reflect the need for increased densities as mentioned in proposed action 2.2, page 37. We also welcome proposed action 5A (page 65) recommending a policy for the refusal of developments that represent an under use of land. Despite past initiatives to raise awareness about the benefits of higher densities, more still needs to be done in London to break the association in many people's minds between high density and low quality housing.

13. **Residential density** - We recommend that the SRDF includes a sub-regional target for the average density of new housing development in line with the density matrix established in the *London Plan*.

14. **Affordable housing** - The draft SRDF notes that some boroughs are not providing the 50% affordable housing required by the London Plan. Provision of affordable housing in London for key workers and others in need could also help reduce the amount of out-migration from London and should help maintain the quality of public services. We therefore support the call for stronger guidance on provision of affordable housing for key workers in boroughs that are under performing.

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

16. Given that the mayor and the Government are strongly committed to greatly increasing the rate at which new housing is built, there is a risk that the quality of construction of new houses will be compromised in order to meet building targets. There may be at least two reasons for this. Firstly, as the Government accepts, there is currently a shortage of skills in the

construction industry and an expansion of the required capacity of the industry is likely to exacerbate that situation. Secondly, significant emphasis is being put on the potential for new building materials and construction techniques (including off-site manufacture) to speed up the delivery of new housing. There is a danger that new building materials and construction techniques could be adopted before their durability and suitability for purpose has been properly demonstrated *in situ*.

17. The SRDF should encourage local planning authorities (LPAs) to ensure that new developments are built to high standards of construction and use high quality materials.

#### **Release of employment land (paras 98-109, pages 32-34)**

18. The draft SRDF mentions the need for reallocation of employment land for new housing and other uses several times and calculates that 500 hectares can be reallocated by 2016 (two thirds of the amount for the whole of London). We welcome this as East London has a surplus of industrial land in strategic locations that could be used for new mixed-use developments. We support the proposed action (1G second bullet point) asking boroughs to programme the reallocation of identified land in their Local Development Frameworks and the caveats on reallocation provided by the last two bullet points of proposed action 1G.

#### **Transport (pages 47-54)**

19. Provision of new transport infrastructure and upgrading of the existing provision is crucial to the successful regeneration of East London. We welcome the majority of proposals contained in the SRDF (and Mayor's Transport Strategy) but we are disappointed to see that there is no reference to walking and cycling in the draft SRDF. Paragraph 174 refers to the 'need to manage demand for car travel' and to do so by initiatives to encourage behavioural change. This is very welcome but the SRDF could say more about what measures for achieving behavioural change will be used (such as travel planning, provision of high quality safe routes for walking and cycling, car share schemes, etc). Such initiatives, while usually small and locally focussed could, taken as a whole across the sub-region, have a significant effect and so should be included along with the large infrastructure schemes already included. This issue is of particular relevance to East London where the predicted growth in housing, jobs and population makes the need for demand management measures urgent.

20. We recommend the upgrading of proposals for the East of London and Greenwich waterfront transit schemes from a bus to a tram service.

#### **Flood risk**

21. CPRE's principle concern with regard to flood risk is that the risks should be managed responsibly so as to enable development to take place in urban areas while avoiding development outside urban areas. The increasing risk of severe tidal flooding associated with storm surge in the Thames Gateway has received a great deal of media attention, and has generated a great deal of public concern. Concern has also been expressed by the Environment Agency about the increasing risk of fluvial flooding, exacerbated by an increase in the area of land covered by impermeable surface and large areas of the defences in Kent and Essex may be in need of renewal and enhancement. The Association of British Insurers (ABI) has been particularly vocal, making it clear that the issue is real and that it could undermine the delivery of new housing in the Thames Gateway on the scale that the Government intends.

21. PPG25 - *Development and Flood Risk* requires lower flood risk areas to be prioritised above higher risk areas<sup>3</sup>. Despite the fact that this is intended to take place within the context of the sequential approach set out in PPG3, there is a risk that PPG3 may be undermined through areas of lower flood risk outside urban areas being prioritised for development in an attempt to avoid the need to enhance flood defences.

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

23. The SRDF should contain details of how the flood risk in the East London Sub-Region will be dealt with, particularly with respect to any cross-border effects with the rest of the Thames Gateway Growth Area.

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

### **Water resources**

25. Water supply resources across the whole South East of England are already stretched. Additional growth in the East of London will add to demand and cannot be met without a significant improvement in the efficiency with which water is used and a major investment programme to bring forward additional resources. The draft SRDF does not say enough about how improvement in water efficiency will be achieved. Also, proposed action 1F.1 suggests that the boroughs must work with stakeholders to identify the need for additional infrastructure but this approach is inadequate. This issue must be tackled on a sub-regional, London and pan-regional basis, since much of London's water supply comes from outside the Greater London boundary. The SRDF should include a list of requirements for additional water supply infrastructure, leakage reduction and reduction of *per capita* water use to ensure that adequate supply can be provided for the anticipated growth levels in East London. The SRDF should also make it clear that the environmental impacts of these requirements has been assessed and considered acceptable<sup>3</sup> and the plans costed and agreed with the water companies and regulatory authorities.

26. Appendix 1, below, presents a list of measures that we recommend and that can be taken, including at a national Government level, to improve the efficiency with which water resources are used.

### **The historic environment**

27. The draft SRDF barely mentions the historic environment and the need for its protection and enhancement. It should recognise that the strength of character of an area promotes social and economic benefits by helping to create a sense of place, civic pride and a sense of

belonging, and by attracting people and businesses. The Strategy recognises that culture can be a key driver in sustainable regeneration of communities and CPRE maintains that the historic environment is an important part of an area's cultural identity.

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

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

30. Nevertheless, the Government's current review of heritage protection legislation has identified a number of areas for improvement to the current system. It accepts that the historic environment '*is a contributor to overall quality of life*' and makes an important contribution to economic and community regeneration<sup>2</sup>. It accepts that its protection will be a vital part of RSS, requiring authorities to make protection a key plank in their Community Strategies<sup>3</sup>. This has provided a useful basis for the idea of a 'new kind of national park' for the Thames Gateway promoted by architect Sir Terry Farrell, with support from Demos, English Heritage and CPRE. CPRE believes this idea might best be carried forward through the establishment of a new regional park authority (see part 3 on the institutional framework). Such an authority will be able to coordinate and facilitate the delivery of the initiatives set out in *Creating sustainable communities: Greening the Gateway*<sup>4</sup>.

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

32. The SRDF should address the historic environment more thoroughly and encourage LPAs to:

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

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<sup>2</sup> ***The Historic Environment: A Force for the Future***. DCMS, 2001.

<sup>3</sup> *Review of Heritage Protection: The Way Forward*. DCMS, June 2004.

<sup>4</sup> *Creating sustainable communities: Greening the Gateway. Implementation Plan*. ODP, Feb. 2005.

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

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

34. The SRDF should encourage LPAs to:

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

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

## **IIA/SEA process**

35. We understand that an Integrated Impact Assessment (incorporating Strategic Environmental Assessment) has been performed on the draft SRDF. In order to conform to the regulations for Strategic Environmental Assessment the draft impact assessment report should have been published alongside the draft SRDF for consultation. The assessment report is not available on the GLA website. In fact, no mention of the IIA/SEA process is made. This situation should be rectified as soon as possible and the assessment report and process made public as required by the regulations<sup>4</sup>.

**CPRE London,  
September 2005**

## **Appendix 1 - PROMOTING WATER EFFICIENCY**

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

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

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<sup>1</sup> *Draft East of England Plan*, East of England Regional Assembly, November 2004.  
<http://www.eera.gov.uk/category.asp?cat=452>

<sup>2</sup> *Greater London Housing Requirements Study*, Mayor of London, December 2004.  
[http://www.london.gov.uk/mayor/housing/docs/housing\\_reqs\\_2004.pdf](http://www.london.gov.uk/mayor/housing/docs/housing_reqs_2004.pdf)

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<sup>3</sup> A sequential approach is set out in paragraph 30 and Table 1 of PPG25.

<sup>4</sup> Section 13 of *The Environmental Assessment of Plans and Programmes Regulations 2004*, HMG, July 2004.  
[http://www.odpm.gov.uk/stellent/groups/odpm\\_planning/documents/page/odpm\\_plan\\_029731.pdf](http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_029731.pdf)