

CPRE's POLICY ON REGENERATION OF THE THAMES ESTUARY

October 2018

1. This policy position statement sets out the background to CPRE's interest in regeneration of the Thames Estuaryⁱ and the principles by which we think the area should be planned over the coming decades. It represents the combined views of the CPRE Essex, CPRE Kent and CPRE London branches as well as national CPRE.

The issues

Background to the initiative

2. In recent years the economy and population of London and the wider South East have grown significantly, and Government has tended towards planning policies that continue to encourage and further increase this level of development in the future.
3. Both previous Conservative and Labour Governments have proposed major growth in the Thames Estuary area. Following work dating back as far as 1987, in 1995 regional planning guidance (RPG 9a) sought to encourage the re-use of brownfield land and safeguard and enhance natural and man-made environmental assets. The Estuary was subsequently designated as a 'Growth Area' in the Labour Government's Sustainable Communities Plan in 2003ⁱⁱ. The former Growth Area included a number of east London boroughs, Medway, and other districts within both south Essex and north west Kent. CPRE has a track record of engagement with these policies, especially through the work of CPRE Londonⁱⁱⁱ.
4. The most recent Government-appointed Thames Estuary Growth Commission has also included Canterbury and Thanet districts in north east Kent. Some of the area is economically buoyant, due to being relatively close to London and on the transport corridor to continental Europe. There are however substantial areas of deprivation, not only within east London but also in towns such as Basildon and Tilbury to the north; Dartford, Gravesend and Medway Towns to the south; and more rural areas such as the Isle of Sheppey and Thanet.

Current proposals for growth

5. In June 2018 the Commission recommended that 1 million new homes and 1.3 million new jobs should be created in this area by 2050^{iv}. The Commission also called for this growth to be serviced by a new road (the Lower Thames Crossing), and for additional rail links alongside the recent development of Crossrail and High Speed 1. The Government is due to respond formally to the Commission in the 2018 Autumn Budget.

6. It is currently unclear as to what priority national Government attaches to growth in the Thames Estuary. The earlier Sustainable Communities Plan clearly set out that the Thames Gateway was the priority for development in the wider South East, allotting a budget of £446 million over 4 years from 2003 until 2007, three times larger than the other three identified 'growth areas' put together. Existing railway passenger lines and major roads, such as the A2, are running at or near capacity. Crossrail is now being built at a cost of £14 billion and is due to open in late 2019. This spend benefits the Estuary to at least some extent. There is scope to extend Crossrail further eastward to Ebbsfleet and Gravesend. Currently Crossrail will only go as far east as Abbey Wood in south east London, however.
7. In 2017 DfT announced its preferred route for a Lower Thames Crossing running from North Ockenden in Essex to Shorne in Kent. Highways England is currently working on detailed proposals for its statutory consultation in advance of its application for a Development Consent Order for the scheme in 2019. CPRE objects to the plans as proposed, which will do little to alleviate the congestion and air pollution at the Dartford Crossings, and which make no provision for any modes of travel other than road-based vehicular movements. We support the Commission's aspiration to 'future proof' any Lower Thames Crossing with provision for rail and other modes of transport.
8. Beyond the proposed Crossing, no new package of commitments, either to further extend Crossrail or develop the Estuary more generally, has yet emerged from the current Government. It is also unclear as to whether Government endorsement of the Commission recommendations would lead to those recommendations having the weight of national planning policy in the land use planning process. This is in marked contrast to the other currently proposed growth area in the Cambridge-Milton Keynes-Oxford Arc, where the National Infrastructure Commission has made recommendations for growth. If these recommendations are endorsed then they would have the same weight as national planning policy.

Current land use in the Estuary

9. There is a significant amount of brownfield (previously developed) land in the Estuary area. Local authority brownfield land registers show the capacity of brownfield sites suitable for housing has increased to 84,880 homes in 2017. This is an increase of around 30% on previous estimates of capacity shown in the National Land Use Database up until 2012^v. CPRE has been supportive of the principle of regenerating this area since 2002 largely due to the potential it offers to make better use of such previously developed land. These figures show that this remains a significant opportunity which can both improve the local environment while providing new housing and jobs.
10. There is also an important concentration of high quality (Best and Most Versatile or BMV) farmland, and this resource needs to be recognised and robustly protected. Natural England data indicates that 16.9% of England is Grade 1 and 2 agricultural land. For Kent and Medway this rises to 29.4%, and for the 6 North Kent districts an even greater 37.4%. There are also particular concerns about water stress in many areas on the Kent side of the Estuary^{vi}.

11. Neither the Commission nor the Government, in its new method for calculating housing need, have factored in the significant constraints arising from the Green Belt, much of which is important and valued countryside. This is highlighted in the Appendix to the Commission's report - in particular, by Map 9 (Land Availability) which clearly shows the paucity of unconstrained land in South Essex, resulting from existing Green Belt boundaries, flood risk zones and various nature conservation designations.
12. Green Belt protection has played an important role in encouraging long-term management and protection from development of areas such as Rainham Marshes and the Thames Chase Community Forest. The Community Forest needs to be revived and supported to help improve native woodland cover. As well as encouraging nature conservation and tree planting, Green Belt policy is also important in safeguarding land for recreation and connecting local people with farming (for example through local food networks). There are also substantial amounts of brownfield land which are of high nature conservation value and/or remote from main urban areas, and in many cases these should also be better managed rather than developed.
13. The 'Thames Gateway Parklands' initiative^{vii}, spearheaded by Sir Terry Farrell, aims to improve the quality of the landscapes (both developed and undeveloped) of the Estuary. A number of beneficial changes have also been made as part of this initiative. However, supporting reports by Farrells show that only about 11% of the Estuary area has statutory protection for nature conservation and important sites for nature outside the Green Belt have been lost to development.

What CPRE wants to see

14. CPRE has adopted a set of principles that set out our policy position and campaigning priorities on the Thames Estuary. We want to see the Government follow these principles in its response to the Commission.
 - **Regeneration of suitable brownfield sites within existing towns in the Estuary should be re-established as the main priority for meeting the growth needs of London, alongside other brownfield land in Greater London itself.** Some progress has been made since 2002 in regenerating brownfield sites for new housing, particularly within the inner urban London boroughs in the Estuary area. As figures in the brownfield land registers show, there is also still plenty of brownfield land available and suitable for housing development within the urban settlements of the Estuary beyond London. Many of these settlements need continued investment to address deprivation and lack of skills in the current workforce. Green Belt protection continues to play an important role in reducing the scope for less sustainable greenfield options, and is an incentive to focus investment on urban brownfield sites instead. Such investment would often be a far better use of public money in relative terms than investing in growth in areas like the Cambridge-Milton Keynes-Oxford Arc, an area where housing growth would more likely lead to significant countryside loss, more road building, air pollution and car dependency, and where the economy is already far more buoyant.
 - **The landscapes of the Thames Estuary need to be better understood and managed through the planning process.** We do not believe that the Commission's recommended level of growth can be achieved without significant environmental

damage, both within and beyond the Green Belt, and there are major concerns about potential widespread loss of Best and Most Versatile (BMV) agricultural land. There should be a continued commitment to permanence of the Green Belt designation in line with current policy. Nature conservation interest on brownfield sites should also be properly understood and nurtured as part of the wider ecological network for the Estuary.

CPRE believes that the Estuary would benefit from the establishment of a Regional Park along similar lines, and with similar powers, to the Authority in the Lee Valley, which adjoins the Estuary to the north west. A new Authority could enforce and co-ordinate environmental protection and improvement, alongside regeneration and renewal, in particular encouraging nature conservation, landscape restoration, sustainable farming, and public access. The Lee Valley funding model, derived from a levy on local authorities, would also be more economically and environmentally sustainable than attempting to fund landscape improvements through planning gain from greenfield development^{viii}.

- **In housing, the main priority should be providing mixed communities with substantial amounts of affordable housing, supported by a genuine choice of transport modes.** The scale of development proposed by the Commission is well above what has been achieved in the Estuary in recent years. Recent rates of new housing development in the Estuary have run at about 10,000 a year, only about half that envisaged in current local plans and less than a third of the rate proposed by both the Commission and in the Government's new standard method for calculating housing need. To provide some context on this, all five of the South Essex local authorities and the County Council have agreed a joint target of 100,700 new homes together with the creation of 58,000 jobs by 2050.

It is also questionable as to whether such a rate of growth can be realistic in the light of recent and expected levels of job creation within the Estuary. In practice we are concerned that most of the job creation will be within London, and that areas further out in the Estuary will struggle to attract the jobs to match an exponential increase in housebuilding.

The Government's Letwin Review of Build Out has highlighted the need to build new housing for a range of markets in order to significantly boost completion rates. We want development on brownfield land in the principal urban areas to be prioritised, but equally critically local needs for affordable housing should be met, rather than housing being simply sold at the highest possible market prices. There are concerns that the recent regeneration of the inner London areas in particular have provided insufficient levels of affordable housing.

Where peripheral development is needed it should be outside the Green Belt and in the form of urban extensions where possible. It should also be designed to use land efficiently, be integrated with the public transport network and take account of landscape character. High quality design that responds well to the area's historic character is important to creating new places that people will want to live, and there is scope to learn from design good practice in recent developments such as at the Greenwich Peninsula. Large custom build schemes such as those regularly developed in continental Europe could also be encouraged.

- **Sustainable transport at all levels should be supported and prioritised over new road-building.** If major growth in the Estuary is to continue, significant investment in the area's public transport, walking and cycling, is needed. As CPRE's [policy on transport](#) states, we need to manage our existing road network better, rather than expanding it. We would therefore prefer investment in the Estuary's railway network, such as an extension to Crossrail, to be prioritised over the building of a Lower Thames road crossing.
- **There needs to be wide-scale public engagement and consultation on the overall growth proposals,** allowing alternative options to be considered before any policy decisions are made. We believe that there should urgently be a full Parliamentary Select Committee Inquiry into the proposals, to look at the potential impact on both the local environment and on the economies of more deprived regions in England (see below). Once such an inquiry has made recommendations, any proposals for development should be taken forward through local strategic plans.
- **The Government should have a far more transparent and consultative strategy for sharing prosperity across England, and within the wider South East.** The Estuary needs a significant degree of continued investment in order to create new places where people want to live (see above), but it has also benefitted from substantial recent investment already through major infrastructure schemes such as Crossrail and High Speed 1. The future development of the Estuary should be considered as part of a wider strategy alongside, for example, the need to improve rail links within the Midlands and northern regions.

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ⁱ The following local authorities are considered part of the Thames Estuary:

Basildon, Castle Point, Rochford, Southend-on-Sea, Thurrock (in the CPRE branch area of Essex); Canterbury, Dartford, Gravesham, Medway, Swale, and Thanet (covered by CPRE Kent); Barking & Dagenham, Bexley, Greenwich, Havering, Lewisham and Tower Hamlets (covered by CPRE London).

ⁱⁱ RPG9a, *The Thames Gateway Planning Framework*, 1995:

<http://webarchive.nationalarchives.gov.uk/20100519214233/http://www.communities.gov.uk/documents/thamesgateway/pdf/147561.pdf>. The Sustainable Communities Plan (2003) can be found at http://webarchive.nationalarchives.gov.uk/20060502112921/http://www.odpm.gov.uk/pub/872/SustainableCommunitiesBuildingfortheFutureMaindocumentPDF2121Kb_id1139872.pdf

ⁱⁱⁱ For a good summary of the policy approach of CPRE to the Thames Gateway initiative see the 2005 report http://www.cprelondon.org.uk/images/Thames_Ggateway-from_rhetoric_to_reality.pdf and other information available on the CPRE London website.

^{iv} Thames Estuary 2050 Growth Commission, *2050 Vision*, June 2018.

^v CPRE analysis of brownfield land registers and National Land Use Database returns produced by Thames Estuary local authorities, January 2018.

^{vi} Environment Agency and Natural Resources Wales, *Water stressed areas - final classification*, July 2013.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

^{vii} <https://farrells.com/wp-content/uploads/2017/08/Thames-Gateway-Parklands.pdf>

^{viii} For a more detailed discussion of the Lee Valley Regional Park see CPRE, *Nature Conservation and Recreational Opportunities in the Green Belt*, December 2016.