

### **Open and Green**

**Biodiversity**. Allotments, weedy corners and fancy gardens are all urban havens for bees and other pollinators **g**. Small wild and semi-wild areas in cities have been mostly stripped of their value to wildlife by over-intensive grounds management by councils **Q**.

**Triangle 4th go.** Tower Hamlets council is making a fourth attempt to build a tower block on a nature reserve on a next to the Regent's Canal. The Limehouse Triangle was created as a biodiversity project funded by the council two decades ago. Cllr Andrew Wood said: "It's mad to propose building on green space that we own. It sends a signal to developers that it's okay to for them to build on green space as well" Ad.

Parks. Five Haringey parks were given "red flags" by Keep Britain Tidy. Two had their green flag status restored [ND]. Ilford North MP Wes Streeting said he will ask the government to call in a plan to house more than 90 homeless families in two Hainault parks R.E.



Plans for temporary homes in Hainault

Metropolitan open land in Whitton is under threat after the government bought the land and submitted a planning application to relocate Turing House Free School onto the site. The 6.5-hectare site was last used as grazing land and is adjacent to the local recreation ground. Richmond council has rejected brownfield alternatives, probably on cost grounds. CPRE London is among groups leading calls to oppose the plans

Blots on the landscape. Defence minister Tobias Ellwood said the Army will work to repair damage to Woolwich Common 853. Save Lea Marshes is seeking votes for its inaugural Green Blot Award for the "biggest crime" against open green spaces in Waltham Forest and Hackney in 2018 ...

**Festival**. Over 80 people attended CPRE London's mini-film festival held jointly with the London Friends of Green Spaces Network. It featured the work of Parks Friends Groups №.

### Metropolitan Green Belt Threatened

Strategic authority needed. An analysis by the London Green Belt Council (LGBC) found that the number of new homes planned on the metropolitan green belt has almost doubled in two years to more than 200,000. Of 66 local authorities with land in the metropolitan green belt, 55 have have proposed to allocate green belt land for development – a total of 519 potential housing sites. The LGBC said councils should prioritise the 4,934 hectares of brownfield land under their control, enough for 260,000 houses. It called on the government to create a Strategic London Green Belt Authority to protect the land

## **Around the Capital**

City. The proposed 305-metre high Tulip skyscraper would contravene the London Plan because it was not free for visitors and would harm protected views of the Tower of London. City planners also questioned the "highly distinctive design" saying it would "appear incongruous" said its height was unjustified. Historic Royal Palaces also objected bd. A design competition for a string of miniature landscaped parklets has been announced by the London Festival of Architecture and the City bd LFM. Winter gardens, green walls and terraces are planned up the full height of a 21-storey tower on Creechurch Lane bd. Planners are recommending approval of redevelopment of 1-2 Broadgate after a certificate of immunity was granted to prevent listing of the 20th century offices. English Heritage wanted them listed as Grade II\*. The office, retail and leisure complex will feature roof gardens and terraces bd. The City has published new images of how the city will look if all existing consents are built look if all existing consents are built bd. See page 3 for the City Plan 2036.



The City skyline in 2026

**Croydon** council is consulting on introducing an Article 4 direction to remove permitted development rights for Houses in Multiple Occupation (HMOs) in the borough . A developer is a launch a high court challenge to a decision by James Brokenshire to reject plans for a 17-storey tower in Purley.

**Enfield.** As the council consults on its local plan, Enfield Racial Equality Council said building in areas that are already densely populated could put more strain on transport and other public services. "We have got two choices: either use some of the green belt scrub land, or we have to go up again and build high-rise buildings better than we did in the 1960s and 70s" lind.

#### Planning and Environmental News from CPRE London

Greenwich council has added 45 structures to its local heritage list . Greenwich & Woolwich MP Matt Pennycook has criticised proposals for development on Charlton Riverside. The chair of Greenwich council's planning committee called it "reminiscent of Stalingrad".

Hackney council has approved taking over swathe of Shoreditch Park as part of its plan to construct a new Britannia leisure centre, a move opposed by CPRE London and local campaigners [167]. Sadiq Khan has pledged £1.5 million to improve Ridley Road Market Ga.

Hammersmith and Fulham. Volunteers planted 150 trees in Margravine Cemetery in Barons Court

Haringey council's cabinet has agreed to include the Pinkham Way site next to the North Circular Road as the borough's contribution to the North London Waste Plan (NLWP). The Pinkham Way Alliance said the cabinet had ignored a submission from Natural England: "It comments that the Pinkham Way site 'has formed a rich, biodiverse mix of habitats which will be a loss to Haringey and more widely to London itself, if developed" in the loss of the loss

Havering. A planning application has been submitted to demolish Chapmans Farm in Upminster and build nine houses on green belt land. The Upminster and Cranham Residents Association said: "While there is a need for affordable housing in our borough, the development of nine 'unaffordable' luxury houses on green belt land is not the answer. Our green belt is a valuable community asset and any encroachment will be vigorously resisted" R.

**Hounslow**. Residents are concerned about light pollution from plans for floodlighting of a sports pitch at Brentford School for Girls ...

**Islington**. Plans for a new workplace building at Tileyard Studios have been submitted bd. The council is to continue its restrictions on permitted development rights ≱.

Kensington & Chelsea. Plans to redevelop the Sutton Estate with 343 new homes, 270 of them for social rent were rejected by James Brokenshire. He said the proposal failed to comply with the no net loss of affordable homes policy in the local plan plan how how be.

**Lambeth** councillors rejected concerns about the impact on the Westminster World Heritage Site when they approved two towers of 41 and 32 storeys on the Vauxhall gyratory and bus station **bd bd**.

**Newham**. Plans for the first phase of the Thameside West scheme have been submitted. The scheme will include 460 mixed-tenure homes and 35,000sq ft of workspace on the site of a former Carlsberg Brewery bd.



**Plans for Riverside West** 

**Richmond**. A Stakeholder Reference Group of residents and a Design Panel have been set up to work alongside the council to help shape the future of Twickenham Riverside. A controversial scheme to develop the area was scrapped last summer Ric (4).

Southwark. Developer Meadow Residential is preparing a new planning application for a stadium for Dulwich Hamlet Football Club at Champion Hill together with over 230 homes. It says there will be no new buildings on metropolitan open land . Plans have been submitted for a 37-storey office tower next to the Shard. The 144m tower will include a 250-seat auditorium and terrace on its 21st and 22nd floors. A double-height public garden will be built within the building on the fifth and sixth floors bd. Historic England warned Southwark Council of its concern about the piecemeal development of skyscrapers on Old Kent Road. It complained the council does not have a policy for tall building development in the area set.

**Tower Hamlets**. Disused railway arches at Millwall Park could be converted into cafes and community space to attract more people to the park Ad.

**Bishopsgate Goodsyard**. A revised plan will now contain 450 flats, up from 250 proposed last year. It well under the 1,356 units set out originally and still below the 500 requested by Hackney planners **bd bd**.

**Wandsworth**. A sustainable and organic street food project is to install three "cubes" to serve food outside Southside Shopping precinct. Made from upcycled shipping containers, the StreetCubes will source sustainable food from within 100 miles .



A StreetCube

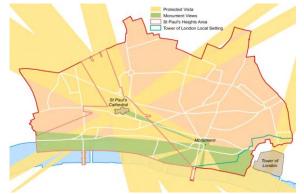
**Westminster**. Communities secretary James Brokenshire announced that the government had applied for planning permission for the controversial holocaust memorial in Victoria Gardens. He said: "I understand that there has been some concern on the chosen location, but equally we are clear that this is the right place for such a memorial" . Two new stands have been approved at Lord's Cricket Ground increasing capacity by 2,500 bd. From February, residents will be allowed to speak at planning committee meetings and more applications will be decided by officers rather than councillors bd. Westminster council has been awarded £1 million from City Hall to improve Church Street. The project will provide new affordable work and community space, revitalise an underused public space and refresh public toilet facilities . In a sign of the pressures facing London housing market from overseas investors, the South China Morning Post is promoting the Church Street scheme as an investment opportunity ...

### City Plan 2036

Consultation. The City is consulting on its local plan for the next twenty years. Closes 28 February. The plan requires a greening element for new buildings such as a planted wall or sedum roof. It wants to close the gap between the Walkie Talkie and the eastern cluster of towers. Pedestrians will be prioritised and the public realm improved with artworks and new walking routes through major developments. Open spaces will provide more play opportunities. There will be more trees and soft landscaping in the public realm to promote biodiversity and "where feasible linking up existing green spaces and routes to provide green corridors."

"New tall buildings will be required to enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space or other facilities at upper levels, available at no charge."

Telephone boxes will be removed unless of heritage interest. Other goals include a Zero Waste City and outer-city consolidation centres for deliveries. Protected and monument views, the St Paul's Heights Area and the Tower of London Local Setting will be maintained.



Protected views and areas in the City

### Housing

Affordable housing. Sadiq Khan launched a £38m fund for community-led social housing . Planning lawyers advised that if developers worked across more than one site, they could chooose where to locate affordable housing if a borough agreed . Analysis of dwelling stock by the London Tenants Federation shows that estate demolition has not increased social rented housing in the capital compared to 2001. Its borough by borough comparison identifies Southwark as the worst with 10% less social housing than in 2001 and Brent as the best with a 17% increase

Permitted rights. The RTPI warned that permitted development rights (PDR) for high streets and height extensions "fly in the face of democracy" and put quality and affordability at risk . CPRE was among 15 signatories of an open letter to James Brokenshire saying PDR jeopardised both housing affordability and quality. PDR have also led to 10,000 fewer affordable homes being built. The signatories are calling for an independent review of PDR . High streets minister Jake Berry said he wanted to extend PDR to allow takeaways to be converted to housing without planning permission.

# Heritage and Culture

Culture. Sadiq Khan announced the creation of six Creative Enterprise Zones to counteract the erosion of the capital's creative industries by high rents, low pay and lack of opportunity . The National Portrait Gallery is to create a new main entrance . A concert hall, the Centre for Music, is planned for the former Museum of London site in the Barbican .



Plans for the Centre for Music

### **Transport and Environment**

High Speed 2. Former chair Sir Terry Morgan said no one knew the final cost of the project. He also argued the line should terminate at Old Oak Common not Euston in the first phase of the project T. HS2 Ltd has delayed appointing contractors for Old Oak Common and Euston stations T. Images have been released of a proposed vent shaft for the line Dd.



Proposed HS2 vent shaft at Euston

#### Planning and Environmental News from CPRE London

Rail and tube. There is a 20% risk that Crossrail will exceed its newly approved £17.6bn budget [17]. Transport for London said it was disappointed with the rate of progress in completing the tunnels [18]. The House of Commons Library has published a briefing on the options for Crossrail 2 [18]. The Northern Line extension to Battersea has been delayed by a year to

Cycling. Sadiq Khan launched an Action Plan to double levels of cycling in the capital over the next six years, including the introduction of a Cycling Infrastructure Database and the rebranding of Cycle Superhighways and Quietways under a single, unified name. There will be more Mini Hollands and safer junctions IN Dice 3.

**Roads.** The contract award for the £1bn Silvertown Tunnel has been delayed by five months, moving the opening date from 2023 to 2024 Rev. R.E.

**Infrastructure**. Future transport projects in London could be undermined if politicians fail to engage with the public, engineering company AECOM warned **TN**.

Aviation policy. The government has published the Aviation Strategy Green Paper for consultation. It is strongly pro-growth and sets out how the government intends to support both more intensive use of existing airport capacity and develop a new framework for considering the case for further runway expansion, in addition to the third runway at Heathrow

### **Air Quality**

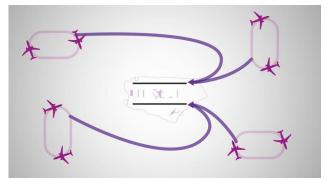
Cleaner air? The government published its Clean Air Strategy which includes measures to prohibit the sale of the most polluting fuels for woodburning stoves and open fires, but no proposals for transport (Th. Caroline Russell AM said: "If the Government is serious about tackling air pollution it should not be pressing ahead with a third runway at Heathrow" Green campaigners condemned the plan as "underwhelming" and a "failed opportunity". They complained it had a "transport shaped hole" (They complained it had a "transport shaped hole") (They complained it had a "transport

**Air pollution**. Sadiq Khan declared a "public health emergency" over London's air pollution stan. Google Earth has equipped two Street View cars with air quality sensors. These will record pollution readings every 30 metres at tens of thousands of locations and build up a picture of London's air quality over the course of a year will said the mayor's air quality plan, including introducing the Ultra Low Emission Zone in April, will substantially reduce NO2 pollution in the poorer areas of the capital work airq Pollution in tube stations 30 times higher than beside busy roads in capital **g**. Sadiq Khan announced a £23 million scrappage scheme to help micro-businesses purchase electric vans . The Real Urban Emissions (True) Initiative claimed the capital's black taxis are 30 times more polluting than cars. Sadiq Khan said this "damning report" highlights why we need to accelerate uptake of electric taxis 🔊 🚟 💗. HS2 is to insist all HGVs engaged in construction meet Euro VI low emission standards. Cars and vans must meet the standard by 2020 **II**. Hounslow is proposing to charge between £500 and £1,000 a year per workplace parking space, raising up to £3.8 million annually ......

### **London Airports**

**Aviation noise.** The Assembly environment committee published a report on aircraft noise over the capital **3** Commendations are:

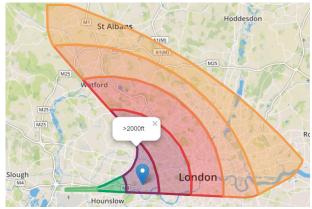
- The Independent Commission on Civil Aviation Noise should use lower thresholds for disturbance.
- Flights at Heathrow and City airports should not grow
- Heathrow's third runway should not go ahead.
- Air traffic controllers should minimise continuous stacking and maximise descent and ascent to keep aircraft further from the ground for longer.



Proposed parallel operation at Heathrow

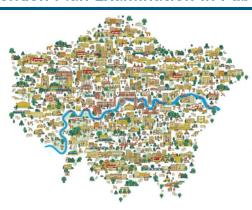
Parallel approaches. Heathrow is planning to increase flights by 25,000 a year before the third runway is built – an extra 68 take offs and landings a day. The move would require the cap on 480,000 flights a year to be lifted to allow a 5.2% increase in movements. The airport will operate take off and landings from the two runways in parallel with a reduced separation between planes guided by satellite data. Some new flightpaths will overfly areas that currently are not affected by Heathrow arrivals. The airport wants to alternate its flightpaths to give some residential areas a break from overhead flights but the plan will cut respite over parts of west London. It is consulting on both this scheme and flightpaths for the third runway until the end of March

Reaction. Gareth Roberts, leader of Richmond council, said 25,000 extra flights would be disastrous for the borough Ric. Chiswick residents complained that the airport was not holding a consultation in their area which could be overflown up to 47 times an hour W4. Teddington Action Group published a detailed briefing on aviation air pollution Action Group published a detailed briefing on aviation air pollution Action Group published a detailed briefing on aviation air pollution Action Group published a detailed briefing on aviation air pollution Action Group published a detailed briefing on aviation air pollution Action Group published a detailed briefing on aviation air pollution Action Group published a detailed briefing on aviation air pollution Action Group But Group Grou



Proposed height of flights with marker on Chiswick High Street

#### London Plan Examination in Public



Good growth. CPRE London welcomed the plan's commitment to good growth. It said the policy on growing a good economy should give explicit recognition to improving the quality of the urban environment as a foundation for economic success. The policy on creating a healthy city should recognise the importance of improving the quality of green space, as well as increased access and provision, for health outcomes. Friends of the Earth said: "It is doubtful whether the level of growth proposed is either achievable or sustainable."

Regeneration. The Environment Agency warned that the plans for Opportunity Areas needed a stronger assessment of flood risk. The New Policy Institute said Opportunity Area development must "reduce spatial inequalities and lower environmental, economic and social barriers." Historic England said the plan does not properly consider the impact of development on historic assets and their settings. It added: "The historic environment can often act as a catalyst for regeneration."

**Green belt protection**. The London Assembly and CPRE London said that green belt locations have very poor access to public transport. CPRE added:

"We do not believe that recent levels of economic growth or public spending on infrastructure in London can be maintained. In such circumstances, the building of major new settlements or urban extensions in the Green Belt will be neither affordable, necessary or desirable."

#### It continued:

"We believe [policies] should be strengthened by a requirement to enforce a presumption against the loss of Green Belt through active intervention by the GLA to resist the release of Green Belt land for development which is currently being considered by a number of outer London boroughs."

Friends of the Earth and Just Space supported the strongest green belt protection.

**Green belt review**. Buckinghamshire district councils, Thames Valley LEP, East of England Local Government Association and South East Councils said the London Plan should consider a green belt boundary review. The Home Builders Federation agreed:

"A more reliable strategy to accommodate London's housing needs would involve a review of London's Green Belt."

London First said the draft plan is inconsistent with the NPPF because it does not allow changes to the green belt boundary in exceptional circumstances or for land swaps. Real Estate Company CBRE said:

"It is unclear how the necessary growth is expected to be delivered at a Borough level, if Boroughs are not permitted to review their Green Belt... Boroughs should be encouraged through the spatial strategy to comprehensively assess their Green Belt and MOL."

The Borough of Enfield said "it is not sensible" to rule a green belt review out, an approach supported by Newham and Kingston. Wandsworth said: "The consideration of Green Belt land for potential development purposes would not undermine the priority to be given to brownfield sites." Merton College said Barnet, Enfield, Kingston, Hounslow, Havering and Sutton are considering or undertaking reviews of green belt or metropolitan open land. It said Redbridge has already released green belt land for housing.

#### Metropolitan open land. CPRE London said:

"It is important that intensification is accompanied by strong protection of existing green spaces within built up areas, whether or not they are designated as Metropolitan Open Land (MOL), and the provision of new green infrastructure, including through the proposed new urban greening factor, particularly in areas which are deficient in green space."

Just Space said: "We strongly oppose any diminution in protections for Metropolitan Open Land as they constitute a crucial element in London's sustainability and residents' well-being." CPRE London said the continued expansion of London's population predicted in the plan should be accompanied by new green infrastructure. It said the plan should support a Great Thames Park, as well as to the development of new regional parks in green belt areas around the city.

Communities. Just Space said before the EiP : "We have become increasingly alarmed for the future of London as an inclusive city. The new Plan wants significantly more market-led housing and intensification but it seems to ignore the effect it will have on a large chunk of London's citizens."

Just Space said that the proposed plan gives virtually no recognition to neighbourhood planning. Footwork Architects called for greater attention to social and community context in the early stages of planning proposals. Peckham Vision made similar points. The London Forum of Amenity and Civic Societies said the plan should aim for walkable neighbourhoods and said "residents should feel comfortable with scale and nature of local changes and that new developments make their neighbourhood a desirable place to be." The New Policy Institute said planning guidance should set out minimum criteria for social infrastructure to meet the needs of London's diverse communities of.

#### Planning and Environmental News from CPRE London

Housing. The Home Builders Federation said there is no guarantee that 66,000 dwellings per annum can be delivered each year until 2041 or that boroughs can deliver. London First said the plan is over-reliant on small sites for achieving housing targets. Kington council it said does not believe the small sites policy will deliver the number of homes anticipated. Several other developers and their presentative expressed doubt whether the housebuilding targets in the draft plan could be achieved. CPRE London said the proposed target for affordable housing should be raised to 60%. The Adam Smith Institute called for minimum space standards to be removed from the new London Plan .

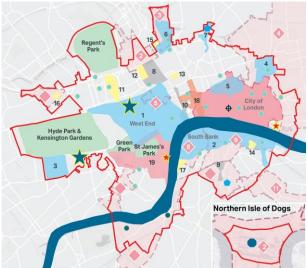
**Neighbourhoods**. Neighbourhood Planners London criticised the draft plan for straying into areas that are not strategic. It said policies on protection of allotments, the urban greening factor, food growing and small-scale allocations on "low quality" green belt sites should be set at borough and neighbourhood level. CPRE London also said a greater emphasis should be given to neighbourhood plans. It called for a change in wording to emphasise the need for the form and layout of location to reflect and enhance local character, historic environment and distinctiveness. It said:

"It is also important that the diverse and distinctive character of London's local areas is safeguarded in promoting urban intensification... Overall the draft Plan gives insufficient consideration to the protection and enhancement of this diverse local character... There is a risk that future development will erode the distinctive character of existing neighbourhoods by creating homogenous 'anywhere' places."

#### Just Space said:

"Plans to prioritise housing and intensify town centres threatens valued social and community infrastructure and assets, jobs and especially local and ethnic businesses, existing affordable housing and a valuable social and public space for vulnerable Londoners... We vehemently oppose the extension of Central Activity Zone functions at the expense of existing residential neighbourhoods, especially where this entails valuable social housing being lost, as in Elephant and Castle."

Friends of the Earth joined Just Space in supporting Lifetime Neighbourhoods.



The Central Activities Zone (CAZ)

Sustainability. The London Sustainability Commission said the plan "would be much more effective and coherent if sustainability requirements were picked up and enforced throughout the Plan, rather than the current structure which attempts to address sustainability in a single chapter." It said there is a paucity of references to design and there should be explicit reference to Old Oak and Park Royal as a cluster for environmental enterprise. Friends of the Earth called for a stronger environmental focus in the plan. CPRE London said:

"There should be a more ambitious approach to realising the land use benefits of achieving the Mayor's target of 80% of journeys to be by active or sustainable modes by 2041. Modal shift on this scale will result in the release of considerable amounts of land – we call it 'grey space' – currently devoted to the use of the private car, including extensive areas of surface car parking, land-hungry roundabouts and excessively wide highways."

Spatial strategy. CPRE London said development should be concentrated in Greater London, a relatively low-density capital. It warned the plan's building requirements will prove to be unrealistically high and build out of existing permissions will be slower than envisioned. That could lead to pressure on green belt sites rather than the necessary focus on brownfield. Friends of the Earth said London needed to be seen in the wider context of the UK and "measures are urgently required to rebalance the economy and foster sustainable patterns of development with a focus on reducing commuting, prioritising regeneration." Just Space said: "the strong intensification of developments close to transport nodes, and the destruction of local businesses, amenities and services is NOT producing a sustainable city or minimizing the need to travel, but is in fact creating a stronger need to travel."

The South East. CPRE London said developing outside the capital to accommodate London commuters, including in the East West Arc between Oxford and Cambridge, would "be environmentally very damaging and a diversion from helping to regenerate other areas of the country." The Home Builders Federation said development across the wider South East would "be sensible" but there was no support for this among local authorities. A response from South East council leaders said: "London's bus, tube and cycle networks surpass provision outside London, and therefore accommodating London's housing need within its boundary is the more sustainable option." A consortium of developers represented by Barton Wilmore said councils across the South East should be required to address London's unmet housing need. The housing ministry (MHCLG) said London should work more closely with South East councils on housing need and the green belt.

#### The CPRE London eBulletin

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