



Campaign to Protect
Rural England
LONDON

Draft Alterations to the London Plan (Spatial Development Strategy for Greater London): Housing Provision Targets, Waste and Minerals (October 2005)

Comments by CPRE London

Summary

1. The Mayor should, through the revisions to the London Plan:
 - adopt the proposed target of 31,090 additional dwellings per year;
 - adopt a policy to reduce the target if it transpires that it exceeds the capacity of previously developed urban land;
 - adopt a policy that boroughs should identify appropriate proportions of new housing that should be of particular sizes and establish appropriate targets against which actual provision should be monitored;
 - adopt the remainder of the policy amendments proposed in the consultation document in respect of housing provision;
 - adopt a more cautious approach to the concept of regional self-sufficiency in waste management and disposal; and
 - explain the difference between waste management and waste disposal and set out separately the land requirements for each, and for landfill in London in particular.

Housing provision targets

2. **Policy 3A.1:** CPRE London strongly supports the Mayor's intention to increase the amount of new housing being built in London. More and better housing in London could make a substantial contribution to reducing the need for urban sprawl throughout south-eastern England. We support the proposed target of 31,090 additional dwellings per year. That support is, however, conditional on the understanding that this can be achieved without loss of greenfield land in the Green Belt or Metropolitan Open Land, and without causing a net loss of other green open space in London that has significant biodiversity or amenity value. The London Plan should make it clear that, if it transpires that the new target cannot be attained within these constraints, then the target will be reduced before loss of greenfield land is incurred.

3. However, it is important that the total housing stock in London closely matches the range of needs in respect of house sizes (the London Housing Strategy recognises this issue in respect of subsidised affordable housing). In some parts of London, for example, the market appears to

favour smaller dwellings at the expense of family housing with gardens. This may be a significant factor in the scale of out-migration of economically active young people from London, undermining London's economic well-being, adding to pressure on commuter routes and adding to development pressure elsewhere in south-eastern England. We therefore recommend that Policy 3A1 is complemented by a policy that boroughs should identify appropriate proportions of new housing that should be of particular sizes and establish appropriate targets against which actual provision should be monitored.

4. We support the remainder of the proposed changes set out in Policy 3A.2 and paragraphs 3.9 to 3.15.

Planning for waste

5. We support the Mayor's aim of moving towards greater regional self-sufficiency in waste management and we hope that this objective would add momentum to efforts to reduce the amount of waste requiring disposal in London or elsewhere. Indeed, we support the Mayor's policy of encouraging the Government to increase its targets for recycling and composting municipal waste (it is already technically possible to recycle almost all waste).

6. We are concerned, however, that an excessive emphasis on regional self-sufficiency at the expense of other considerations may lead to poor choices in the location of waste management facilities in London. If taken too far, such a policy could lead to an unnecessary concentration of new waste management facilities within the London Green Belt while spare capacity or more suitable alternative sites exist elsewhere. The Foreword to the consultation document is far too bluntly worded in this regard and, while not necessarily reflecting accurately the content of the proposals, it is nevertheless a cause for concern:

'We cannot continue to export our waste to neighbouring regions. We must deal with our own waste here, in London.'

7. This is not an appropriate policy, if indeed it is the policy. London is fundamentally different from the other regions of the UK:

- i. We recognise that all regions have difficulty finding sites suitable for waste disposal facilities (especially landfill), but London is almost entirely urbanised and therefore has very much less choice of locations. It cannot be reasonable to apply such a policy identically to a region which is 90% rural and to one which is 90% urban.
- ii. A substantial proportion of London's waste arisings is generated by people who come into London on a daily basis but are resident elsewhere. It is questionable whether the definition of 'regional self-sufficiency' for London should extend to a requirement to dispose of the waste generated by people who are not resident within the London Region (especially given that they do not necessarily contribute to the costs of that disposal by London's waste disposal authorities).

8. However, PPS10 - *Planning for Sustainable Waste Management* - is helpful in this regard. As the consultation document points out, according to PPS10, waste should be disposed of in '*one of the nearest appropriate installations*'. That wording does not preclude the possibility of crossing a regional boundary in order to reach the '*nearest appropriate installation*' and the London Plan should recognise that flexibility.

9. Policy 4A.1 suggests that 75% should be 'managed' within London. This wording appears to allow the possibility that, so long as the waste is 'managed' - i.e. treated in some way such as through incineration or sorting for recycling - before leaving London, then there is no limit to the proportion that may be exported for *disposal* elsewhere. Indeed, the preamble to Policy 4A.1 suggest that 'treatment' within London, followed by export to another region for final disposal is consistent with total regional self-sufficiency in London. The London Plan should be explicit about the proportion of waste arisings in London that should be finally disposed of (as opposed to 'managed') within London.

10. Moreover, nowhere in the draft modified policies nor in the supporting text is any indication given as to whether any additional land or new site within London is anticipated as being required for landfill specifically. The London Plan should be clear as to whether new landfill capacity is required in London and, if so, what broad location is proposed.

CPRE London
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