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Sadiq Khan (Mayor of London)

New London Plan

GLA City Hall

London Plan Team

Via Email

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Dear Mayor

London Plan Consultation – Policy SI10

I wish to make a representations on the London Plan on behalf of the London Aggregates Working Party (LAWP) principally about the policy on aggregates (SI10). The Working Party also wishes to comment on other policies (SI15, T7) that address infrastructure issues involved in aggregate supply.

The London Aggregates Working Party (LAWP), comprises representatives from the aggregates industry, the Greater London Authority, the London Boroughs, Port of London Authority, and Crown Estate. It is tasked with monitoring aggregate supply in the London and accordingly advises local authorities and Government on aggregate policy. Aggregates are an essential component of the construction sector including housing, regeneration projects and infrastructure. As such, a steady and adequate supply of aggregates underpin the objectives of the London Plan.

The LAWP supports the London Plan's approach to aggregates (SI10), but wishes to make some observations on particular points relating to the following policies. Suggested rewording of the policy wording is included.

Aggregates SI10 (A)

The overall thrust of this policy is welcomed as it provides the strategic context for the main components of the supply of aggregates to London. However, the reference in (1) to 'encouraging re-use and recycling construction, demolition and excavation waste ...' (CDE waste) should reference 'recycled aggregate'. Moreover, the details on targets would be better placed in SI10(B) while the 95% recycling target for CDE waste is entirely misplaced as this is a waste planning matter.

It is noted the target in (A) for recycled aggregate has been reduced to 50% of CDE waste from the 90% target in the existing Plan. Even so this is still a challenge as the target is very much higher than the current recycled aggregate estimates as reported to LAWP last year in the Aggregates Monitoring report 2016 (AM 2016). This estimated recycled aggregate production in 2016 as between 12% and 25% of CDE waste. Moreover, the data on recycled aggregate production and indeed CDE waste processing is very unreliable, which presents issues for monitoring targets, as LAWP has found in conducting the annual Aggregate Monitoring surveys.

It is further queried whether there is capacity within the Capital to process all the arisings of CDE waste. The estimates produced by SLR in 2017 for the GLA (see London Plan – Waste Forecasts and Apportionments) indicate that by 2041 arisings will be between 9.75 and 13 million tonnes per year and this would require a significant amount of land to process. Currently a large proportion of this waste is exported to neighbouring counties and whether the processing of all this material within London is feasible is not stated. It is noted that the policy's supporting text (9.10.5) notes that quarries could be used for CDE waste processing. It is appreciated there are opportunities for site recycling operations with major construction projects and possibly elsewhere. However, these present limited opportunities.

An alternative approach, as recommended by SLR, would be to not state 'targets' or 'apportionment'. The data on CDE waste in London is hitherto unreliable so the monitoring of a target-based policy is problematical. Instead there is some sense in the SLR recommendation to focus the policy wording more on local plans promoting and identifying sites for recycled aggregate facilities in association with mineral operations and major construction sites. Moreover, it should be acknowledged by the London Plan, in the supporting text, that London will continue to be dependent on sites outside the Capital for producing recycled aggregate from CDE waste.

Accordingly, it is recommended that SI10 (A) be revised thus (NB the deletions):

A. An adequate supply of aggregates to support construction in London will be achieved by:

- 1. encouraging re-use and recycling of construction, demolition and excavation waste as recycled aggregate within London**
- 2. extracting land-won aggregates within London**
- 3. importing aggregates to London by sustainable transport modes**
- ~~4. meeting the target of 95 per cent recycling/re-use of construction, demolition and excavation waste by 2020 and recycling 50 per cent of that waste as aggregates by 2020~~**

Aggregates SI10 (B)

This aspect of SI10 is welcomed in principle as a continuation of the current framework. However, the opportunity should be taken to expand it to set out the requirements for the other components of aggregate supply. SI10 currently makes no provision for aggregate wharf and depot and recycled aggregate facilities.

With regard to land-won aggregates it should be noted that this 'apportionment' has not been achieved in recent years as the table below (based on AM 2016 data) indicates.

	Apportion' (Total)	Apportion' (Annual)	Sales 2016	Av (3 yr.) Sales	Av. (10yr) Sales	Landbank (years)
Havering	1.75	0.25	c	0.126	NA	5.8
Redbridge	0.7	0.125	c	0	NA	0.1
Hillingdon	1.75	0.25	c	0.217	NA	2.3
Hounslow	0.7	0.125	c	0	NA	0
London	5	0.7	0.35	0.34	0.56	2

(figs in tonnes millions)

However, recent permissions and some evidence of potential capacity indicates the landbank could be achieved in the short to medium term. However, the policy's soundness does depend on its deliverability until 2041. The proposed London landbank equates to 17 million tonnes of sand and gravel (approximately 5.5mt. each for Havering and Hillingdon and 3mt. each for Hounslow and Redbridge) over the whole plan period. Whether the resource in the four Boroughs could sustain this is not explained. As of the end of 2016, reserves for London were 1.3 million tonnes with about further five million tonnes approved or pending approval since that date. Accordingly, a further 10 million tonnes over the plan period needs to be identified in local mineral plans. It would be helpful if the supporting text stated the overall tonnage requirement for each borough as well as the annual production expected to be provided across London.

As this part of the policy sets out the provision of aggregate it should include statements on the provision of other facilities. The reference to CDE waste recycling would be better not include targets as discussed above, but be supportive of the production of recycled aggregate.

Accordingly, it is recommended that SI10 (B) be revised thus (NB the deletions and insertions in red):

B. Development Plans should:

- (a) **make provision for the maintenance of a landbank (i.e. seven years' supply) of at least five million tonnes of land-won**

aggregates up to 2041, in particular through a landbank apportionment of:

1. at least 1.75 mt to London Borough of Havering
 2. at least 0.7 mt to London Borough of Redbridge
 3. at least 1.75 mt to London Borough of Hillingdon
 4. at least 0.7 mt to London Borough of Hounslow.
- (b) ensure sufficient capacity of aggregate wharves and aggregate rail depots is maintained/expanded to ensure a steady and adequate supply of imported and marine aggregates to London.
- (c) support the production of recycled aggregate and where practicable expand capacity at/or: adjacent to aggregate wharves and rail depots; quarries during their operational life; within/or adjacent to major construction projects and; other suitable locations.

Aggregates SI10 (C)

A policy safeguarding aggregate resources is welcomed. However, the reference to aggregate recycling here is confusing as safeguarding resources and safeguarding aggregate infrastructure are separate issues. The latter is addressed in the recommended revised SI10 (D2) below and moreover in T7 (C) to which there should be a cross reference in the supporting text.

A further problem with the effective operation of aggregate infrastructure is subsequent development of sensitive development land uses in their vicinity. Accordingly, the 'Agent of Change' principle, referred to in Policy SI15 (H) and paragraph 9.15.6 is welcomed although it should be applied not only to safeguarded wharves, but extended to apply to rail depots and rail links, and other minerals infrastructure eg concrete batching and asphalt plants, that should also be safeguarded in line with NPPF para 143.

Accordingly, it is recommended that SI10 (C) be revised thus (NB the deletions and insertions in red):

C. All Mineral Planning Authorities in London should identify and safeguard in Development Plans:

1. sand and gravel resources from development that would otherwise sterilise future potential extraction
2. existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials along with existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material (as required by NPPF para 143)

Aggregates SI10 (D)

The latter part of (D2) above refers to minimising road movements that would be best included with the supporting text

On the other hand, there are merits in the inclusion within this policy of a requirement for the imposition of conditions relating to ongoing amenity, environmental and traffic impacts that are peculiar associated with operational mineral developments as set out in SI15

D. To reduce the environmental impact of aggregates facilities, Development Plans should:

- 1. ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction, with particular emphasis on promoting green infrastructure, especially biodiversity**
- 2. ~~safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution and/or processing to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.~~
ensure planning conditions are imposed on aggregate facilities to so that noise, dust and traffic impacts are effectively controlled.**
- 3 Ensure new development in proximity to safeguarded sites are designed to avoid and mitigate potential conflicts, in line with the Agent of Change principle.**

Aggregates SI10 Supporting Text

With regarding to the supporting text there are some further points:

9.10.2: This text about needs to be expanded to illustrate the total tonnage of 17 million tonnes sand and gravel required over the period to 2041 and that of each of the aggregate producing boroughs. Alternatively, there should be least an explanation of the landbank being least 7 years supply (0.7mtpa) as the current wording is open to differing interpretations.

9.10.4: Reference to minimising road movement in D2 would be better placed here. There should also be an explanation that associated with safeguarding is the impact of redevelopment of neighbouring land on safeguarded sites as set out in SI15. A justification for supporting the expansion of these facilities in appropriate circumstances should be added as the Capital will become increasingly dependent on imports and marine aggregates

9.10.5: The reference to depots needs clarification. Is it rail depots/ rail heads or other aggregate facilities e.g. recycled aggregate facilities, concrete

batching plants? Suggested locations for the latter are in the recommended revised policy and an explanation would be helpful. Although there are merits for using former quarries for recycled aggregate production the invariable Green Belt location of London quarries is an impediment to achieving this beyond the life of the quarry. There should be an acknowledgement that maximising recycled aggregate production from London's CDE waste will depend, in part, on facilities in neighbouring mineral planning authority areas.

9.10.6: It is unclear which of the boroughs should still be producing Local Aggregate Assessments (LAA). Under the present London Plan it is only the four sand and gravel producing boroughs that are not covered by a joint LAA. The proposed wording implies others with 'aggregate facilities' would have to prepare a LAA. Indeed, all the London Boroughs are required by the NPPF to prepare a LAA, singly or jointly. An option could be that one joint LAA is prepared for all of London in partnership with the boroughs and jointly funded by all the parties.

It is hoped the comments are helpful and the Secretary is prepared to attend the EiP if the Inspector wishes aggregates to be discussed.

Yours sincerely,

Richard Read
LAWP Technical Secretary