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Date: 02 March 2018

Sadiq Khan (Mayor of London)  
New London Plan  
GLA City Hall  
London Plan Team  
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London SE1 2AA

Submitted by email only:  
[londonplan@london.gov.uk](mailto:londonplan@london.gov.uk)

Dear Sir/ Madam,

## REPRESENTATIONS ON BEHALF OF AGGREGATE INDUSTRIES UK LTD TO THE DRAFT NEW LONDON PLAN (ISSUED FOR CONSULTATION DECEMBER 2017)

### 1. Introduction and Context

We are instructed by Aggregate Industries UK Ltd (AI) to submit representations to the Draft New London Plan, which was issued for consultation on 1 December 2017.

Aggregate Industries are at the frontline of the construction and infrastructure industries, producing and supplying an array of construction materials. With over 330 sites and more than 4100 dedicated employees, they produce everything from aggregates, asphalt, ready-mixed concrete and precast concrete products. AI also produce, import and supply materials for cement and offer national road surfacing and contracting services. Within London AI import significant amounts of material via their safeguarded wharf and railhead sites. These sites also tend to accommodate and co-locate a range of associated mineral plant/infrastructure including for the purposes of concrete batching, operated under the name London Concrete, asphalt production and minerals recycling.

To assist in understanding the AI sites and operations within London, a 'Site Overview for London Plan' document has been produced by AI and is attached at Document 1. This in particular highlights the significant issues the operator has had in protecting their operations and sites.

### DOCUMENT 1

The issues highlighted by the AI case studies are notwithstanding the fact that a number of these sites are expressly safeguarded by a variety of different policy designations including safeguarded wharf status, current London Plan provisions, express local plan designations as minerals railheads and/or SIL. Other sites are not expressly safeguarded despite the clear requirements of the NPPF with regards to safeguarding of these type of sites with the intent of facilitating the sustainable use of minerals. Indeed, the NPPF expressly requires, at Para 143, bullet point 4, in the preparation of local plans, that local planning authorities should:

*-safeguard existing planned and potential rail heads, wharfage and associated storage, handling and processing facilities for bulk transport by rail and inland waterways of minerals;*

*safeguard existing, planned and potential sites for concrete batching, the manufacture of coated materials and other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate.*

Notwithstanding, the current protective policy context for these kind of sites and related minerals infrastructure (minerals plant) they are increasingly under threat particularly by the encroachment of incompatible land uses and/or not appropriately safeguarded at local plan level or during consideration of planning applications.

A recently published report from the Mineral Products Association (MPA) 'Safeguarding London's Wharves and Rail Depots for future Prosperity and Sustainability' (November 2017) assists in detailing why these railhead and wharf sites, and associated infrastructure, are so critically important to London and the serious threats that these sites face if they are not appropriately protected and safeguarded by the planning system.

As underscored by the accompanying MPA press release to their Report the contribution minerals related wharf and rail sites make to London and the need to safeguard them is critical:

- *London needs 10 million tonnes of sand, gravel and crushed rock every year to build, maintain and improve housing, buildings and infrastructure. Without an effective supply chain delivering around 30,000 tonnes every single day, construction in the capital city would become increasingly restricted.*
- *97% of these raw materials are transported into London by river and rail and are delivered to wharves and rail depots that handle these aggregates for onward distribution across the capital.*
- *The use of the water and rail freight to deliver materials to the heart of the city reduces the need for long distance lorry movements, with every aggregates train the equivalent of 75 lorries and every dredger the equivalent of 250 lorries.*
- *The supply chain for these materials is being increasingly threatened by other types of development, especially housing, adjacent to wharves and rail depots which can lead to restrictions being put on site operations. Once lost these strategically important sites won't be replaced, cutting off sustainable supplies of the raw materials that feeds construction in London*
- *Effective safeguarding of these sites, together with manufacturing facilities such as concrete batching plants and asphalt plants, is critical to the delivery of the London Plan and Mayor's transport, environmental and air quality strategies.*

It is relevant to note that outside of London, where the mineral planning authority (MPA) will generally comprise the County Council it is extremely common place to see express identification and safeguarding within the minerals plan of mineral wharves, railheads and associated mineral infrastructure/plant. Indeed, that safeguarding often involves the identification of Minerals Infrastructure Consultation Areas (around wharves, railheads and plant) which can extend up to 250 m from the boundary of the site where applications which could compromise the operation of these facilities require the MPA to be consulted so that they have the opportunity to consider whether the development proposed would lead to unacceptable sterilisation of the mineral infrastructure.

The above well established approach to protecting minerals infrastructure outside of London underscores the point that for safeguarding of wharf and rail sites and associated minerals infrastructure to work effectively that it must be able to work in a twofold manner. It must seek to protect safeguarded sites for

particular uses (i.e. those which make use of the wharf and rail head for transporting goods and materials and associated facilities) **as well as** ensure that surrounding development does not prejudice the use of such sites for its safeguarded purpose.

As such AI, as a key minerals operator within London, are very keen to ensure that every opportunity is taken to ensuring a robust safeguarding policy approach is adopted within the London Plan which is fully reflective of NPPF requirement and which will provide effective and clear guidance to local planning authorities both in producing their own plans and in determining planning applications. On this basis AI very much welcome the opportunity to comment on the London Plan Consultation Draft.

It is noted that we are aware that the Port of London Authority are also preparing representations to the London Plan with particular emphasis on safeguarded wharves considerations, amongst other things. We have liaised with the PLA in the preparation of the comments now made on behalf of AI and confirm our support for the submissions made by the PLA to the consultation draft – a number of which have been picked up within this submission.

## **2. Representations to Relevant Draft London Plan Policies**

On behalf of AI the draft policies and supporting text relating to safeguarded wharves and railheads within the Draft London Plan are generally welcomed. In light of the matters detailed above we have identified areas where it is recommended that the policies should be amended to ensure they are robust and maximise the prospect that they will effectively safeguard these types of sites and operations and to ensure that they are consistent with the requirements of the NPPF, and therefore sound. The key focus of our representations therefore lie with the following draft policies:

- Policy SI10: Aggregates;
- Policy SI15: Water Transport;
- Policy D12: Agent of Change

To ensure consistency and conformity, and to avoid inconsistencies between plan policies, and derived from the suggested amendments to the above policies, related comments and suggested amendments have also been made to the following draft policies:

- Policy D13: - Noise;
- Policy E4: - Land for Industry, logistics and services to support London's economic function;
- Policy E5: - Strategic Industrial Land;
- Policy E7: - Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function;
- Policy GG5: - Growing a Good Economy
- Policy T7: - Freight and servicing;

For ease of reference the policies are dealt with in accordance with the above order. For recommended amendments additional proposed text is shown as **underlined** and text to be removed is shown **~~struck-through~~**.

### **Draft Policy SI10, Aggregates, and Supporting Text**

As per the current corresponding London Plan Policy 5.20, Aggregates, and supporting paragraph 5.94 the supporting text to draft Policy SI10 should specifically confirm that Boroughs must safeguard both existing, planned and potential sites for all the uses and activities identified for safeguarding in paragraph 142 of the NPPF. Ideally this should be referenced in the policy, with the supporting text providing further clarification.

The following amendments are recommended:

## **Policy SI10 Aggregates**

- C. All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans for the full range of uses and activities identified for safeguarding in paragraph 143 of the NPPF and including aggregate recycling.
- D. To reduce the environmental impacts of aggregates, Development Plans should
  - 1) ensure that .....
  - 2) safeguard wharves and/or railheads with existing or potential capacity for aggregates distribution and/or processing and/or associated minerals plant to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.

Supporting Para 9.10.14

**Boroughs should protect existing, planned and potential sites for aggregate extraction, aggregate processing and other associated mineral plant and transportation and specifically for all the uses and activities identified for safeguarding in paragraph 143 of the NPPF. Existing and future wharf capacity is essential, especially for transporting marine-dredged aggregates, and should be protected in accordance with Policy SI15 Water transport. Equally important are railway depots for importing crushed rock from other parts of the UK, as well as receiving sand and gravel, the majority of which is marine dredged and landed at wharves either within Greater London or Kent. Railheads are vital to the sustainable movement of aggregates and boroughs should protect them”.**

## **Draft Policy SI15, Water Transport, and Supporting Text**

Policy SI15 and the supporting text, which will replace Policy 7.26 of the Adopted London Plan, is broadly welcomed but would benefit from further clarification and amendment particularly to make it consistent with the NPPF and therefore sound. It is confirmed that we concur with many of the PLA’s suggested amendments to this policy, and in line with the PLA’s representations, the following amendment to this policy are proposed:

- C. ~~Development proposals to facilitate an increase in the amount of freight transported by river should be supported~~ **that seek to maximise the amount of freight transported by water will be supported.**
- D. The Mayor will keep the network of safeguarded wharves under regular review. **Until the Safeguarding Direction in respect of a wharf is removed or amended, the Safeguarded Wharf policy and relevant Safeguarding Direction remains in full force.** Boroughs should protect existing locations and identify new locations for additional waterborne freight. There may be opportunities to consolidate wharves as part of strategic land use change, in particular, within Opportunity Areas; these will need to ensure that the existing and potential capacity and operability of the safeguarded wharves is retained and where possible expanded.

- E. **Safeguarded wharves should only be used for waterborne freight handling use, including associated storage, handling and processing facilities and associated plant and consolidation centres. The redevelopment of safeguarded wharves for other.....**
- F. **Development proposals which ~~increase~~ maximise the use of Safeguarded Wharves for waterborne freight transport, especially on vacant wharves and wharves which are currently not handling freight by water, will be supported.**
- G. **Development proposals ~~that include the provision of a water freight use on a Safeguarded Wharf, with other land uses above or alongside,~~ will need for other uses on part of a Safeguarded Wharf site must show through the viability testing criteria that the area identified is unviable for waterborne freight handling use. The design of the development must then will ensure that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced, and that the development does not constrain future flexibility of the Safeguarded Wharf to accommodate different operational requirements now and into the future.**
- H. **Development proposals adjacent to ~~or~~, opposite or located in close proximity to Safeguarded Wharves (including vacant wharves) should be designed to ~~minimise~~ ensure there are no conflicts of use and disturbance, in line with the Agent of Change principle. Development proposals near to vacant or underutilised safeguarded site should include a noise assessment that assesses a reasonable worst case scenario for the use of the wharf and assumes the wharf is in full operation to its maximum potential.**

The following additional new supporting text and amendments to supporting text to Policy SI15 are recommended in line with the proposed amendments to the Policy:

Supporting para 9.15.5

“Many of London’s river freight wharves are located in areas of high demand and high value for other land uses. A network of wharves is protected from redevelopment by Safeguarding Directions. The Mayor will regularly review wharf safeguarding to ensure the changing need for waterborne freight is addressed. Until a review is finalised and the Safeguarding Directions are removed or amended, the safeguarded wharf policy and Safeguarding Directions remain in full force. The capacities identified in the safeguarded wharves review must be used as the starting point for establishing the capacity of a wharf, including vacant wharves.”

New supporting para (insert after 9.15.5)

Safeguarded wharves undertake on-site storage, handling, processing and production activities, which include concrete batching , asphalt and other types of plant, in association with the use of the wharf for waterborne freight handling. These activities are generally considered to be critical to the economic viability of both the Safeguarded Wharf itself and also the maximisation of the use of the river for transport. Development proposals that include these will be encouraged, particularly where their provision on site can reduce the need for unsustainable transport movements or multi-site handling processes.

Paragraph 9.15.9

Many wharves are in Opportunity Areas and/or are increasingly surrounded by different land uses that do not have an industrial or freight purpose. In line with the Agent of Change principle, new development next to or, opposite or in close proximity to wharves should utilise the site layout, building orientation, uses and materials to design out potential conflicts. Development proposals near to, opposite or in close proximity to a vacant or underutilised Safeguarded Wharf should include a noise assessment that assesses a reasonable worst case scenario for the use of the wharf and assumes the wharf is in full operation to its maximum potential. Design mitigations could include the provision of fixed shut windows and winter gardens on elevations facing Safeguarded Wharves. Proposals for neighbouring development sites must ensure that appropriate highway access to wharves for commercial vehicles is maintained.

With specific reference to the proposed changes at part (H) of policy SI15 and paragraph 9.15.9 it is highlighted that there is strong case to support the setting of a minimum distance from safeguarded wharves within which new noise sensitive development would be expressly required to have regard to the inter-relationship with the wharf. This is a commonly the case in County Mineral Plans outside of London. It is recommended that consideration be given to the potential for this. At minimum the Policy and text should be clear that development in close proximity to the wharf, not just adjacent or opposite, has the potential to prejudice the operation of Wharves and should fall under the remit of this policy.

It is confirmed that we are in agreement with the PLA with regard to their identification that the definition of Safeguarded Wharves at Annex 3 is factually incorrect. To ensure the robustness of proposed policy SI15, Annex 3 must be amended to remove references to the Safeguarded Wharves Review 2017/2018.

### **Draft Policy D12, Agent of Change and Supporting Text**

The introduction of the 'Agent of Change' principle is welcomed and makes a good start in recognising and addressing issues which operators on both wharf, rail and other industrial sites within London have been grappling with in the context of safeguarding their existing and future operations from encroaching noise sensitive development.

We concur with the PLA's stance, as set out within their representations, that the policy should be more specific regarding the correct approach that boroughs should take when determining planning applications for new noise-sensitive development near operational safeguarded wharves or vacant or under-utilised safeguarded wharves. This same approach must also be applied to railheads and to other industrial locations accommodating mineral plant. This is particularly to ensure that there is no inconsistency with the NPPF requirement to safeguarded existing, planned and potential sites and uses in respect both of wharves and rail sites and as reflected in draft policies SI15 and SI10. In addition to ensure there is no inconsistency with draft policy E5, Strategic Industrial Locations, which similarly requires boroughs in their development plans to develop local policies to protect and intensify the function of SILs and the requirement that development proposals within or adjacent SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24 hour basis.

From the operator perspective, and their experience in seeking to defend their sites and operations within London, it is key that mitigation measures within new development around safeguarded sites are robustly considered at an early stage, and that local planning authorities are satisfied with these measures before planning permission is granted. This is to avoid mitigation being considered as an afterthought at conditions

stage. It is also critical that regard be had to the fact that the operation of the site could be expanded or intensified as encouraged by Policies SI15, SI10 and E5.

On this basis the following amendments to Policy D12 are proposed:

- B. **Boroughs should ensure that planning decisions reflect the Agent of Change principle and take account of existing noise-generating uses and land use designations, including safeguarded wharves, railheads and SIL and their potential for expansion and intensification, in a sensitive manner when new development, particularly residential, is proposed nearby. Where new noise sensitive development is proposed near to a vacant or under-utilised safeguarded wharf, railhead or SIL designated site, the Agent of Change principle should be taken into account by neighbouring development proposals to ensure the safeguarded site is not prevented from being fully utilised for its intended use.**

Paragraph 3.12.7:

Noise impact assessments accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the noise characteristics of existing uses can be properly captured and assessed. For example, cultural venues can have peaks of noise at different times of the day and night and on different days of the week, and many SIL areas and industrial activities at safeguarded wharves and railheads operate on a 24 hours a day, 7 days a week basis. ~~and~~ Boroughs should require a noise impact assessment to take this into **full** consideration. Such assessment should be progressed in full consultation with the operator of the noise generating site and should be evidence in the planning application submission. Boroughs should pay close attention to the assumptions made and methods used in noise impact assessments to ensure a full and accurate assessment”.

A new paragraph should be inserted following paragraph 3.12.17:

Where a site is safeguarded for an industrial use, including Safeguarded Wharves, railheads and waste sites, the Agent of Change principle applies to adjacent development proposals even if the site is currently vacant or under-utilised. Development proposals near to a vacant or under-utilised safeguarded site should include a noise assessment that assesses a reasonable worst case scenario for the use of the safeguarded site and assumes the safeguarded site is in full operation to its maximum potential.

### **Draft London Plan Policy D13, Noise**

Policy D13 must ensure that it appropriately reflects and is in conformity with the requirements of the agent of change policy. Suggested amended wording is proposed on this basis:

**A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:**

- 1) **avoiding significant...**



- 2) ~~reflecting~~ according with the Agent of Change principle in particular to ensure measures do not add unduly to the costs and administrative burdens on existing noise generating uses. New development must take account of existing noise-generating uses and land use designations, including safeguarded wharves, railheads and SIL and their potential for expansion and intensification,

Paragraph 3.13.2:

The Agent of Change Principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the new development. Through the application of this principle existing land uses should not be ~~unduly~~ impacted by the introduction of new noise-sensitive uses. For certain sites, however, such as safeguarded Wharves, railheads and SIL sites regard must additionally be had to not prejudicing the intensification or expansion of activities at these locations.

### **Draft Policy E4, Land for Industry, Logistics and Services**

Draft Policy E4 is broadly supported, subject to some minor amendment and additions so that it is consistent with other provisions in the draft London Plan and the NPPF and ensure that where release of such sites occurs it does not prejudice the future use of nearby land retained for these purposes.

Policy E4

- E Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

Boroughs should ensure that any releases do not result in the proliferation of sensitive uses around retained industrial land or access routes, and must not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities, in line with Policy E5, Part E.

### **Draft Policy E5, Strategic Industrial Land**

Draft Policy E5, is supported, subject to some minor amendment and additions so that it is consistent with other provisions in the draft London Plan and the NPPF.

Part E to be expanded to ensure that adequate protection is applied not only to on-site industrial operations, but also along access routes so that vehicular movements essential to industrial/logistical operations are not compromised by new developments.

*“E Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs or along key access routes to them should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.”*



## **Draft Policy E7, Intensification, co-location and substitution of land for industry, logistics and services.**

There is no objection in principle to Draft Policy E7 and the intensification of industrial land but there is concern with regard to this including mixed use or residential development in LSIS or on non-designated industrial sites, as provided by part (c) and (d) of this policy. Many sites such as this will abut designated SIL sites and indeed safeguarded wharves, and/or railhead locations and sites accommodating minerals plant. This policy approach can only be supported under the provisions of Part E of the draft policy which must be retained in full and would benefit from further clarification as follows:

- E The processes set out at Parts B, C and D above must ensure that:**
- 1) the industrial uses....**
  - 2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Sites are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7 day/24 hour access and operational requirements. In line with Policy E5, Strategic Industrial Locations, Part E, and with Agent of Change principles, Policy D12 and having regard to Policies SI10, Aggregates and SI15 Water Transport.**

Supporting text to the policy should also be clear that wharves, railheads and mineral plant are not appropriate for consideration for substitution outside of London. These sites and infrastructure are critically required within London to sustainably service the construction industry and as expressed by a range of other policies in the Plan, and the NPPF, are to be expressly safeguarded for those purposes. In the event that these are unavoidably threatened relocation within the vicinity should be the only option considered. For avoidance of doubt supporting para 6.7.5 should be amended as follows

**There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital. There may be scope for some substitution of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including, for example, on business supply chains, labour markets, pollution and congestion. Safeguarded wharves, railheads and mineral plant are not considered appropriate for substitution outside of the capital, due to the established locational factors that define why these sites are safeguarded/protected in London and in line with the specific safeguarding requirements of Policy SI10, Aggregates and SI15, Water Transport.**

## **Draft Policy GG5, Growing a Good Economy**

In accordance with the amendments recommended above, it is considered that amendments to Draft Policy GG5 are warranted further underpinning the critical contribution that industrial sites make to London's economic success. The following amendments are recommended.

**To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:**

- C Plan for sufficient high quality employment and industrial space in the right locations to support economic development and regeneration, and continue to**

safeguard vital industrial infrastructure including wharves, railheads, mineral plant waste and aggregate sites.

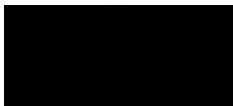
## **Draft Policy T7, Freight and Servicing**

Draft Policy T7 is supported particularly with regard to the specific requirement at Part C that: *wharves and railheads for the distribution of aggregates should be safeguarded in line with Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI15 Water Infrastructure.*

## **Conclusions**

As is clear from the submission made there are a range of interlinked policies which AI would be keen to see amended and/or clarified to ensure that the key sites they operate within London and which are critical to sustainably servicing the construction industry and development in the Capital are appropriately protected. AI would be very keen to review their submissions further with the GLA and would be very happy to arrange a meeting at the appropriate time. In the meantime we would be grateful for your confirmation of receipt of these representations and confirmation that they have been duly made.

Yours faithfully



VILNA WALSH  
Director

cc. Jo Baker - Aggregate Industries



# Aggregate Industries Site overview for London Plan

Joanne Baker, Estate Manager South East  
March 2018



# Unloading Railheads and Asphalt & Concrete Operations Within Greater London

## Unloading Railheads

- Acton
- Bow – Two separate sites – London Concrete and London Aggregates
- Greenwich (Angerstein Wharf)
- Ferme Park Sidings, Hornsey
- Wembley (Neasden)

## London Concrete Operations at

- Day Group's Battersea Rail Depot
- Day Group's Brentford Rail Depot
- Day Group's Purley Rail Depot
- Day Group's Tolworth Rail Depot
- Sipson Quarry, Harlington

## Key Threats and Challenges

In spite of strong national and London Plan policies safeguarding wharves, rail depots and related plant, these policies are not always implemented or applied effectively or reflected at local plan level. This can, amongst other things, lead to incompatible development close to wharf and rail locations which can put pressure on and limit the operation of these facilities.

If wharf and rail depots sites are lost, there is very limited if any opportunity to replace them and the ability to supply the London construction market in the most sustainable manner will be permanently gone.

The following case studies highlight our experience as a key operator in London and the issues and challenges we have had in seeking to protect our sites and operations.







# Acton, Horn Lane, LB Ealing, West London

## Uses

### Main Yard

- Drystone depot - Bottom discharge rail discharge system
- Day's operate a bagging plant at the site
- Receives limestone from Somerset, granite from the Isle of Grain.
- Operates as a handling agent for Cemex and Hanson, receiving their aggregate for on going distribution to Cemex (limestone from Dove Holes) and Hanson (limestone from Whatley Quarry, Somerset)
- London Aggregates sales and distribution office

### Western Yard

- Drystone depot – grab discharge – granite rail ballast and limestone
- Waste Management Site – recycling of spent rail ballast from London Underground and inert waste recycling to create recycled aggregate.

## Throughput

- Circa 500,000 tonnes per annum of aggregate

## Safeguarding and other Relevant Designations

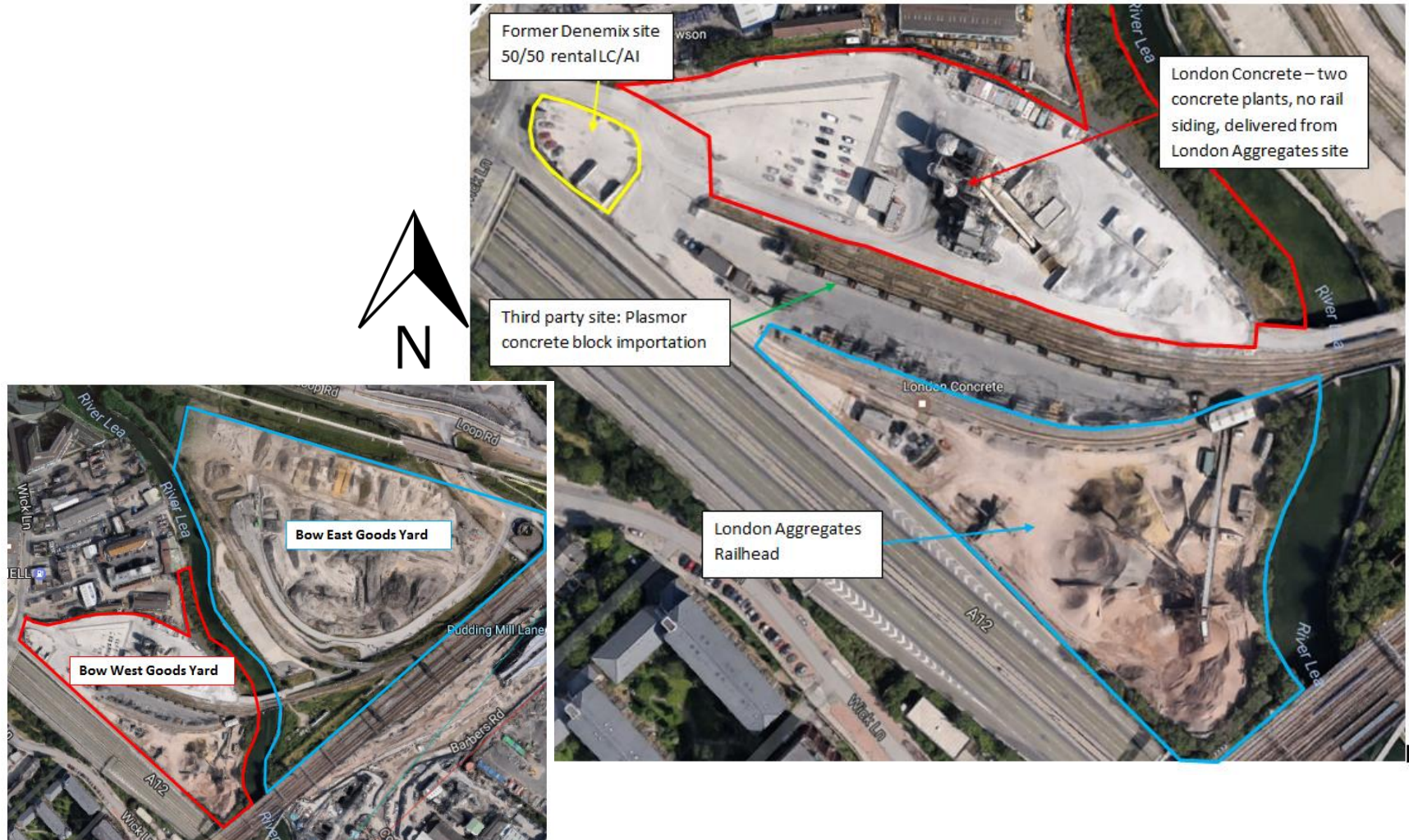
- Minerals Aggregate Distribution Site identified on Proposals Map – but the area subject to this designation is only very indicatively marked and not clear that this extends over the full aggregates railhead.
- Core Strategy Policy 1.2 Part I confirms the council will seek to minimise the movement of aggregates by road, maximise the movement of aggregates via rail and will encourage aggregate recycling at depot sites in Ealing including at Horn Lane
- Site Allocation ACT6: Consolidation of industrial, aggregates and waste facilities to the north of railway sidings. Design principles confirm – north of the railway will continue to be safeguarded for essential aggregates/waste functions and related B1(c), B2 and B8 industrial uses, including consolidation and maximisation of existing freight operations at the railway sidings.

## Key Challenges and Threats

- Minerals Aggregate Distribution Site designation only very indicatively marked on Proposals Map.
- Site Allocation ACT6 – whilst helpful does not include the full railhead and operational railway land.
- Notwithstanding the site allocation, Hanson had a significant battle with regard to securing consent for replacement of their concrete batching plant at the entrance to the goods yard.
- Previous MP sought to get the safeguarded rail depot status of the site removed.



# Bow Midland West, East London, Tower Hamlets / LLDC





# Bow Midland West, East London, Tower Hamlets / LLDC

## Uses

- Aggregates rail depot
- Concrete batching plant (London Concrete)
- Site has been used in the past for the recycling of aggregates on a small scale but due the increase in demand for aggregates from London Concrete, this is not being undertaken at present.

## Throughput

- Circa 475,000 tonnes per annum of aggregate

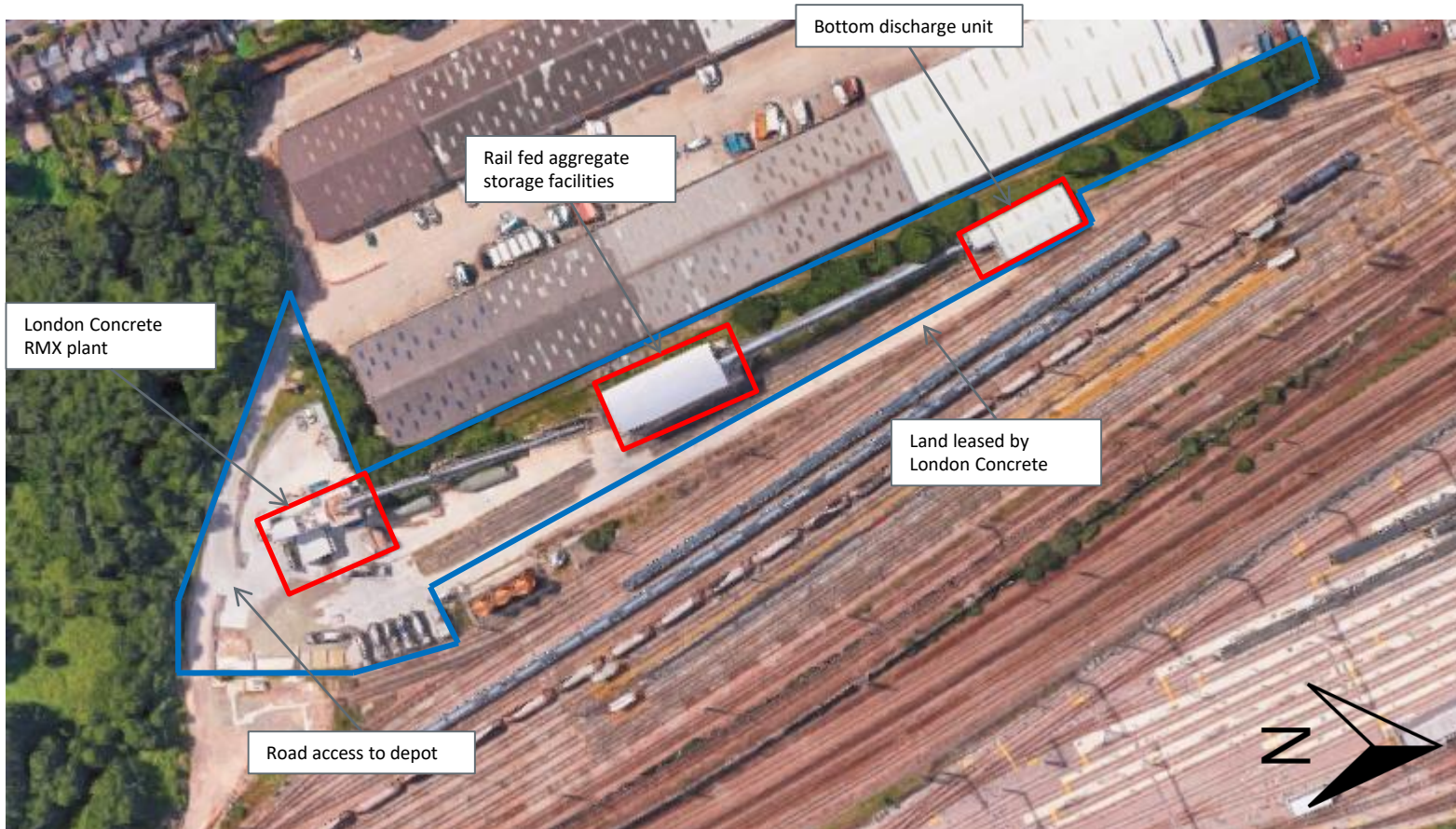
## Safeguarding and other Relevant Designations

- Safeguarded Rail Site
- Strategic Industrial Location

## Key Challenges and Threats

- CPO of site resisted during the Olympics which would have resulted in the loss of the railhead and associated plant infrastructure. Through the CPO process AI/LC were able to agree temporary closure during the Olympics with reinstatement thereafter.
- Only by repeated representations and objections during the Local Plan review and consultation process (both Tower Hamlets and LLDC plans/SPDs) has express identification and safeguarding of the site in the Local Plan and Proposals Map been secured.
- Applications for change of use to residential development under permitted development rights within the SIL have had to be resisted. This would have introduced noise sensitive development in close proximity to the operational rail site and associated plant. This included the submission of objections to prior approval applications, submission against a subsequent appeal and assisting the LPA by providing a Counsel's opinion.
- Without an Article 4 Direction in place removing PD rights for conversion to residential within the surrounding area the threat remains.
- Increasing residential development and allocations around the SIL and safeguarded rail site are changing the context of the surrounding area – resulting in the introduction of new noise sensitive receptors. These comprise a key threat to the future operation of the site.

# Ferme Park (Hornsey – London Concrete), LB Haringey



# Ferme Park (Hornsey – London Concrete), LB Haringey

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## Uses

- Concrete batching plant, associated hoppers and conveyors
- Bottom discharge rail discharge system
- Rail fed aggregates storage facility

## Throughput

- Circa 130,000 tonnes per annum of aggregate

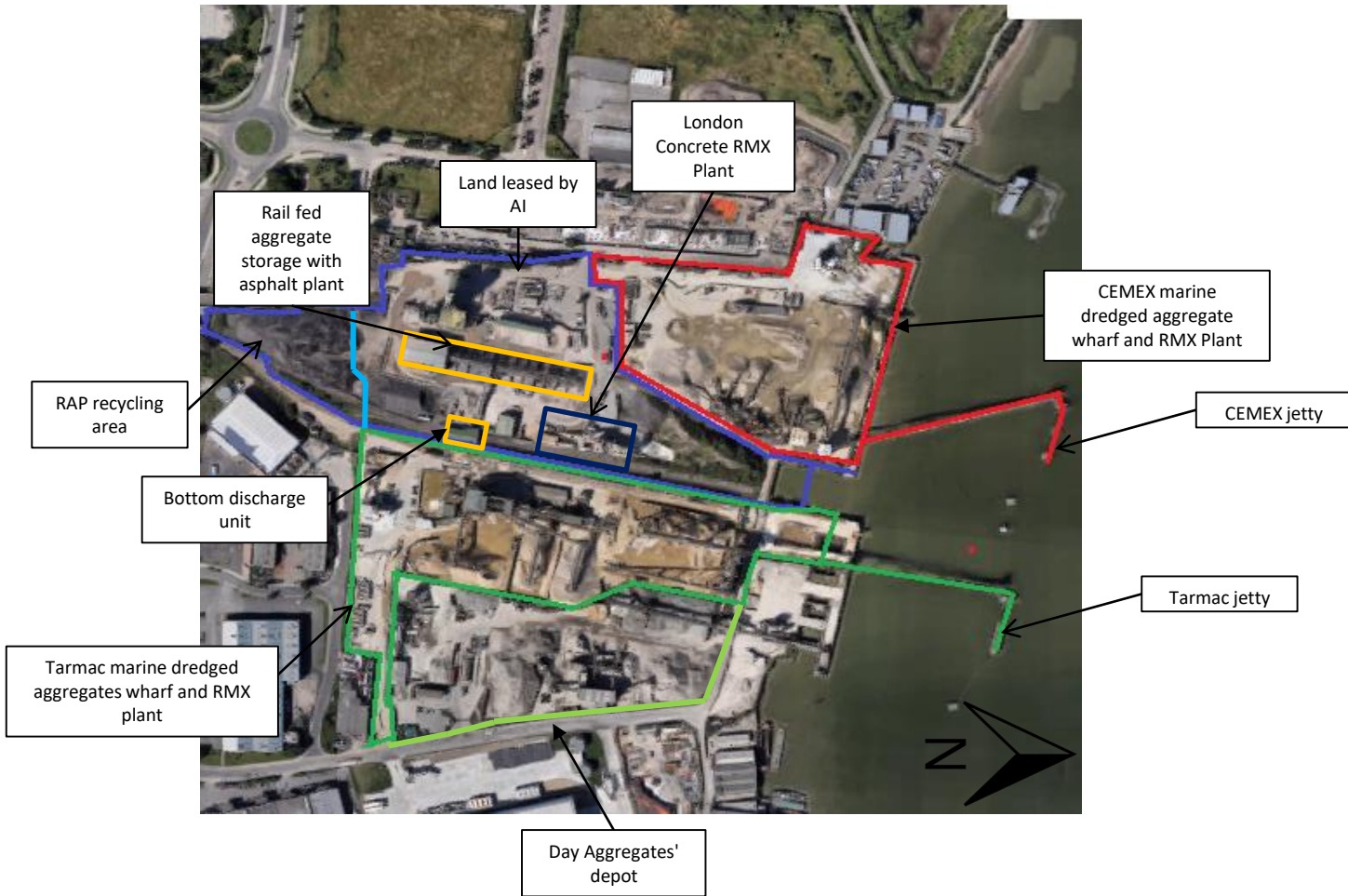
## Safeguarding and other Relevant Designations

- Majority of site falls within a wider Local Strategic Industrial (LSIS) designation.

## Key Challenges and Threats

- Planning permission had to be secured via appeal.
- No safeguarding provision or supportive polices for the rail site or associated uses in the Local Plan or identification of the site on the Proposals Map.

# Angerstein Wharf, LB Greenwich



# Angerstein Wharf, LB Greenwich

## Uses

The AI facility at Angerstein Wharf forms part of a wider complex of uses both on Angerstein Wharf and on the adjoining Murphy's Wharf.

Angerstein Wharf – AI facilities	Angerstein Wharf – Cemex facilities	Murphy's Wharf – Tarmac facilities	Murphy's Wharf – Day's facilities
<ul style="list-style-type: none"> <li>Aggregate rail depot</li> <li>Coated roadstone (asphalt) plant</li> <li>Concrete batching plant</li> <li>Importation, processing, storage and distribution of reclaimed bituminous products.</li> </ul>	<ul style="list-style-type: none"> <li>Marine dredged aggregates wharf</li> <li>Concrete batching plant</li> </ul>	<ul style="list-style-type: none"> <li>Marine dredged aggregates wharf</li> <li>Concrete batching plant</li> <li>Rail distribution of aggregate</li> </ul>	<ul style="list-style-type: none"> <li>Aggregates depot</li> <li>Recycling facility</li> </ul>

## Throughput

- Aggregate Industries throughput - circa 200,000 tonnes per annum of aggregate.
- Jointly the two wharves service approximately one third of all of London's primary aggregate needs.

## Safeguarding and Other Relevant Designations

- Safeguarded Wharf Directions apply to both sites – supplemented by London Plan policy requirements re safeguarded wharves
- Greenwich Core Strategy – provides the following designations across the two wharves:
  - Strategic Industrial Location
  - Rail Freight Site
  - Aggregates Zone
  - Safeguarded Waste Site (part)



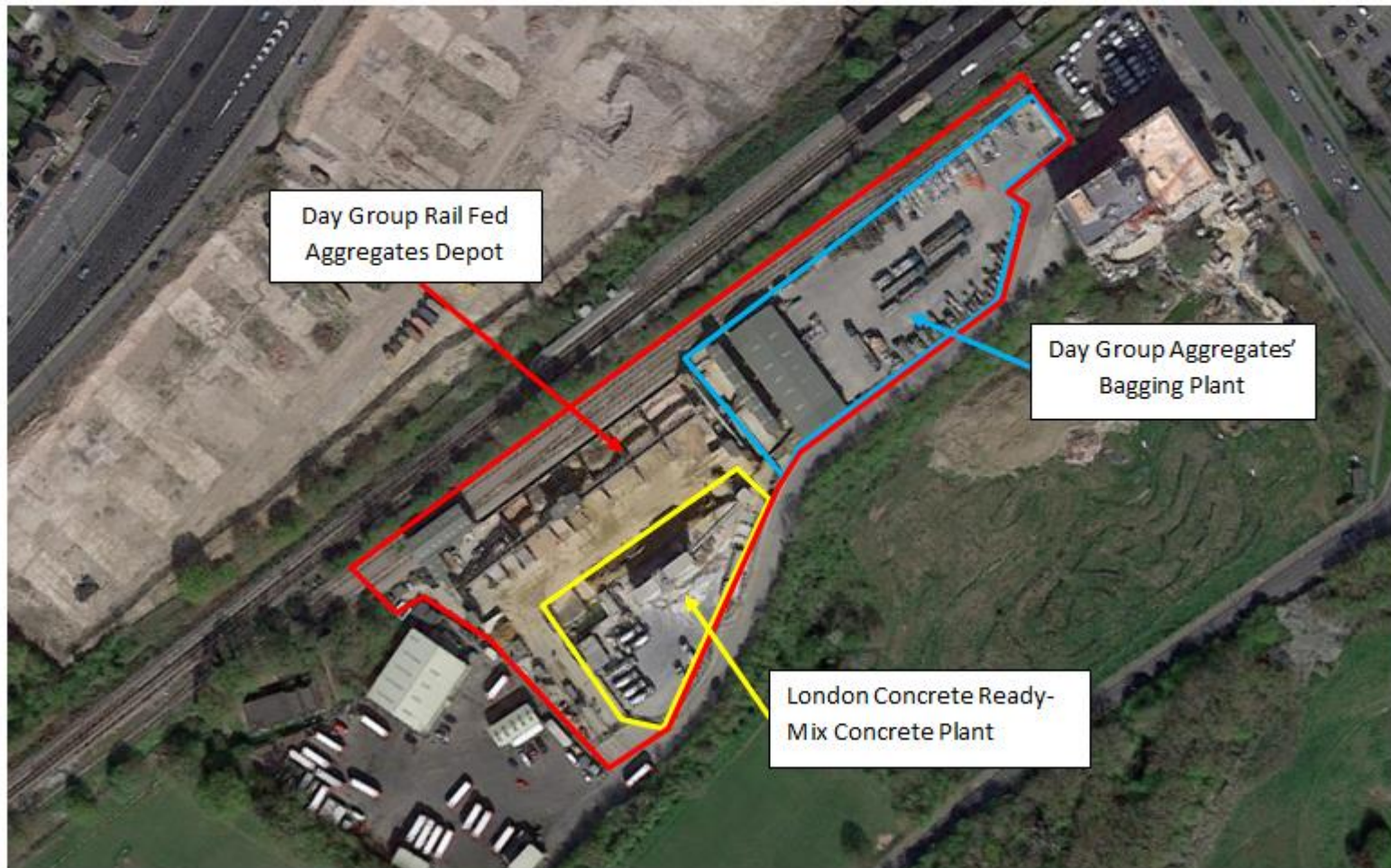
# Angerstein Wharf, LB Greenwich

## Key Challenges and Threats

Notwithstanding the strong policy/safeguarding protection which applies across Angerstein and the adjoining Murphy's Wharf, AI and other operators of the two wharves (Cemex, Days and Tarmac) have had to expend considerable time and effort defending their sites and associated activities from encroaching residential development. This has included:

- Progressing a successful Judicial Review of the Greenwich Millennium Village (GMV) development– which ultimately secured the redesign of the development to ensure the introduction of new residential uses did not prejudice the operation of the wharves.
- The Operators are now involved in reviewing all discharge of conditions re noise for the GMV development.
- Objections to significant new residential development proposals at Royal and Deanston Wharves, within LB Newham directly opposite the safeguarded wharves which has not properly assessed the impact of noise from the safeguarded wharves on the new residential use nor appropriately mitigated the proposals. The key concern is the likelihood is that once those units are occupied that this could lead to complaints and nuisance claims which could prejudice the future operation of the wharves.
- Representations objecting to the Charlton Riverside SPD. In particular to the failure to provide guidance that any noise sensitive development coming forward on land nearby or adjoining the safeguarded wharves should be designed, laid out and mitigated to ensure it does not prejudice the operation of the wharves and that such development should be progressed on the basis of early consultation with the Wharf Operators and PLA.
- Development within Charlton Riverside in close proximity to the safeguarded wharves seen as a key threat.

# Tolworth, London Borough of Kingston





# Tolworth, London Borough of Kingston

## Uses

- London Concrete Batching Plant
- Railhead/aggregate depot and bagging facility operated by Day's.

## Throughput

- Plant uses circa 130,000 tonnes of aggregate from the adjoining rail served depot.

## Safeguarding and Other Relevant Designations

- Identified as a Strategic Rail Freight site in the Kingston Core Strategy (Policy C5) and on the Proposals Map
- Tolworth Key Area of Change Policy - applies policy protection to ensure that any neighbouring development is "planned, laid out, and designed to take into account surrounding land uses and, in particular, it should not prejudice the existing or permitted use and operation of the Aggregates Depot, Kingston Road, Tolworth which comprises a Strategic Rail Freight Site".

## Key Challenges and Threats

- Safeguarding and identification of the site on the proposals map was secured only as a result of plan representations – and has required regular submissions of representations to ensure the on-going protection of the Strategic Rail Freight Site.
- Notwithstanding the helpful policy position, particularly the Tolworth Key Area of Change Policy, numerous residential-led redevelopment proposals and other noise sensitive proposals have come forward which have had limited if any regard to the requirements of this policy.
- Objections have had to be progressed including submission of independent review by an acoustic consultant of noise assessments submitted. These have consistently found failings both in the assessments and the proposed mitigation.
- Notwithstanding the objections made, applications have been permitted with final noise/acoustic mitigation measures to be dealt with by planning condition which are not considered to be robust enough to appropriately deal with the issues raised and allow for the potential of openable windows and balconies facing directly over the active rail site and associated facilities.
- New residential development in close proximity comprises a key threat to future operation of this site.