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Dear Natalie

ROYAL DOCKS & BECKTON RIVERSIDE OPPORTUNITY AREA PLANNING FRAMEWORK - WORKING DRAFT CONSULTATION

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. It is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. The British Marine Aggregate Producers Association (BMAPA) is the representative trade body for the British marine aggregate industry.

The MPA has a number of concerns over the Working Draft and the potential effect on the steady and adequate supply of aggregates and construction materials into London, and the effects on our members' businesses.

We fully appreciate the need for new housing and employment. However, we are concerned over the proposed 'release of Strategic Industrial Land' and 'release and relocation' of a number of safeguarded aggregates wharves. The proposed residential and mixed-use development in close proximity to aggregate wharves and other minerals infrastructure, including concrete batching and asphalt plants, may place potential constraints on their operation.

London's aggregates wharves are essential for the supply of aggregates (marine-dredged sand and gravel, crushed rock) for use in construction (particularly concrete), and thus in turn are essential for the development and growth of London and the wider economy. In 2014, over 4 million tonnes of marine dredged sand and gravel, and 700,000 tonnes of crushed rock, was landed at London wharves. Marine dredged sand and gravel represents 90% of total sand and gravel used in London.

Import by ship has clear environmental benefits through reducing road haulage distances, lorry movements and associated congestion and pollution, while delivering large amounts of material to wharves close to where it is needed either for direct use or more often for use in ready mixed concrete.

The London Plan recognises this and provides for safeguarding of wharves through Policies 5.20 'Aggregates', 6.14 'Freight', and 7.26 'Increasing the use of the Blue Ribbon Network for Freight Transport', reflecting the requirement of the National Planning Policy Framework (NPPF). The NPPF requires safeguarding of existing, planned and potential wharfage and associated storage, handling and processing facilities, and of existing, planned and potential sites for concrete batching and manufacture of coated materials.

The Port of London's recent *Thames Vision* sets out goals for the Port of London to handle 60-80 million tonnes of cargo per year, with at least 5.5 million tonnes of goods moved between wharves on the Thames, and to establish the Thames as the default choice for transport of construction materials. The safeguarding of wharves will be essential to deliver these.

In a number of areas the opportunity Area Planning Framework does not appear consistent with the London Plan, NPPF or other strategies, proposing residential and mixed-use development on or in proximity to wharves and other mineral infrastructure.

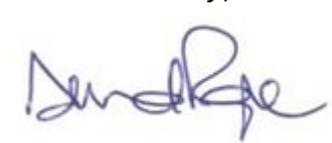
Where direct loss of wharf land and capacity is proposed, practicable 'relocation and consolidation' will depend on alternative land and river frontage being available that is suitable in terms of capacity, accessibility, location in relation to market, suitability and size of berth and of associated land for processing and storage of materials. It will also depend on land ownership and operators being willing to move. This is all necessary in order to ensure continuity of supply of materials. There may also be competition implications, as the number of local sites and/or operators are potentially reduced.

Development of incompatible uses in proximity to wharves (including on the opposite bank) may also constrain their operation, particularly uses that are noise-sensitive such as residential. Noise may be generated by transfer of aggregates, their processing, ship engines and rail and lorry movements. The ability to land at wharves is influenced by tidal access therefore the ability to operate on a 24 hour basis is essential.

Designing-in noise mitigation into new residential developments has proved problematic elsewhere in London, for example in Greenwich, resulting in conflicting uses next to each other and real concerns over the long-term security of wharf operations even where they remain safeguarded.

The practical issues and implications associated with implementation of the 'relocate and consolidate' approach, therefore, need to be much better understood and investigated, in order to demonstrate that they are actually deliverable and consistent with national and other London Plan policy.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'David Payne', enclosed in a thin blue rectangular border.

DAVID PAYNE
Senior Planning Advisor
Mineral Products Association