



Mineral Products Association

The Trade Association for the Aggregates, Asphalt,
Cement, Concrete, Dimension Stone, Lime, Mortar
and Silica Sand Industries

Carmel Edwards
EIP Secretariat - London Plan
GLA
City Hall
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26th February 2019

Dear Carmel

**LONDON PLAN EXAMINATION - MATTER 70 AGGREGATES
PARTICIPANT 5740**

Please find attached the Mineral Products Association's statement in relation to *Matter 70 Aggregates*, for the hearing session on 1st May 2019.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Payne', is positioned above the printed name.

DAVID PAYNE
Senior Planning Advisor

Aggregates

M70. Would Policy SI10 provide a justified and effective strategic framework for the steady and adequate supply of aggregates to support construction in London? In particular:

- a) *Would the approach taken to land-won aggregates accord with national policy? What is the justification for the landbank apportionment in the four boroughs identified? Would the approach taken be effective in ensuring an adequate supply of aggregates to meet the level of growth envisaged?*

NPPF requires mineral planning authorities to provide for the extraction of mineral resources of local and national importance (which includes aggregates) and to provide for a steady and adequate supply of aggregates by maintaining landbanks (of at least 7 years for sand and gravel). The requirement to maintain a landbank of 5mt is equivalent to c.0.7mtpa, apportioned to the 4 Boroughs known to host major resources.

NPPF also requires minerals planning authorities to make provision for the land-won and other elements of their Local Aggregates Assessment (LAA). The LAA for London (NLP/SI/041) and London Aggregates Working Party Aggregates Monitoring Report (NLP/SI/042) set out recent sales and permitted reserves. These indicate that production of sand and gravel from within London has fluctuated over recent years, falling from 0.8mtpa in 2008 to 0.26mt in 2017, and that reserves were c. 2.2mt in 2017 (Table 4 LAA). Thus, recent sales have been well-below the level set out in London Plan policy. Production obviously depends on investment by industry, and this can be encouraged by plans providing greater certainty through allocating specific sites and identifying 'preferred areas' and 'areas of search'.

The LAA indicates that recent permissions and 'commitments' (including allocated sites) in the local plans of Boroughs with an apportionment indicate that the London Plan requirements (Policy SI10B) could be met in future (para 5.8/6.3 LAA) and so appear to be reasonable and deliverable. The LAA highlights factors, including major construction projects, expected to influence demand for aggregates and concludes that *'it is quite possible the demand will be more than that of recent years.'* It also acknowledges that the vast majority of aggregates will be imported into London but that *'local land won material has a role of providing a local sourced alternative aggregate supply...and represents London's contribution to national Managed Aggregates Supply System.'* (para 6.8).

Therefore, the approach to provision for land-won aggregates is consistent with national policy, will help to meet objectively assessed needs, is an appropriate strategy and is deliverable.

NPPF (207c) requires plans to make provision for land-won aggregates through specific sites, preferred areas/areas of search, and locational criteria. PPG makes it clear that plans should identify specific sites as a priority to provide such certainty (paras 008/009). We therefore recommend that clause 1 of Policy SI10 should make this clear (as detailed in our proposed changes to Policy SI10 below). Maintaining the level of provision made in the Plan

through the apportionments will help enable an increase in production from within London, encouraging investment by industry and diversifying supply.

- b) *In the absence of a target for recycling/reuse of construction, demolition and excavation waste by 2020 and the recycling of that waste as aggregate, would the policy be effective?*

The value of a target is not clear. The management of CDE waste is driven by a range of financial and regulatory factors, and the data available for generation of waste and its destination are poor. The amount of CDE that can be 'recycled' as aggregate is limited to some of the hard fraction eg concrete, and will not be suitable for certain applications such as use in structural concrete, and so scope for substitution may be limited.

- c) *Would the approach taken to safeguarding resources and facilities, as set out in SI10C, be effective in ensuring the steady and adequate supply of aggregates to support construction in London?*

No. The clause, as amended with the Mayor's 'minor suggested changes' only applies to sand and gravel resources and doesn't provide sufficient clarity about what safeguarding entails. It would thus not be effective or be consistent with national policy.

We recommend that clause C is amended to provide for safeguarding of both resources and infrastructure, and have made suggested amendments below. If these changes are made then clause 2 in SI10D is no longer required, and we recommend that this is deleted (as indicated below) so as to avoid confusion (as it is not really relevant to reducing the 'environmental impacts of aggregate facilities').

We recommend that the policy clarifies that plans should identify Mineral Safeguarding Areas that reflect the extent of minerals resources in line with the NPPF. This is important to provide clarity as to where safeguarding applies (to developers) and that it is about the long-term preservation of resources rather than identifying areas for mineral working in the Pan period.

In addition to the recommended changes to the policy, we also recommend some minor amendments to paragraphs 9.10.1 and 9.10.4, detailed below. These will further clarify why safeguarding of mineral transport and processing facilities is a critical issue in London, and provide further information on how safeguarding is implemented.

- d) *Would Policy SI10 adequately address the full range of environmental and other impacts of aggregate facilities?*

We recommend that the clause SI10D is amended to be more generic (see below).

- e) *Would it provide appropriate, justified and effective guidance on development management matters?*

We recommend that the clause SI10D is amended to be more generic (see below).

MPA recommended amendments to Policy SI10 and supporting text:

Policy	MPA's recommended amendments in blue (Mayor's 'minor changes' in red)	Justification of recommended amendments
SI10 B	<p>1) Development Plans should make provision, in the form of specific sites, preferred areas or areas of search, 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:</p> <p>1a) at least 1.75 mt to London Borough of Havering</p> <p>2b) at least 0.7 mt to London Borough of Redbridge</p> <p>3c) at least 1.75 mt to London Borough of Hillingdon</p> <p>4d) at least 0.7 mt to London Borough of Hounslow.</p> <p>2) ensure sufficient capacity of aggregates wharves and aggregate rail depots is available to ensure a steady and adequate supply of imported and marine aggregate to London.</p> <p>3) support the production of recycled and secondary aggregate and, where practicable, expand capacity at/or adjacent to aggregate wharves and rail depots and quarries during their operational life, within or adjacent to major construction projects.</p>	<p>To provide sufficient certainty and to reflect PPG (para 008 Reference ID: 27-008-20140306 / 009 Reference ID: 27-009-20140306)</p> <p>We <u>support</u> for this new sub-clause as provision and maintenance of sufficient wharf and rail depot capacity is essential in helping ensure a steady and adequate supply of minerals into London, by sustainable transport modes.</p>
SI10 C	<p>All Mineral Planning Authorities in London should, in their development plans, identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities.</p>	<p>We <u>recommend</u> these changes in order to clarify the purpose of this clause, which should be the safeguarding of resources <i>and</i> infrastructure from sterilisation or constraint due to new development, and to properly reflect the requirements of NPPF (para 204) and Planning</p>

	<ol style="list-style-type: none"> 1. sand and gravel resources from development that would otherwise sterilise future potential extraction, through defining Mineral Safeguarding Areas; 2. existing, planned and potential aggregate rail depots and wharves; 3. existing planned and potential sites for manufacture of concrete, concrete products and asphalt; and 4. sites for processing and distribution of construction, demolition and excavation waste and secondary aggregates 	<p>Practice Guidance (para 005). Having provision for safeguarding within one clause helps to provide clarity. Equivalent safeguarding should be applied to rail depots/railheads and other minerals infrastructure as it is to wharves.</p>
<p>SI10 D</p>	<p>To reduce the environmental impact of aggregates facilities, Development Plans should:</p> <ol style="list-style-type: none"> 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. <p>2A) ensure that the environmental and amenity planning conditions are imposed on impacts of new aggregate facilities are assessed and so that noise, dust and traffic impacts are effectively controlled through planning conditions.</p> <p>2B) ensure new development in proximity to safeguarded sites are designed to avoid and mitigate potential conflicts, in line with the Agent of Change principle.</p>	<p>The safeguarding of wharves and railheads facilities will deliver benefits from movement of aggregates by sustainable modes, for example reduced emissions and congestion resulting from the distance material would otherwise be transported by HGV and amount of HGV movements. However, we <u>recommend</u> that clause C is amended to more comprehensively address safeguarding and so provide greater clarity and so clause D2 should be deleted as it doesn't address the environmental impact of <i>facilities</i>.</p> <p>To cover assessment and management of environmental and amenity effects of development rather than listing a limited range of issues.</p> <p>We <u>support</u> this new sub-clause which emphasises the application of the Agent of</p>

		<p>Change principle in relation to safeguarding of aggregates facilities.</p>
<p>para 9.10.1</p>	<p>London needs a reliable supply of construction materials to support continued growth. National planning policy requires Mineral Planning Authorities to maintain a steady and adequate supply of aggregates. These include land-won sand and gravel, crushed rock, marine sand and gravel, and recycled materials. Most The vast majority of primary aggregates used in the capital come from outside London, including marine sand and gravel and land-won aggregates, principally crushed rock from other regions. There are relatively small resources of workable land-won sand and gravel in London.</p>	<p>Around 97% of the c10mtpa of primary aggregates consumed in London are imported from outside of London (including c4mt marine dredged sand and gravel landed at wharves, and c4mt of crushed rock brought by rail to rail depots). Our <u>recommended</u> minor change emphasises the almost total reliance on wharves and rail depots for supplies, and the importance of safeguarding these.</p>
<p>Para 9.10.4</p>	<p>Boroughs should protect existing, planned and potential sites for aggregate extraction and transportation, processing and manufacture from development that may constrain their operation or expansion. This includes new development proximate to safeguarded sites that may be sensitive to site operations and so should be sited and designed in line with the Agent of Change principle. 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 and requiring equal protection are railway depots for importing crushed rock from other parts of the UK. Railheads are vital to the sustainable movement of aggregates and boroughs should protect them in line with policy T7.</p>	<p>Safeguarding includes protecting facilities from the potential sterilising or constraining effects of sensitive development proximate to safeguarded sites. This includes development that can be some distance from a site but which can be sensitive to noise from sites and facilities that may need to operate 24/7. It would help to cross-reference the Agent of Change principle that will be applied.</p> <p>We <u>support</u> the proposed minor changes to Policy T7 which provide necessary clarity how safeguarding of railheads will be applied.</p>