

London

Aggregates Monitoring Report

2017

LAWP

London Aggregates Working Party

LAWP 18/03

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Errata

Since the publication of the London AM 2017 report the following errors have been corrected:

Title page: Date changed to 'December 2018'.

Paragraph 4.1. - the current London Plan was published in March 2016 – not March 2015.

Paragraph 4.7. – the reference to minor modifications to the draft London Plan (SI10) has been changed to 'Minor Suggested Changes' to be consistent with GLA terminology.

Paragraph 7.1. – the term 'aggregates' has been added in the first sentence for clarification.

Paragraph 7.3. – the *drafting note in italics* has been deleted.

Appendices

A – Table deleted with consequential references in main text to avoid disclosure of confidential information.

D & E – personal contact data has been redacted.

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Executive Summary

- The London Aggregates Monitoring 2017 Report (AM2017) is the latest in a series prepared by the London Aggregates Working Party (LAWP), which reports on sales and related information of various forms of aggregates – construction minerals – from quarries, wharves and rail depots. It also provides information on recycled aggregates. The purpose of AM 2017 report is to help assess whether London is meeting its national and local obligations regarding the Managed Aggregate Supply System (MASS) as required by national planning policy and advise Government and mineral planning authorities (mpas) of any corrective action.
- The National Planning Policy Framework (NPPF) sets out the policy context for the planning of aggregates. A revised NPPF was published in July 2018, although policy on aggregates has not substantively changed. The subsequently published revised Planning Practice Guidance advises that that for the preparation of minerals plans, aggregate working parties are also expected to be treated as additional signatories in statements of common ground (SoCG).
- The London Plan provides the strategic context for planning for the supply of aggregates and in particular sets out the ‘apportionment’ for the four aggregate producing London Boroughs. The apportionment requires these Boroughs between them to maintain a landbank of at least five million tonnes (equivalent to 0.7mtpa) until 2031. The London Plan (2019-2041) is under review and the LAWP made detailed comments (Appendix E). The Greater London Authority (GLA) has proposed minor changes to the aggregates policy (SI10) and the LAWP has been invited to participate in the relevant hearing session in 2019.
- The results from all the AMs carried out in 2017 were not collated nationally so interregional movements of minerals information has not been updated since 2014. However, it is plain from AM 2017 the pattern of sales in London indicates a continuing dependence on continual imports of aggregates from outside London and a supply of marine aggregates. This emphasises the importance of safeguarding and supporting the appropriate transport infrastructure in order to maintain a steady and adequate supply of aggregates for London.
- In 2017 there were only two producing sand and gravel quarries (There is also a soft sand pit on the edge of London, which has only a marginal role), although a third has permitted reserves. Sales from the quarries in 2017 declined from the previous year to 0.26mt, which reflects a long-term

downward trend and is substantially below the apportionment. Nevertheless, the permission in Havering in 2017 meant the landbank increased to 3.2 years the highest for a decade. A further permission in Redbridge in 2018 and other prospects indicate the landbank could further increase in the short term. However, more increases depend on planning applications being submitted in accordance with up to date mineral policies in local plans. These collectively need to identify sites or 'preferred areas' or 'areas of search' to enable 0.7mtpa of sand and gravel extraction per year over the London Plan period to 2031. The local plans should also safeguard sand and gravel resources.

- There are 11 active wharves within London, which in 2017 sold 5.1mt (AM2017 survey), which is a slight decline on the previous year but still well above the ten-year average. The origin of marine material is the East Coast, East English Channel and Thames Estuary dredging regions which have about 19 years of reserve. Notwithstanding that, the supply of marine sand and gravel in London requires the maintenance of sufficient wharf capacity - currently about 20% above 10-year average sales and a network of sites to secure this supply. Accordingly, there is a continuing need for the wharves to be safeguarded and new capacity promoted by The London Plan and borough development plans. The re-commissioning of the currently inactive Peruvian Wharf, Newham, is imminent.
- Most imports of crushed rock are sold through the 16 active rail depots in London. Sales in 2017 were 3.7mt, again a decline in sales from the previous year, but still above the ten-year average sales. Rail depots crushed rock sales are about 75% of London's crushed rock consumption. The principal sources are Somerset and Leicestershire which according to their Local Aggregate Assessments have sufficient supplies unto 2030. As with marine aggregates the critical issue is the maintenance of capacity – currently about 25% above capacity - and an effective distribution of sites. According safeguarding of current facilities and promotion of new capacity needs to be endorsed by the relevant plans. An application for a new aggregate depot at Cricklewood Yard, Barnet, is awaiting determination.
- In common with previous years the AM survey had poor responses on the sales of recycled aggregate. Current best estimates from Environment Agency's (EA) data on construction, demolition and excavation (CDE) waste arisings and treatment suggests between 2.0mt and 3.0mt could have been produced from 'fixed' sites in 2017 depending on whether 50% or 75% recycling of relevant CDE waste was realised. The maintenance of an effective supply of recycled aggregate is dependent on supportive policy in local plans that incorporate safeguarding of facilities.

- Only Redbridge London Borough (LB) has an adopted minerals local plan, which safeguards 1.2 million tonnes of sand and gravel resource. There are other areas identified with potential resources and the Borough is confident it can meet its London Plan obligations.
- Hillingdon submitted its Local Plan Part 2 for examination in May 2018, which re-categorises sites identified in the Local Plan Part 1 (2012) to reflect the National Planning Practice Guidance (2014) for minerals. It also proposes a new site, referred to as the Bedfont Court Estate, as an 'Area of Search'. In total, 106 ha. of land is designated as either a Specific Site, Preferred Area or Area of Search based on the knowledge of mineral resources existing and the likelihood of extraction being acceptable in planning terms. In the absence of being able to meet its London Plan landbank apportionment, Hillingdon considers this to be the most appropriate response to managing its land-won supply.
- In the absence of up to date national and regional guidelines for aggregates provision, overall, the London Aggregates Working Party concludes that London is not making a full contribution to meeting both national and local requirements for the supply of aggregate. The landbank and sales are below the requirements of the London Plan. However, permissions have been granted latterly and policy is in place or is emerging that provides a framework to increase supply from local sand and gravel resources. Moreover, infrastructure is also in place and safeguarded to facilitate sales within London of imported and marine aggregates that ensures the Capital has an appropriate aggregate supply.

1 London Aggregates Working Party

- 1.1 The London Aggregates Working Party (LAWP) was formed in 2003, completing the coverage of Aggregate Working Parties (AWPs) for all of England. The working party includes officers of the London Boroughs, the mineral planning authorities in London; the Greater London Authority (GLA); the minerals industry through the Mineral Products Association (MPA); and the British Aggregates Association (BAA). The Government is also represented by the Department of Communities and Local Government (DCLG). The Crown Estate; the Marine Management Organisation (MMO); and the Port of London Authority (PLA) are also represented, together with adjoining AWP's in eastern and south-eastern England.
- 1.2 The working party is a technical advisory body with the task of monitoring the supply and demand for aggregates (construction minerals) at the London 'regional' scale. The LAWP advises both the London mineral planning authorities and the GLA, which is responsible for the London Plan and since 2016 the preparation of a London wide Local Aggregate Assessment (LAA), as well as Government, through the DCLG and the National Aggregates Coordinating Group (NCG).

2 Scope of this Report

- 2.1 The Aggregates Monitoring report for 2017 (AM 2017) incorporates the AM 2017 survey data and other relevant information collected by the LAWP secretariat, the Environment Agency's Waste Data Interrogator and the Crown Estate marine aggregates data. Unlike the 2014 survey, the AM 2017 survey has not been subject to a national collation of data so a current picture of imports and exports of aggregates is unavailable. However, the 2014 overall picture of sales and consumption is illustrated in Tables 1 and 2. Only two boroughs, a third has permitted reserves, had active sand and gravel workings, but many more had wharves and/or rail depots. Likewise, many boroughs had construction, demolition and excavation (CDE) waste recycling sites that produce aggregates. The issue of reporting on recycled aggregate sales is covered later in this report.
- 2.2 The AM report provides an update on the progress of local plans for those boroughs with aggregate resources – see Appendix C for key milestones for minerals in local plans. It also includes a list of current aggregate producing sites – Appendix A (now redacted) - and progress on relevant planning applications – Appendix B. There is also a Summary table which outlines the critical information in AM2017.

2.3 The national planning context for the report is the National Planning Policy Framework (NPPF)¹ - see below - and Planning Practice Guidance (PPG)² which provide advice on the national Managed Aggregate Supply System (MASS).

3 National Planning Policy Framework

3.1 The NPPF states that minerals are essential to support economic growth and our quality of life. Accordingly, mpas should, amongst other things:

- Identify and include policies for extraction of mineral resources of local and national importance in their area whilst taking account of the contribution that substitute or secondary materials might make to mineral supplies;
- Define Mineral Safeguarding Areas and adopt appropriate policies in order that mineral resources are not needlessly sterilised;
- Safeguard existing, planned and potential rail heads, links to quarries, wharves and processing facilities for bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine dredged materials;
- Safeguard 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;
- Set out policies to encourage prior extraction of minerals before other development takes place, where practicable and environmentally feasible;
- Recognise that some noisy short-term activities are unavoidable to facilitate minerals extraction; and
- Put in place policies to ensure that worked land is reclaimed at the earliest opportunity and that high quality restoration and aftercare takes place.

3.2 Accordingly, mpas should plan for a steady and adequate supply of aggregates by:

- Preparing an annual Local Aggregates Assessment (LAA), either individually or jointly by agreement with other mpas;
- Participating in the operation of an Aggregates Working Party and taking the advice of the AWP into account when preparing their LAA; and
- Making provision for the land-won and other elements of their LAA in their mineral local plans, taking into account the advice of the AWP and the NCG.

3.3 Guidance on MASS is outlined in the PPG which was last revised in July 2018. The guidance sets out a process in which LAAs are a key element in assessing whether a steady and adequate supply of aggregates is being maintained. The

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

² <http://planningguidance.communities.gov.uk/>

AWP draws together the conclusions of all the LAAs in its region and, when forwarding these to the NCG, it advises whether, in its view, the region is making a full contribution towards meeting both national and local needs. The NCG is to consider whether the AWP's make appropriate provision to maintain a steady and adequate supply of aggregate.

- 3.4 Earlier in 2018 the Government consulted on changes to the NPPF and the Secretary in consultation with the Chairman responded on behalf of the LAWP. The response supported the joint response on behalf of the English AWP's and stressed the importance of MASS in maintaining a steady and adequate supply of aggregates to the Capital. However, it raised concern that the revised NPPF might jeopardise MASS and endorsed detailed points raised by the joint AWP submission - see Appendix D.
- 3.5 In July the Government published a revised NPPF. There were no substantive changes to the chapter on minerals and the role of AWP's. Subsequently, revised Planning Practice Guidance has been published and includes advice that for the preparation of minerals plans, aggregate working parties are also expected to be treated as additional signatories in statements of common ground (SoCG). In the spirit of this advice the LAWP expects to be a signatory to SoCG to the aggregates policy elements within local prepared by the Boroughs.

4 London Plan

- 4.1 The London Plan³, published in March 2016, to include alterations since the original publication in July 2011, is the strategic plan for the capital.
- 4.2 The London Plan under policy 5.20 sets out the strategy to ensure an adequate supply of aggregates to support construction in London, including that London should make provision for the maintenance of a landbank of at least 5 million tonnes (i.e. seven years supply) of land-won aggregates until 2031. Local plans should make provision for maintenance of that landbank through an apportionment of at least:
 - a. 1.75 million tonnes to Havering LB.
 - b. 0.7 million tonnes to Redbridge LB.
 - c. 1.75 million tonnes to Hillingdon LB.
 - d. 0.7 million tonnes to Hounslow LB.(This in effect requires provision to be made London-wide for at least 0.7mtpa – approximately 0.25mtpa each for Havering and Hillingdon and, 0.125mtpa for Hounslow and Redbridge).

³ <https://www.london.gov.uk/what-we-do/planning/london-plan>

- 4.3 The London Plan recognises that there remains potential for extraction beyond that which the boroughs identified, including in the Lee Valley. Other boroughs with aggregate should consider opportunities in line with policies in the London Plan, including identifying and safeguarding aggregate resources in their local plans.
- 4.4 The London Plan reflects the NPPF in seeking to maximise recycling and re-use of construction, demolition and excavation (CDE) waste to reduce demand on primary aggregates, and mpas are to support the development of aggregate recycling facilities in their local plans, subject to local amenity conditions. In recognition of the heavy dependence of London on imports of crushed rock and marine (dredged) aggregates, the London Plan requires the boroughs in their local plans to safeguard wharves and rail heads with existing or potential capacity for aggregate distribution.
- 4.5 Subsequent alterations to the original 2011 London Plan included two additions to the text. The first relates to safeguarding sites for aggregate plant, the second removed the requirements for 29 of the borough, most of which have no potential for land-won extraction, to produce a LAA. The GLA has taken on the task of preparing a LAA for these boroughs. At the meeting of the LAWP on 8 January 2016 it was agreed that the GLA would prepare a London wide LAA with assistance from the boroughs.
- 4.6 The London Plan is now under review and a consultation took place earlier in the year. The Secretary in consultation with the Chairman responded on behalf of the LAWP – see Appendix E – specifically with regard to the aggregate policy (SI10). The policy is supported as it endorses the current policy approach, including the ‘apportionment’. Nevertheless, it offered detailed points to improve the policy’s effectiveness. The GLA is considering the responses to the consultation and proposes to submit to Government the Plan for Examination later in 2018.
- 4.7 Subsequently, some ‘Minor Suggested Changes’ to SI10 have been proposed by the GLA which took account of comments by the LAWP – see Appendix F. The LAWP has been invited by the Examination Panel to participate in the hearing session on Aggregates in 2019.

5 Aggregate Sales and Consumption

- 5.1 The AM 2014 national survey of primary aggregates demonstrates that London’s sales of aggregate were 5.1 million tonnes (mt) (0.4 mt land-won sand and gravel and 4.7 mt marine sand and gravel), the highest since 2005. However, sales of land won sand and gravel have been steadily decreasing both in actual tonnage and as a proportion of all sales.

On the other hand, London's consumption of aggregates was 9.6 mt (1.8 mt land-won sand and gravel, 3.8 mt marine sand and gravel and 3.9 mt of crushed rock).

- 5.2 This compares with 2009 when sales of all primary aggregates were 4.2 mt (0.6 mt land-won sand and gravel and 3.7 mt marine sand and gravel) compared with a consumption of 9.5mt (1.8 mt land-won sand and gravel, 3.8 mt marine sand and gravel and 3.9mt of crushed rock).
- 5.3 It appears that London's overall aggregate consumption pattern is quite steady at about 9.5 mt. This is notwithstanding a significant decrease in that of land-won origin. Both marine dredged aggregates and imported crush rock sales make up the majority of supply..
- 5.4 AM 2014 indicates (see Table 2 and Figure 6) that 0.1 mt of land-won sand and gravel is exported to South East England, principally Surrey. While 0.3 mt of marine dredged aggregate also goes to South East England, again principally Surrey, and 0.9 mt to the East of England.
- 5.5 On the other hand, imports (see Table 2 and Figure 6) of sand and gravel are from South East England, 0.9 mt (land-won 0.5 mt and marine dredged 0.4 mt) and East of England, 1.1 mt (1 mt land-won). With regard to crushed rock 1.5 mt is received from South West England, principally Somerset and, 0.9 mt from the East Midlands, principally Leicestershire.

6 Quarries

- 6.1 In 2017, only two quarries were producing sharp sand and gravel in the boroughs of Havering and Hillingdon, although both Redbridge and Havering have a site each with permitted reserves. There is a soft sand quarry (which has not provided any AM information for some years) in Bromley - see Figure 1 – but this is judged to have an insignificant contribution to the London aggregate picture. It's reserves in 2009 were less than 0.2mt.
- 6.2 Sales, permissions and reserves information for sand and gravel quarries for the 10 years from 2008 – 2017 are shown in Table 2 and Figures 2 and 3. Sales have demonstrated a significant and continual decline over the last decade or so. They were over 0.8mtpa of sales a decade ago, but only 0.26mt in 2017. This only represents a third of the London Plan apportionment of 0.7mtpa
- 6.3 Some 4.7mt has been extracted over the last ten years (2008-2017) although this has been largely replaced by 3.2mt of new reserves. The latest is in Havering (1.35mt) which effectively give the borough a local land banks of 11 years. The new permission means the overall London landbank is at its highest

in the last decade although at 3.2 years (4.7 calculated on 10-year average sales) it still falls short of the London Plan requirement.

- 6.4 As at the end of 2017 there are still some outstanding applications – see Sections 11 & 12 below and Appendix B – which, if permitted would increase the reserves and the landbank.
- 6.5 The AM 2017 survey covered the capacity of the London sand and gravel quarries to sell aggregate. Capacity has been estimated on the capability of the quarries to produce aggregate taking into the technical constraints and any planning restrictions on sales, lorry movements and operating hours. Given this the quarries covered by the 2017 survey have a capacity of 0.6mtpa, which is well above 2017 sales level, but still inadequate to deliver the London Plan requirement.
- 6.6 The AM survey does not address the issue of the sand and gravel resource and how effectively it is being safeguarded.
- 6.7 The overall situation is that London in 2017 still fails to contribute fully to its land won aggregate planning requirements. Progress in remedying this is discussed in the Conclusions – see Section 13.

7 Wharves

- 7.1 There are 11 (12 in 2016) active aggregates wharves on the Thames although Conway Wharf did not, as in the past, participate in the AM survey – see footnote to Table 4 – which also includes Port of London Authority (PLA) data. Since last year Cringles in Wandsworth has closed and Riverside Wharf, Greenwich, only sold a relatively small amount of crushed rock. Three wharves; Murphy's (Tarmac), Dagenham (Hanson) and Angerstein (Cemex), account for over three-quarters of aggregate sales.
- 7.2 AM 2017 covered operators' estimates for total sales capacity at the wharves. There was not a 100% response to the question but based on available data it is estimated overall London wharves capacity is only 6% above current sales. Indeed, according to PLA sales information the wharves sales are above capacity. Although there are likely to be some survey errors through the under reporting of capacity data the picture stresses the importance of maintaining the current wharf system.

Marine dredged sand and gravel

- 7.3 In 2017 the AM survey shows that 5.1mt (6.0mt according to PLA records) of marine aggregate was sold at the London wharves, this is a decrease of 10% on

the previous year although still 20% above the 10-year average. The origin of 4.96mt⁴ marine dredged sand and gravel landed in London, which in 2016 was mainly from the dredging regions of the East Coast (44%), East English Channel (35%) and Thames Estuary (20%). The Crown Estate reports indicate that the reserves in these 'regions' are sufficient, at 10-year average offtake, for 19 years of dredging.

- 7.4 To assist with the maintenance of Marine Plans for these areas are being prepared: the East Marine Plans covering the East Coast (North Sea) and South Marine Plans (East English Channel) have been adopted by the Government. The South East Marine Plan (Thames Estuary) is under preparation.
- 7.5 All Marine Plans are adopting similar policies regarding aggregates, which are supportive of the requirements of MASS considering other policy requirements.

Crushed rock and land won sand and gravel

- 7.6 A small amount, 0.12mt of crushed rock was recorded by the AM survey as sold at four wharves in 2017. Although the PLA recorded 0.67mt, about 11% of wharf all sales.
- 7.7 In the past, some wharves sold land won sand and gravel, but no sales were recorded by the present AM survey, although PLA have recorded 0.12mt of sales.

8 Rail Aggregate Depots

- 8.1 There were 16 active rail depots in 2017. All handled imported rock and some also handled land won sand and gravel. Sales of all aggregates were 5.3 mt, about 5% below 2016, but well above the 10-year average sales.
- 8.2 Operators' estimates for total sales capacity at the rail depots is about 7.1mtpa, but as in the case of the wharves there was not a 100% response to the survey question. There seems to be London rail depot capacity of about 33% above overall sales. An adequate rail aggregate depot capacity and its safeguarding is essential to the maintenance of a crushed rock supply.

Crushed rock

- 8.3 Imported crushed rock sales at the depots were 3.7mt, a 7% decrease on 2016 but still high compared with the 10-year average - see Table 5, Figure 5. These sales represent 69% of all aggregate sales at rail depots. The most important sources of rock are the Leicestershire and Somerset. The LAWP has considered

⁴ https://www.thecrownestate.co.uk/media/2483/marineplusaggregates_2017_web.pdf

Note distinction between landings and sales of marine aggregates

the Local Aggregate Assessments of both these mineral planning authorities and is satisfied the supply from these areas can be sustained until 2030 or later.

Sand and gravel

- 8.4 In 2017 the London rail depots sold close to 1.6 mt of sand and gravel, a significant proportion (94%) of which was of marine origin.

9 Recycled Aggregate

- 9.1 It is estimated there over 50 fixed sites⁵ that seem to be handling CDE waste – see Table 1 below. However, as in previous years the AM 2017 survey had a very poor response from the operators so it has not been possible to directly report on the amount of recycled aggregate sold. However, as in previous years, some recycled aggregate estimates have been calculated from the Environment Agency’s Waste Data Interrogator (WDI).

Table 1: Production of Recycled Aggregates in London (Thousand tonnes)

	2015	2016	2017	Estimated 3-yr Average
CD&E Waste Received for Treatment	3,568.65	4,142.01	4,022.34	3,910.99
Recycled Aggregate (lower band* estimate)	1,784.32	2,071.00	2,011.17	1,955.49
Recycled Aggregate (upper band estimate*)	2,676.49	3,106.51	3,016.75	2,933.25

Source: Environment Agency Waste Data Interrogator 2015 -2017

*Lower and Upper bands for estimated tonnage are 50% and 75% respectively of all relevant CD&E waste treated at CDE waste recycling sites.

- 9.2 It is estimated recycled aggregate produced in London in 2017 was between 2.01 and 3.02 which although slightly below 2016 is above the 3-year average. This estimate is only for ‘fixed’ sites covered by EA licensing. A significant amount of material could be recycled on major construction sites.

⁵ Temporary sites associated with the life of a construction project excluded.

- 9.3 The Minerals Product Association (MPA) estimate⁶ that in the UK overall, about 30% of aggregate is supplied from recycled or secondary sources. MPA suggest that as this level of supply has been maintained for a number of years this might represent a maximum as there are limitations on the amount of source material and the capacity to produce material of appropriate quality. Moreover, it is currently impossible to say if this estimate is applicable to London, but if it is, about 4.6mt of recycled and secondary aggregate would have been produced in 2017.
- 9.4 Road planings are a specific source of recycled aggregate. Hitherto the London highway authorities have not been surveyed. It is proposed to undertake such a survey later in the year.
- 9.5 Currently there is no information on secondary aggregate – aggregate derived from industrial processes e.g. incinerator bottom ash (IBA) – for London.

10 Demand for Aggregates

- 10.1 The demand for aggregates is assumed for AM purposes to be a reflection of the consumption data collected, however, this can only be reported when the National Collation of AM surveys is undertaken every four years. London consumption of aggregates in 2014 was 9.6 mt (1.8 mt land-won sand and gravel, 3.8 mt marine sand and gravel and 3.9 mt of crushed rock). This compares with 9.4mt in 2009.
- 10.2 It is assumed the London economy will remain buoyant, which will sustain a level of construction characteristic of the last decade or more. Indeed, for aggregate planning purposes it would be wise to assume this might increase. There are commitments to increased housing supply and there are notable infrastructure projects – HS2, Tideway Tunnel, TfL projects – along with continuing business investment and housing.
- 10.3 All of the above will have implications for demand although the recently announced commitment by Government to proceed with the Heathrow Expansion, is likely to significantly increase the demand on reserves, aggregate infrastructure and resources on the western side of London

11 Environment

- 11.1 All active and inactive sand and gravel quarries are within the Metropolitan Green Belt. No national environmental designations such as SSSI were affected. Wharves and depots are not in the Green Belt or affect the designations.

⁶ MPA Economic & Market Briefing 2018

- 11.2 Given the density of built development in London and house building pressures many mineral sites are sited close or even within sensitive land uses. This creates potential land use conflict, which seems to be increasing, particularly around operational wharves, which can give rise to noise and other amenity impacts on housing and mixed-use schemes. This gives rise to challenging issues for the planning process. The London Plan provides guidance to developers to ameliorate problems and there are good examples of good practice, particularly in relation to noise on facades. Similar issues apply to rail depots and recycling sites. It is unfortunate good practice is not always followed. It should be also noted these sites have an important role in removing heavy goods vehicles from the roads
- 11.3 All the boroughs that that 'host' minerals infrastructure should have appropriate safeguarding policies in their local plans, which should be monitored for their effectiveness. It is noted that safeguarding policy has been supported by the Secretary of State. A scheme for the redevelopment of land on the rear part of Peruvian Wharf, Newham for 950 flats behind the proposed aggregate facilities was dismissed early in 2018

12 Minerals Development Plans, and Planning Applications

- 12.1 The review of the London Plan is considered in section 4 above. The LAWP will support policy SI10 as proposed for modification – Appendix F - by the GLA for the reasons set out in the letter – Appendix E
- 12.2 Appendix C illustrates the current progress in adoption of mineral planning policies in London's development plans. Of the four boroughs identified in the London Plan required to make land-won sand and gravel provision Havering, Hounslow and Hillingdon LBs have adopted mineral planning policies.
- 12.3 Redbridge LB has an adopted minerals local plan which has a 'preferred areas' comprising 1.22mt of sand and gravel resource. This would meet the Borough's apportionment for the next ten years. The mineral plan also identifies further areas of search and the borough's LAA 2015 confirms the objective of meeting the London Plan's apportionment to 2031.
- 12.4 Hillingdon submitted its Local Plan Part 2 for examination in May 2018, which re-categorises sites identified in the Local Plan Part 1 (2012) to reflect the National Planning Practice Guidance (2014) for minerals. It also proposes a new site, referred to as the Bedfont Court Estate, as an 'Area of Search'. In total, 106 ha. of land is designated as either a Specific Site, Preferred Area or Area of Search based on the knowledge of mineral resources existing and the likelihood of extraction being acceptable in planning terms. In the absence of

being able to meet its London Plan landbank apportionment, Hillingdon considers this to be the most appropriate response to managing its land-won supply. It also safeguards sites for aggregate recycling and rail depots.

- 12.5 Hounslow has allocated in its Borough Plan one 'preferred area' (Rectory Farm – see below) estimated at 3mt of sand and gravel, and identified further areas that are currently safeguarded.
- 12.6 Havering submitted in March 2018 a local plan for examination that comprises mineral polices. The Plan identifies land to the south and north of the Borough that merit safeguarding for future mineral supply. No preferred areas are identified but the plan does commit to maintaining a 7-year land bank to meet London Plan requirements.
- 12.7 A summary on the progress of planning applications is illustrated in Appendix B. The most notable decision is the permission granted on appeal at Wennington Hall Farm, Ingrebourne Hill, Rainham in April 2017. There are however some significant other applications/proposals:
- Extension to Fairlop Quarry, Hainault, Redbridge – permitted June 2018
 - Prior extraction at Rectory Farm, Hounslow – permitted in principle July 2017
 - Aggregate rail depot at Cricklewood Railway Yard, Barnet – not yet determined.
 - The imminent recommissioning of Peruvian Wharf.

13 Findings and Conclusions

- 13.1 The overall aggregate monitoring picture is illustrated in Table 6 which provides a summary of the critical metrics

Marine aggregates and imports

- 13.2 The data clearly illustrates that supply of aggregates to London is very dependent on the imports of land won sand and gravel, crushed rock and the landing of marine dredged aggregates. In 2017 almost 10.5mt of aggregate sales was from these facilities.
- 13.3 It is noted that the main sources of this material, crushed rock from Somerset and elsewhere in the UK and offshore gravel reserves are sustainable until 2030, at least. However, the supply to London is dependent on appropriate infrastructure, the wharves and rail depots, being maintained and although there is a margin of headroom the capacity is fragile. Many of the facilities are in areas that include sensitive development that generate pressures to

relocate or limit the operations of this infrastructure. This means it is paramount the safeguarding of these facilities is maintained or even enhanced and further capacity created. Accordingly, the London Plan and Borough Plans when reviewed should address this matter. It should also be noted that although there are some facilities, particularly wharves, which dominate supply, all facilities have a role. A wide distribution of varying types and sizes of wharves and depots are essential elements in the overall supply system.

- 13.4 The current application at Cricklewood Rail Yard, Barnet for an aggregate depot (and CDE waste rail transfer station) would if granted add additional capacity. Also, the imminent re-commissioning of Peruvian Wharf will increase marine aggregate supply options. The withdrawal of the application for a large housing development to the rear of the wharf is a welcome upholding of wharf safeguarding policy

Land won sand and gravel

- 13.5 Land won sand and gravel is very much a minor player in the supply of aggregates to London. The London sand and gravel 'landbank' is just over three years and undershoots the 0.7 mtpa 'apportionment' in the London Plan. Moreover, it is noted that the 'capacity' of the current sites cannot meet the apportionment and only Hillingdon and Havering are currently producing sand and gravel. Nevertheless, it is important that London has a 'local' aggregate resource available to the market. Moreover, within the overall picture of the Managed Aggregate Supply System (MASS) it is important that London continues to make a 'full contribution'⁷ to its own and national aggregate needs by meeting London Plan requirements as required by the PPG
- 13.6 Appendix A illustrates that reserves were permitted (Wennington Hall Farm, Havering - 1.35mt) in 2017 and since (Fairlop Quarry Extension, Redbridge - 1.0mt). There is also an outstanding application (Rectory Farm, Hounslow – 3mt) that could augment the landbank significantly.
- 13.7 It is further noted that the policy framework – see above – give support to the release of further reserves. It is noted The London Plan review continues the current apportionment, which is needed to underpin a local land won aggregate supply as part of the Capital's contribution to MASS. Furthermore, to ensure that London continues to have a local resource to draw on it should continue to be safeguarded in Local Plans (and not just those currently identified with an 'apportionment') along with 'prior extraction' policy so extraction can be, where appropriate, be embedded with construction.

⁷ <https://www.gov.uk/guidance/minerals#planning-for-aggregate-minerals> – paragraph 073

Recycled aggregates

- 13.8 The limited information on recycled aggregates means it is difficult to reach a full understanding of this aspect of aggregate supply, but the estimates indicate recycled aggregates are unlikely to replace the main supply streams. Furthermore, they are unlikely to meet the production levels indicated in the London Plan. The source material is volatile as it is dependent on the nature of construction projects. Also, availability of appropriate recycling plant and sites is not dependable in London.
- 13.9 Nevertheless, recycled aggregates are likely to be more significant in volume terms, but not necessarily quality, than local sand and gravel supply. Accordingly, planning policy should continue to be supportive of the production of recycled aggregates, and support the development of appropriate facilities, generally but in particular by adopting guidance for their siting, taking into account environmental policy and the Green Belt.

Demand for aggregates

- 13.10 All the evidence suggests that London's need for aggregates will be maintained at recent levels or more likely to increase. Indeed, the Mineral Products Association report on aggregate demand and supply until 2030 supports this assumption. In order to meet this the implications for GLA and the London Plan review and the borough plans are:
- The sand and gravel resource within London should continue to be safeguarded in relevant local plans along with appropriate 'prior extraction' policy so that mineral extraction is embedded with construction.
 - The aggregate wharves and rail depots should be safeguarded and policy strengthened to not only cover protection of the sites themselves but a 'safeguarding zone' around them (including land within another Borough) so that any new development includes appropriate mitigation measures. Moreover, consideration be given to support enhanced capacity including new sites, for wharves and rail depots
 - The current 'apportionment' arrangements for sand and gravel extraction be maintained and endorsed by the London Plan review and implemented by the relevant Borough Local Plans.

- The London Plan and the Borough plans should continue to endorse aggregate recycling and support the development of appropriate facilities, generally but in particular by adopting guidance for their siting taking into account environmental policy and the Green Belt.

Conclusions

- 13.11 The London Aggregates Working Party concludes that according to the 2017 AM survey data London is not making a full contribution to the managed aggregate supply system in the sense the landbank and sales are below the requirements of the London Plan. In the absence of up to date national and regional guidelines for aggregates provision, overall, the London Aggregates Working Party concludes that London is making some contribution to meeting both national and local requirements for the supply of aggregate. However, permissions have been granted latterly and policy is in place or emerging that helps to address this issue.
- 13.12 It is further noted infrastructure is of sufficient capacity to facilitate sales within London of imported and marine aggregates at a level well in excess of current levels.
- 12.13 Finally, the four London Boroughs with a London Plan sand and gravel apportionment need to continually review their local plans to ensure they can provide their landbank requirements and provide sufficient aggregate infrastructure capacity.

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Table 2: Summary sales/consumption of primary aggregates 2001-2014 (Thousand tonnes)

	Aggregate Sales								Aggregate Consumption							
	Sand and Gravel				Crushed Rock		Total Primary Aggregate		Sand and Gravel				Crushed Rock		Total Primary Aggregate	
	Land won	%	Marine	%	Sales	%	Tt	%	Land won (Tt)	%	Marine	%	Tt	%	Tt	%
2001	837	18%	3,725	82%	0	0%	4,562	100%	2,021	21%	5,090	53%	2,453	26%	9,563	100%
2005	1,038	20%	4,035	80%	0	0%	5,073	100%	2,185	21%	4,278	41%	3,892	38%	10,355	100%
2009	577	14%	3,662	86%	0	0%	4,239	100%	1,459	16%	3,824	41%	4,086	44%	9,369	100%
2014	376	7%	4,678	93%	0	0%	5,054	100%	1,834	19%	3,849	40%	3,890	41%	9,573	100%

Source: AM2001, 2005, 2009, 2014 National Collations (BGS)

Table 3: Summary exports and imports of primary aggregates 2014 (Thousand tonnes)

Exports Aggregate Mineral		Sales within London	Sales Outside South-East						All sales outside London	Total Sales
			South West England	South East	East of England	East Midlands	South Wales	Other		
Sand and Gravel	Land-won	245		131					131	376
	Marine	3,392		329	956				1,285	4,677
	Total	3,637		460	956				1,416	5,053
Crushed Rock										-
Total		3,637	-	460	956	-	-	-	1,416	5,053
Imports Aggregate Mineral		Imports from:								
		Total Imports to London	South West England	South East	East of England	East Midlands	South Wales	Other	Outside England & Wales	
Sand and Gravel	Land-won	1,590	93	495	1,001			1		
	Marine	456		387	70					
	Total	2,046	93	882	1,071			1		
Crushed Rock			1,505	2	10	890	173	72	1,236	
Total		2,046	1,598	884	1,081	890	173	73		

Source: AM 2014 National Collation (BGS)

Table 4: Sales of sand and gravel, permissions, reserves apportionment and landbank 2008-2017 (Thousand tonnes)

Year	Sharp Sand & Gravel			Total Sand & Gravel ¹					
	Sales (Tt)	Permissions (Tt)	Reserves at end of year (Tt)	Sales (Tt)	% change on previous year	Permissions (Tt)	Reserves at end of year (Tt)	Apportionment	Land-bank (years)
2008	741	176	1,244	826	-28	176	1,512	1,000	1.5
2009	509	600	1,810	577	-30	600	1,981	1,000	2
2010	c	0	c	679	18	0	1,380	700	2
2011	c	0	c	658	-3	0	1,120	700	1.6
2012	c	0	c	320	-51	0	1,180	700	1.7
2013	c	0	c	379	18	0	1,376	700	2
2014	307	0	702	375	-19	0	702	700	1
2015	302	1,100	1,406	302	-2	1,100	1,406	700	2
2016	350	0	1,321	350	15	0	1,321	700	2
2017	262	1,350	862	262	-25	1,350	2,212	700	3.2
Last 10 year average	412			473					
Last 3 year average	305			305					
% change (2008-17)	-65%			-68%					

Source: AM2016 report, AM 2017 Survey

¹ Includes a small amount of hoggin/construction fill sales – 68,000 tonnes sales in 2014 – see AM 2014&15

Permission in 2017 is the result of 1 new site being approved in the year

Soft sand details were removed this year as no sales/reserves have been reported in the previous 3 years

Table 5: Wharf sales of marine dredged sand and gravel, crushed rock and land won sand and gravel 2008-17 (Thousand tonnes)

Year	Marine Dredged Sand and Gravel		Crushed Rock Imports		Land-won Sand & Gravel		All Aggregates	
	Sales (Tt)	% Total Sales	Sales (Tt)	% Total Sales	Sales (Tt)	% Total Sales	Sales (Tt)	% Change from Year Before
2008	4,350	89%	360	7%	202	4%	4,912	5%
2009	3516*	87%	359	9%	146*	4%	4,021	-18%
2010	3,007	85%	379	11%	135	4%	3,521	-12%
2011	3,638	82%	655	15%	160	3%	4,453	26%
2012	3,775	83%	629	14%	144	3%	4,548	2%
2013	4,357	86%	581	14%	118	0%	5,056	14%
2014	4,596 (4,904)	86% (87%)	666 (649)	12% (11%)	107 (115)	2% (2%)	5,369 (5,668)	6% (12%)
2015	4,959 (5,099)	93% (88%)	381 (589)	7% (10%)	0 (110)	0 (2%)	5,340 (5,798)	- 1% (2%)
2016	5394 (5,614)	95% (86%)	308 (760)	5% (12%)	0 (180)	0% (2%)	5,702 (6,554)	7% (15%)
2017	5,023 (5,221)	98% (87%)	123 (672)	2% (11%)	0 (122)	0% (2%)	5,146 (6,016)	-10% (-8.2%)
10 year average	4,262		444		101		4,292	
3 year average	5,125		271		0		5,396	

Source: AM 2016 report, AM2017 Survey

¹ AM2014 did not distinguish land-won from marine sand and gravel so a 2% estimate was applied for land-won (average 2011-2015). AM2009 also did not distinguish land-won from marine; here a 4% estimate was applied.

²The Port of London Authority figures are shown in brackets for 2014, 2015, 2016 and 2017 and include data on Conwy Wharf, which was not surveyed by the AM survey. These record all aggregate sales 5%, 8%, 15% and 17% higher than AM data respectively.

Table 6: Rail depot sales of crushed rock, land-won and marine dredged sand and gravel, 2008-2017 (Thousand tonnes)

Year	Crushed Rock Imports		Marine Dredged Sand and Gravel		Land-won Sand & Gravel		All Aggregates
	Sales (Tt)	% Total Sales	Sales (Tt)	% Total Sales	Sales (Tt)	% Total Sales	Sales (Tt)
2008	3,391	69%	1,165	23%	372	8%	4,928
2009	2,370	67%	953	27%	192	6%	3,515
2010	2,608	71%	938	25%	147	4%	3,693
2011	3,580	72%	1,258	25%	117	3%	4,955
2012	2,777	71%	1,021	26%	115	3%	3,913
2013	3,100	70%	1,199	27%	122	3%	4,421
2014	2,464	67%	1,111	30%	127	3%	3,702
2015	2,747	63%	1,496	34%	96	2%	4,339
2016	3,953	71%	1,564	28%	50	1%	5,567
2017	3,668	69%	1,561	29%	104	2%	5,333
10 year average	3,066		1,227		144		4,437
3 year average	3,456		1,540		83		5,080

Source: AM 2016 report, AM2016 Survey

Table 1: Key Facts¹ (Thousand tonnes)

Mineral	Sales	Av (10yr) Sales	Av (3yr) Sales	Trend (2017 Sales v. 10yr. average)	Trend 2017 (Sales v 3 yr. average.)	Apportment	Reserve	Landbank (yrs)	Capacity (pa)	Comment
Quarries (S&G)	262	473	305		-	700	2,212	3.2	800	
Wharves (All aggregate)	5,146	4,292	5,396						5,446	Newham; Peruvian wharf scheduled to reopen 2017/18. Wandsworth: Battersea Wharf Closed in 2017 Sales appear to be only 6% below capacity
Rail Depots (All aggregate)	5,333	4,437	5,080						7,098	
Recycled/Secondary Produced	2,011-3,017	n/a	1,955-2,993	n/a					n/a	2017 sales above average

Summary Comments:

London is likely to continue to require the level of aggregate supply of recent years and given the requirements for housing and infrastructure, including the major projects referred to above, this could increase. This should be noted and **the following points considered in the London Plan review and in due course the Borough local plans to sustain aggregate supply.**

Imports and marine aggregates will continue to dominate supply. The aggregate wharves and rail depots should therefore continue to be safeguarded and the London Plan review should consider strengthening this policy to include a 'safeguarding zone' around these facilities. Moreover, consideration should be given to support enhanced capacity including new/recommissioned sites.

Local land won sand and gravel can continue as a local sustainable supply for London. Accordingly, the safeguarding of the resource is still needed along with requirements to consider 'prior extraction' for major construction projects.

Although the current 'apportionment' has consistently not been met recent permissions and local plan commitments suggest this can be attained. Accordingly, the London Plan apportionment arrangements should be maintained.

Aggregate recycling should continue to be supported but the unreliability of the data makes 'target/apportionments' unrealistic but guidance for the siting of these facilities should be adopted that take into account environmental policy and the Green Belt.

1 The table includes post 2017 information to provide an up to date picture to assist with preparation of the London Aggregates Assessment 2017.

2 Estimated from Environment Agency WDI information on CDE wastes

Figure 1: Location of quarries, wharves and rail depots in 2017

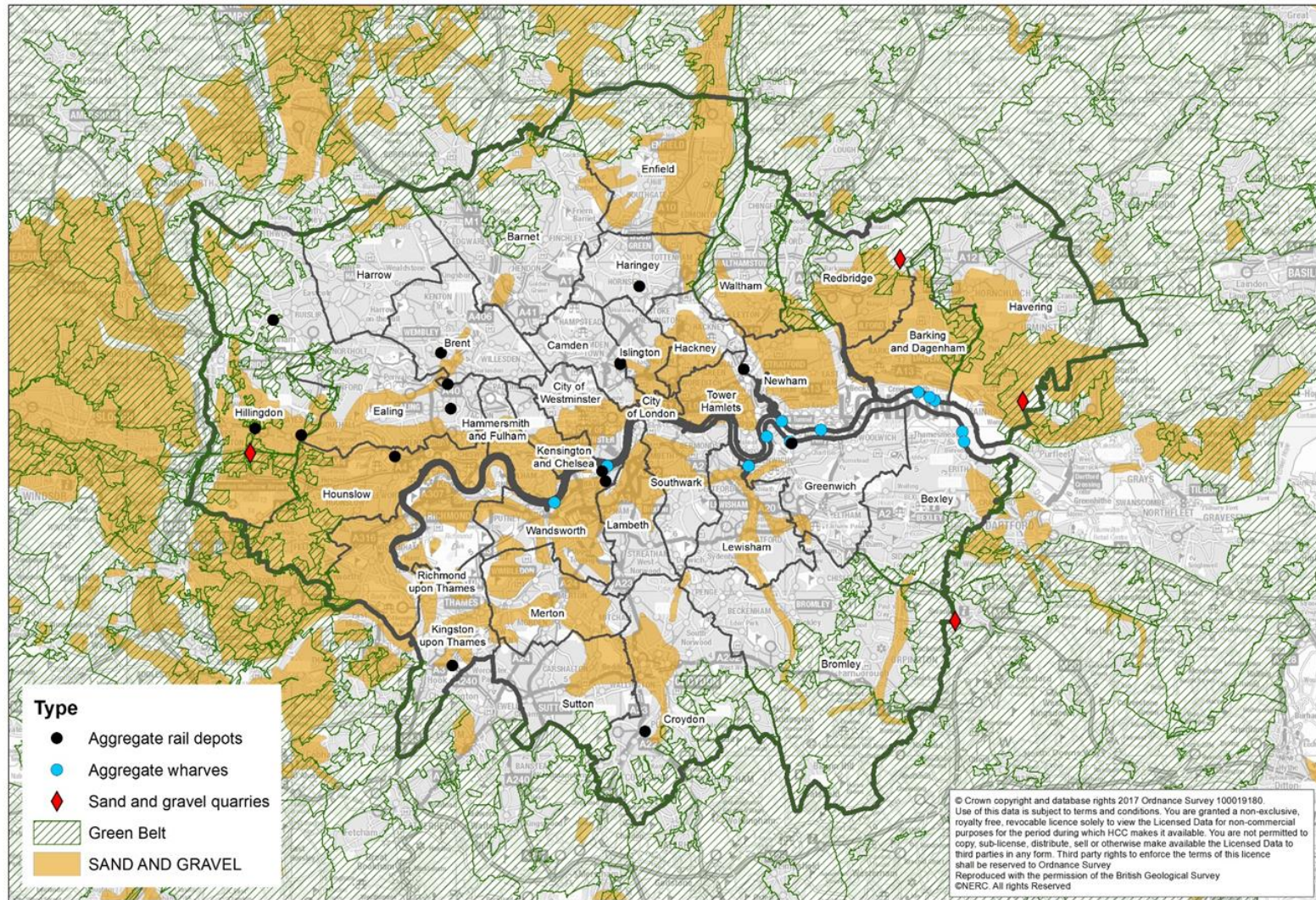


Figure 2: Sales of land-won sand and gravel compared with permissions, 2008-2017

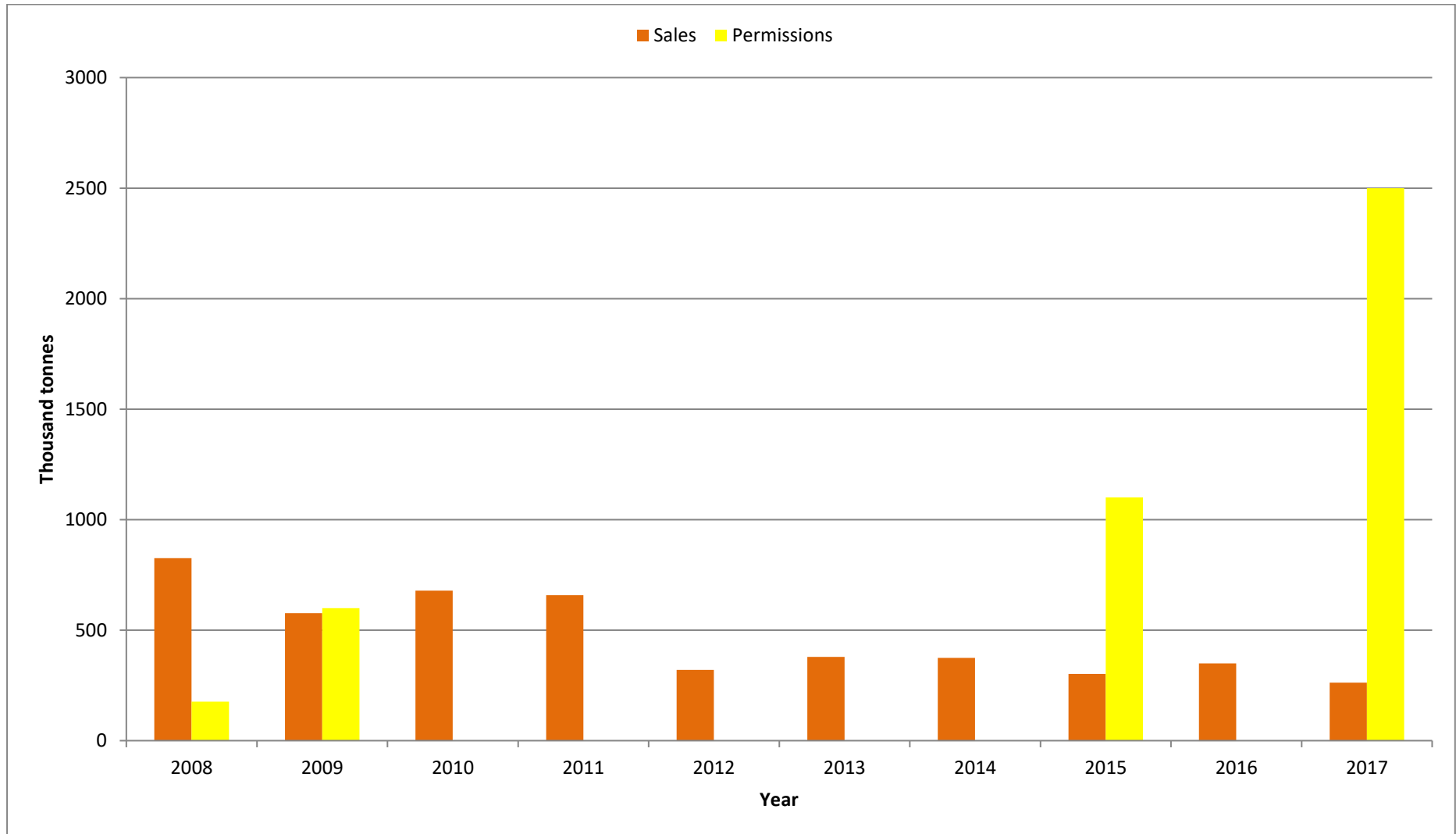


Figure 3: Sales and reserves of land-won sand and gravel, 2008-2017 (incorrect reserves for 2017 – see Table 4)

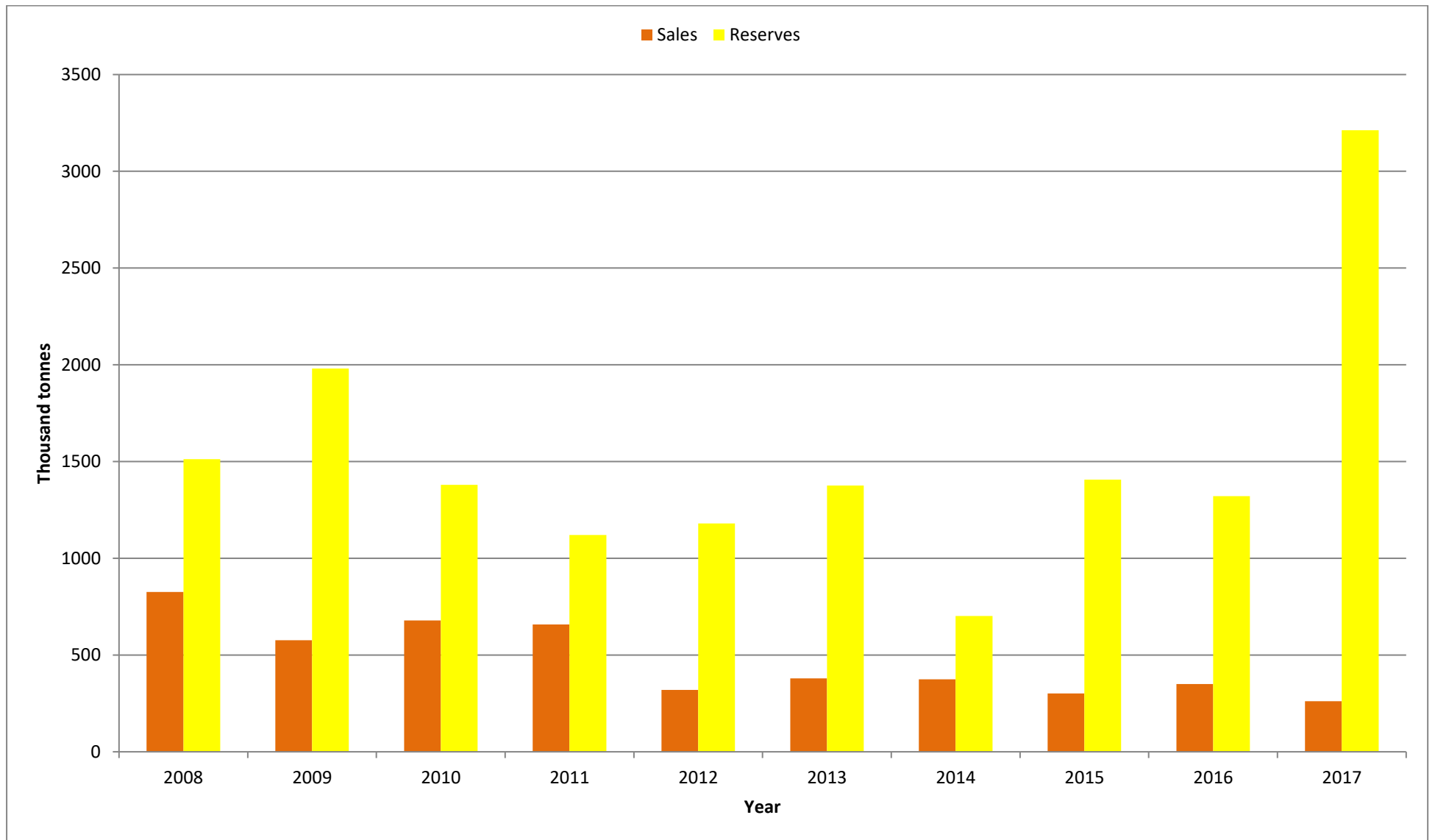


Figure 4: Wharf sales of marine dredged sand and gravel, crushed rock and land-won sand and gravel, 2008-2017



Figure 5: Rail depot sales of marine dredged sand and gravel, crushed rock imports, and land-won sand and gravel, 2008-2017

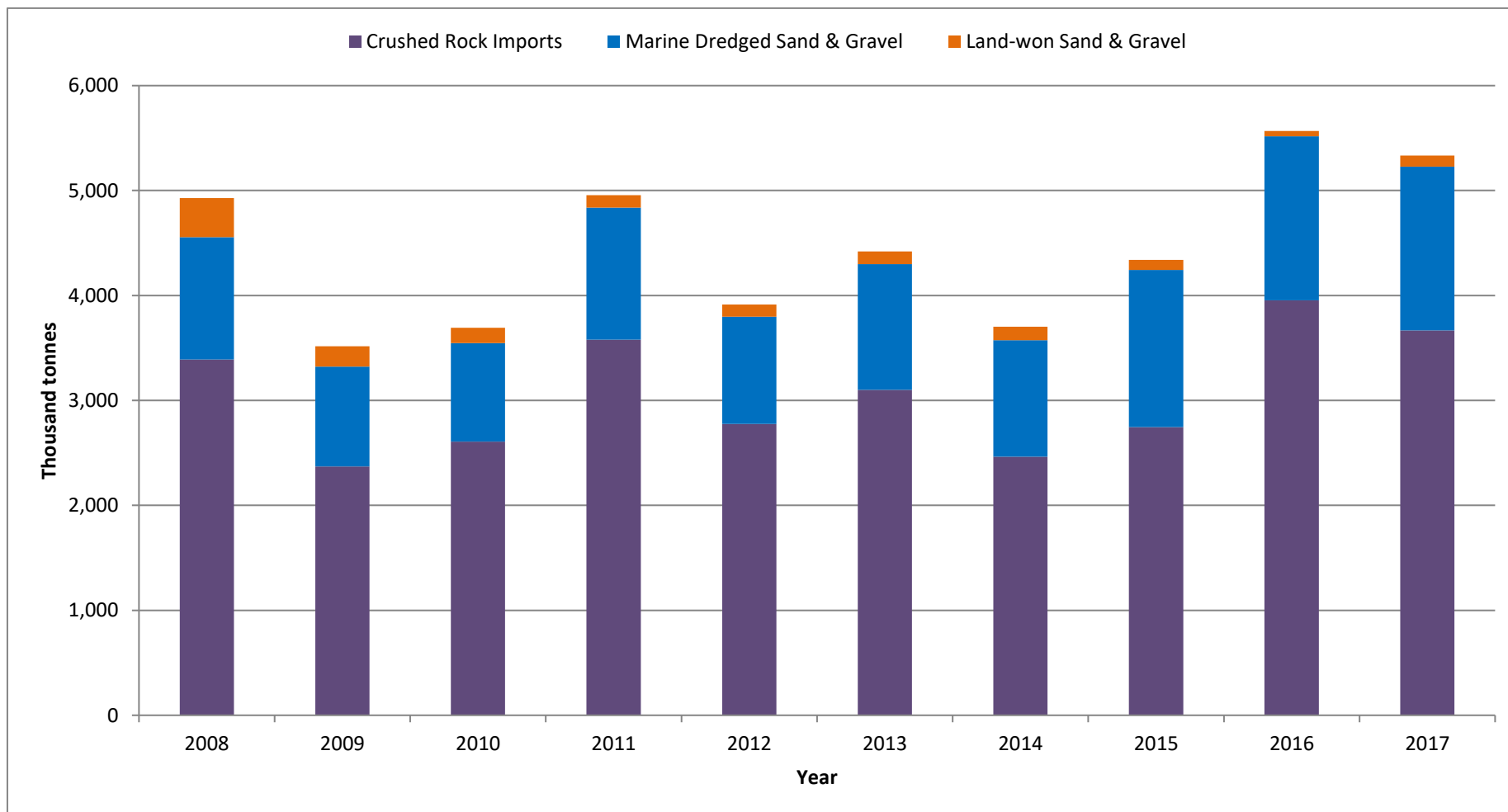
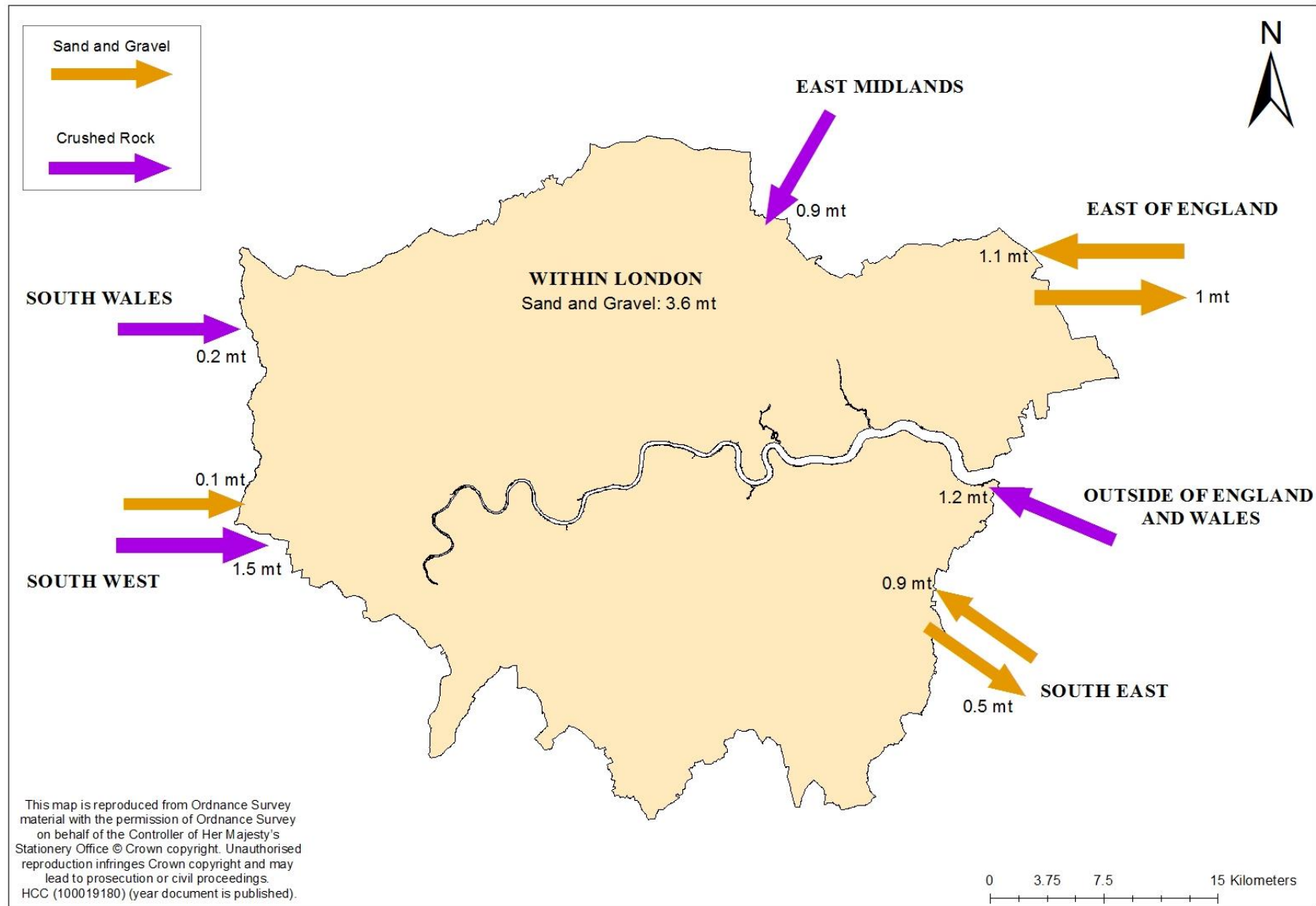


Figure 6: Primary aggregate imports and exports in the London region, 2014



Appendix A: Active and inactive quarries, wharves and rail depots at end 2017

(Deleted)

Appendix B: Aggregate applications; permitted, refused, undetermined or withdrawn in 2017

Site Name	Mineral	Location	Type of development/ mineral	Applicant	Reserves/ Capacity	Status (undetermined, withdrawn, refused, permitted)	Designations (AoNB, SSSI / NNR, SPA/ SAC)	Green Belt
Havering Land at Wennington Hall Farm, Rainham (APP/B5480/W/1 6/3159082)	Sharp sand and gravel/ CDE recycling & backfill	554300, 181300	New quarry/sharp sand and gravel and CDE waste recycling	Ingrebourne Valley Ltd	1.35mt (1.7 CDE backfill)	Permitted (on appeal)		x
Hounslow Rectory Farm Cranford Lane (P/2016/5112)	Sharp sand and gravel	< ... >	New quarry/sharp and gravel	Chadbourne Estates	3.0mt	Undetermined (Permitted in principle – prior extraction for major logistics development)		x
Redbridge, Fairlop Quarry (2089/16)	Sharp sand and gravel/ CDE recycling backfill	<...>	Quarry extension	Brett Tarmac	1.0 mt (0.75mt CDE backfill)	Undetermined (Permitted 5 June 2018)		x
Barnet, Cricklewood Railway Yard (17/5761/EIA)	Crushed rock, CDE waste)	< ... >	Aggregate and CDE waste transhipment depot	DB Cargo UK Ltd	1.5mtpa (2 trains in a day for aggregate 1 out for CDE waste)	Undetermined (part of Brent Cross redevelopment)		

Appendix C: Key milestones for minerals in Local Plans 2017

MPA	Local Plan or SPD title	Public Participation (Reg 18)	Publish Draft (Reg 19)	Submission to Sec of State (Reg 22)	Estimated date for independent examination	Estimated date for Adoption
London						
Greater London Authority	The London Plan	Early 2018	na	Autumn 2018	Jan – May 2019	Late 2019
West London						
LB Hillingdon	Local Plan: Part 1 Strategic Policies Unitary Development Plan- Saved Policies Part 2: development management policies, site allocations & policies map	October - December 2015	October 2015	May 2018	August 2018	Adopted Nov 2012 Adopted Sep 2007 Spring 2019
LB Brent	Unitary Development Plan Development Management Policies (Will take out the aggregate policy)	June - July 2014	September 2015	Early 2016	Summer 2016	Adopted 2004 Winter 2016
LB Ealing	Development Strategy 2026					Adopted April 2012

	(also known as the Core Strategy DPD) Development Sites					Adopted December 2013
LB Hounslow	Hounslow Local Plan 2015-30 Volume 1 Hounslow Local Plan 2015-30 Volume 2					Adopted 15th Sep 2015 Adopted 15th Sep 2015
LB Richmond upon Thames	Local Plan Review Core Strategy Development Management Plan	4 January - 1 February 2016	Late autumn 2016	Spring/summer 2017	Autumn/winter 2017/18	Spring 2018 Adopted April 2009 Adopted November 2011
LB Hammersmith & Fulham	Core Strategy Local Plan	January - February 2015	Summer 2015		Early 2016	Adopted October 2011 Summer 2016
LB Camden	Local Plan Development Policies	Winter 2013/Spring 2014	Winter/Spring 2015	Winter 2015	Spring 2016	Summer 2016 Adopted 2010
LB Wandsworth	Core Strategy Local Plan Review (2012-2016)	July - September 2014	October 2014	March 2015	December 2015	Adopted October 2010 March 2016
LB Kingston Upon Thames	Core Strategy					Adopted April 2012
LB Sutton	Core Strategy Site Development Policies DPD	January-February 2016	June 2016-July 2016	October 2016	February 2017	Adopted December 2009 Adopted March 2012 March-May 2017

	Local Development Scheme (2016-2031)					
East London						
LB Enfield	Core Strategy 2010-2025 New Local Plan 2017-2032	December 2015-February 2016				Adopted November 2010
LB Waltham Forest	Core Strategy Development Management Policies					Adopted March 2012 Adopted October 2013
LB Croydon	Local Plan - Strategic Policies CLP1 Local Plan - Strategic Policies CLP1.1 (Partial Review) Development Plan Document CLP2	November - December 2015 November - December 2015	Summer 2016 Summer 2016	Winter 2016/2017 Winter 2016/2017	May 2017 May 2017	Adopted April 2013 Winter 2017 Winter 2017
LB Bromley	Local Plan Unitary Development Plan	June/July 2015	December 2015	February 2016	Spring 2016	Summer 2016 Adopted 2006
LB Bexley	Core Strategy Detailed Policies & Sites Local Plan	Autumn 2013	Winter 2015	Spring 2016	Winter 2016	Adopted Feb 2012 Early 2017
LB Greenwich	Core Strategy with detailed Policies Site Specific Allocations	Autumn 2016	Winter 2016	Spring 2017		Adopted July 2014 Autumn 2017

LB Barking & Dagenham	Core Strategy Local Plan	Autumn-Winter 2015	Summer-Autumn 2016	Winter 2016	Winter -Spring 2017	Adopted July 2010 Spring 2017
LB Havering	Core Strategy Local Plan	Includes mineral policies		27 March 2018	9-18 October 2018	Adopted July 2008 Early 2019
LB Redbridge	Mineral Local Plan Local Plan Review (2015-2030)					Adopted September 2012 Adopted 15 March 2018 (No mineral polices – MLP still part of development plan)
London Legacy Development Corporation	Local Plan					Adopted July 2015

Appendix D

LAWP

London Aggregates Working Party

**Technical
Secretary:**

Richard Read BA. MRTPI

Address: c/o Strategic Planning, Hampshire County Council, First Floor, EII Court West, The Castle, Winchester, SO23 8UD

Tel:

Email:

Via Email to:

planningpolicyconsultation@communities.gsi.gov.uk

8 May 2018

Dear Sir or Madam

Revised National Planning Policy Framework (NPPF)

Thank you for providing the opportunity to comment on the proposed revisions to the NPPF. These comments are on behalf of the London Aggregates Working Party (LAWP).

The LAWP is a joint signatory to a letter sent on behalf of all nine English Aggregate Working Parties as a response to the consultation.

Accordingly, the LAWP fully supports the joint response by the English AWP's. However, it wishes to stress how the Managed Aggregate Supply System (MASS) has been successful in providing a steady and adequate supply of aggregates to London. The Capital is very short of indigenous aggregate resources and is dependent on imports largely from elsewhere in England and landings of marine sand and gravel. These flows are underpinned by the MASS, which helps ensure the continued supply of aggregates needed to sustain the London economy. The MASS also helps demonstrate how all mineral planning authorities have a role either through making appropriate provision for land-won resources, or supply infrastructure such as recycled aggregate facilities and transport infrastructure like wharves and rail depots.

However, LAWP is concerned that some of the elements of the MASS are in jeopardy. The policy wording changes in the proposed revised NPPF implies a proposed change in status of mineral planning policy, and a possible loss of the National and Sub-National Aggregate Guidelines. These are key to maintaining the MASS.

In view of this, the LAWP endorses the detailed points raised by the joint AWP response and urges Government to give these favourable considerations.

Yours faithfully,

Richard Read
LAWP Technical Secretary

Appendix E

LAWP

London Aggregates Working Party

Technical Secretary: Richard Read BA. MRTPI

Address: c/o Strategic Planning, Hampshire County Council, First Floor, Ell Court West, The Castle, Winchester, SO23 8UD

Tel:

Email:

Sadiq Khan (Mayor of London)

New London Plan

GLA City Hall

London Plan Team

Via Email

26 February 2018

Dear Mayor

London Plan Consultation – Policy SI10

I wish to make 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,

A handwritten signature in blue ink that reads "Richard Read". The signature is written in a cursive style with a large initial 'R'.

Richard Read
LAWP Technical Secretary

Appendix F

Policy SI10 Aggregates – with proposed minor modifications as submitted to the New London Plan EiP

- 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 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.~~
- B 1) Development Plans should 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:
- ~~1a) at least 1.75 mt to London Borough of Havering~~
 - ~~2b) at least 0.7 mt to London Borough of Redbridge~~
 - ~~3c) at least 1.75 mt to London Borough of Hillingdon~~
 - ~~4d) at least 0.7 mt to London Borough of Hounslow.~~
- 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.**
 - 3) support the production of recycled 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.**
- C All Mineral Planning Authorities in London should identify and safeguard ~~aggregate resources~~ in Development Plans, including aggregate recycling facilities.
sand and gravel resources from development that would otherwise sterilise future potential extraction.
- 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.
- 2A) ensure planning conditions are imposed on new aggregate facilities so that noise, dust and traffic impacts are effectively controlled.**

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.

- 9.10.1 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 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.
- 9.10.2 A realistic **landbank figure** (i.e. seven years' supply) of at least 5 million tonnes of land-won aggregates for London throughout the Plan period has been apportioned to boroughs as set out in the policy above. There remains some potential for extraction beyond the four boroughs identified in Policy SI10 Aggregates, including within the Lee Valley, and boroughs with aggregates resources should consider extraction opportunities.
- 9.10.3 Aggregates are bulky materials so Development Plans should maximise their use and re-use and minimise their movement, especially by road. The objective of proximity dictates the best and most local use of materials that can be extracted in London. The **re-use/recycling** of building materials and aggregates is a significant and well established component of the circular economy advocated in Policy SI7 Reducing waste and supporting the circular economy and reduces the demand for natural materials.
- 9.10.4 Boroughs should protect existing, planned and potential sites for aggregate extraction and transportation. 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. Railheads are vital to the sustainable movement of aggregates and boroughs should protect them.
- 9.10.5 **Sites for depots** may be particularly appropriate in preferred industrial locations and other employment areas. Boroughs should examine the feasibility of using quarries as CD&E recycling sites once mineral extraction has finished.
- 9.10.6 Mineral Planning Authorities are required to prepare an annual **Local Aggregates Assessment** (LAA). It is not reasonable to expect boroughs without mineral resources or aggregate facilities to produce their own LAAs, so the Mayor will continue to prepare a joint London-wide LAA to supplement individual LAAs from boroughs with resources and facilities.

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