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Matter 70: 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?

The supply of land-won aggregates in London faces acute problems due to the existing density of development and shortage of suitable land. Some areas that have been identified for land-won aggregates are amongst those that have some of the highest development pressures, such as Hounslow and Hillingdon. These pressures arise from housing apportionment targets, infrastructure projects of national importance, and other factors such as an increase in apportioned waste tonnage.

At Policy SI10 B, we note that the Plan relies heavily on Boroughs in West London, including Hounslow and Hillingdon (as part of the West London Waste Authority area). These Boroughs are subject to major projects, such as the enabling works for HS2, and potentially, a 3rd runway at Heathrow. These are areas where we can expect increases in housing and other growth, under proposals within the draft Plan. It is therefore difficult to see how the apportionments for land-based aggregates would be effective over the Plan's timeframe.

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?

London is heavily dependent upon imports of aggregates. Consequently, supply does not necessarily depend upon the Plan having a target for recycling and re-use of aggregates. We believe that policy effectiveness

depends more upon the rate at which development is built and on the impact of increased development density on supply chain logistics.

The policy aspiration is consistent with the aims of the overall approach to promoting recycling and the circular economy. We welcome this as it encourages waste to be moved up the waste hierarchy.

There is a question around whether a target for recycling of construction materials is measurable, in relation to Question M68 (b). At present it is measurable, but with difficulty, due the nature of the available data being fragmented and some knowledge gaps requiring an expert analysis.

This issue is addressed in the government's new Resources and Waste Plan for England (December 2018). This has outlined proposals for the mandatory electronic recording of waste movements, together with a more holistic approach to waste data. This should make this target much more readily 'measurable', without the need for an in-depth knowledge of waste data.

For reasons discussed above and in our statement on Matter 69, it is unlikely that a target that included excavated materials would be feasible. This is due to changes in the regulatory regime, post - Methley Quarry judgement[1] (please refer to our statement on Matter 69), and the definition of waste 'recovery' that accompanied the consequent regulatory changes.

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?

The Mayor's overall approach at Policy SI10 C seems appropriate. However, London, as a region, has unique issues in strategically planning for the supply of minerals. For example, it is heavily dependent upon supply from outside London, due to the density of development, population pressures, and absence of suitable geology in many areas within Greater London.

The future supply of aggregates, from areas that supply London, necessitates on-going cooperation with minerals planning authorities, in the wider South East and further afield. This applies particularly to crushed rock supplies.

Security of supply also depends upon safeguarding transport hubs, including wharfs and railheads, in addition to safeguarding existing sites for receiving materials. However, it is likely that increased development pressures, in growth locations that have transport hubs and access to wharves, may impact on the ability of aggregates handling sites to operate effectively.

[1] Tarmac Aggregates Ltd, R (on the application of) v The Secretary of State for Environment, Food and Rural Affairs & Anor [2015] EWCA Civ 1149

This has already been evidenced by some sites having their operating hours reduced, due to the encroachment of housing development. In this regard, we welcome the 'Agents of Change' principle, embedded within Policy D12 in relation to the prevention of nuisances arising.

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

Our response to question c) refers. We support the Mayor's Suggested revisions at SI10 D 2A) and 2 B), as helpful links to other policies in the Plan.

However, the extraction of aggregates and other minerals, may have adverse impacts on the water table and upon public water abstractions. We therefore suggest that Point D is strengthened further by reference to the Plan's policies' aims; to safeguard London's water supplies and support the delivery of the Thames River Basin Management Plan and associated Catchment Plans' actions.

The environmental impacts of aggregate facilities will continue to be addressed though the combination of planning and permitting regimes.

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

We have no comments on this question.