

9th December 2016



Mineral Products Association

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

By email only: yourviews@london.gov.uk

Dear Sirs,

LONDON PLAN CONSULTATION - *A CITY FOR ALL LONDONERS*

The Mineral Products Association (MPA) represents companies producing 90% of mineral products, including aggregates, asphalt, cement and concrete, which comprise the largest flow of materials moving into and around London and the biggest supplier to the construction industry.

Our industry is the largest freight user of the Thames and the rail network and we are also major users of the road network as virtually all deliveries to construction sites are by HGV.

General

Minerals are essential to the economy. The development and growth envisaged in London - of housing, business and infrastructure - and delivery of the Mayor's objectives for housebuilding, economic development and environmental quality, requires a steady, adequate and sustainable supply of construction materials.

London depends on imports of construction materials - sand, gravel and rock - from outside of the Greater London boundary. Around 10 million tonnes of aggregates are imported into London each year, mainly to its rail depots and wharves, providing over 95% of London's construction material. In total, over 20 million tonnes of aggregates, concrete and asphalt are delivered in London annually and without these supplies, construction would stop.

Around 4 million tonnes of crushed rock are imported to London's railheads/depots from Somerset and the Midlands, and 4 million tonnes of sand and gravel dredged from the seabed are landed at London's wharves each year. Recycled aggregates also make a large contribution to supply. Delivery by rail and ship, close to market, displaces significant amounts of lorry movements on London's roads, with obvious air quality, carbon, congestion and road safety benefits. For example, one train can deliver the same quantity of aggregate as more than 75 lorries, and enough material to build 30 houses, with delivery by train having carbon emissions 76% per tonne lower by road. A single barge can deliver the same as 50 lorries.

The consultation document makes no reference to the supply of construction materials or the need for sites and infrastructure necessary to ensure this continues.

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Many rail depots and wharves are under threat from incompatible development on or adjacent to these sites. Development of housing on or close to these sites - many of which need to operate 24/7 - may be sensitive to noise, and without adequate mitigation, can result in complaints and compromising of site operations.

The strategic and critical importance of rail depots, aggregates wharves and industrial land needs to be recognised and sites properly safeguarded to ensure sustainable supply of construction materials.

Comments on the Consultation Document

Accommodating Growth

The need for new homes and employment space is clear. It is essential that planning for these, and intensifying development particularly around rail stations and waterfront locations and in the 'Opportunity Areas' and 'Intensification Areas' (page 25), does not affect the ability to continue to supply the supply of construction materials required to enable the needs of the growing population to be met.

Likewise, industrial land (page 23) needs to be safeguarded for minerals import, processing and distribution, reflecting the NPPF requirement that planning authorities safeguard:

- existing, planned and potential rail heads, rail links to quarries, wharfage, and associated storage, handling and processing facilities for bulk transport by rail, sea or inland waterways of minerals;
- existing, planned and potential sites for concrete batching, manufacture of coated materials, other concrete products and handling, processing and distribution of substitute, recycled and secondary material.

We are aware of growing development pressure on existing wharves, railheads and strategic industrial land throughout London (see table at the end of this submission). This includes planning decisions by Boroughs that do not properly reflect or implement national and London safeguarding policy, resulting in:

- direct loss of sites and capacity due to applications for minerals supply infrastructure not being permitted or overly constrained;
- direct loss of sites and capacity due to non-minerals development being permitted on sites;
- indirect effects due to sensitive, inappropriate development being allocated in Local Plans and developed in close proximity to operational and potential wharf and railhead sites.

Many wharves and rail depots are critically positioned to supply areas experiencing and identified for future growth. The safeguarding of these sites, and enabling of delivery of materials by rail and river, is crucial in helping to deliver the ambitions of 'more efficient freight' and improving air quality (page 33). Loss of such sites and capacity would result in more material having to be transported greater distances by road.

Economy

The intention to upgrade and extend London's infrastructure is strongly supported. However, while the existing document highlights the need for a strategic investment programme, and an ambition to recycle and re-use more materials, it does not acknowledge or prioritise the need to ensure a steady, adequate and sustainable supply of the materials required to build and maintain the infrastructure - namely aggregates, concrete and other construction products.

As London is almost totally reliant on imports of aggregates from other parts of the UK, the majority by rail and river, the 'investment programme' must also consider material supplies, and ensure that wharves and rail depots, and industrial land for manufacturing facilities, are properly safeguarded. Loss of capacity and operational flexibility will put this supply at risk.

Environment, Transport and Public Space

The need for better integration and breaking down policy silos is strongly supported. This goes to the heart of our concerns.

Currently many mineral import and infrastructure sites across London are being adversely affected by poor planning decisions that do not recognise their strategic importance or the effect that inappropriately located and designed sensitive development can have on operations.

This is due to competing demands and aspirations, but also a lack of awareness and understanding, including within London Boroughs, of where the material comes from that makes development possible and the importance of safeguarding of wharf, rail depot and industrial sites.

We fully understand the need for new housing and wider regeneration. However, London depends on wharves and rail depots for the import of the vast majority of aggregates used in construction. Our members depend on these to maintain supplies and their business.

The new London Plan has a critical role to play in making the link between economic development, housing and infrastructure, and maintaining the sustainable supply of construction materials. Loss of sites, their capacity, or operational flexibility, will mean threats to security of supply, and increasing lorries on London's roads with consequential effects on air quality, and congestion.

Table 1. Examples of current wharf and rail depot safeguarding issues in London

Site	Issue
Bow East Goods Yard, Newham	LLDC aspirations for residential and opposition to safeguarding railhead for development of concrete batching, block and coated roadstone plants. Temporary planning permission proposed.
West Drayton, Rail depot	Proximate noise and dust sensitive development
Kings Cross, Rail depot	Proximate - residential
Murphy's and Angerstein Wharf, Greenwich	Proximate development of large scale housing. Incorporation of noise mitigation in new development
Victoria Deep wharf, Greenwich	Proximate noise sensitive residential development
Pier Wharf, Wandsworth	Proximate noise sensitive residential development
Orchard Wharf, Tower Hamlets	Proposed reactivation of aggregates & cement wharf - permission for jetty refused, disregarding safeguarding policy

I trust these comments are helpful. We look forward to working with the GLA and Mayor on the development and future implementation of the Plan.

Yours faithfully,



David Payne
Senior Planning Advisor
Mineral Products Association