

## Response ID ANON-D83X-JE34-W

Submitted to **Local Plan Reg 19** Submitted on **2019-12-05 09:18:51**

**1 What is your name?** Chris Herbert

### Places

**20 Which Place would you like to comment on? (you will get the opportunity to select additional places to comment on throughout the survey)**

**Please select a place::**

East

### East Place

**36 Please check the boxes of the soundness test which you believe policy BP2 East does not pass:**

Is not Consistent with national/regional policy

**For those which have been checked, please state your reasons::**

#### BACKGROUND

Aggregates Industries UK Ltd (AIUK) rail aggregate depot at Wembley is a long established facility meeting a vital need for the sustainable importation of aggregate into London and providing asphalt and ready mixed concrete into the local construction market. It is considered to be a strategically important facility that is vital to the continued supply of aggregate into London via sustainable modes of transport and should be safeguarded as such.

#### NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The NPPF states at paragraph 204 that planning policies should:

“safeguard existing, planned and potential sites for the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.”

Paragraph 182 of the NPPF also requires that: “Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or agent of change) should be required to provide suitable mitigation before the development has been completed.”

#### LONDON PLAN - EXISTING

Policy 5.20: Aggregates

##### Strategic

A The Mayor will work with all relevant partners to ensure an adequate supply of aggregates to support construction in London. This will be achieved by:

- 1 encouraging re-use and recycling of construction, demolition and excavation waste within London
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- 3 importing aggregates to London by sustainable transport modes.

B The Mayor will work with strategic partners to achieve targets of:

- a 95 per cent recycling/re-use of construction, demolition and excavation waste by 2020
- b 80 per cent recycling of that waste as aggregates by 2020.

C London should make provision for the maintenance of a landbank (i.e. seven years' supply) of at least 5 million tonnes of land won aggregates throughout the plan period until 2031.

LDF preparation

D LDFs should make provision for the maintenance of a landbank (i.e. seven years' supply) of at least 5 million tonnes of land won aggregates throughout the plan period to 2031 by a landbank apportionment of:

a at least 1.75 million tonnes to LB Havering

b at least 0.7 million tonnes to LB Redbridge

c at least 1.75 million tonnes to LB Hillingdon

d at least 0.7 million tonnes to LB Hounslow

E Mineral planning authorities in London should:

a identify and safeguard aggregate resources in LDFs

b support the development of aggregate recycling facilities, subject to local amenity conditions.

F To reduce the environmental impact of aggregates, LDFs should;

a ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction

b safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution

c minimise the movement of aggregates by road and maximise the movement of aggregates via the Blue Ribbon Network

d develop policies that support the protection and enhancement of aggregates recycling facilities.

DRAFT LONDON PLAN – CONSOLIDATED SUGGESTED CHANGES, JULY 2019

POLICY SI10: AGGREGATES

A An adequate supply of aggregates to support construction in London will be achieved by:

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2) extracting land-won aggregates within London

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B Development Plans should:

1) 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: a) at least 1.75 mt to London Borough of Havering encouraging re-use and recycling of construction, demolition and excavation waste within London, including on-site

2) extracting land-won aggregates within London

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B Development Plans should:

4) a) at least 1.75 mt to London Borough of Havering b) at least 0.7 mt to London Borough of Redbridge c) at least 1.75 mt to London Borough of Hillingdon d) at least 0.7 mt to London Borough of Hounslow.

5) 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 and maximise the movement of aggregates by sustainable modes

6) support the production of recycled/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.

C All Mineral Planning Authorities should, in Development Plans:

- 1) identify mineral safeguarding areas to protect sand and gravel resources from development that would otherwise sterilise future potential extraction
- 2) identify and safeguard sites and facilities, including wharves and railheads, with existing, planned or potential capacity for transportation, distribution, processing and/or production of primary and/or secondary/ recycled aggregates.

D To reduce the environmental impact of aggregate sites and facilities development proposals should:

- 1) demonstrate that appropriate measures to deal with aftercare, restoration and re-use of minerals sites following extraction are in place; with particular emphasis on promoting green infrastructure and biodiversity
- 2A) ensure that potential impacts, in particular to the natural and historic environment and to human health, are assessed and are s effectively controlled.

E Development proposals should be designed to avoid and mitigate potential conflicts with sites safeguarded for the transportation, distribution, processing and/or production of aggregates, in line with the Agent of Change principle.

#### COMMENTARY

The NPPF and the London Plan establish a clear policy framework requiring Development Plans to provide for the safeguarding of rail aggregate depots. This is of particular importance in Brent as the Draft Local Plan is proposing an allocation, BEGA1, in close proximity to our facility. It is therefore important that the Local Plan both safeguards this facility and draws attention to its presence so that prospective developers are aware of it when drawing up plans for development in its vicinity. The current version of the Local Plan does not deal with this in an adequate manner, in that:

- Policy BP2 does not refer to the presence of the rail aggregate depot;
- The supporting text to allocation BEGA1 does not refer to the presence of the rail aggregate depot;
- Policy BT3 is not specific enough and does not provide enough protection; and
- The Local Plan Policy Map does not identify this facility.

#### CHANGES REQUIRED

1. Additional text in policy BP2 East, as follows:

(u) Ensure the adjacent existing rail aggregate depot is safeguarded and new development provides “agent of change” mitigation if required.

### **37 Do you consider the site allocations within the East Place sound?**

#### **East site allocations test of soundness - BESA1:**

Is not Consistent with national/regional policy

#### **East site allocations test of soundness - BESA2:**

#### **East site allocations test of soundness - BESA3:**

**Please state your reasons for those you have checked, being sure to reference the site allocation:**

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## LONDON PLAN - EXISTING

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## DRAFT LONDON PLAN – CONSOLIDATED SUGGESTED CHANGES, JULY 2019

### POLICY SI10: AGGREGATES

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B Development Plans should:

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- 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 and maximise the movement of aggregates by sustainable modes
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C All Mineral Planning Authorities should, in Development Plans:

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#### COMMENTARY

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#### CHANGES REQUIRED

### **2. Additional text to be inserted into the Planning Considerations section of allocation BEGA1, as follows:**

The presence of an existing active rail aggregate depot to the west of the allocation needs to be considered to ensure future development proposals do not place unreasonable restrictions on this existing operation which is of strategic importance for the sustainable supply of aggregates into London.

### **38 Would you like to comment on another place?**

NO

## Themes

**47 Which theme would you like to comment on? (you will get the opportunity to select additional themes to comment on throughout the survey)**

**Please select a theme::**

Transport

## Transport

**92 Policy BT1 (sustainable Travel Choice):**

**Agreement matrix BT1 - How strongly do you agree/disagree with this policy?:**

**For those which have been checked, please state your reasons::**

**93 Policy BT2 (Parking and Car Free Development):**

**Agreement matrix BT2 - How strongly do you agree/disagree with this policy?:**

**For those which have been checked, please state your reasons::**

**94 Policy BT3 (Freight and Servicing Provision and Protection of Freight Facilities):**

**Agreement matrix BT3 - How strongly do you agree/disagree with this policy?:**

Strongly disagree

Is not Consistent with national/regional policy

**For those which have been checked, please state your reasons::**

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CHANGES REQUIRED

3. New policy BT3a to specifically safeguard bulk transport, handling and processing facilities as required by

the NPPF and London Plan, as follows:

Existing bulk mineral transport, handling and processing facilities and facilities for the manufacture of concrete and concrete products will be safeguarded and development proposals which would conflict with the effective operation of these facilities will not be permitted unless:

- The development proposals can provide appropriate mitigation to ensure that they will not place unreasonable restrictions on the effective operation of these facilities or;
- The existing facility can be satisfactorily relocated within the development proposals in terms of operational requirements and environmental criteria; or
- The facility is replaced in an appropriate alternative location.

**95 Policy BT4 (Forming an Access on to a Road):**

**Agreement matrix BT4 - How strongly do you agree/disagree with this policy?: For those which have been checked, please state your reasons:**

**96 Would you like to comment on another theme?**

Not Answered

**Delivery and Monitoring**

**97 Do you have any comments to make on the Delivery and Monitoring chapter? Please ensure that**



## Survey Feedback

### 100 Please provide feedback on the format and content of this survey below:

#### Feedback on survey:

The survey did not allow for the ability to make representations on the Policy Map, please see comments below:

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#### CHANGES REQUIRED

4. Draft Local Plan Policy Map 2019, Map 2 (Employment, Heritage and Environmental Protection) – identify Wembley rail aggregate depot on this plan and cross reference back to proposed new policy BT3a

#### **Fair Processing Statement**

**101 Would you like for your personal data to be used for reasons other than identifying your representation and for contact in relation to this?**

Yes