

25 June 2025

Havering Council on behalf of
East London Joint Waste Local Plan
Town Hall
Main Road
Romford
RM1 3BB

By email only (eljjointwasteplan@haverling.gov.uk)

SLR Project No.: 403.065696.00001

Client Reference No.: 000027

**RE: East London Joint Waste Local Plan – Regulation 19 Consultation on Submission Draft.
Representations on behalf of Heidelberg Materials UK**

Dear Sir/Madam

SLR Consulting Limited (SLR) has been instructed by Heidelberg Materials UK, the trading division of Hanson Quarry Products Europe Limited, to make representations to the above Plan.

As we have previously set out in representations to the Regulation 18 consultation of the Joint Waste Local Plan (the Plan), our client operates an 'intermodal construction materials facility' (including wharf and railhead) off Chequers Lane in the Borough of Dagenham and Barking (centred on national grid reference TQ 49227 81902). This facility processes marine dredged sand and gravel, which is landed at a jetty within the River Thames, and is also connected to the rail network to allow the importation and export of aggregates. With the ability to use both river and rail, this helps reduce HGV movements on the local road network. Within the site are also facilities for the manufacture of concrete, coated roadstone and the bagging of aggregates. Notable to the draft Plan the facility also has a permit for the processing of construction and demolition wastes (including recycled asphalt plantings, RAP) the latter being used in the roadstone coating (asphalt) plant.

Our client's facility is therefore of great importance to the East London subregion and the London metropolitan area as a whole, for the supply of construction materials.

Our client is seeking ways to reduce carbon emissions from its operations¹ and also recognises the benefits of the 'circular economy' and the role it can play in reducing the reliance on primary aggregates. Not only does the circular economy husband mineral resources for future generations, it also results in carbon reductions. As such the circular economy and climate change are linked. Indeed, our client envisages increasing demand for secondary aggregates over the Plan Period.

Having reviewed the draft Plan published on the Havering Council website, along with some of the background information, we would like to make the following comments in the light of our client's operations and aspirations for any future development within the Plan area.

¹ [heidelberg-materials-uk-committed-to-reaching-net-zero-carbon-by-2050.pdf \(heidelbergmaterials.co.uk\)](#)

Representations

Areas of Support

In the first instance, there are many sections in the draft Plan that our client can still support, and we are pleased to see that all waste streams are addressed. From our client's perspective it is the strategy and policy approach for construction, demolition and excavation (CDE) waste that is relevant. In brief, the areas we continue to support are:

On Page 5, the summary points of:

- Minimising waste produced from development, with emphasis on re-use and recycling of waste arising
- Safeguarding existing capacity
- Allowing development of new waste management capacity at existing sites if it allows waste to be managed more sustainably.

As previously noted with the Regulation 18 Draft of the Plan we agree with the sentiment in paragraph 2.40 that there is very little CDE waste *"that can not be cycled or recovered in some way"*. However, we would add that this is provided that there are suitable facilities in place to manage the waste arisings.

Paragraphs 2.71 and 2.72 are also supported, noting the role of the circular economy and that the circular economy plays an important role in tackling the climate emergency. The processing of CDE wastes to produce secondary aggregates is therefore a key component of the circular economy, reducing the reliance on primary aggregates (which will need to be imported into the Plan area).

Turning to the draft vision and objectives (pages 51 to 53) we support the integration of the circular economy into all forms of development; the need for a network of accessible 'service providers' for *inter alia* reuse and recycling; and the priority to be given to using recycled materials in construction. We also note the desire for infrastructure that promotes alternative modes of transport, including the River Thames.

Paragraph 6.5 notes the Borough of Newham is *"exploring the concept of dedicated 'Circular Economy Construction Hubs' which may be developed to offer space for the storage, sorting, testing and redistribution of reclaimed construction materials"*. Paragraph 6.26 then expands upon this stating *"Proposals for 'Circular Economy construction Hubs' which provide dedicated space and facilities for the storage and repair of waste materials, as well as opportunities for the development of skills needed to achieve a circular economy e.g. repair workshops, will be encouraged"*. This is the type of facility our client is looking to develop at a number of its existing sites. As such, Policy JPW1 is supported.

These points, and particularly the recognition of the circular economy, help with the soundness of the Plan, ensuring consistency with National Policy.

Finally, as a result of our previous representations we are pleased to see that our client's Dagenham site is listed in Appendix 2 and this is supported. However, we believe that the area shown in Appendix 3 is incorrect (see below).

Areas of Concern in relation to Soundness

In terms of meeting the need for positively managing CDE wastes arisings we note that the draft Plan indicates there is a surplus capacity within the plan area and therefore there is no need for the development of additional capacity. It then adds that *"The Plan proposes the safeguarding of most existing sites and will allow additional waste development in exceptional circumstances"*. At paragraph 4.5, it notes that the existing waste management



capacity is c. 3,185,500 tpa giving a surplus of 0.98Mtpa. Whilst the paragraph has been updated there still appears to be errors. Firstly, Footnote 10 refers to an evidence paper published in November 2022 when the latest version is January 2025. Moreover, the projected arisings (see Table 14 in the January 2025 CDE Waste Arisings Baseline Report) are 2,203,591t in 2023 rising to 2,644,970 in 2041 (allowing for growth). Consequently, the surplus is 0.98Mt in 2023 reducing to 0.54Mt in 2041. Paragraph 4.5 therefore needs correcting. These inaccuracies undermine the soundness of the Plan. Allied to this, the surplus is based on a planning permission being implemented and the facilities listed in Appendix 3 being suitable to manage CDE wastes. For the Plan to be sound therefore, a degree of flexibility needs to be introduced.

In terms of the statement that *"no additional capacity is needed"* we can see the numerical reasoning for this and understand the broad rationale. However, we would still contend that the existing capacity stated in the Plan may be skewed due to the number of businesses managing excavation wastes (and the large volume of such wastes arising), which will mask any requirement for secondary aggregates. The plan does differentiate between the arisings of C&D and excavation wastes (see Table 5 in the draft Plan for example) and so the existing capacity should similarly be differentiated. In view of the wide range of waste types within the CDE category, it is imperative that suitable flexibility is built into the Plan to ensure each particular waste stream is adequately catered for; indeed, this does seem to be the aim of the Plan. For example, paragraph 2.40 notes that *"Different types of CD&E waste require different forms of management"* which we agree with. In this respect, our client expects growth in the recycled/secondary aggregates sector, either from the processing of demolition wastes (which are typically concrete based) or wastes from highway works (in the form of RAP). Indeed, the draft Plan at paragraph 2.9 comments that (emphasis added) *"The London Plan reflects the NPPF in seeking to maximise recycling and reuse of construction, demolition, and excavation (C, D& E) wastes **and the Boroughs should support the development of aggregate recycling facilities in their local plans.**"* The production of secondary aggregates offsets the need for primary aggregates, which accords with the circular economy and measures to reduce carbon emissions. As noted above, the draft Plan does recognise the need for processing such wastes to produce secondary aggregates as part of the circular economy; it also seems to imply that new capacity will be acceptable, be it qualified by the term *"in exceptional circumstances"*.

Regarding draft Policy JWP2 though, we still struggle to understand how it will deliver the Vision and Objectives of the draft Plan, and indeed the London Plan. To us, we still consider the policy is overly complex and restrictive and therefore not effective. Given the positive sentiments the Plan has about the circular economy we do not see how the policy will allow any new capacity for particular waste streams (such as recycled/secondary aggregates) to come forward over the Plan period. The policy will therefore stymie development and the potential supply of recycled and secondary aggregates to developments. As such this affects the soundness of the plan and the policy should be simplified and redrafted.

Finally, whilst we welcome and support the inclusion of our client's Dagenham site in Appendix 2 (as a safeguarded site) we believe that the area shown in Appendix 3 is incorrect. We attach to this letter a plan produced by our client showing the extent of their landholding at Dagenham; the plan contained in Appendix 3 only includes a small part of the site and doesn't even cover the area for which an Environmental Permit has been granted. To allow for flexibility and potential future growth at Dagenham, making beneficial use of the wharf frontage and rail connection, the plan contained in Appendix 3 needs to be updated to cover the whole site under our client's control. As it stands, should any new operations be proposed on land outside of that currently shown in Appendix 3 then we struggle to see how they would be fully compatible with Policy JWP2. To us, this undermines the soundness of the Plan.



Closure

SLR has been instructed by Heidelberg Materials UK to make representations to the Regulation 19 Submission East London Joint Waste Local Plan. Our client operates a multimodal construction materials facility at Dagenham, which is river and rail connected. It supplies a wide range of construction materials to the local market and uses secondary aggregates in the manufacture of coated roadstone. Our client recognises the importance of the circular economy, its links to carbon reduction, and thus the positive effect it can have on the climate emergency. Our client aspires to grow its secondary aggregate operations over the course of the plan period to reduce reliance on primary aggregates.

The overall thrust of the Plan would seem to support our client's aspirations and certainly contains strong messages to this effect, being consistent with National Policy; however, the wording of Policy JWP2 would seem to stymie any new development as it is overly complex and restrictive. We therefore are of the view that the policy needs to be redrafted to be more supportive of secondary aggregates. Secondly, whilst we welcome, and are supportive of, the inclusion of our client's site at Dagenham in Appendix 2 as a safeguarded site, we believe the area shown in Appendix 3 is incorrect and should reflect our client's actual landholding. We therefore request that the plan in Appendix 3 is updated.

We trust that our representations are clear but if you have any questions we would be pleased to discuss further.

Regards,

SLR Consulting Limited

Chris Lowden, BSc(Hons) MRICS, MIQ
Technical Director/Planning and ESIA

Office phone
Mobile
Email

cc B Ayres Esq, B Vosper - Heidelberg Materials UK

