

**London Plan - Examination in Public**  
**Statement by Tarmac - Participant ID 2504**  
**Matter No. 70 - Aggregates**

**Introduction**

Within London Tarmac operates a portfolio of wharves and rail depots (also referred to as railheads) that help deliver building materials - aggregates, recycled aggregates, ready mixed concrete, cement and asphalt - to meet the capital's construction and building programme. Each train, ship and barge that Tarmac has access to assists greatly in transporting bulky materials around the capital in the most sustainable way. Some of our wharf sites are also rail linked such that aggregates that are imported by sea faring ships to the wharf site are then able to be further transported by rail to a network of rail linked depots across the capital.

Wharves are dependent on the tide and rail freight is dependent on rail line capacity and availability. Due to inherent issues with both modes of transport, both operations need to operate 24/7. Failure to accommodate this critical supply chain could result in a substantial increase in lorry movements, conflicting sustainability and road safety objectives.

Strong national and local planning policy to accommodate aggregate, recycled aggregates, ready mixed concrete, cement and asphalt facilities, along with safeguarded wharves and rail depots, is necessary to ensure a sustainable supply of aggregate to facilitate London development. Local Planning Authorities must have appropriate policy controls to be able to prevent incompatible development (such as residential led uses) in close proximity to these operations. Policy needs to be unambiguous on this point so that Local Planning Authorities can confidently enforce it.

Clearly Tarmac is not opposed to development, this is the lifeblood of the company. However through suitable design measures, wharves, rail depots and similar facilities can be protected from incompatible development.

**Questions - 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?*

We support the identification and non-sterilisation of land won aggregates.

*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?*

We support the use of recycling material, with recognition that its end use in some construction products is not an appropriate substitute for virgin material products.

*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?*

SI10C needs further amendments. Whilst SI10C supports the safeguarding of sand and gravel resources, there must be equal provision for the safeguarding of rail and water depots and wharves. These facilities are essential to ensure import capacity within London is maintained. The continued operation of these facilities will ensure the ongoing security of supply of construction materials into London's infrastructure and housing projects. This is consistent with NPPF paragraph 204.

Tarmac strongly supports the SI10B requirements for safeguarding. It is vital that Development Plans requiring sufficient capacity at rail depots are put in place to ensure the continued delivery of essential construction materials for housing and infrastructure projects. The safeguarding of railheads, associated rail facilities and wharves as in policies SI10D, T7 and SI15 are all welcome.

However, there is clarity needed in SI10C - this would be resolved by including comments regarding safeguarding as contained in SI10D and T7.

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

We recommend a more generic approach to this wording so that facilities are protected from all potential environmental issues. This should not be restricted to noise, dust and traffic, but include matters such as, but not limited to, lighting (particularly as a lot of night time operations occur) and vibration.

The full environmental benefits of these sustainable facilities should be recognised.

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

Developers need to consider all matters that could potentially affect environment or amenity.