

# Day Group Ltd. comments

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Day Group Ltd operate four aggregate railheads and an aggregate wharf within London, importing in the most sustainable ways possible a significant percentage of the 10 million tonnes of primary aggregate consumed by construction activities in the Capital each year. The use of rail depots to bring construction materials into London saves millions of lorry miles each year with the associated benefits to air quality and road safety.

We are pleased to have the opportunity to comment on the current draft of the London Plan.

Aggregate wharves and rail depots can generate noise and dust. They need the flexibility to be available 24/7 to accommodate ships and trains and are likely to generate significant numbers of short lorry journeys in supplying local construction projects.

Strong national and local planning policies already exist to safeguard wharves and rail depots (referred to in the Plan as railheads) but these are not always implemented effectively by Local Planning Authorities. This can lead to incompatible development close to wharf and rail sites which if poorly designed can generate complaints from residents about noise. This can result in limitations being imposed on the operation of these strategically critical facilities.

There are recent examples in London of this happening.

If wharf and rail depot sites are lost, either through design or ignorance the ability to supply construction materials into London in the most sustainable way will be lost for ever, with the associated damage to London's economy.

The Draft London Plan contains a number of welcome measures to ensure that new development does not result in the reduction of availability or capacity of wharves and rail depots. However it could be stronger in places, more consistent in its guidance and give equally strong protection to rail depots as it already does to wharves.

D12 Agent of Change.

We support this policy, however C3 should include the need to utilise 'site layout, building orientation, uses and materials' in addition to the measures listed, to be consistent with the narrative in 9.15.9 relating to SI 15.

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### D13 Noise

We support this policy with the following recommendations for improving it further:

D13A2 refers to 'reflecting the Agent of Change principle'. The Agent of Change principle does not soften the requirements on new developments by adding the ambiguous word 'unduly' to the requirement to avoid costs and administrative burdens on existing noise-generating businesses. The Agent of Change principle is clear in Policy D12A and "places the responsibility for mitigating impacts..... on the proposed new noise-sensitive development". The word 'unduly' should be removed from D13A2.

Text 3.13.2 should be amended accordingly, removing the word 'unduly' since it introduces ambiguity.

D13A5 should add 'site layout, building orientation, uses and materials' to the list of methods of separating new noise-sensitive development from major noise sources. This would be consistent with the wording under SI15 and could also be consistent with a similarly strengthened D12C3.

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S10 Aggregates.

We support this policy but SI10D2 needs to make the case more strongly for aggregate rail depots. Aggregate wharves are strongly protected in SI15 but there is no equivalent policy support for railheads. They face the same development pressures as wharves and are as critical to London's ability to develop as the wharves are.

We recommend the addition (in bold) to SI10 D2 to mirror the protection for wharves in SI15H:

“Safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution and/or processing to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes. **Development proposals adjacent to or opposite such railheads should be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle**”.

Text 9.10.4 should also refer to the Agent of Change principle in the same way that 9.15.9 does specifically for wharves.