

1 March 2018

New London plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GLKZ

Dear Sir/Madam

Tarmac response – Draft London Plan

Tarmac, a CRH company, is the UK's leading sustainable building materials and construction solutions business. Our innovative services and solutions help to deliver the infrastructure needed to grow the economy today and create a more sustainable built environment to support our future prosperity. We employ approximately 7,000 people at more than 350 operational locations across the UK and are the largest manufacturer of cement and lime with facilities based in England, Wales and Scotland. Tarmac's corporate brochure can be found via the link below:

https://issuu.com/tarmac ltd/docs/tarmac_corporate_brochure_web

Within London Tarmac operates a portfolio of wharves and 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.

To maintain such an important and connected logistical supply chain requires investment and certainty around depot availability. Notwithstanding this, Tarmac is investing in additional barge loading facilities that will enable further haulage of materials 'intraport' by river in between certain existing wharves. Maintaining Tarmac's portfolio of wharves, rail sidings and depots is essential to ensuring these materials can be sustainably delivered without adding additional road going vehicles to the capital's already congested network.

As with the majority of wharf locations along the Thames, our sea faring vessels are tidal dependant on gaining access and unloading cargoes irrespective of the time of day. In a similar way many of our rail heads operate at night to avoid the passenger traffic peak times during the day. Road transport will continue to be necessary as building projects do not all have immediate access to an adjoining rail siding or wharf for example.

Tarmac is naturally supportive of growth, investment in infrastructure, construction and housing across the capital generally and is a customer focus business ensuring that the required building materials are supplied in a timely manner, to the right quality and without unnecessary wastage.

TARMAC.COM

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Tarmac Trading Limited Registered in England and Wales. Company No. 453791

Tarmac Cement and Lime Limited Registered in England and Wales. Company No. 66558

Tarmac Services Limited Registered in England and Wales. Company No. 8197397

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Despite planning policy within the current London Plan recognising the importance that wharves, barge loading locations and rail heads have in removing road going traffic from the capital's congested network, we are finding that an unfair priority is being given to the residential building sector to the potential detriment of such facilities. Planning decisions are being made that result in residential developments occurring in close proximity to these facilities without appropriate design considerations or standoffs to them. For example, the consequences of noise complaints arising from residents occupying a new high rise river fronting dwelling alongside an existing wharf operating 24/7 is very real to us. The impact of restrictions being placed on an existing 24/7 wharf or railhead could result in additional road transport to meet demand and goes against the grain of sustainable transport and maximising the use of the River/Rail. Additional policy protection is therefore required to level the playing field to ensure due consideration is given to such important locations.

Tarmac fully supports policy Policy D12 – Agent of Change in relation to the above. Clarity is required however to what 'existing noise generating activities' means, and wharf sites and railheads and associated ancillary facilities should be expressly referred to. As such the sub text in para 3.12.4 should clarify that....

In terms of the aggregates sector, existing noise generating activities will include safeguarded wharves, railheads and any associated cargo unloading or loading operations and any on site ancillary facilities. They will also include quarrying activity, concrete batching plant sites, asphalt plant sites and recycled aggregate processing sites. The worst case scenario in terms of noise assessments will assume that all operations at a particular location are operating simultaneously.

Tarmac supports policy SI10 for the reasons already outlined. Indigenous supply to assist London in meeting its building material needs is important to meet planning policy generally but also that London is seen to be doing its bit for delivering its local supply requirements.

Tarmac supports policy SI15 Water Transport for the reasons already outlined above. In addition para 'H' to this policy should be extended to say...

In this respect proposals within 500m of a safeguarded wharf will need to carry out a safeguarded wharf assessment as a matter of course to demonstrate that proposed developments have been appropriately designed to take account of the location of and activities occurring on the safeguarded wharf. A safeguarded wharf assessment beyond 500m may be necessary depending on individual circumstances including the distance existing noise outputs occur from the safeguarded wharf.

Yours faithfully



Simon Treacy
Estates Manager

Mayor of London

londonplan@london.gov.uk

2nd March 2018

Dear Sir / Madam,

Re: Draft New London Plan

Thank you for the opportunity to contribute towards this consultation.

Tarmac, a CRH company, is the UK's leading sustainable building materials and construction solutions business. Our innovative services and solutions help to deliver the infrastructure needed to grow the economy today and create a more sustainable built environment to support our future prosperity. We employ approximately 7,000 people at more than 350 operational locations across the UK and are the largest manufacturer of cement and lime with facilities based in England, Wales and Scotland.

Tarmac welcomes the positive and helpful statements in the plan with relation to the transport of construction materials in the Freight Transport Policies (Chapter 10) and Aggregates Policy (SI10). The statement that 'London needs a reliable supply of construction materials to support continued growth' recognises the importance of the supply chain. In particular, Tarmac feels there has also been much improvement in the understanding of the need to protect wharf and rail sites for aggregates handling/processing as well as the economic and infrastructure development need for a sustainable source of aggregates (both primary and recycled). Continued support for CLOCS for suppliers, hauliers and contractors/clients supports improvements in road safety and demonstrates recognition of work to date by industry.

General comments

With regards to the challenges of congestion and poor air quality Tarmac views the role of rail and water freight as vital to the future sustainability of London's low CO₂ housing and infrastructure growth. Tarmac has invested significantly over many years in increasing its rail capability and is looking for further opportunities to do so. The benefits of bulk rail transport include lower CO₂ per tonne transported and removal of HGV movements from public highways, with one aggregate train removing up to 60 HGVs from the road. Rail freight also has far lower NO₂ and particulates emissions.

As Tarmac has previously stated, it is important not to hinder the use of rail and water freight by reducing capacity or inappropriate constraint being placed on planning. It is also important to ensure that rail and water depots are safeguarded and that other developments, such as housing, are not given precedence. This includes the need to maintain hours of operation and not restrict operations due to noise (or other perceived impact) at both existing and new sites. For rail freight solutions to continue to support the growth of the economy and infrastructure in London, rail linked sites need to be protected for the distribution of aggregates, cement, asphalt and other construction products into local construction sites, for example Tarmac's operation at Greenwich. According to Rail Freight Group figures, 40% of construction aggregates to London are supplied by rail. Any actions that restrict the operation, capacity or development of rail freight would lead to more freight being moved by road.

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The Mineral Products Association publication, '*Mineral products in London - Safeguarding London's wharves and rail depots for future prosperity and sustainability*^[1]' contains information regarding the importance of the minerals industry, rail and water freight to the city of London's development.

Tarmac therefore welcomes statements within the Draft London Plan that recognise the need for industrial land and secure the safeguarding of existing rail depots. It is important that these statements are maintained in the final version of the plan, ensuring that wharves and other rail linked operations are also covered by this safeguarding, and that relevant planning authorities work to the framework provided.

In addition to the safeguarding of industrial land (policy E4 - Land for Industry, logistics and services to support London's economic function) and rail freight operations, the important policies D12 (Agent of Change) and D13 (Noise), will ensure 'noise sensitive' developments shall not impact or otherwise constrain the operations at wharves, depots and operations. Paragraph A (E4) could be improved to further support the sustainable supply of aggregates and construction materials through 'a sufficient supply of land and premises in different parts of London' by specifically referring to minerals transportation, importation, processing and related manufacturing, for example the production of asphalt and concrete.

The statement that: 'All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities' is a prudent proposal that should be retained in the final plan. Policy SI10 (Aggregates) shows appropriate consideration for the safeguarding of railheads used for aggregates. However, clause D should be developed to apply the agent of change principle (as that in policy SI15) to 'design out potential conflicts' in adjacent developments, for example, the impact of noise at the adjacent development rather than limiting operations at railheads, wharves and other mineral product handling operations. Similarly, the safeguarding of wharves and railheads used for the distribution of aggregates (policy T7, Freight and Servicing, clause C) is supported. The encouragement of re-use and recycling of construction, demolition and excavation waste within London promotes circular economy principle, with the provision for at least seven years of supply of aggregates welcome to secure future growth.

It should be recognised within this strategy that there will continue to be a need for road transport of goods from the rail head or wharf to their final destination. In these situations, HGVs will still be required even if for short distance movements. The London Mayor should consider further research into vehicles capable of low emission local delivery of construction materials and supporting infrastructure. In addition, it is recommended that The London Mayor supports further research in alternative fuelling of rail diesel engines as the technology is some way from being economically viable. Tarmac supports a long term 'rail-based' urban logistics solution. Further comments in the Freight Transport Policy regarding the encouragement of out-of-peak deliveries and a modal shift from road to rail support Tarmac's freight strategy and should lead to a decrease in congestion on roads. However, on site planning and working practices need to be flexible enough to accommodate the opportunity that out-of-peak deliveries bring.

Overall, Tarmac is supportive of the document. I hope that you find the above comments of interest and use. If you do have any questions resulting from the above, or would like to discuss the points raised in more detail, then please do not hesitate to contact me.

Yours faithfully,

Tim Cowling
Regulatory Affairs Manager

[1] http://www.mineralproducts.org/documents/Mineral_Products_in_London_Safeguarding_Wharves_and_Rail_Depots_Nov2017.pdf