

Planning Policy  
Environment and Community Services  
Town Hall  
Wandsworth High Street  
London  
SW18 2PU

My Ref: TAR-172-P/JJ  
Your Ref:  
Date: 23<sup>rd</sup> February 2022

Sent by email only to [planningpolicy@wandsworth@gov.uk](mailto:planningpolicy@wandsworth@gov.uk)

Dear Sir/Madam,

## Wandsworth Publication Draft Local Plan

These comments are submitted on behalf of our client, Tarmac Trading Ltd (Tarmac), who operates Battersea Concrete Plant, Stewarts Lane, Nine Elms, SW8 3HE.

This letter aims to provide comments relating to potential implications on Tarmac operations at Battersea Concrete Plant. Our comments specifically relate to Change No. 49 (Amended Site Allocation) as listed on the *Policy Map Changes Document (January 2022)* and Policies SDS1 and LP34 of the *Local Plan Publication Version*.

The Local Plan Publication Version proposes a new land use allocation for land which includes the Tarmac Concrete Plant within its boundaries. At present, the site is within an established 'Industrial Business Park' designation as established in the *Local Plan Employment and Industry Document (LPEID)* adopted in 2018. The Industrial Business Park allocation is now proposed to be removed. The Local Plan Publication Version instead proposes to include the Concrete Plant within the new "**Battersea Design and Technology Quarter (BDTQ)**".

The BDTQ aims to establish a new creative and technological allocation consisting of three clusters: NE6, NE7, and NE8. The Tarmac Concrete Plant is within cluster '**NE8**' of the BDTQ.

Paragraph 5.11 of the Publication Version Local Plan states that it is the intention of the Local Plan to embrace the opportunity to:

*"...transform the parts of the Queenstown Road, Battersea SIL composed of Havelock Terrace, Ingate Place, and Silverthorne Road into the Battersea Design and Technology Quarter (BDTQ). This seeks to leverage the 'Apple effect', and to build on the existing creative economy within the*

### Heatons

The Arc, 6 Mallard Way, Pride Park, Derby, DE24 8GX

tel: [REDACTED] email: [REDACTED] web: [www.heatonplanning.co.uk](http://www.heatonplanning.co.uk)

*wider area to support the intensification of the existing industrial capacity by attracting a cluster of start-ups and micro-businesses in the creative, tech and digital sectors..”*

Our client would like to express their support for the aspirational growth and development of the Borough as set out within the Local Plan Publication Version, including the development of the Battersea Design and Technology Quarter in which the Concrete Plant is located. Operations at industrial, mineral processing, and minerals infrastructure sites such as those at the Concrete Plant not only provide employment for the residents of the Borough, but are vital in the delivery of construction and infrastructure projects within the Borough and beyond. Overall, the principle of the BDTQ is supported, subject to consideration of comments relating to policy LP34 set out below.

With regard to the Local Plan Publication Version, Tarmac supports the wording of **Policy SDS1** ‘Spatial Development Strategy 2023-2038’ which supports the general retention of existing employment sites and premises.

**Policy LP34** ‘Managing Land for Industry and Distribution’ refers to the protection and retention of land for industrial uses in Strategic Industrial Locations and Locally Significant Industrial Areas. Tarmac support the wording of Policy LP34, as long as the objectives of the BDTQ do not lessen the need to ensure the safeguarding of existing industrial uses. As a land use proposed to fall within the new BDTQ, the operation of the Concrete Plant should be as safeguarded as the site previously was when designated within an ‘Industrial Business Park’. This would provide confidence to existing industrial occupiers that new development and the diversification of industrial areas will not unduly impact upon their abilities to run successful businesses.

We wish to take this opportunity to state that paragraph 187 of the NPPF contains the ‘agent of change’ principle. It is acknowledged that the Local Plan Publication Version recognises the presence of the Concrete Plant (within subtext at paragraphs 5.70 and 18.37). However, given the importance of such mineral uses in the delivery of the wider objectives of the Local Plan, we consider that Policy LP34 provides an appropriate opportunity to include reference to the protection of minerals infrastructure sites.

Planning policies within Local Plans have a duty to “safeguard existing, planned and potential sites for: 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” as stated in paragraph 210e of the NPPF. The inclusion of specific protection for minerals infrastructure, such as Concrete Plants, is also specifically referred to in Minerals Planning Practice Guidance, as follows:

*“Planning authorities should safeguard existing, planned and potential storage, handling and transport sites to:*

- ensure that sites for these purposes are available should they be needed; and*
- prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.”*

(Paragraph: 006 Reference ID: 27-006-20140306)

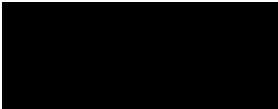
Therefore, we consider that the Local Plan Publication Version can be brought in accordance with national policy on this matter only through the inclusion of Policy wording aimed at preventing land use conflicts between sites such as the Concrete Plant at Stewart's Lane and other land uses. We consider that in order for the Local Plan to be consistent with national policy, appropriate protection should be afforded within the Local Plan to industrial uses wherever they are located, not just in identified Strategic Industrial Locations and Locally Significant Industrial Areas.

We conclude that this can be resolved through the addition of specific wording relating to the protection of land uses such as the Concrete Plant from conflicting land uses in Policy/Policies within the Local Plan, rather than mentioned within the Plan's subtext.

We trust that these comments are helpful. We would welcome opportunity to discuss the contents of this letter.

Should you have any queries please do not hesitate to contact us.

Yours faithfully,



Joel Jessup  
Heatons