

Greater Cambridge Shared Policy Team,
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne
Cambridge
CB23 6EA

Our Ref: TAR-302-P
Date: 30th January 2026

Sent by email: localplan@greatercambridgeplanning.org

Dear Sir / Madam,

RE: Draft Greater Cambridge Local Plan Consultation, representations submitted on behalf of Tarmac Trading Limited

This letter has been prepared by Heatons on behalf of our client, Tarmac Trading Limited (hereafter referred to as Tarmac), as a formal representation to the above consultation. Tarmac is one of the UK's leading sustainable building material companies with innovative products, solutions and services not only delivering infrastructure needed to grow the UK economy but also enabling a more sustainable built environment for the country's long-term future.

Tarmac has contributed to some of the UK's biggest construction projects, including Wembley Stadium, Heathrow Terminal 5, The Shard, and the London 2012 Olympics and Paralympic Games. Minerals infrastructure is essential to produce and deliver the construction materials needed to deliver development / growth targets.

The purpose of this letter is to highlight the importance of safeguarding and ensure that policies safeguard existing, planned and potential sites for: the 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 in the emerging Draft Greater Cambridge Local Plan.

Cambridge Rail Facility

Within the Greater Cambridge Local Plan boundary, Tarmac operates a rail fed asphalt plant and an aggregate handling depot, as well as a readymix concrete plant. Located on the parcel of land by the rail track is the rail fed asphalt plant and the aggregate handling depot, with the readymix concrete plant situated on a separate area of land, along Cowley Road. Whilst in close proximity of one another and both operated by Tarmac, they operate as two separate sites, but both are important for strategic mineral supply. To avoid confusion, this letter will refer to Tarmac's entire ownership as 'the Site', the

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exact location can be seen on the Site Location Plan below (Figure 1). More specifically, the Site is part of the North East Cambridgeshire redevelopment framework designated under emerging Policy S/NEC.



Figure 1: Site Location Map with Tarmac interest edged green

Tarmac is one of the largest users of rail freight and the largest transporter of construction materials by rail in the UK, with the business transporting approximately nine million tonnes of material by rail across the UK each year.

Given Cambridge’s central location within the UK and convenient rail access to London, this Site is extremely important for the sustainable transport of minerals across the region and the wider UK. Tarmac’s operations at the Site have been active for over thirty years, therefore the Site is well-established in the locality.

The Site’s importance is reflected within the Cambridgeshire and Peterborough Joint Minerals and Waste Local Plan (2021), where it is allocated as a ‘Transport Infrastructure Area’, which safeguards the Site’s use for the sustainable transportation of minerals and waste. It is imperative this safeguarding is sufficiently reflected in the emerging Greater Cambridge Local Plan.

Relevant Planning Policy and Material Considerations

Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021)

The Site is designated as a 'Transport Infrastructure Area' within Policy 15, which identifies Tarmac's 'Cambridge North East Aggregate Railhead' site, the policy safeguards existing operations against development which would result in the loss or reduced capacity of such infrastructure.

Policy 16 'Consultation Areas' is also relevant to the Site, as it assigns a 250m buffer around the designated Transport Infrastructure Area to ensure that existing sites are 'protected from development that would prejudice operations within the area for which the buffer is identified, or to protect development that would be adversely affected by such operations' (Paragraph 6.5). The Policy also refers to the application of the Agent of Change principle to ensure that protected infrastructure, such as Transport Infrastructure Areas, is not prejudiced in any way.

National Planning Policy Framework (2024)

Section 17 of the National Planning Policy Framework (NPPF) 'Facilitating the sustainable use of minerals' states that, 'it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs' (paragraph 222).

Paragraph 223 (part e) states that, planning policies should, among other things, 'safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing, distribution of substitute, recycled and secondary aggregate material'.

The 'agent of change' principle, is referred to at Paragraph 200, to ensure new development is 'integrated effectively with existing businesses and those businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established'.

Planning Practice Guidance: Minerals

Planning Practice Guidance (PPG) for minerals states that the role of the district planning authority has an important role in safeguarding minerals in three ways, one of which includes 'having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans' (Paragraph 005).

PPG also states that, '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)'.

Greater Cambridge Draft Local Plan Consultation Document (December 2025)

The Greater Cambridge Draft Local Plan Consultation Document (December 2025) sets out the authorities' vision for future development in Cambridge City and South Cambridgeshire, this includes provisional policies and site allocations.

Emerging Policy S/NEC: North East Cambridgeshire

Within the Draft Local Plan, the Site falls within the proposed site allocation boundary of 'Policy S/NEC: North East Cambridge', which sets out a spatial framework for the mixed-use redevelopment of the North East Cambridge area. This site allocation aims to deliver 8,350 new homes; 320,000 sqm of additional business floor space; 27,300 sqm of industrial floor space; a new district/local centre; educational facilities; and other amenities. As can be seen in **Figure 2** below, the Site is shaded as 'commercial led development', the approximate location of Tarmac's facilities have also been pinpointed on the map below.

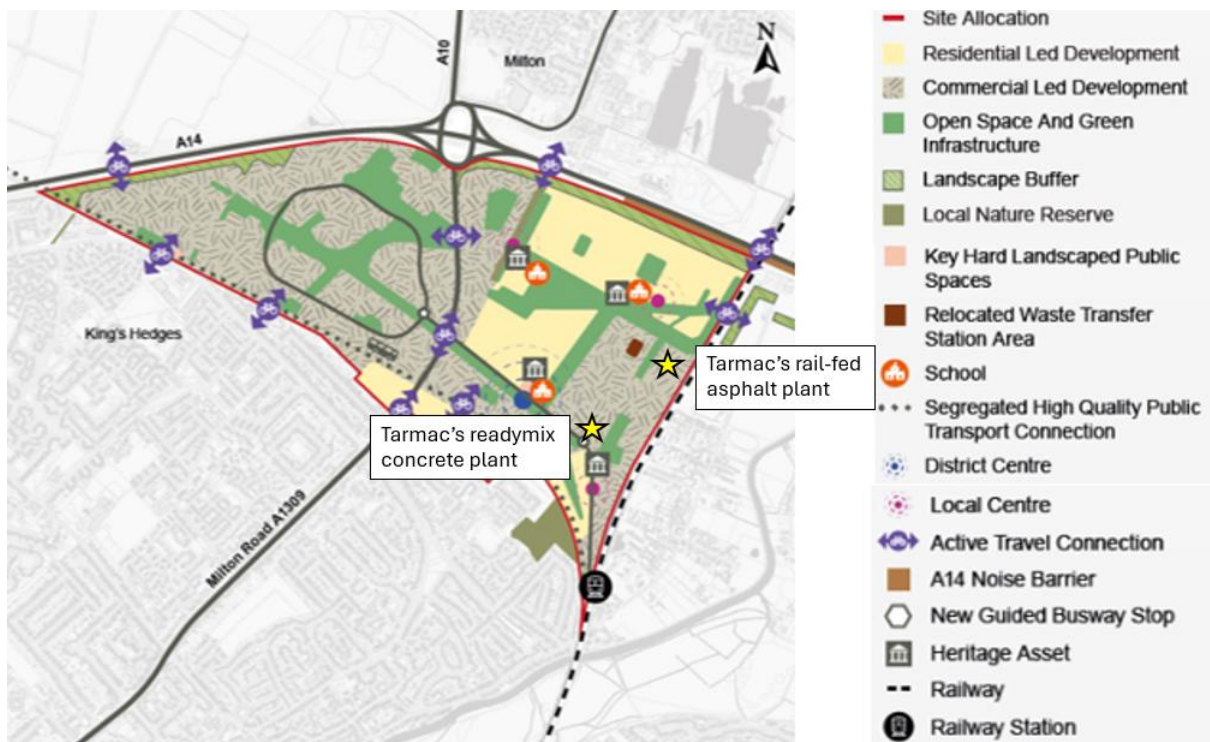


Figure 2: Spatial Framework of Policy S/NEC with Tarmac's operations pinpointed.

Tarmac's comments on emerging Policy S/NEC

Policy S/NEC only identifies 'aggregate railheads' as a safeguarded use in the context of the proposed redevelopment.

Paragraph 223 (part e) of the NPPF (2024) is clear that a greater range of mineral related processing, manufacture and distribution infrastructure should be safeguarded by planning policy. As currently worded in the draft Greater Cambridge Plan, this does not adequately safeguard all the existing mineral infrastructure site within the allocation area and therefore does not accord with the requirements of the NPPF.

The policy should be expanded to reflect the NPPF and safeguard all mineral related uses on site including the rail fed asphalt plant, aggregate handling depot, and readymix concrete plant. Otherwise, these critical pieces of minerals infrastructure will not be sufficiently protected

Furthermore, emerging Policy I/SI 'Safeguarding Important Infrastructure' is included within the Draft Local Plan as a specific safeguarding policy, naming existing rail freight and interchange facilities. Tarmac's operations listed above are not included within this safeguarding policy despite being an essential rail facility used to support the sustainable transportation of construction materials. It is essential that the Sites Tarmac operate from in this locality are included within this safeguarding policy to ensure these uses are safeguarded from any adverse impacts or conflicts of land use from future development.

The 'safeguarded' status within Policy S/NEC says that the aggregates railhead 'must be maintained unless relocation is secured'. Tarmac plan to continue to operate from the Site throughout the emerging Plan period and there is no agreement or intention to relocate. Therefore, the Site should be safeguarded in line with its safeguarded status within the Cambridgeshire and Peterborough Minerals and Waste Local Plan as a Transport Infrastructure Area.

As seen in Figure 1, the spatial framework allocates residential led development to the north of Tarmac's site, and to the south of the concrete plant along with areas of 'commercial led development'. The 'commercial led development' requires clarity on types of uses that may be appropriate to this setting. As worded, it adds ambiguity to any prospect land uses surrounding the Site. These prospective uses and any residential development would give rise to potential conflicting land uses and the potential for disamenity on any new users situated in close proximity to existing critical infrastructure. As a minimum, reference to the Agent of Change principle is required in policy to ensure that the onus of assessing any potential for adverse impact is on new development and not on existing businesses/uses.

Additionally, the consultation document/supporting evidence identifies that the Government will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) through the Housing Fund, which raises uncertainty on the effective delivery of a significant proportion of the residential component of the Councils' vision for North East Cambridge in the time period previously envisaged, including the assumed delivery of a significant amount of housing within the plan period. Delivery of this vision is subject to alternative funding being found to enable the relocation of the Cambridge Wastewater Treatment Plant which places uncertainty on its overall viability and deliverability. There is also considered to be a need to revisit any proposed uses for redevelopment

in this area to safeguard existing business/infrastructure and to ensure that the Plan complies with national guidance.

Tarmac are proposing to continue operation and the relocation of the aggregate railhead is not proposed. As the proposed allocation is a 'framework' for new development, there is flexibility over where to locate residential and potentially sensitive non-residential development where it is not/less likely to be impacted by existing mineral operations.

Conclusion

This letter has sought to set out Tarmac's comments on emerging Policy S/NEC in relation to its Site which comprises an aggregate railhead, concrete plant and rail-fed asphalt plant. Presently, the emerging policy lacks adequate safeguarding for the Site to accord with the NPPF and PPG requirements.

Tarmac request the inclusion of their entire Site within emerging Policy I/SI 'Safeguarding Important Infrastructure', given their Site is vital for the sustainable transport of minerals and construction materials.

We are keen to remain involved with the process of the emerging Draft Greater Cambridge Local Plan, should you have any queries or would like any further information then please feel free to contact us.

Yours faithfully,

