

Heatons

Planning Environment Design

Planning Policy

Luton Council
George Street
Luton
LU1 2BQ

Our Ref: TAR-345-P

Date: 22nd July 2026

Sent by email only to: localplan@luton.gov.uk

Dear Sir/Madam,

**RE: LUTON COUNCIL NEW LOCAL PLAN SCOPING CONSULTATION –
REPRESENTATIONS ON BEHALF OF TARMAC TRADING LIMITED**

We are writing on behalf of our client, Tarmac Trading Limited (Tarmac), in response to the open consultation on the emerging Luton Local Plan, and associated documents, closing 23rd July 2026. 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 Olympic and Paralympic Games. They have strong partnerships that have been forged with wildlife trusts and other leading conservation bodies in the UK and work closely with local communities, steering groups, local councils, and Mineral Planning Authorities (MPA).

Minerals and waste planning is vital to sustain the production and transportation of materials for the country. Mineral sites also make important contributions to the local and national economy. Tarmac has a strong presence in Luton through its bulk transport facilities and ability to supply construction materials across the region which ensures development targets can be achieved.

Heatons

[Redacted signature block]

Heatons is the trading name for Heaton Planning Ltd.

Registered office – [Redacted] Registered No. [Redacted]

The purpose of this letter is to highlight the importance of economic growth, and to represent the interests of the mineral industry and ensure that important mineral resources and infrastructure are not adversely impacted through the policies and allocations in the emerging Luton Local Plan.

Tarmac Interests in Luton

Tarmac has an important operational interest at the Crescent Road railhead, shown in Figure 1. The railhead is strategically important as it provides for the bulk transport of minerals into the town, as well as onsite storage. The railhead is one of two in Luton that are safeguarded in the Minerals Local Plan, the other being at Leagrave Road. Aggregate is delivered to and stored on the site and used to supply construction projects across the Luton area.

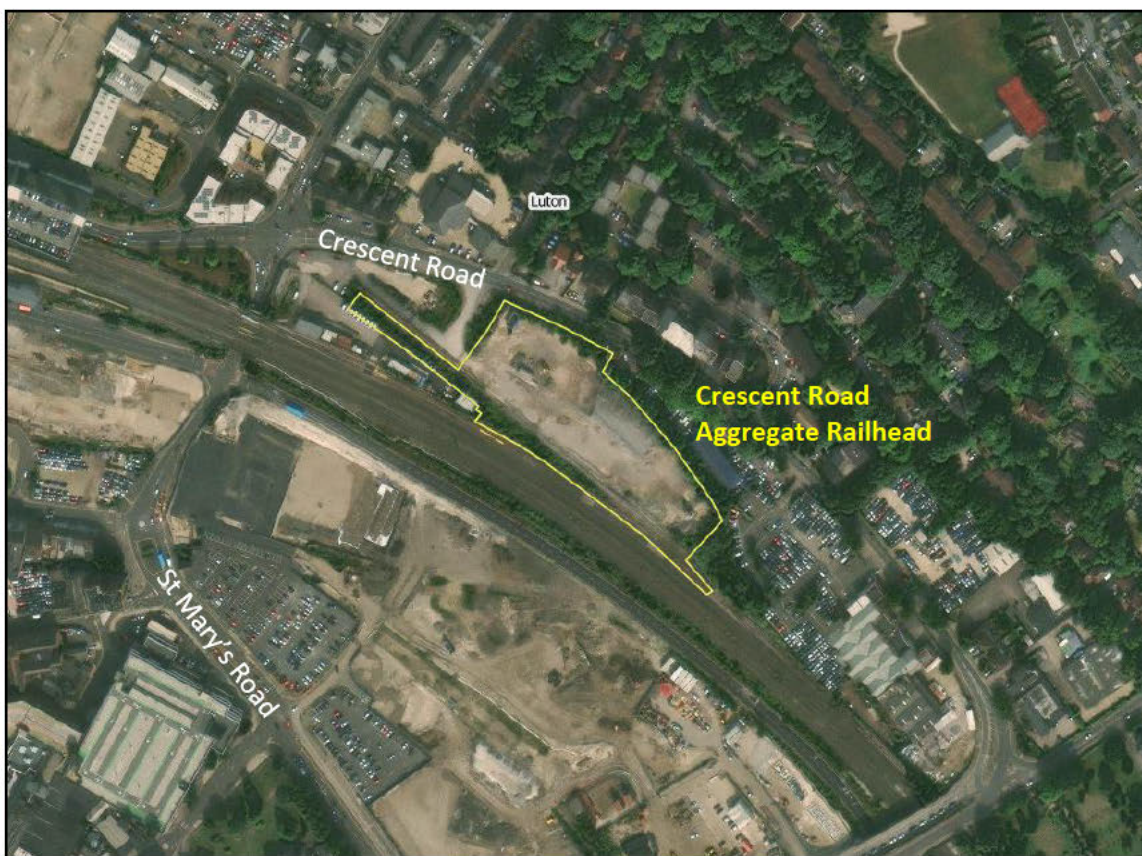


Figure 1. Crescent Road railhead and associated operational area.

Minerals and Waste Local Plan (January 2014)

Policy MSP 10 'Strategic Transport and protection of existing railhead facilities' states there will be a presumption against any development that could prejudice existing railheads used for the transportation of minerals into or out of the Plan area.

Crescent Road Aggregate Railhead is a safeguarded site in the Minerals and Waste Local Plan. The Minerals Local Plan recognises the importance of such infrastructure and protects them accordingly.

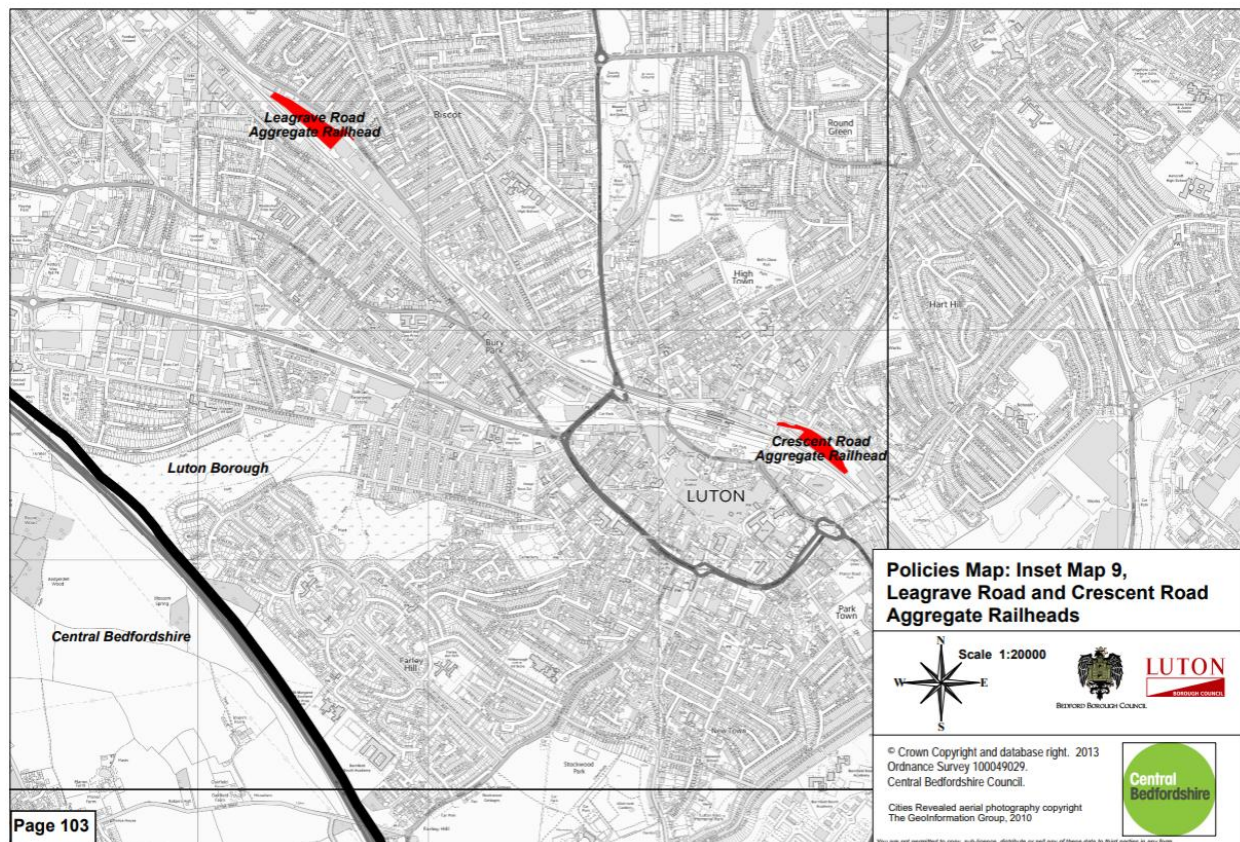


Figure 2. Minerals and Waste Local Plan Inset Map 9.

National Planning Policy and Guidance

National Planning Policy Framework 2024

There is a degree of established responsibility for planning policies at local and national levels to safeguard mineral resources and mineral operations from sterilisation. The National Planning Policy Framework (NPPF) proposes a positive approach towards mineral development across the UK.

Section 6 of the NPPF relates to 'Building a strong, competitive economy'. Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt, and significant weight should be placed on the need to support economic growth and productivity.

Section 17 of the NPPF relates specifically to 'Facilitating the sustainable use of minerals'. Paragraph 222 states it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.

Paragraph 223 states that planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas and adopt appropriate policies so that known locations of specific mineral resources of local and national importance are not sterilised by non-mineral development. Paragraph 224 states that, 'great weight should be given to the benefits of mineral extraction, including to the economy'.

The NPPF also includes the 'Agent of Change' principle whereby existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established (Paragraph 200). The onus is therefore placed on new development to account for mitigation and the NPPF is clear that planning policies should reflect this principle.

National Planning Practice Guidance 2014

National Planning Practice Guidance states that the responsibility for safeguarding mineral resources is not just limited to Mineral Local Plans. Regard should be had to the Minerals Local Plan when identifying suitable areas for non-mineral development in the Local Plan. This includes showing Mineral Safeguarding Areas on all policy maps and the associated Mineral Consultation Area buffer (in this case 250m) (NPPG Paragraph: 005, Reference ID: 27-005-20140306).

Tarmac's Comments

We have reviewed the contents of the online scoping consultation document and make the following comments:

Climate Change Mitigation and Adaptation –

- The Council should take pragmatic, viable and achievable measures which acknowledge the balance of creating significant economic and housing growth and working towards a more sustainable society. In terms of climate change adaptation, this could involve substantial infrastructure investment which is not 'net zero' in itself but is necessary in order to protect residents and the economy.
- Overall, the new Local Plan must not introduce net zero requirements which stifle new development and make it unviable. The Council must avoid stifling economic growth as this is counterproductive to the goals of climate change mitigation and adaptation in the long term.

Economic Growth –

- The NPPF places significant weight on the need to support economic growth. The UK Government has made economic growth its priority and this is reflected in its

support for airport expansion, new reservoirs and railways, changes to Green Belt policy, and the significant increases in housing requirements across the country. The message coming from central government is clear that economic growth is the priority and this should be reflected in the emerging Local Plan.

- Significant economic growth cannot be achieved without the construction materials and viable bulk transport of materials such as that provided by safeguarded rail heads and related infrastructure in Luton. The Local Plan must therefore ensure that these sites are safeguarded and no constraints are placed on their existing and future operation, either through stifling Local Plan policies or through the allocation of new development nearby (i.e. 'agent of change').

Final Comments –

- It is considered that the Luton Local Plan should incorporate the 'Agent of Change' principle into policy to protect existing businesses. Safeguarded mineral infrastructure in Luton should also be identified on the Policies Map to ensure these important sites are protected and make it clear to all stakeholders of the importance of minerals planning. This cross reference with the Minerals Local Plan also serves to raise the awareness of the minerals planning more generally.

Final Remarks and Conclusion

Tarmac is keen to engage with the preparation of the Luton Local Plan and ensure that it is prepared in a manner consistent with national policy. The NPPF is unambiguous in placing great weight on the importance of mineral resources and infrastructure, which is crucial to delivering the aims of significant economic growth.

Tarmac also considers that economic growth should be the focus of the new Local Plan. Economic growth is the national priority, and Local Plans are a vital part of delivering significant future economic growth.

Thank you for the opportunity to comment on this consultation. Should you have any queries please do not hesitate to contact us.

Yours faithfully,

Heatons