



The Planning Inspectorate

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Weil, Gotshal & Manges
One South Place
London
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Your Ref:

Our Ref: APP/Y5420/A/05/1189822

Date: 22 February 2006

Dear Sir/Madam

**TOWN & COUNTRY PLANNING ACT 1990
APPEAL BY LONDON CONCRETE LTD
SITE AT FERME PARK DEPOT, CRANFORD WAY, HORNSEY, LONDON, N8 9DG**

I enclose a draft copy of the document list for this inquiry to assist in the preparation of your closing submissions.

Yours faithfully

Mr Peter Lyne



Draft.....

Appeal Ref: APP/Y5420/A/05/1189822

The Ferme Park Depot, Cranford Way, Hornsey, London N8 9DG

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

James Maurici
of Counsel

Instructed by the Head of Legal Services for the
Council.

He called

Dani Fiumicelli

Capita Symonds Ltd, Buchanan House, 24-30
Holborn, London EC1N 2LX.

David Gurtler

Nathaniel Lichfield & Partners, 14 Regents Wharf,
All Saints St, London N1 9RC.

RULE 6(6) PARTIES

FOR GREEN N8:

Kulraj Dassaur of Counsel
Nick Flynn
Rachel Xuereb

Instructed by Green N8.

They called

Charles Keel
Kevin Sheridan
Cynthia Barlow
Jane Owen
Ofer Acco
Paul Soper

70A Uplands Road, London N8 9NT.
65 Burgoyne Road, London N4 1AB.
8A North Villas, London NW1 9BJ.
22A Uplands Road, London N8 9NL.
20 Uplands Road, London N8 9NL.
78 Inderwick Road, London N8 9JY.

FOR PARK RESIDENTS' ASSOCIATION:

Cheryl Walton

14 Lothair Road, London N4 1EL.

FOR GREEN N4 & N15

Mario Petrou

PO Box 45129, London N15 3XF.

FOR THE APPELLANT:

R Harris QC

Instructed by Firstplan Ltd.

He called

Doug Sharps CEng FIMechE FIOA

Sharps Redmore Partnership, The White House,
London Road, Copdock, Ipswich IP8 3JH.

Alexander Grant BSc(Hons) MSc	Partner, Smith Grant LLP, Station Road, Ruabon, Wrexham LL14 6DL.
John Stephenson FRICS MCI Arb	Senior Director, Grant and Partners, 50 Conduit Street, London W14 S2 PD.
Graham David Bellamy BSc CEng MICE	Partner, Bellamy Roberts, Clover House, Western Lane, Odiham, Hampshire RG29 1TU.
Derek Casey	Managing Director, London Concrete Ltd, London House, 77 Boston Manor Road, Brentford, Middlesex TW8 9JQ.
Michael Woolner BA MRTPI	Director, Firstplan Ltd, 25 Floral Street, London WC2E 9DS.

INTERESTED PERSONS:

Lynne Featherstone MP	20 North Grove, London N6 4SL.
David Lammy MP	House of Commons, Westminster, London
Joanne McCartney	Assembly Member, Greater London Authority.
Mandy Steele	65 Mayfield Road, London N8 9LN.
Elizabeth Adalian	21 Umfreville Road, London N4 1RY.
Marina Bloomfield	138 Chettle Court, Ridge Road, London N8 9NX.
Vivien Luxford	64 Tottenham Lane, London N8 7EE.
Frances Walsh	73 Rathcoole Gardens, London N8 9NE.
Stefan Hohmann	Chairman of Friends of Stationers Park, 43 Mayfield Road, Crouch End, London N8 9LL.
David Jennings	54 Denton Road, London N8 9NT.
Sean Wallis	7 Farnfields Court, Oakfield Road, London N4 4LA.
Cllr Peter Hillman	11 Bream Close, Tottenham, London N17 9DF.
Adam Coffman	117 Fairfax Road, London N8 0NT.
Peter Sanders	54 Inderwick Road, London N8 9LD.
Charles Bezzant	42 Nelson Road, London N8 9RU.
Andrew Wickham	Weston Park Primary School, Denton Road, London N8 9WP.
Kit Greveson	190A Stapleton Hall Road, London N4 4QL.
Ali Nabeii	16 Dickenson Road, London N8 9ET.
Lydia Rivlin	Deputy Chairman, Tottenham Conservatives, 5 Bruce Grove, London N17 6RA.
Alison Smith	70 Stanhope Gardens, London N4 1HT.
Eleni Leoussi	57 Oakfield Road, London N4.
Gabi Brogan	87 Mayfield Road, London N8 9LN.
Janet Dean	100A Uplands Road, London N8 9NJ.
Lorna Brown	379 Wightman Road, London N8 0NA.
Clare Richmond	94 Denton Road, London N8 9NT
Tarsem Flora	Purley and Woodcote Residents' Association, 38B Russell Hill, Purley CR8 2JA.
Daniel Smith	Smith Lance Larcade & Bechtol, 4-8 Canfield Gardens, London NW6 3BS.
Alisha Sufit	Stroud Green Residents' Association, 43 Ridge Road, London N8 9LJ.
Eldridge Culverwell	113 Stapleton Hall Road, London N4 4RD.
David Schmitz	88 Falkland Road, London N8 0NP.

Peter Budge	140B Nelson Road, London N8 9RN.
M Clunie	Teacher, Hornsey School for Girls, 33 Effingham Rd, London N8 0AA.
Cllr LR Edge	Civic Centre, Wood Green, London N22.
Cllr Takki Sulaiman	Civic Centre, Wood Green, London N22.
Cllr Prescott	Civic Centre, Wood Green, London N22.
Helen Riley	64 Mount View Road, London N4 4JR.
Anna Keeling	Parent Governor Sth Harringay Infants School.
Dave Morris	Haringey Federation of Residents' Associations, 42 Falmer Road, London.
Tina Harper	123a Wightman Road, London N4 1RJ.
Keith Flett	Haringey TUC, 38 Mitchley Road, Tottenham N17 9HG.
Vince Sudbery	10 Addington Road, London.
Harold Jimmick	72 Hampden Road, London N8 0HT.
M Longo	355 Wightman Road, London N8 0NA.
Joseph Farrugia	33 Nelson Road, London N8 9RX.
Peter Lorimer	83 Burgoyne Road, London N4 1AB.
Sally Walker	17 Priory Avenue, London N8 7RP.
Catrina Zahoor	100 Chettle Court, Ridge Road, London N8 9NX.
Darren Newland	Chair Chettle Court Residents' Association [including DVD by Youth Forum], 124 Chettle Court, Ridge Road, London N8 9NX.
John Grayson	2 Rathcoole Gardens, London N8 9NE.

DOCUMENTS

Document	1.1	List of persons present at the Inquiry.
	1.2	List of persons present at the site visit.
Document	2	Council's letter of notification about the Inquiry and list of persons notified.
Document	3	Letters of representation [including from Lynne Featherstone MP and David Lammy MP.]
Document	4	Statement of Common Ground. [including Drawing No. ?? requested by Inspector]
Document	5.1	Proof of evidence by D Fiumicelli.
	5.2	Summary.
	5.3	Appendices numbered A - I. <u>Submitted at Inquiry</u> J - Cross-examination note Mr Sharps. K - Bibliographical references. L - <i>Design Manual for Road and Bridges</i> , vol.11 Section 3 pt.7. M - <i>R v Bedford BC</i> . N - Revised Table 6.
Document	6.1	Proof of evidence by D Gurtler.
	6.2	Summary.
	6.3	Appendices numbered 1-3. <u>Submitted at Inquiry</u> 4 - Traffic survey, Thursday 10 November 2005. 5 - Photographs western loop.

- 6 - *Guidelines for the Environmental Assessment of Road Traffic*, Institute of Environmental Assessment, Note 1.
- 7 - Drawing showing distances from appeal site.
- 8 - Appeal Ref:T/APP/H5960/A/98/299070/P5, dated 4 March 1999.
- 9 - Appeal Ref:APP/H5960/A/02/1084148, dated 20 September 2002.
- 10 - Bundle of objection letters.
- 11 - Committee Report.
- 12 - Minutes of Planning Applications Sub Committee, 10 October 2005.
- 13 - *Haringey Employment Study*, Atkins.
- 14 - email from Tradewinds 14 February 2006.
- 15 - Tables traffic figures (amended).
- 16 - Correspondence re SOCG.
- 17 - Steer Davies Gleave letter dated 31 August 2005.
- 18 - HC Judgement CO/2739/2001.
- 19 - Haringay Club programme.
- 20 - Correspondence concerning average number mixer trucks.
- 21 - Haringey UDP bundle.
- 22 - extract from MPG6.
- 23 - extract from GPDO and EIA regs.
- 24 - UDP Policy UD7.
- Document 7.1 Proof of evidence by Green N8.
- 7.2 Summary.
- 7.3 Two DVDs.
- Submitted at Inquiry
- 1 - Statement of Objections.
- 2 - Accident statistics taken from Transport for London by Ms Barlow.
- 3 - *Ecological appraisal of Ferme Park, Hornsey* by Cresswell Associates, dated November 2003.
- 4 - Extract from BMJ 1996;312:649-650 concerning air pollution and extract from article by David V Bates.
- 5 - Press release by Association of Chief Police Officers entitled *National Police operation clamps down on defective goods vehicles*, dated 25 February 2005.
- 6 - Written statement by Jenny Cooper, resident of 191 Wightman Road.
- 7 - Development control committee report, Buckinghamshire County Council, dated 9 April 2002 concerning proposed variation of condition at London Concrete's Gerrards Cross plant.
- 8 - Extract from Watch Committee *Portland Cement Annex 1 Portland Cement Dust: Hazard Assessment* (2004).
- 9 - Extract from HSE Working Group on Action to Control Chemicals, *4 Portland Cement: Assessment of the respiratory and carcinogenic hazards of Portland Cement*.
- 10 - HSE Construction Information Sheet No.36 Revision 1 *Silica*.
- 11 - Extract from PPS23.
- 12 - Extract from *Electronic Library of Construction and Occupational Safety and Health, Cement and Concrete Training Guide*.
- 13 - Extract from Worker Safety Series *Concrete Manufacturing*, Occupational Safety and Health Administration, US Dept of Labor.
- 14 - Extract from *Ready Mixed Concrete: Health & Safety Data Sheet* Bardon Concrete.

- 15 - *Ferme Park, Hornsey Proposed Concrete Plant Airbourne Dust Assessment for: London Concrete Ltd, by Smith Grant LLP, November 2003.*
- 16 - Extract from *Moving Freight: how to balance economy and environment*, IHT May 2005.
- 17 - *Analysis Pedal Cyclist Fatalities Involving Goods Vehicles from Jan 1999 - May 2004*, London Road Safety Unit.
- 18 - Extract from *Applications and Decisions*, The Traffic Commissioner for the Eastern Traffic Area, No.4785.
- 19 - Extract from *Sustainability Aggregate Industries*.
- Document 8.1 Proof of evidence by Park Residents' Association.
8.2 Appendices numbered 1-3.
- Document 9.1 Proof of evidence by Green N4 and N15.
9.2 Submitted at Inquiry
1 - Suggested site visit route.
- Document 10.1 Proof of evidence by DF Sharps.
10.2 Summary.
10.3 Appendices numbered A - F.
Submitted at Inquiry
G - Emails between Doug Sharps/Dani Fiumicelli.
H - Witness details.
J - Noise emission levels from bottom discharge rail wagons.
K - Noise limit conditions.
- Document 11.1 Proof of evidence by AD Grant.
11.2 Summary.
11.3 Appendices numbered 1-7.
Submitted at Inquiry
8 - *Peer Review of the Dust Assessment Report*, Casellae Stanger, 19 September 2005.
- Document 12.1 Proof of evidence by J Stephenson.
12.2 Summary.
12.3 Appendices numbered 1-2.
Submitted at Inquiry
3 - sbh Draft Particulars.
- Document 13.1 Proof of evidence by GD Bellamy.
13.2 Summary.
13.3 Appendices numbered 1-13.
- Document 14.1 Proof of evidence by D Casey.
14.2 Summary.
14.3 Appendices numbered 1-5.
Submitted at Inquiry
6 - Statutory Declaration and MK1-3.
- Document 15.1 Proof of evidence by M Woolner.
15.2 Summary.
15.3 Appendices numbered 1-15.
Submitted at Inquiry
16 - Draft planning obligation.
17 - Network Rail letter dated 2 December 2005.
18 - Haringey UDP Comments and Council's Response.
19 - Plans showing UDP proposal sites.

20 - Extracts Green N8 website.

21 - Extract from London Plan.

Statements/documents by those who spoke at the Inquiry

- Document 16.1 Letters submitted by Joanne McCartney, Assembly Member GLA.
16.2 Statement by Frances Walsh.
16.3 Statement by Lydia Rivlin, Deputy Chairman, Tottenham Conservatives.
16.4 Statement by Stefan Hohmann, Chairman of Friends of Stationers Park.
16.5 Statement by Eleni Leoussi - including Photographic Tour.
16.6 Statement by Tarsem Flora, Chairman Purley and Woodcote Residents' Association - including maps and attachments.
16.7 Statement by David Schmitz, The Ladder Community Safety Partnership - including appendices 1-3.
16.8 Statement by Vivien Luxford.
16.9 Statement by David, Lisa, Joshua and George Jennings.
x Statement by Peter Lorimer.
x Transcript of Youth Forum DVD.

NOT COMPLETE

[I could not carry all documents home with me on 17/2 - to be updated on 20/3]

Other written representations submitted during the Inquiry

- x Letter dated 16 February 2006 from Paul McKay, Secretary Living Streets Haringey Branch, 10 Hewitt Rd, Haringay, London N8 0BL.
x Letter dated 16 February 2006 from Tim McCall, 54 Woodlands Park Rd, Haringay, N15 3RX.

NOT COMPLETE [to be updated on 20/3]

- Document 17.1 Draft planning obligation.
17.2 Bundle of correspondence with Council's comments on draft obligation.

- Document 18 Suggested planning conditions.

PLANS

- Plan A Site Location Plan, Drawing No.FP/01, scale 1:2500, dated 3 December 2003.
Plan B Proposed Ready Mix Concrete Plant, Drawing No.2416/01E, dated November 2003.
Plan C Proposed Ready Mix Concrete Plant, Drawing No.2416/10D, dated June 2005.
Plan D Details of Overhead Bins and Plant Working Area, Drawing No.2416/20C, dated June 2005.